



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1220

Date Filmed 10/23/81 Camera No. --- 2

Cameraman JRC

93

304

403

108

108

108

108

108

108

FEDERAL ELECTION COMMISSION

MR 1200

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

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

date

William Taylor
8/11/81

FEC 9-21-77

81040301394

MEMORANDUM TO: Marjorie E. Brown

FROM: Elmer E. Galt

SUBJECT: MBR 1216

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

81040301395



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Schmelling, Esq.
Assistant General Counsel
One East Wacker Drive
Suite 1910
Chicago, Illinois 60601

Re: MUR 1220

Dear Mr. Schmelling:

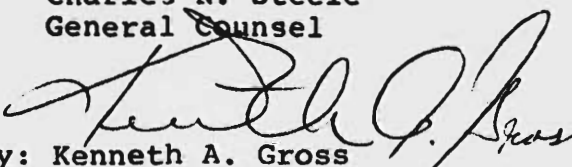
On July 13, 1981, the Commission accepted the conciliation agreement signed by your client in settlement of a violation of 2 U.S.C. § 432(b)(2), a provision of the [Federal Election Campaign Act of 1971, as amended]. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation agreements


By: Kenneth A. Gross
Associate General Counsel

81040301396

81040301397

Form 3811, Jan. 1978

7-16-81

● 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:
 William H. Schmeeling, Esq. (AEC)
 4100 East Wacker Drive
 Suite 1910
 Chicago, IL 60601

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 _____ 1-5582H _____

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 7-20-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CHICAGO, ILL. POSTMARK
 JUL 20 1981

★ GPO : 1979-300-455

MUR 1320 - 7/20/81



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Schmelling, Esq.
Assistant General Counsel
One East Wacker Drive
Suite 1910
Chicago, Illinois 60601

Re: MUR 1220

Dear Mr. Schmelling:

On July 13, 1981, the Commission accepted the conciliation agreement signed by your client in settlement of a violation of 2 U.S.C. § 432(b)(2), a provision of the [Federal Election Campaign Act of 1971, as amended]. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation agreements

BEFORE THE FEDERAL ELECTION COMMISSION

81 FEB 26 AM 1:46

In the Matter of)

Local Union #3216 of)
District 7 of the)
United Steelworkers)
of America)

MUR 1220 (80)

CONCILIATION AGREEMENT

81040301399
This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that Local Union #3216 of District 7 of the United Steelworkers of America ("Respondent") violated 2 U.S.C. § 432(b)(2)(A) by failing to forward contributions within 30 days of receipt.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).

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

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The respondent is part of the United Steelworkers of America (Steelworkers).

2. The Steelworkers maintains a political committee known as the United Steelworkers of America Political Action Fund (Steelworkers P.A.F.).

3. The respondent received contributions under \$50.00 from the members of the Steelworkers for the Steelworkers P.A.F.

4. The respondent failed to forward within 30 days to the treasurer of the Steelworkers P.A.F. contributions it had received.

WHEREFORE, Respondent agrees:

V. That its failure to forward within 30 days contributions it received is a violation of 2 U.S.C. § 432(b)(2)(A).

VI. The respondent agrees that it shall forward all contributions of \$50.00 or less it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than thirty (30) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(A).

VII. The respondent agrees that it shall forward all contributions in excess of \$50.00 it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than ten (10) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(P).

VIII. The respondent agrees that, in conjunction with the Steelworkers P.A.F. it will restructure its collection and transmittal procedures so that it will be able to conform to the provisions of 2 U.S.C. § 432(b)(2).

81040301400

IX. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

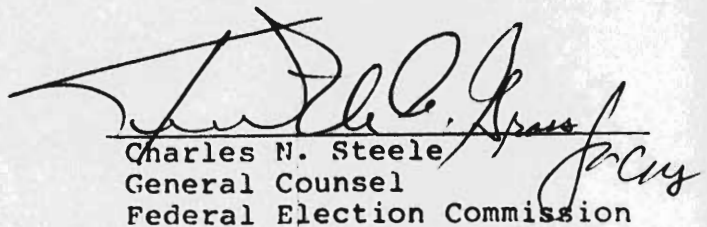
X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute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

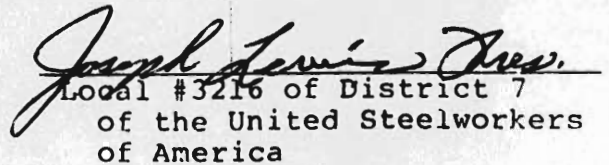
XI. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

July 15, 1981
Date

2/19/80
Date


Charles N. Steele
General Counsel
Federal Election Commission


Local #3216 of District 7
of the United Steelworkers
of America

PY: _____

ITS: _____

81040301401

Dist 3.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

District 38 of the
United Steelworkers
of America

)
)
)
)

MUR 1220 (80)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that District 38 of the United Steelworkers of America ("Respondent") violated 2 U.S.C. § 432(b)(2)(A) by failing to forward contributions within 30 days of receipt.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).

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

III. Respondent enters voluntarily into this Agreement with the Commission.

81040301402

IV. The pertinent facts in this matter are as follows:

1. The respondent is part of the United Steelworkers of America (Steelworkers).

2. The Steelworkers maintains a political committee known as the United Steelworkers of America Political Action Fund (Steelworkers P.A.F.).

3. The respondent received contributions under \$50.00 from the members of the Steelworkers for the Steelworkers P.A.F.

4. The respondent failed to forward within 30 days to the treasurer of the Steelworkers P.A.F. contributions it had received.

WHEREFORE, Respondent agrees:

V. That its failure to forward within 30 days contributions it received is a violation of 2 U.S.C. § 432(b)(2)(A).

VI. The respondent agrees that it shall forward all contributions of \$50.00 or less it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than thirty (30) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(A).

VII. The respondent agrees that it shall forward all contributions in excess of \$50.00 it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than ten (10) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(B).

VIII. The respondent agrees that, in conjunction with the Steelworkers P.A.F. it will restructure its collection and transmittal procedures so that it will be able to conform to the provisions of 2 U.S.C. § 432(b)(2).

81040301403

IX. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

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

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

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

July 15, 1981
Date

Feb. 17, 1981
Date

Charles N. Steele
Charles N. Steele
General Counsel
Federal Election Commission

Robert J. Petrus
District 38 of the United
Steelworkers of America

BY: _____

ITS: _____

81040301404

BEFORE THE FEDERAL ELECTION COMMISSION

81 FEB 23 AM 11:50

In the Matter of

District 30 of the
United Steelworkers
of America

)
)
)
)

MUR 1220 (80)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that District 30 of the United Steelworkers of America ("Respondent") violated 2 U.S.C. § 432(b)(2)(A) by failing to forward contributions within 30 days of receipt.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).

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

III. Respondent enters voluntarily into this Agreement with the Commission.

81040301405

IV. The pertinent facts in this matter are as follows:

1. The respondent is part of the United Steelworkers of America (Steelworkers).
2. The Steelworkers maintains a political committee known as the United Steelworkers of America Political Action Fund (Steelworkers P.A.F.).
3. The respondent received contributions under \$50.00 from the members of the Steelworkers for the Steelworkers P.A.F.
4. The respondent failed to forward within 30 days to the treasurer of the Steelworkers P.A.F. contributions it had received.

WHEREFORE, Respondent agrees:

V. That its failure to forward within 30 days contributions it received is a violation of 2 U.S.C. § 432(b)(2)(A).

VI. The respondent agrees that it shall forward all contributions of \$50.00 or less it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than thirty (30) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(A).

VII. The respondent agrees that it shall forward all contributions in excess of \$50.00 it receives on behalf of the Steelworkers P.A.F. to the treasurer of said fund no later than ten (10) days after receipt, pursuant to 2 U.S.C. § 432(b)(2)(B).

VIII. The respondent agrees that, in conjunction with the Steelworkers P.A.F. it will restructure its collection and transmittal procedures so that it will be able to conform to the provisions of 2 U.S.C. § 432(b)(2).

81040301406

IX. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

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

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

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

July 15, 1981
Date

Jul 17, 1981
Date

Charles N. Steele
Charles N. Steele
General Counsel
Federal Election Commission

Nancy O. Drayton
District 30 of the United
Steelworkers of America

BY: _____

ITS: _____

81040301407.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
District 30) MUR 1220
District 38)
Local Union 3216)
of the United)
Steelworkers of America)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 13, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1220:

1. Accept the conciliation agreements as submitted with the General Counsel's July 9, 1981 memorandum.
2. Send the letters as attached to the General Counsel's memorandum dated July 9, 1980.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively.

Attest:

7-13-81
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 7-9-81, 10:47
Circulated on 48 hour vote basis: 7-9-81, 4:00

81040301408

United Steelworkers of America

AFL CIO CLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601

PRINTED IN U.S.A.



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: William Taylor

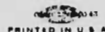
8104030409

61040301410

United Steelworkers of America

AFLCIOCLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



Attention: William Taylor

Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463



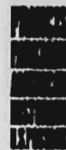
U.S. POSTAGE
15c



United Steelworkers of America

AFLCIOCLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

61040301611

United Steelworkers of America

AFLCIOCLOC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: William Taylor

81040301412

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

District 30 of the United Steelworkers
of America
District 38 of the United Steelworkers
of America
Local Union #3216 of District 7 of the
United Steelworkers of America

MUR 1220

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on April 13,
1981, the Commission approved by a vote of 6-0 the letter
attached to the April 9, 1981, Memorandum to the Commission
in this matter.

Attest:

4/13/81
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour vote basis:

4-9-81, 2:34
4-10-81, 2:00

81040301413

April 9, 1961

MEMORANDUM TO: Marjorie W. Hanson
FROM: Elissa T. Gaff
SUBJECT: MUR 1220

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

81040301414



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: FEBRUARY 23, 1981
SUBJECT: WITHDRAWAL OF OBJECTION TO MUR 1220,
Memorandum to the Commission dated
February 19, 1981

You were notified via memorandum on February 20, 1981 of an objection by Commissioner Thomson to the above-named document.

By memorandum, this date, Commissioner Thomson removed his objection and cast an affirmative vote. A copy of his memorandum is attached.

The certification of approval is also attached.

Also attached is a copy of Commissioners Aikens' vote sheet with her comment.

ATTACHMENTS:

1. Copy of Memo
2. Certification
3. Copy of Vote Sheet

81040301415



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 FEB 23 AM 11:49

February 23, 1981

MEMORANDUM

TO: Marjorie Emmons
Secretary to the Commission

FROM: Vernon W. Thomson
Commissioner

SUBJECT: Withdrawal of objection to MUR 1220

Please withdraw MUR 1220 from the agenda of the Executive Session meeting of February 24, 1981, and record me as voting in favor of the General Counsel recommendation for an extension of time. The points to which I objected have been satisfactorily clarified.

81040301416



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*

DATE: FEBRUARY 20, 1981

**SUBJECT: OBJECTION - MUR 1220 - Memorandum
to the Commission dated 2-19-81; Received in
OCS 2-19-80, 11:01**

The above-named document was circulated on a 48
hour vote basis at 4:00, February 19, 1981.

Commissioner Thomson submitted an objection at 12:16,
February 20, 1981. A copy of his vote sheet is attached.

This matter will be placed on the Executive Session
Agenda for Tuesday, February 24, 1981.

ATTACHMENT:
Copy of Vote Sheet

81040301417

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

United Steelworkers of America PAF

MUR 1220

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 23, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1220:

1. Approve the respondents' request that they be allowed until February 20, 1981 in which to return the signed agreements.
2. Approve the letter as submitted with the General Counsel's February 19, 1981 memorandum.

Commissioners Aikens, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

2/24/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-19-81, 11:01
Circulated on 48 hour vote basis: 2-19-81, 4:00

81040301418

MEMORANDUM TO: FILE

FROM: WILLIAM TAYLOR

DATE: FEBUARY 25, 1981

SUBJECT: Letter to respondent concernig his request for a continuance
to February 20, 1981 *Myk 1220*

8104030141

It is recommended that we do not send a letter notifying the respondent of the fact that the Commission on February 21, 1981 approved the respondent's request that it be given until February 20, 1981 in which to return signed the proposed conciliation agreements of the Commission.

United Steelworkers of America

AFLCIOCLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: Mr. William Taylor

61040301420

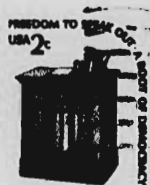
8104030421

United Steelworkers of America

AFL CIO CLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601

PRINTED IN U.S.A.



Attention: William Taylor

Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

8 1 0 4 0 3 0 1 4 2 2

United Steelworkers of America

AFLCIOCLOC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: William Taylor



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: DECEMBER 24, 1980

**SUBJECT: OBJECTION - MUR 1220 - Memorandum to the
Commission dated 12-22-80; Received in OCS
12-22-80, 10:59**

The above-named document was circulated on a 48
hour vote basis at 4:00, December 22, 1980.

Commissioner Reiche submitted an objection on
December 23, 1980.

This matter will be placed on the Executive Session
Agenda for January 6, 1980.

81040301423

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

United Steelworkers of America)
Political Action Fund, et al.)

MUR 1220

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on January 6, 1981, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1220:

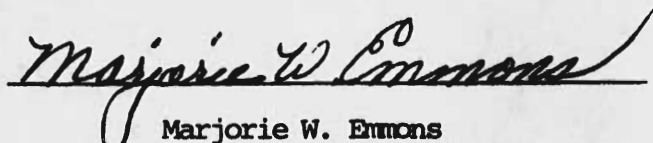
1. Approve the conciliation agreements attached to the General Counsel's December 22, 1980 report in this matter.
2. Approve the letter attached to the General Counsel's December 22, 1980 report.

Commissioners Harris, McGarry, Thomson, and Tiernan voted affirmatively for the decision. Commissioners Aikens and Reiche dissented.

Attest:

1/8/81

Date


Marjorie W. Emmons
Secretary to the Commission

81040301424

01040301428

RECEIVED 20: 10/10/78
FROM: [illegible]
SUBJECT: [illegible]

...to the ...
... Thank you.

81040301426

United Steelworkers of America

Five Gateway Center
Pittsburgh, Pa. 15222



80 SEP 26 P12:05

Mr. Max L. Friedersdorf
Chairman
Federal Election Commission
Washington, D. C. 20463

Attn: Mr. William E. Taylor
Office of the General Counsel

8104030422 United Steelworkers of America

AFLCIOCLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601

PRINTED IN U.S.A.



Mr. Max L. Friedersdorf, Chairman
Federal Election Commission
Washington, D. C. 20463

0000125 A9:30

81040301428

United Steelworkers of America

AFL CIO CLC

ONE EAST WACKER DRIVE
SUITE 1910
CHICAGO, ILLINOIS 60601



William E. Taylor
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

0000125 ALL: 04



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: SEPTEMBER 29, 1980

SUBJECT: MUR 1220 - Interim Investigative Report #1 dated
9-23-80; Signed 9-25-80: Received in OCS
9-25-80, 3:56

The above-named document was circulated to the
Commission on a no-objection basis at 11:00, September 26, 1980.

There were no objections to the Interim Investigative
Report at the time of the deadline.

81040301429

September 12, 1961

MEMORANDUM TO: Marjorie W. Hanson
FROM: Elissa T. Carr
SUBJECT: MUR 1220

Please have the attached Interim Invent Report distributed to the Commission. Thank you.

81040301430



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 11, 1980

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Local Union #3216, District 7
of the United Steelworkers
c/o Walter Kunowski
200 General Lafayette Building
210 Goddard Blvd.
King of Prussia, PA 19406

Re: MUR 1220

Dear Mr. Kunowski:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that Local Union #3216 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon review of the information available to the Commission, the Commission determined, on September 3, 1980, that there is reason to believe that Local Union #3216 violated 2 U.S.C. § 432 (b)(2)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against Local Union #3216, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

Max L. Friedersdorf

Max L. Friedersdorf
Chairman

81040301431

81040301432

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:
Local Union #3216, District 7
c/o Walter Kunkowski

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
Σ1Ε9h6

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
9-16-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

Taylor 1220

SEP 16 1980 PA
CLERK IN CHARGE
1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE 9/11/80

MUR NO. 1220
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Local Union #3216 of District 7
of the United Steelworkers of
America

Taylor - 523-5071

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

BACKGROUND

A review by the Reports Analysis Division of the February and March reports of receipts filed by the United Steelworkers of America Political Action Fund (the Committee), a separate segregated fund established by the United Steelworkers of America ("Steelworkers") disclosed the failure of Local Union #3216 of District 7 of the Steelworkers to forward to the Committee contributions received by it within 30 days, pursuant to 2 U.S.C. § 432(b).

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 432(b)(2)(A) of the recently amended Act requires "every person who receives a contribution for a political committee which is not an authorized committee shall if the amount of the contribution is \$50.00 or less forward to the treasurer such contribution no later than 30 days after receiving the contribution."

The reports filed by the Committee for February and March of 1980 show that Local Union #3216 failed to forward contributions to the treasurer of the Committee within 30 days in violation of 2 U.S.C. § 432(b)(2)(A).

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that Local #3216 of District 7 of the United Steelworkers of America violated 2 U.S.C. § 432(b)(2)(A).

81040301433



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank S. McKee
Five Gateway Center
Pittsburgh, PA 15222

Re: MUR 1220

Dear Mr. McKee:

On September 3, 1980, the Commission found reason to believe that your committee violated 2 U.S.C. § 437b and 2 U.S.C. § 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above captioned matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action at this time and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that failure of the United Steelworkers of America Political Action Fund to deposit the contributions in question within 10 days and the receipt of money obtained from commercial transactions nevertheless appears to be a violation of 2 U.S.C. § 437b and 1 U.S.C. § 441b(b)(3)(A), respectively and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

Max L. Friedersdorf
Chairman

81040301434

81040301435

Form 3811, Aug. 1978

● 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:
Mr. Frank S. McKee
Five Gateway Center
Pittsburgh, PA 15222

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 15976

(Always obtain signature of addressee or agent)

4. I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
W. Hunt

5. DATE OF DELIVERY
9-16

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

POSTMARK
 SEP 16 1980
 PITTSBURGH PA
 INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Taylor

1220

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE 9/11/80

MUR NO. 1220
STAFF MEMBER(S) & TEL. NO.

Taylor - 523-5071

RESPONDENT United Steelworkers of
America Political Action
Committee

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

A review by the Reports Analysis Division of the monthly reports of receipts filed by the United Steelworkers of America Political Action Fund (the Committee), a separate, segregated fund established by the United Steelworkers of America ("Steelworkers"), disclosed the failure of the Committee to deposit the contributions received in the appropriate depository within 10 days of their receipt, pursuant 11 C.F.R. § 103.3 as it implemented 2 U.S.C. § 437b (now 2 U.S.C. § 437(h)). In addition, these reports disclosed the receipt of funds obtained by the Committee in commercial transactions in violation of 2 U.S.C. § 441b(b)(3)(A).

FACTUAL BASIS AND LEGAL ANALYSIS

The Committee listed on its reports the receipt of various contributions received from different union locals of the Steelworkers. The contributions in question were funds raised by the local unions of the Steelworkers usually by the holding of dances, outings and raffles for their respective members.

Contributions made prior to the effective date of the 1979 amendments are considered to have been "received when either in the physical possession of the treasurer or in the possession of his or her agents (See Advisory Opinion of the Commission 1978-98). Thus, the Committee is considered to have received all contributions collected by the local unions, prior to the effective date of the 1979 amendments January 8, 1980), at the time the local unions gained possession of the contributions. It is from this date that the Committee has 10 days in which to deposit the contributions.

81040301436

Though the Committee's failure to deposit the contributions is a violation of 2 U.S.C. § 437b, as implemented by 11 C.F.R. § 103.3, the Committee promptly deposited the contributions after they were forwarded and its failure to meet the 10 day deposit requirement was not due to its negligence but to the failure of the local unions to forward the contribution promptly. Also, under the recently amended, Act, the Committee would not be in violation by the recently amended 103.3 of the regulations.

In addition, the reports filed by the Committee disclosed the receipt of funds obtained from commercial transactions conducted by the various local unions. These reports list money raised from the sale of "golf caps" or the sale of "items" in violation of 2 U.S.C. § 441b(b)(3)(A) (See Commission Advisory Opinion 1979-63).

Though, the receipt of funds obtained by the Committee from commercial transactions is in contravention of the Act, the total amount raised over the period of time reported does not, at this time, warrant further Commission action.

Based on the foregoing analysis, the Federal Election Commission has found that the United Steelworkers of America Political Action Fund violated 2 U.S. C. § 437b and 2 U.S.C. § 441b(b)(3)(A) but has determined that no further action should be taken.

81040301437



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert J. Peters
District Director
District 38 of the United
Steelworkers of America
P.O. Box 2428
West Covina, CA 91793

Re: MUR 1220

Dear Mr. Peters:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that District 38 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act")

Upon review of the information available to the Commission and information supplied by you, the Commission determined on September 3, 1980, that there is reason to believe that District 38 violated 2 U.S.C. § 432(b)(2)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against District 38, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

Max L. Friedersdorf
Max L. Friedersdorf
Chairman

81040301438

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE 9/11/80

MUR NO. 1220
STAFF MEMBER(S) & TEL. NO.

RESPONDENT District 38 of the
United Steelworkers of
America

Taylor - 523-5071

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

BACKGROUND

A review by the Reports Analysis Division of the February and March reports of receipts filed by the United Steelworkers of America Political Action Fund (the Committee), a separate segregated fund established by the United Steelworkers of America ("Steelworkers"), disclosed the failure of District 38 of the Steelworkers to forward to the Committee contributions received by it within 30 days, pursuant to 2 U.S.C. § 432(b).

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 432(b)(2)(A) of the recently amended Act requires "every person who receives a contribution for a political Committee which is not an authorized Committee shall, if the amount of the contribution is \$50.00 or less forward to the treasurer such contribution no later than 30 days after receiving the contribution."

The reports filed by the Committee for February and March of 1980, show that District 38 failed to forward contributions to the treasurer of the Committee within 30 days in violation of 2 U.S.C. § 432(b) (2)(A).

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that District 38 violated 2 U.S.C. § 432(b)(2)(A).

81040301439

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER (Note items 1, 2, and 3) A 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: <i>Robert S. Peters</i>								
3. ARTICLE DESCRIPTION: <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td><i>940315</i></td> <td></td> </tr> </table> (Always obtain signature of addressee or agent)			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		<i>940315</i>	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	<i>940315</i>							
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent <i>R. Peters</i>								
4. DATE OF DELIVERY		POSTMARK						
5. ADDRESS (Complete only if requested)								
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS <i>MPM</i>						

☆GPO 1977-0-249-595

Taylor

1220

81040301440



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harry Dougherty
District Director
District 30 of the United
Steelworkers of America
9000 Keystone Crossing
Indianapolis, Indiana 46240

Re: MUR 1220

Dear Mr. Dougherty:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that District 30 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon review of the information available to the Commission, the Commission determined, on September 3, 1980, that there is reason to believe that District 30 violated 2 U.S.C. § 432(b)(2) (A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against District 30, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

Max L. Friedersdorf

Max L. Friedersdorf
Chairman

81040301441

81040301442

PS Form 3811 Aug. 1978

● 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:
Mr. Harry Dougherty

3. ARTICLE DESCRIPTION:
REGISTERED NO. _____ CERTIFIED NO. **088966** INSURED NO. _____
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
[Signature]

4. DATE OF DELIVERY **9-15-80** POSTMARK **SEP 15 1980**

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE _____ CLERK'S INITIALS _____

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Taylor

1220

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE 9/11/80

MUR NO. 1220
STAFF MEMBER(S) & TEL. NO.

RESPONDENT District 30 of the United
Steelworkers of America

Taylor - 523-5071

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

BACKGROUND

A review by the Reports Analysis Division of the February and March reports of receipts filed by the United Steelworkers of America Political Action Fund (the Committee), a separate segregated fund established by the United Steelworkers of America ("Steelworkers"), disclosed the failure of District 30 of the Steelworkers to forward to the Committee contributions received by it within 30 days, pursuant to 2 U.S.C. § 432(b).

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 432(b)(2)(A) of the recently amended Act requires "every person who receives a contribution for a political Committee which is not an authorized Committee shall, if the amount of the contribution is \$50.00 or less forward to the treasurer such contributions no later than 30 days after receiving the contribution."

The reports filed by the Committee for February and March of 1980 show that District 30 failed to forward contributions to the treasurer of the Committee within 30 days in violation of 2 U.S.C. § 432(b)(2)(A).

Based on the foregoing analysis, the Federal Election Commission has found reason to believe District 30 of the United Steelworkers of America violated 2 U.S.C. § 432(b)(2)(A).

81040301443

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

United Steelworkers of America)
Political Action Fund, et al.)

MUR 1220

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on September 3, 1980, do hereby certify that the Commission took the following actions in MUR 1220:

1. Failed on a vote of 3-3 to pass a motion to:

- a) Find reason to believe that the United Steelworkers of America Political Action Fund violated 2 U.S.C. 437b (now 2 U.S.C. §432(h)(1)) and 2 U.S.C. §441b(b)(3) and take no further action.
- b) Find reason to believe that Local Union #3216 of District 7 of the United Steelworkers violated 2 U.S.C. §432(b)(2)(A).
- c) Find reason to believe that District 30 of the United Steelworkers violated 2 U.S.C. §432(b)(2)(A).
- d) Find reason to believe that District 38 of the United Steelworkers violated 2 U.S.C. §432(b)(2)(A).
- e) Send the letters attached to the General Counsel's August 15, 1980 report on MUR 1220.

Commissioners Harris, McGarry, and Tiernan voted affirmatively for the motion; Commissioners Aikens, Friedersdorf, and Reiche dissented.

2. Failed on a vote of 3-3 to pass a motion to:

- a) Find reason to believe that the United Steelworkers of America Political Action Fund violated 2 U.S.C. §437b (now 2 U.S.C. §432(h)(1)) and 2 U.S.C. §441b(b)(3).
- b) Find reason to believe that Local Union #3216 of District 7 of the United Steelworkers violated 2 U.S.C. §432(b)(2)(A).

Continued

81040301444

2. (Continued)

- c) Find reason to believe that District 30 of the United Steelworkers violated 2 U.S.C. §432(b) (2) (A).
- d) Find reason to believe that District 38 of the United Steelworkers violated 2 U.S.C. §432(b) (2) (A).
- e) Request the Office of the General Counsel to revise the letters attached to the August 15, 1980 report to conform with these actions.

Commissioners Aikens, Friedersdorf, and Reiche voted affirmatively for the motion; Commissioners Harris, McGarry, and Tiernan dissented.

3. Decided by a vote of 6-0 to take the following actions:

- a) Find reason to believe that the United Steelworkers of America Political Action Fund violated 2 U.S.C. §437b (now 2 U.S.C. §432(h) (1)) and 2 U.S.C. §441b(b) (3), and take no further action at this time.
- b) Find reason to believe that Local Union #3216 of District 7 of the United Steelworkers violated 2 U.S.C. §432(b) (2) (A).
- c) Find reason to believe that District 30 of the United Steelworkers violated 2 U.S.C. §432(b) (2) (A).
- d) Find reason to believe that District 38 of the United Steelworkers violated 2 U.S.C. §432(b) (2) (A).
- e) Send the letters attached to the General Counsel's August 15, 1980 report.

Attest:

9/8/80

Date

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

81040301445



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES STEELE

FROM:

MARJORIE EMMONS *mwe*

DATE:

AUGUST 20, 1980

SUBJECT:

MUR 1220 - First General Counsel's
Report, dated August 15,
1980.

OBJECTION

By this memorandum you are informed that Commissioner Reiche has filed an objection in the above-named matter, thereby putting it on the agenda for the Executive Session of September 3, 1980.

81040301446

August 12, 1955

MEMORANDUM TO: Marjorie W. Evans

FROM: Elissa T. Gay

SUBJECT: MUR11220

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

81040301447

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 AUG 15 All: 10

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 8-15-80

MUR# 1220
STAFF MEMBER(S)

Taylor

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:

United Steelworkers of America Political
Action Fund, Local Union #3266, District 30
and District 38 of the United Steelworkers
of America

RELEVANT STATUTE:

2 U.S.C. § 432(b)(2)(A)
2 U.S.C. § 437b (now 2 U.S.C. § 432(h)(1))
11 C.F.R. § 103.3
2 U.S.C. § 441b(b)(3)

INTERNAL REPORTS CHECKED: RAD Report

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

A review by the Reports Analysis Division of the monthly reports (attachment "B") of receipts filed for 1977, 1978 and 1979 by the United Steelworkers of America Political Action Fund ("the Committee") established by the United Steelworkers of America ("Steelworkers") disclosed the failure of the Committee to deposit the contributions received in the appropriate depository within 10 days of their receipt; pursuant to 11 C.F.R. § 103.3(a) as it implemented 2 U.S.C. § 437b (now 2 U.S.C. § 432 (h)(1)).^{1/} These Committee reports, also, disclosed the receipt of funds obtained by the Committee in commercial transactions in violation of 2 U.S.C. § 441b(b)(3)(A). In addition to the Committee's failure to deposit the contributions in question in the appropriate depository within 10 days of receipt, the reports of February and March of 1980 (attachment "D") disclose the failure of Local Union #3216 of

^{1/} The Committee's inability to deposit contributions within 10 days is a problem that has plagued it for some time. An audit conducted by the Compliance Review Section Office of Disclosure and Compliance of the Commission dated October 28, 1976 (attachment "C"). pointed out the failure of the Committee to deposit contributions within 10 days.

81040301448

District 7, District 30 and District 38 of the Steelworkers to forward contributions they received to the Committee within 30 days, pursuant to 2 U.S.C. § 432(b)(2)(A).2/

FACTUAL AND LEGAL ANALYSIS

The Committee, a separate segregated fund established by the Steelworkers, listed the receipt of various contributions in the above-mentioned reports received from different local unions of the Steelworkers. The contributions in question were funds raised by the local unions of the Steelworkers usually by the holding of dances, outings and raffles for their respective members. The individual contributions received appear to have been of an amount less than \$50.00.3/ Prior to forwarding these contributions to the Committee, the local unions would place them in a bank account opened for the purpose of holding these contributions or would keep physical possession of the money.4/ Often the contributions would be held for a period of up to six months before being forwarded.

Contributions made prior to the effective date of 1979 amendments are considered to have been "received" when either in the actual possession of the treasurer or in the possession of his or her agent. (AO 1978-98 attachment "E"). Thus, the Committee in this matter is considered to have received all contributions collected by the local unions, prior to the effective date of the 1979 amendments, at the time the local unions gained possession of the contributions. It is from this date that the 10 days of § 103.3(a) of the regulations commenced to run.

2/ 2 U.S.C. § 432(b)(2)(A) and 11 C.F.R. 102.8(b)(1) require a person to forward a contribution of \$50.00 or less to the treasurer within 30 days. Prior to the 1980 amendments 11 C.F.R. 102.8(b)(1) required: "Every person who is not an authorized agent of the treasurer or candidate, and who receives contributions aggregating in excess of \$50.00 on behalf of a political committee or candidate shall, on demand of the treasurer or candidate, and in any event within 5 days after receipt, render to the treasurer or an authorized agent or the candidate an accounting thereof, ..."

3/ Given the nature of the fundraising activities involved and with no evidence to the contrary, it is assumed that all the individual contributions involved are \$50.00 or less. Thus, the 30 day forwarding requirement of § 432(b)(2)(A) would apply to this matter rather than the 10 day forwarding requirement of § 432(b)(2)(B) and then only to contributions forwarded after the effective date of the 1979 Amendments.

4/ There is no evidence that any of these contributions were commingled with other union funds.

81040301449

It should be noted that prior to the recent amendments of the regulations, § 103.3(a) stated "All contributions received by ... any other political committee(s) shall be deposited in a checking account in the appropriate campaign depository by the treasurer of the Committee or his or her agent, within 10 days of the ... treasurer's receipt thereof." A contribution was regarded as "... received by the treasurer of the fund or his/her agent at the time [contribution was] received by an employee or representative of the union." (See AO 1978-98 attachment "E").

However, section 103.3(a) was changed to read." The treasurer of the [political] committee shall be responsible for making such deposits. ["Such deposits" refers to contributions received by the political committee]. All deposits shall be made within 10 days of the treasurer's receipt." It thus appears that by the terms of the recently amended 103.3(a) the 10 day period commences to run from the time of the actual receipt of a contribution by a treasurer and not from the receipt of a contribution by an employee or representative of the local union. This interpretation of § 103.3(a) is strengthened by the fact that 2 U.S.C. § 432(b)(2)(A) requires "every person who receives a contribution for a political committee which is not an authorized committee shall if the amount is \$50 or less, forward to the treasurer such contribution no later than 30 days after receiving the contribution, and from 2 U.S.C. § 432(b)(2)(B) which requires "if the amount of the contribution is in excess of \$50.00 to forward to the treasurer such contribution, ... no later than 10 days after receiving the contribution."

Thus, to continue to interpret "receipt" to mean receipt by an employee or representative of the local union as well as receipt by the treasurer of the committee would create a clear conflict between 2 U.S.C. § 432(b)(2)(A), which allows an employee or representative of a union 30 days to forward a contribution of under \$50.00 to the treasurer of the committee and 103.3(a) of the regulations which requires the treasurer of the committee to deposit any contributions received within 10 days. If "receipt" means receipt by an employee or representative of the local union, then a treasurer, in order to deposit a contribution within 10 days, would have to have physical possession or control over the contribution within 10 days. This would require an employee or representative to forward a contribution substantially sooner than the 30 days allowed by 2 U.S.C. § 432(b)(2)(A).

Though the Committee's failure to deposit the contribution in question is a violation of 2 U.S.C. § 437b (now 2 U.S.C. § 432(h)(1)), as implemented by 11 C.F.R. § 103.3(a), the Committee promptly deposited the contribution upon receipt, and its failure to meet the 10 day deposit requirement was not due to its negligence but to the failure of the local unions to forward the contributions promptly. In addition, the Committee would not be in violation of of § 437b's successor, 2 U.S.C. § 432(h)(1), as implemented by the recently amended 103.3(a) of the regulations. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that United Steelworkers of America Political Action Fund violated 2 U.S.C. § 437b, (now 2 U.S.C. § 432 (h)(1)) but take no further action.

81040301450

In addition, the reports filed by the Committee disclosed the receipt of funds obtained from commercial transactions conducted by the various local unions (attachment "B"). These reports list money raised from the sale of "items" and "golf caps" in violation of 2 U.S.C. § 441b(b)(3)(A) (AO 1979-63, attachment "F").

Though the receipt of funds obtained by the Committee from commercial transactions is in contravention of the Act, the total amount of money raised was only \$3,145.00 out of over one million dollars raised in a three year period. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the United Steelworkers of America Political Action Fund violated 2 U.S.C. § 441b(b)(3)(A) but take no further action.

2 U.S.C. § 432(b)(2)(A) of the recently amended Act requires "every person who receives a contribution for a political Committee which is not an authorized Committee shall, if the amount of the contribution is \$50.00 or less forward to the treasurer such contributions no later than 30 days after receiving the contribution." This represents a considerable change from § 432(b) prior to the 1979 amendments which only required a person who received a contribution in excess of \$50.00 for a political committee to render within five days a detailed account of the contribution.

The reports filed by the Committee for February and March of 1980 (attachment "E") list contributions received from Local Union #3216 of District 7, District 30 and District 38 of the Steelworkers by the Committee after the effective date of the newly amended Act. These reports show that these local unions failed to forward to the treasurer of the Committee contributions they received within 30 days, as required by 2 U.S.C. § 432(b)(2)(A).

The local unions, either due to poor accounting and administrative procedures or out of reluctance to part with the contributions have consistently failed to forward to the treasurer of the Committee the contributions they raised within 30 days. 2 U.S.C. § 432(b)(2)(A) of the recently amended Act requires Local Union #3216 of District 7, District 30 and District 38 to forward contributions to the treasurer of the Committee within 30 days. Thus, it is the Office of General Counsel's recommendation that the Commission find reason to believe that Local Union #3216 of District 7, District 30 and District 38 violated 2 U.S.C. § 432(b)(2)(A).

RECOMMENDATIONS

1. Find reason to believe that the United Steelworkers of America Political Action Fund violated 2 U.S.C. § 437b (now 2 U.S.C. § 432(h)(1)) and 2 U.S.C. § 441b(b)(3) and take no further action.
2. Find reason to believe that Local Union #3216 of District 7 of the United Steelworkers violated 2 U.S.C. § 432(b)(2)(A).

81040301451

3. Find reason to believe that District 30 of the United Steelworkers violated 2 U.S.C. § 432(b)(2)(A).
4. Find reason to believe that District 38 of the United Steelworkers violated 2 U.S.C. § 432(b)(2)(A).
5. Send attached letters.

Attachments

1. RAD Report - A
2. 1977, 1978 and 1979 reports - B
3. Audit Report - C
4. February and March of 1980 Reports - D
5. AO 1978-98 - E
6. AO 1979-63 - F
7. letters.

81040301452

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 177-78

DATE 21MAR80
PAGE 1

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND CONNECTED ORGANIZATION: STEEL WORKERS OF AMERICA UNITED						ID #C00003590
1977 STATEMENT OF ORGANIZATION - AMENDMENT						18FEB77 4 77FEC/048/4808
MISCELLANEOUS REPORT						22FEB77 2 77FEC/048/5129
STATEMENT OF ORGANIZATION - AMENDMENT						4MAR77 4 77FEC/049/3129
MISCELLANEOUS REPORT						13MAR77 1 77FEC/050/0279
STATEMENT OF ORGANIZATION - AMENDMENT						3APR77 4 77FEC/051/5112
STATEMENT OF ORGANIZATION - AMENDMENT						27APR77 1 77FEC/052/5025
STATEMENT OF ORGANIZATION - AMENDMENT						31MAY77 5 77FEC/054/0267
STATEMENT OF ORGANIZATION - AMENDMENT						9JUL77 4 77FEC/055/5211
STATEMENT OF ORGANIZATION - AMENDMENT						20SEP77 4 77FEC/057/4980
STATEMENT OF ORGANIZATION - AMENDMENT						7OCT77 4 77FEC/059/4118
STATEMENT OF ORGANIZATION - AMENDMENT						7NOV77 3 77FEC/061/3051
STATEMENT OF ORGANIZATION - AMENDMENT						10DEC77 4 77FEC/062/4050
FEBRUARY MONTHLY		15,679	1,100	1JAN77 -31JAN77	5	77FEC/048/5130
MARCH MONTHLY		11,103	1,100	1FEB77 -29FEB77	5	77FEC/049/3124
APRIL MONTHLY		11,347	9,675	1MAR77 -31MAR77	5	77FEC/051/1107
MAY MONTHLY		8,249	2,100	1APR77 -30APR77	5	77FEC/053/0826
JUNE MONTHLY		10,748	13,250	1MAY77 -31MAY77	6	77FEC/054/1993
JUNE MONTHLY - AMENDMENT		11,774	14,209	1MAY77 -31MAY77	16	77FEC/055/5224
JULY MONTHLY		10,212	2,750	1JUN77 -30JUN77	9	77FEC/055/5215
AUGUST MONTHLY		15,557	543	1JUL77 -31JUL77	8	77FEC/057/1651
SEPTEMBER MONTHLY		13,592	1,928	1AUG77 -31AUG77	7	77FEC/057/4973
OCTOBER MONTHLY		47,166	24,119	1SEP77 -30SEP77	12	77FEC/059/4135
NOVEMBER MONTHLY		56,486	6,871	1OCT77 -31OCT77	13	77FEC/061/3055
DECEMBER MONTHLY		48,937	5,083	1NOV77 -30NOV77	61	77FEC/062/3096
DECEMBER MONTHLY - AMENDMENT		48,937	6,083	1NOV77 -30NOV77	3	78FEC/065/0776
YEAR END		34,328	2,978	1DEC77 -31DEC77	92	78FEC/064/5419
YEAR END - AMENDMENT				1DEC77 -31DEC77	4	78FEC/066/5005
REQUEST FOR ADDITIONAL INFORMATION				1DEC77 -31DEC77	2	78FEC/065/4938
REQUEST FOR ADDITIONAL INFORMATION				1JAN77 -31DEC77	2	79FEC/132/4148
REQUEST FOR ADDITIONAL INFORMATION				1JAN77 -31DEC77	2	79FEC/135/1330
1978 STATEMENT OF ORGANIZATION - AMENDMENT				27JAN78	4	78FEC/065/1812
STATEMENT OF ORGANIZATION - AMENDMENT				4FEB78	5	78FEC/065/4112
STATEMENT OF ORGANIZATION - AMENDMENT				15FEB78	5	78FEC/067/2539
STATEMENT OF ORGANIZATION - AMENDMENT				27FEB78	5	78FEC/067/3739
STATEMENT OF ORGANIZATION - AMENDMENT				9MAR78	4	79FEC/121/2820
STATEMENT OF ORGANIZATION - AMENDMENT				11MAR78	4	78FEC/068/2316
STATEMENT OF ORGANIZATION - AMENDMENT				31MAR78	4	78FEC/069/3987
STATEMENT OF ORGANIZATION - AMENDMENT				5MAY78	19	78FEC/073/4925
MISCELLANEOUS REPORT				15MAY78 TO SEC	2	79FEC/074/1915
STATEMENT OF ORGANIZATION - AMENDMENT				15MAY78	5	78FEC/074/1182
STATEMENT OF ORGANIZATION - AMENDMENT				30JUN78	7	78FEC/076/2361
STATEMENT OF ORGANIZATION - AMENDMENT				7JUL78	5	78FEC/077/3080
STATEMENT OF ORGANIZATION - AMENDMENT				2AUG78	5	78FEC/082/2305
STATEMENT OF ORGANIZATION - AMENDMENT				28SEP78	5	78FEC/084/4435

ALL 77-78
DOCUMENTS HAVE
BEEN REVIEWED

81040301453

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-78)

DATE 24MAR80
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	STATEMENT OF ORGANIZATION - AMENDMENT			11OCT78	9	78FEC/089/1901
	STATEMENT OF ORGANIZATION - AMENDMENT			27OCT78	9	78FEC/094/1014
	STATEMENT OF ORGANIZATION - AMENDMENT			1ODEC78	7	78FEC/116/0003
	FEBRUARY MONTHLY	16,758	38,150	1JAN78 - 31JAN78	5	78FEC/066/5015
	MARCH MONTHLY	31,760	20,294	1FEB78 - 28FEB78	7	78FEC/068/2173
	MARCH MONTHLY - AMENDMENT	-	-		3	78FEC/072/2735
	REQUEST FOR ADDITIONAL INFORMATION			1FEB78 - 28FEB78	3	78FEC/071/0037
	APRIL MONTHLY	10,823	10,300	1MAR78 - 31MAR78	6	78FEC/070/3007
	APRIL MONTHLY - AMENDMENT	-	-	1MAR78 - 31MAR78	4	78FEC/075/4214
	REQUEST FOR ADDITIONAL INFORMATION			1MAR78 - 31MAR78	3	78FEC/073/2438
	MAY MONTHLY	15,723	72,275	1APR78 - 30APR78	8	78FEC/073/4935
	JUNE MONTHLY	12,338	77,928	1MAY78 - 31MAY78	14	78FEC/076/2368
	JULY MONTHLY	48,519	75,121	1JUN78 - 30JUN78	14	78FEC/079/3066
	AUGUST MONTHLY	30,485	39,326	1JUL78 - 31JUL78	12	78FEC/082/2293
	SEPTEMBER MONTHLY	32,202	62,728	1AUG78 - 31AUG78	14	78FEC/084/4441
	SEPTEMBER MONTHLY - AMENDMENT	51,202	62,728	1AUG78 - 31AUG78	3	79FEC/120/3780
	OCTOBER MONTHLY	23,137	81,313	1SEP78 - 30SEP78	19	78FEC/089/1782
	OCTOBER MONTHLY - AMENDMENT	23,137	81,313	1SEP78 - 30SEP78	3	79FEC/120/3783
	10 DAY PRE-GENERAL	60,411	200,468	1OCT78 - 23OCT78	29	78FEC/094/1022
	10 DAY PRE-GENERAL - AMENDMENT	-	-	1OCT78 - 23OCT78	2	78FEC/099/0200
	10 DAY PRE-GENERAL - AMENDMENT	62,975	203,053	1OCT78 - 23OCT78	6	79FEC/120/3786
	30 DAY POST-GENERAL	54,556	54,178	24OCT78 - 27NOV78	57	78FEC/099/0143
	30 DAY POST-GENERAL - AMENDMENT	55,515	55,112	24OCT78 - 27NOV78	5	79FEC/120/3792
	30 DAY POST-GENERAL - AMENDMENT	-	-	24OCT78 - 27NOV78	6	79FEC/130/1376
	YEAR END	30,143	1,923	28NOV78 - 31DEC78	82	79FEC/117/5053
	YEAR END - AMENDMENT	30,159	1,938	28NOV78 - 31DEC78	4	79FEC/120/3797
	REQUEST FOR ADDITIONAL INFORMATION			1JAN78 - 31DEC78	2	79FEC/132/4150
	REQUEST FOR ADDITIONAL INFORMATION			1JAN78 - 31DEC78	3	79FEC/135/1332
	TOTAL	658,153	15,677	809,938	1,100	716 TOTAL PAGES

81040301454

(14)

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - 107 175-80

DATE 21MAR80
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND						
CONNECTED ORGANIZATION: STEEL WORKERS OF AMERICA; UNITED						
ID #C00003590						
1979	STATEMENT OF ORGANIZATION - AMENDMENT			3JUN79	5	79FEC/128/4349
	MISCELLANEOUS REPORT			26JUL79 TO FEC	22	79FEC/133/4917
	STATEMENT OF ORGANIZATION - AMENDMENT			3AUG79	4	79FEC/134/1432
	MISCELLANEOUS REPORT			4SEP79 TO FEC	2	79FEC/135/3915
	STATEMENT OF ORGANIZATION - AMENDMENT			9OCT79	4	79FEC/139/1420
	STATEMENT OF ORGANIZATION - AMENDMENT			5DEC79	5	79FEC/142/2189
	FEBRUARY MONTHLY	24,019	2,194	1JAN79 -31JAN79	8	79FEC/120/5257
	REQUEST FOR ADDITIONAL INFORMATION			1JAN79 -31JAN79	4	79FEC/132/4152
	MARCH MONTHLY	9,200	3,100	1FEB79 -28FEB79	4	79FEC/121/2718
	MARCH MONTHLY - AMENDMENT	9,200	3,100	1FEB79 -28FEB79	5	79FEC/122/2526
	REQUEST FOR ADDITIONAL INFORMATION			1FEB79 -28FEB79	4	79FEC/122/0096
	APRIL MONTHLY	10,983	7,095	1MAR79 -31MAR79	7	79FEC/123/0919
	APRIL MONTHLY - AMENDMENT	0	0	1MAR79 -31MAR79	2	79FEC/126/3045
	REQUEST FOR ADDITIONAL INFORMATION			1MAR79 -31MAR79	4	79FEC/126/1633
	MAY MONTHLY	11,983	15,391	1APR79 -30APR79	7	79FEC/127/3446
	JUNE MONTHLY	16,177	3,778	1MAY79 -31MAY79	7	79FEC/128/3151
	JULY MONTHLY	19,205	25,950	1JUN79 -30JUN79	13	79FEC/133/1195
	AUGUST MONTHLY	10,144	2,451	1JUL79 -31JUL79	12	79FEC/134/3597
	SEPTEMBER MONTHLY	27,709	6,187	1AUG79 -31AUG79	16	79FEC/136/1559
	SEPTEMBER MONTHLY - AMENDMENT	41,642	3,458	1AUG79 -31AUG79	4	79FEC/140/3522
	REQUEST FOR ADDITIONAL INFORMATION			1AUG79 -31AUG79	9	80FEC/149/1665
	OCTOBER MONTHLY	41,065	50,859	1SEP79 -30SEP79	22	79FEC/140/3500
	NOVEMBER MONTHLY	57,459	28,070	1OCT79 -31OCT79	66	79FEC/141/3627
	DECEMBER MONTHLY	71,319	8,218	1NOV79 -30NOV79	64	79FEC/142/4251
	YEAR END	43,422	9,403	1DEC79 -31DEC79	75	80FEC/144/2194
1980	MISCELLANEOUS REPORT			7JAN80 TO FEC	3	80FEC/143/4225
	MISCELLANEOUS REPORT			21JAN80 TO FEC	2	80FEC/145/1671
	STATEMENT OF ORGANIZATION - AMENDMENT			22JAN80	4	80FEC/145/3008
	STATEMENT OF ORGANIZATION - AMENDMENT			27FEB80	5	80FEC/149/4792
	FEBRUARY MONTHLY	30,377	14,339	1JAN80 -31JAN80	7	80FEC/148/5000
	MARCH MONTHLY	26,255	43,362	1FEB80 -29FEB80	7	80FEC/150/3850
	TOTAL	422,287	0	210,575	0	405 TOTAL PAGES

ALL 1979 Documents
HAVE BEEN REVIEWED

81040301455

(9)

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

Summary of fundraising activity* 1977-1979

\$174,447

- 1977 Totals

- 1) Amount raised through Sale of Tickets** (Schedule D, Line 1) \$30,835
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$4,605
 - a) % of total received within 1976 requirements 14.93%
- 3) Amount received within the 30 day requirement of the 1979 amendments. 11 C.F.R. 103.3 \$8,471
 - a) % of total received within 1979 requirements 27.47%

1978 Totals

- 1) Amount raised through Sale of Tickets (Schedule D, Line 1) \$67,665
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$2,124
 - a) % of total received within 1976 requirements 3.14%
- 3) Amount received within the 30 day requirement of the 1979 amendments. 11 C.F.R. 103.3 \$39,528
 - a) % of total received within 1979 requirements 58.42%

1979 Totals

- 1) Amount raised through Sale of Tickets (Schedule D, Line 1) \$75,947
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$9,464
 - a) % of total received with 1976 requirements %12.46
- 3) Amount received within the 30 day requirement of the 1979 amendments. 11 C.F.R. 103.3 \$12,568
 - a) % of total received within 1979 requirements %16.55

* This assumes that all contributions raised through this fundraising activity are each less than \$50.00.

** This does not include receipts from mass collections or from the sale of articles.

("A.")

81040301456

United Steelworkers of America

POLITICAL ACTION FUND

FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
682-2400

July 8, 1977

Lloyd McBride
CHAIRMAN

FEDERAL ELECTION
COMMISSION

Frank S. McKee
TREASURER

77 JUL 11 PM 3:48

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: USWA Political Action Fund
I.D. C 0000 3590

Dear Sirs:

Please find enclosed an amended report of receipts and expenditures (FEC Form 3) for May, 1977, by the above-referenced committee. The modifications, primarily in Schedules B and D, of this amended report provide as much information as is available concerning certain fundraising activities which were conducted on behalf of this committee, in October, 1976, in Kokomo, Indiana. The proceeds from those fundraising activities were received by the reporting committee during the May, 1977 reporting period.

Also enclosed are photocopies of a covering letter, dated October 28, 1976, of the report by the FEC Compliance Review Section concerning the USWA Political Action Fund, and of the response to that report which was made, in a letter dated November 16, 1976, by the Treasurer of the United Steelworkers of America Political Action Fund. Although the United Steelworkers of America Political Action Fund has been informing those who engage in fundraising activities on its behalf of the record keeping steps which now are being followed pursuant to that report and correspondence, the particular fundraising activities covered in the enclosed report were undertaken before the understandings represented in that

87170430301345374

(A)

11
July 8, 1977

Page 2

Federal Election Commission

Re: USWA Political Action Fund
I.D. C0000 3590

correspondence were reached. Consequently, the records of the October, 1976 fundraising activities in question are not adequate to supply all of the information which we expect will be included in future reports concerning such activities.

I trust that the information in this amended report, as explained in this letter, constitutes sufficient compliance with the FEC's requirements; but please do not hesitate to contact us if you have any questions regarding this matter.

Very truly yours,

Frank S. McKee

Frank S. McKee
Treasurer

(A)

Schedule D

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

Itemized Receipts Sales and Collections
For Line Number 15C Only of FEC Form 3

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

MS 5/1/77 - 5/31/77

Name of Candidate or Committee in full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below) \$ 2,728.00
 2 Mass collections (List by event below)** None
 3 Sale of items None
 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) \$ 2,728.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period **
Legislative Dance, USWA Local 1054 Union Hall, 920 Millbrook Lane, Kokomo, Indiana	10/30/76	\$1,142.00	\$ None
The following two events were conducted at the Legislative Dance while it was in progress:			
Raffle		900.00	
Tip Board Sales		686.00	
Note: These above fundraising events were conducted prior to the time that our Committee was finally notified by the FEC that the financial details of such fund- raising events were to be included on Form 3. Consequently the local fund- raisers were not required to nor did they keep detailed records. Therefore, all items included in this Amended Form 3 for May '77, are based on such information and is the best record that we are able to provide.			
Subtotal this period this page (optional)		\$2,728.00	\$ None
Total this period (last page this line number only)		\$ 2,728.00	\$.. None

LINE NUMBER 15C

(see instructions on back)

President or Committee in full

United Steelworkers of America
Political Action Fund

117 6/1/77 - 6/30/77

Present Presents during the Reporting Period:

1	Sale of tickets (List by event below)	172.00
2	Mass collections (List by event below)	
3	Sale of items	
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	172.00

List of Sales and Collections by Event

Location and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
St. Patrick's Day PAC (Raffle)	3/19/77	\$ 172.00	\$ None
USWA Local Union 1608 Hall			
1024 Herr Street, Harrisburg, PA.			
Subtotal this period this page		\$ 172.00	\$ None
Total this period (last page this line number only)		\$ 172.00	\$ None

Page

"A"

LINE NUMBER 15C

(see instructions on back)

108 7/1/77 - 7/31/77

Total Proceeds during the Reporting Period:

1	Sale of tickets (List by event below)*	948.00
2	Mass collections (List by event below)**	NA
3	Sale of items	NA
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	948.00

[illegible]

Subtotal this period this page (optional)	\$ 948.00	\$ NA
Total (this period (last page this line number only)	\$ 948.00	\$ NA

Page

Itemized Receipts Sales and Collection
For Line Number 15C Only of FEC Form 3

LINE NUMBER 15C

M10 9/1/77 - 9/30/77

Name of Candidate or Committee in full **United Steelworkers of America Political Action Fund**

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below).....	\$ 21,200.00
2 Mass collections (List by event below).....	719.26
3 Sale of items.....	None
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3).....	\$ 21,919.26

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
LU 1688 - USWA			
Party and Dance		\$	\$
St. Anne's Catholic Church Auditorium			
7th and Reynders Ave.	7/23/77	15,000.00	719.26
Steelton, Penna. 17113			
Local Union 5739 - 50/50 Raffle	2nd Tues. of each month	260.00	None
Chester, Penna.	9/76 thru 6/77		
Local Union 5401 - 50/50 Raffle	3/10 &	200.00	None
Country Market, New Kingston, PA	7/14/77		
Local Union 6014 - PAC Raffle	8/13/77	785.00	None
844 E. Chestnut St., Lancaster, PA			
Local Union 3216 - PAC Raffle (3rd Wed. of each month) - Holy Saviour Hall, Norristown PA	2/16/77 thru 8/17/77	620.00	None
Local Union 3139 Dinner and Raffle	9/17/77	4,335.00	None
Brushton Fire Hall, Hanover, PA			
Subtotal this period this page (optional)		\$ 21,200.00	\$ 719.26
Total this period (last page this line number only)		\$ 21,200.00	\$ 719.26

77030594146

"A"

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

(see instructions on back)

THE NUMBER 15C

412 11/1/77 - 11/30/77

1	Sale of tickets (List by event below)	3,685.00
2	Mass collections (List by event below)**	None
3	Sale of items	None
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	3,685.00

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Ma Collections this Per **
L.U. 6627 Raffle	8/5/77	\$ 282.00	\$
L.U. 3182 Hall, 3230 Philadelphia Pike, Claymont, DEL.			
L.U. 3853 PAC Raffles	*	437.50	
Alloy Metal Wire Works, Prospect Park, Pa. *3/23/77; 3/30/77; 4/6/77; 4/13/77; 4/20/77; 4/27/77; 5/4/77			
L.U. 13866 50-50 PAC Raffle		138.00	
Marcus Hook Fire Hall 8th & Market Streets, Marcus Hook, PA.			
L.U. 1165: Local Union Hall, 750 Charles Street, Coatesville, PA 19320	10-76 thru 9-77	682.00	
1) 50-50 Raffles at each Local Union Meeting	12/8/76	618.75	
2) Drawing at Christmas Party	4/5/77	652.50	
3) Raffle	9/24/77	874.25	
4) Raffle (at L.U. Picnic)			
Subtotal this period this page (optional)		\$ 3,685.00	\$ None
Total this period (last page this line number only)		\$ 3,685.00	** None

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

LINE NUMBER 15C

YE 12/1/77 - 12/31/77

17
(see instructions on back)

Name of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)	▼	\$	589.00
2 Mass collections (List by event below)**	▼	\$	None
3 Sale of items	▼	\$	None
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	▼	\$	589.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period **
LU 5542 Raffle		\$	\$
Messenger Bearing Inc. Plant-Carpenter Shop 3901 D Street Philadelphia, Pa.	9/8/77	78.00	None
LU 12886 Raffle	6/2/77	241.00	None
222 Philadelphia Pike Wilmington, DE			
LU 12886 Raffle	12/1/77	270.00	None
222 Philadelphia Pike Wilmington, DE			
Subtotal this period this page (optional)		\$ 589.00	\$ None
Total this period (last page this line number only)		\$ 589.00	** None

M3-2/1/78 - 2/28/78

Name of Candidate or Committee in full

United Steelworkers of America
 Political Action Fund

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below) \$ 9,863.00
 2 Mass collections (List by event below) None
 3 Sale of items None
 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FSC Form 3) \$ 9,863.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period ..
District 30 - Legislative Conference 1977	9/16 & 17	\$7,690.00	\$ NA
Indianapolis, Indiana	1977		
LU 6816 USWA, Box 132, Collegeville, PA 19426			
Thanksgiving Drawing (Local Union Hall)	11/21/76	315.00	NA
Christmas Drawing (Local Union Hall)	12/19/76	300.00	NA
Local Union Banquet Drawing			
Gilbertsville Fire Hall, Gilbertsville, PA	4/15/77	340.00	NA
Punch Board Sales	June-1977	600.00	NA
LU 1940 USWA, 519 Electric Street, Lewistown, PA	4th Tues. each month	618.00	NA
Subtotal this period this page (optional)		\$ 9,863.00	\$ NA
Total this period (last page this line number only)		\$ 9,863.00	\$.. NA

**Item Receipts Sales and Collection
For Line Number 15C Only of FEC Form 3**

Page 1 of 1 for
LINE NUMBER 15C

Commission

20463

(see instructions on back)

M3- ARND

of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund**

Total Proceeds During the Reporting Period:

1 Sale of tickets (List by event below)	\$ 9,863.00
2 Mass collections (List by event below)	\$ None
3 Sale of items	\$ None
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$ 9,863.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
District 30 - Legislative Conference 1977	9/16 & 17	\$7,690.00	\$ NA
Indianapolis, Indiana	1977		
LU 6816 USWA, Box 132, Collegeville, PA 19426			
Thanksgiving Drawing (Local Union Hall)	11/21/76	315.00	NA
Christmas Drawing (Local Union Hall)	12/19/76	300.00	NA
Local Union Banquet Drawing			
Gilbertsville Fire Hall, Gilbertsville, PA	4/15/77	340.00	NA
Punch Board Sales	June-1977	600.00	NA
LU 1940 USWA, 519 Electric Street, Lewistown, PA	4th Tues. each month	618.00	NA
Note: Fundraising events are reported during			
the month in which the funds raised			
and reports are received by the			
Treasurer's Office.			
Subtotal this period this page (optional)		\$ 9,863.00	\$ NA
(Total this period (last page this line number only)		\$ 9,863.00	\$ NA

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for
LINE NUMBER 14c

(See Instructions on Back)

5/16 5/1/78 - 5/31/78

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

- | | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 1,959.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ 1,959.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 12886, 222 Philadelphia Pike	1/5/78	\$ 214.00	\$ NA
Wilmington, DE	2/2/78	183.00	NA
Raffles	3/2/78	190.00	NA
	4/6/78	166.00	NA
	5/4/78	156.00	NA
LU 3182- LU 3182 Hall, 3230 Philadelphia			
Pike, Claymont, DE			
Dance	2/25/78	1,050.00	NA
Note: Fundraising events are reported			
during the month in which the			
report and transmittal funds			
raised are received by the			
Treasurer's Office.			

SUBTOTAL this period

\$ 1,959.00 \$** None

(See Instructions on Back)

LINE NUMBER 14c

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*	\$	32,269.43
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)**	\$	None
3. Subtotal Receipts from the Sale of Items (not listed below)	\$	None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3).	\$	32,269.43

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 5829 - 50-50 Raffle	5/12/78	\$ 153.00	\$ None
USWA - 136 E. Gay Street West Chester, Penna.			
District 20 - USWA PAC Committee Raffle	5/2/78	17,506.43	None
390 Ohio River Blvd Baden, Penna. 15005			
District 15 PAC Committee Raffle	5/2/78	14,610.00	None
1945 Lincoln Highway No. Versailles, PA 15137			
SUBTOTAL this period		\$ 32,269.43	s.. None

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

MB 7/1/78 - 7/31/78

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

- | | |
|---|-----------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 526.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ 526.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LIJ 6816, USWA - Raffle	4/15/78	\$ 526.00	\$ None
Gilbertsville, PA			
SUBTOTAL this period		\$ 526.00	\$** None

3030322303

HA 1

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

19 8/1/78 - 8/31/78

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 9,752.25.
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** None
3. Subtotal Receipts from the Sale of Items (not listed below). None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 9,752.25

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
District 31, Sub-Dist. 4 Annual Raffle 5090 W. Harrison St., Chicago, IL-60644	6/9/78	\$ 8,648.25	\$ None
Lu 3182 50-50 Drawing 3230 Philadelphia Pike, Claymont, DE	7/25/78	520.00	None
LU 3566 Raffle St. Anthony's Hall, Claymont, DE	7/21/78	259.00	None
LU 12886 50-50 Raffle 222 Philadelphia Pike, Wilmington, DE	7/6/78	167.00	None
LU 1940 50-50 Raffle 519 Electric St., Lewistown, PA	Various Dates	158.00	None
Note: Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's Office.			
SUBTOTAL this period		\$ 9,752.25	\$.. None

8 1708403300314447405 3

5.. NONE

**PTS SALES AND COLLECTIONS
SCHEDULE 14c ONLY OF FEC FORM 3**

Page 1 of 1 for

*FEC NUMBER 14c

(see instructions on back)

LOG 10/1/78 - 10/23/78 -

**Steelworkers of America
Political Action Fund**

Enter below and enter from subtotal Column A)* \$ 7,670.00
 Enter below and enter from subtotal Column B)** \$ 198.00
 (Total) \$ NA
 (Total, Page 2, FEC Form 3) \$ 7,868.00

of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
2	9/23/78	\$ 966.00	\$ NONE
7			
4			
re Hall	9/9/78	4410.00	
0			
3			
Rd. Vol. collect-			
tion at union	various		198.00
meeting	dates		
picnic	6/24/78	769.00	
Raffle	6/24/78	110.00	
Pire,			
3	3/19/78*	376.00	
viour Club	various-at		
	mo. union meets.	564.00	
Hall	various-at		
	union meetings	415.00	
adelphia, PA Area	various	605.00	
during the month in which the report are received in the Treasurer's office.			
(A)		\$ 7,670.00	\$ 198.00

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See instructions on back)

Page 1 of 1 for

LINE NUMBER 14c

LOG 10/1/78 - 10/23/78 -

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 7,670.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 198.00
3. Subtotal Receipts from the Sale of Items (not listed below). \$ NA
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 7,868.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 3182 Annual Party 3230 Philadelphia Pike Claymont, DE	9/23/78	\$ 966.00	\$ NONE
LU 3139 Annual Dinner, Brushton Fire Hall Hanover, PA	9/9/78	4410.00	
LU 6326-Mermaid Swim Club, Jolley Rd.)Vol. collect- Blue Bell, PA	tion at union various meeting dates picnic 6/24/78 raffle 6/24/78	769.00 110.00	198.00
LU 12698 Raffle, 222 Philadelphia Pike, Wilmington, DE	3/19/78*	376.00	
LU 3216 -- 50/50 Raffles, Holy Saviour Club 436 E. Main St., Norristown, PA	various-at mo. union meets.	564.00	
LU 5739 - Raffle, Friendship Fire Hall Linwood, PA	various-at union meetings	415.00	
LU 2151, 1852, 6014 & 6880, Philadelphia, PA Area Sale of Golf Caps	various	605.00	
*Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's office.			
SUBTOTAL this period		\$ 7,670.00	\$ 198.00

8 170840309417049

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

106-AMEND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 12,553.25
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 198.00
3. Subtotal Receipts from the Sale of Items (not listed below). \$ NA
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 12,751.25

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 3182 Annual Party 3230 Philadelphia Pike Claymont, DE	9/23/78	\$ 966.00	\$ None
Local Union 3139 Annual Dinner, Brushton Fire Hall, Hanover, PA	9/9/78	4,410.00	
LU 6326-Mermaid Swin Club, Jolley Rd. Blue Bell, PA (Vol. Collection at Union Meeting) Picnic Raffle	Various Dates 6/24/78 6/24/78		198.00
LU 12698 Raffle, 222 Philadelphia Pike, Wilmington, DE	3/19/78*	376.00	
LU 3216 -50/50 Raffles, Holy Saviour Club 436 E. Main St., Norristown, PA	Various MO. Union Meetings	564.00	
LU 5739 Raffle, Friendship Fire Hall Linwood, PA	Various-at Un. Meet.	415.00	
LU 2151, 1852, 6014 & 6880, Philadelphia, PA Area - Sale of Golf Caps	Various	60.00	
*Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's Office.			
SUBTOTAL this period		\$	\$**

81020301474

"A"

Other Interventions on Bark:

106. Amend

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

Total Proceeds during the Reporting Period:

- | | | |
|---|----|--|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ | |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ | |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 6014 Raffle - 2401 Willow St. Pike Willow Street, PA 17584	8/26/78	\$ 1,000.00	\$
LU 1165 - 750 Charles St. Coatesville, PA			
Christmas Drawing	12/14/77	651.25	
Annual Picnic Raffle	8/26/78	916.50	
50/50 Raffle-Monthly		690.50	
Union Meetings			
LU 3853 - 50/50 Raffles - 1978 Alloy Metal Wire Works Plant Prospect Park, PA	8/30;9/6; 9/13;9/22	225.00	
LU 1852 - Raffle IBEW Bldg, York, PA	10/20/78	1,400.00	
SUBTOTAL this period		\$12,553.25	\$** 198.00

11 A 11

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for

LINE NUMBER 14c

306 10/24/78 - 11/27/78

(See Instructions on Back)

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

- | | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 1,577.87 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ ----- |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ ----- |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ 1,577.87 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 7528 Raffle 2889 Fairfield Avenue, Bridgeport, CT 06605	10/15/78	\$ 102.00	\$ None
LU 13866 Raffle Marcus Hook, PA 19061	9/8/78 & 10/7/78	186.00	None
District 38, Sub-District 1 1520 W. Cameron Avenue, Suite 245 West Covina, CA 91790	October '78	96.87	None
LU 3182 - Sale of Item 3230 Philadelphia Pike Claymont, DE		795.00	None
LU 6627 Raffles 3230 Philadelphia Pike Claymont, DE		398.00	None
SUBTOTAL this period		\$ 1,577.87	\$** None

"A")

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
District 19 Legislative Conference	10/13 &	\$ 498.00	\$ None
50/50 Raffle, 400 Lock Street, Tarentum, PA 15084 (The Hilton Airport Inn, Imperial.PA)	10/15/78		
District 26 PAC Fundraising Comm.	9/18/78 &	480.00	None
400 Realty Bldg., Youngstown, OH 44503	9/22/78		
(Sale of Items during International Convention at Atlantic City, NJ)			
LU 7528 Raffle	10/15/78	102.00	None
USWA - 2889 Fairfield Avenue			
Bridgeport, CT 06605			
SUBTOTAL this period		\$ 1,080.00	** None

("A")

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 1374, USWA - 50-50 Raffle		\$	\$
134 Cumberland Street	2 - '79	200.00	
Lebanon, PA 17042			
LU 1940, USWA - 50-50 Raffle	8 - '78	133.00	
519 Electric St.,			
Lewistown, PA 17044			
SUBTOTAL this period		\$ 333.00	\$ None

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
U- 338, District 38, USWA	October '78	\$ 848.00	\$ NA
PE. 14015 Trent Avenue, Spokane, WA 99215 (Raffle)			
District 7, USWA	4/3/79	1,376.00	NA
Suite 200, General Lafayette Bldg 210 Goddard Blvd King of Prussia, PA 19406 (Raffle)			
SUBTOTAL this period		\$2,224.00	** NA

34

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

January, 1979
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

1/6 5/1/79 - 5/31/79

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

- 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 5,901.27...
- 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
- 3. Subtotal Receipts from the Sale of Items (not listed below). \$ None
- 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 5,901.27

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
CU 1150 Raffle - 208 S. Addison, Indianapolis, IN	10/16/78	\$ 489.00	\$
Muncie Area Legislative Dance USWA - District 30 206 1/2 E. Willard St Muncie, IN 47302	10/28/79	1,155.00 1,328.27	
District 30, USWA Legislative Fund 50-50 Raffle Opryland Hotel., Nashville, TN	3/10/79	1,230.00	
Kokomo Area Legislative Dance 920 Millbrook Lane, Kokomo, IN -Tickets Raffle	10/28/78	880.00 819.00	
SUBTOTAL this period		\$ 5,901.27	\$ None

11A-17

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for
LINE NUMBER 14c

(See instructions on back)

M7 6/1/79 - 6/30/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 592.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below). \$ None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 592.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 8498 Raffle	11/15/78	\$ 592.00	\$
4530 Pebble Lane			
Winston-Salem, North Carolina 27107			
SUBTOTAL this period		\$ 592.00	\$** None

81049031331206

(See Instructions on Back)

• THE NUMBER 14c

SUBTOTAL this period	s* 500.00	s** NONE
-----------------------------------	------------------	-----------------

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(37)
(See Instructions on Back)

Page 1 of for
LINE NUMBER 14c

H9 8/1/79 - 8/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*	\$ 23,099.57
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)**	\$ None
3. Subtotal Receipts from the Sale of Items (not listed below)	\$ 1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3)	\$ 24,849.57

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 14543 - District 7 - 50-50 Raffle	7/11/79	\$ 60.00	\$ None
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
Local Union 5030 - District 7	Various	1,540.00	
USWA Raffle			
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
Local Union 3216 - District 7 - 50-50 Raffle	6/79-7/79	154.00	
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
District 31 - Sub-District 4, USWA	6/10/79	7,706.57	
Annual Raffle			
5090 W. Harrison Street			
Chicago, Illinois 60644			
District 27, USWA Raffle	6/15/79	13,639.00	
1330 Market Avenue, North Canton, Ohio 44714			
SUBTOTAL this period		\$ 23,099.57	\$..

(A)

AMENDED

38

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See instructions on Back)

Page 1 of 1 for

NUMBER 14c

8/1/79 - 8/31/79

Name of Committee in Full

Steelworkers of America Political Action Campaign Fund

Period during the Reporting Period:

Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 23,379.77
 Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
 3. Subtotal Receipts from the Sale of Items (not listed below) \$ 1,750.00
 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 25,129.77

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 14543, District 7, 50-50 Raffle	7/11/79	\$ 60.00	\$
Local Union 14378, District 7, 50-50 Raffle	7/10/79	144.00	
Local Union 4425, District 7, 50-50 Raffle	8/3/79	136.20	
Local Union 3216, District 7, 50-50 Raffle	7/8/79	154.00	
Local Union 5031, District 7, Raffle	Various	1,540.00	
210 Goddard Boulevard			
King of Prussia, Pennsylvania 19406			
District 31 - Sub-District 4	6/10/79	7,706.57	
Annual Raffle			
5090 W. Harrison Street			
Chicago, Illinois			
District 27 Raffle	6/15/79	13,639.00	
1330 Market Avenue, North			
Canton, Ohio 44714			
SUBTOTAL this period		\$ 23,379.77	\$

(A)

39
ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

M10 9/1/79 - 9/30/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Campaign Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 11,549.20
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 100.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 11,649.20

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 3216, District 7, 50-50 Raffle 210 Goddard Boulevard King of Prussia, Pennsylvania 19406	Various	\$ 354.00	\$
Local Union 6017, District 7, 50-50 Raffle	6/2/79	42.00	
Local Union 12781, District 7, 50-50 Raffle	8/10/79	122.00	
Local Union 1940, District 7, 50-50 Raffle	9/3/79	260.00	
Local Union 1940, District 7, 50-50 Raffle	1/1/79-8/79	351.00	
Local Union 3566, District 7, 50-50 Raffle	8/10/79	284.00	
Local Union 12698, District 7, 50-50 Raffle	9/16/79	266.00	
Local Union 5424, District 7, 50-50 Raffle	9/4/79	103.00	
Local Union 6014, District 7, 50-50 Raffle	8/4/79	500.00	
Local Union 7825, District 7, 50-50 Raffle	9/15/79	48.00	
Local Union 15534, District 7, 50-50 Raffle	9/15/79	197.00	
Local Union 15253, District 7, 50-50 Raffle	9/13/79	84.00	
Local Union 12916, District 7, 50-50 Raffle	9/18/79	64.00	
Local Union 4425, District 7, 50-50 Raffle	9/9/79	60.20	
SUBTOTAL this period		\$	\$

**SCHEDULE D
REVISED**

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

41

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of for
LINE NUMBER 14c

M11 10/1/79 - 10/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 25,413.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below) \$ 120.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 25,533.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 6627, District 7, Raffle	8/10/79	\$ 358.00	\$ None
210 Goddard Boulevard			
King of Prussia, Pennsylvania 19406			
Local Union 6465, District 7, 50-50 Raffle	9/8/79	32.00	
Local Union 7936, District 7, 50-50 Raffle	9/19/79	48.00	
Local Union 12974, District 7, 50-50 Raffle	9/20/79	14.00	
Local Union 14700, District 7, 50-50 Raffle	9/15/79	26.00	
Local Union 15139, District 7, 50-50 Raffle	9/25/79	25.00	
Local Union 8695, District 7, 50-50 Raffle	9/20/79	20.00	
Local Union 3853, District 7, 50-50 Raffle	Various	400.00	
Local Union 5808, District 7, 50-50 Raffle	9/6/79	409.00	
Local Union 4993, District 7, 50-50 Raffle	9/11/79	55.00	
Local Union 6326, District 7, Raffle	8/30/79	186.00	
Local Union 1852, District 7, Raffle	9/28/79	2,305.00	
Local Union 8739, District 7, 50-50 Raffle	9/27/79	24.00	
Local Union 13866, District 7, 50-50 Raffle	9/26/79	126.00	
Local Union 12886, District 7, 50-50 Raffle	Various	476.00	
SUBTOTAL this period		\$	\$

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 3853, District 7, 50-50 Raffle	9/5/79	\$ 64.00	\$
Local Union 14378, District 7, 50-50 Raffle	10/2/79	146.00	
Local Union 3182, District 7, Raffle	9/25/79	1,081.00	
District 20 Raffle	6/14/79	16,822.00	
390 Ohio River Boulevard			
Baden, Pennsylvania 15005			
District 7 - 50-50 Raffle	9/28/79	2,796.00	
230 North Fifth Street			
Reading, Pennsylvania 19601			
SUBTOTAL this period		\$ 25,413.00	\$ 25,413.00

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

43

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of for
LINE NUMBER 14c

M12 11/1/79 - 11/30/79

Name of Candidate or Committee in Full

UNITED STEELWORKERS OF AMERICA - POLITICAL ACTION FUND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 3,518.50
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 5,268.50

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 3216, Dist. 7 50-50 Raffle	10/17/79	\$ 84.00	\$
210 Goddard Blvd.			
King of Prussia, PA 19406			
LU 5740, District 7, 50-50 Raffle	10/7/79	184.00	
LU 7038, District 7, 50-50 Raffle	10/7/79	320.00	
LU 5739, District 7, 50-50 Raffle	Various	186.50	
LU 12886, District 7, 50-50 Raffle	10/4/79	185.00	
LU 14378, District 7, 50-50 Raffle	11/6/79	124.00	
District 7, Reading, Pa. Office (Balance from the			
Reading 50-50 Raffle previously reported on the			
October 1979 form)	9/28/79	165.00	
District 38 Raffle			
P.O. Box 2428			
West Covina, Calif. 91793	9/29/79	1,270.00	
SUBTOTAL this period		\$	\$

81040301490

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

44

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 2 of 2 for
LINE NUMBER 14c

M12 11/1/79 - 11/30/79

Name of Candidate or Committee in Full

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below) \$
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
District 23 Raffle	9/21/79	\$ 1,000.00	\$
2084 National Road			
Wheeling, WV 26003			
SUBTOTAL this period		\$	\$ 3,518.50

8104030149314

January, 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20460

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14, ONLY OF FEC FORM 1**

Das Experiment von Wirtz

YE 12/1/79 - 12/31/79

Name of Candidate or Candidate in Field

United Steelworkers of America Political Action Fund

Total Payments during the Reporting Period:

1. Subtotal Payments from the Sale of Vehicles (list by event below and enter from authorized Collection AJ)*	\$	1,068.50
2. Subtotal Payments from Other Collections (list by event below and enter from authorized Collection BG**	\$	
3. Subtotal Payments from the Sale of Items (not listed below)	\$	
4. TOTAL (carry forward to Line 14c of Qualified Summary, Page 2, PSC Form 31)	\$	1,068.50

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Other Contributions this Period*
LU 3216- District 7 50-50 Raffle 210 Goddard Blvd. King of Prussia, PA 19406	11/21/79	\$ 76.00	\$
LU 4425 - District 7 Raffle	12/7/79	233.50	
LU 8298- District 1 Raffle 100 S. Turnpike Rd. Wallingford, Conn 06492	9/23/79	138.00	
LU 4524 District 1 Raffle Box 281 Concord, N.H. 03301	11/79	103.00	
LU 7477 - District 36 Raffle 1825 Morris Avenue Birmingham, AL 35203	11/3/79	518.00	
"A")			



46

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

July 16, 1979

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
Mr. Frank S. McKee, Treasurer
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

Year End 1977, Year End 1978 &

During review of the February Monthly 1979 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

81040301493

("A")

TO: UNITED STEELWORKERS OF AMERICA

POLITICAL ACTION FUND

DATE:

I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1977 REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/77 THROUGH 12/31/77
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

Coverage Dates: ☐ omitted or ☐ incorrect

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

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

Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule

Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

X Other: Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

TO: UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

DATE: _____

I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1978 REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 12/31/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

☐ Coverage Dates: ☐ omitted or ☐ incorrect

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

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

☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☒ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule

☒ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ X Other: Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

449

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

The disclosure of proceeds from fundraisers and raffles on Schedule D for Line 14c of the Detailed Summary Page indicates that political contributions received by local and district unions are not transferred and reported to your committee promptly. Title 2 U.S.C. 432(b) requires that any person who receives a contribution in excess of \$50.00, including those deposited in a transmittal account not considered a committee depository, shall make a detailed accounting to the committee of such receipts no more than five (5) days after receipt.

On October 28, 1976, the Commission issued a final audit report of your committee. Pursuant to the 1976 audit recommendation in Finding E of that report, you were advised to instruct fundraisers of the requirements of 2 U.S.C. 432(b) (See the attached audit report). Please provide an explanation for late reporting of contributions received through fundraisers, raffles and drawings in 1977 and 1978.

81040301496

("A")

50

TELECON:

COMMITTEE: UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

COMMITTEE CONTACTS: TOM CARPENTER
BILL SMELLING
DORIS HARRIS

ANALYST: BEVERLY BROWN

DATE: 7/23/79

RE: REQUEST FOR ADDITIONAL INFORMATION FOR 1977, 1978 & 1979 REPORTS
POSSIBLE VIOLATION OF 2 U.S.C. 432(b)- failure to render detailed
accounting of receipts to the treasurer of the international PAC
within five (5) days after the local's receipt thereof.

PHONE NUMBER: 412 562-2371

Background: On Schedule D for Line 14c of the Detailed Summary Page, the
above committee discloses the receipt of proceeds from local
raffles and fundraising events. At the bottom of the page the
following notation is provided:

Fundraising events are reported during the month in
which the report and transmittal funds raised are
received by the Treasurer's Office.

Since it was evident from the committee's disclosure that
accounting records were not being transferred within the
five (5) day period, a RFAI was sent to request an explanation
for the delay. Referenced in the RFAI was the final audit
recommendations pertaining the requirements of 2 U.S.C. 432(b).

Today: Mr. Carpenter called this day and asked that I listen to what he,
Mr. Smeller and Ms. Harris had to say with regard to the above matter.
According to these representatives, letters to Bob Costa, Vernon
Thompson and Thomas Harris were sent on 5/22/76, 6/2/76 and 11/16/76.
The letter set forth guidelines that the committee requested to
implement upon approval from the Commission. It essentially requested
permission for the Locals to transfer their funds upon the close of
business (ie. end of their fundraising drives). Once the funds
were transferred from the locals to the international PAC, the
locals would close out their transmittal accounts and the inter-
national would disclose the receipt of funds from locals on
Schedule D.

At the close of their 11/16/76^{*} letter to Vernon Thompson and Thomas
Harris, The United Steelworkers of America stated that they would
implement these procedures unless otherwise notified by the Commission.
As they had not heard from the Commission, the Political Action Fund
proceeded to establish procedures based upon their recommendations
to the Commission.

Manuals entitled "Directives to Fundraisers" were prepared and distributed
to all affiliated local unions. Through these directives, locals were
advised of FEC regulations and the manner in which they were to comply.

As I found no record of letters which suggest that local committees
should transfer funds and records upon the close of business, I advised
the committee representative to send me copies of the letters and any
additional information pertaining to this issue.

81040301497

(A) } (* see att. # 13)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

(51)

8/21/79

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
Mr. Frank S. McKee, Treasurer
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

Year End 1977 &

During review of the Year End 1978 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

81040301498

("A")

TO: United Steelworkers of America

(52)

DATE:

Political Action Fund

I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE February Monthly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/79 THROUGH 1/31/79
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

 Coverage Dates: omitted or incorrect

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

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

2 Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

5 Date(s): omitted or inadequate for Schedule(s) Line(s)

1 9 Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)

4 9 Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)

2 4 Election Designation: omitted or inadequate for Schedule(s) Line(s)

3 1 Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)

1 0 Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

3 3 Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

0 0 Inadequate Description of: proceeds dates events location of Schedule

7 4 Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

8 1 0 4 Other: On Schedule A for Line 14a of the Detailed Summary Page you disclose contribution received outside of this reporting period. Please provide an explanation for your late reporting of these receipts.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

(A)

TO: UNITED STEELWORKERS OF AMERICA

DATE: _____

POLITICAL ACTION FUNDI.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1977 REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/77 THROUGH 12/31/77.
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ X Other: Please see page 4

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

("A")

TO: UNITED STEELWORKERS OF AMERICA

DATE: _____

POLITICAL ACTION FUNDI.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1978 REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 12/31/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ X Other: ☐ Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

55

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

On Schedule D for Line 14c of the Detailed Summary Page you disclose the receipt of proceeds from local raffles and joint fundraising events. On these Schedules you disclose funds received outside the reporting period for which you are filing and the following notation is provided:

Fundraising events are reported during the month in which the report and transmittal funds raised are received by the Treasurer's Office.

11 CFR 103.3(a) of the Commission's Regulations which implement 2 U.S.C. 437b(a) requires all contributions received by a political committee to be deposited in a checking account in the appropriate campaign depository by the treasurer of the committee or his or her agent within ten (10) days of the treasurer's receipt thereof. Advisory Opinion 1978-98 (attached) further states that the ten (10) day deposit period begins to run when the contribution is received by a local union representative. Please provide an explanation for your failure to deposit proceeds into your campaign depository within ten (10) days of the Local's receipt thereof.

For further information, enclosed please find Advisory Opinion 1978-42 and the final audit report of AFL-CIO COPE PCC which was approved by the Commission in public session on June 7, 1979.

81040301502

("A")

56

TELECON:

COMMITTEE: UNITED STEELWORKERS OF AMERICA

COMMITTEE CONTACT: DORRIS JARRETT

ANALYST: BEVERLY BROWN

DATE: 10/18/79

PHONE NUMBER: 412-562-2371

RE: LATE FILING OF OCTOBER MONTHLY REPORT & RESPONSE TO RFAI

Ms. Jarrett called this day to request an extension of time in which to submit the committee's October Monthly Report due 10/20/79. Ms. Jarrett stated that they are running a little behind on their paperwork as many of their employees have been ill and out of the office for some time. The report will be a few days late.

I informed Ms. Jarrett that I would make note of our conversation, however, I am not authorized to give extensions. I then asked Ms. Jarrett if the committee had responded to the commission's inquiry regarding their member union's failure to transfer funds within the 10 day period required by 11 CFR 103.3. Ms. Jarrett stated that Mr. Smelling was still investigating the matter. I suggested to Ms. Jarrett that the committee inform the Commission that they are still investigating the matter as their response is overdue.

81040301503

("A")

57
TELECON FOR FILES

FROM: William Schmelling, Atty. (312) 467-1995
TO: Kevin Kelly
DATE: 11/19/79
CMTE: United Steel Workers Political Action Fund
RE: RFAI for Y.E. '77 & '78, Violation of 103.3 (10 day rule)

BACKGROUND

Beverly Brown, Reports Analyst sent a RFAI to this committee after a comprehensive review of their reports. She noted that this committee was reporting receipt of funds raised through fundraising by the locals during different reporting periods. Oftentimes the national would show receipts from local fundraisers 10 months after the fundraising occurred. Beverly sent this committee copies of the AOs defining the pertinent sections of the ACT and asked for explanations.

CONVERSATION 11/20/79

81040301504
Mr. Schmelling called to say that he had just been placed in charge of this problem. He stated that he had discussed these areas with Ms. brown in the past but he wasn't up to date on the procedures. He wanted to know how he should reply to the request. I told him that he would have to make that decision, not me. The information that he had on hand did not go into detail as to whether a transmittal account would be classified as the PAC depository, therefore meeting the 10 day limitation. I replied that the AFL-CIO Audit report stated that all accounts must be transferred and reported within the ten day limitation. I suggested to Mr. Schmelling that he review the information that we had sent him and let me gather together all relevant information before we discuss these problems any further.

("A")



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 18, 1979

Frank S. McKee, Treasurer
United Steelworkers of America Political
Action Committee
Five Gateway Center
Pittsburgh, PA 15222

REFERENCE: 1977 and 1978 Year End Reports

Dear Mr. McKee:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated August 21, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact Kevin Kelly on our toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

81040301505

("A")

(59)

TELECON FOR FILES

FROM: William Schmelling, Counsel for USWA
TO: Kevin Kelly
DATE: 1/8/80
CMTE: United Steelworkers of America Political Action Fund
Subject: Failure to respond to RFAI of 8/21/79.

BACKGROUND:

Beverly Brown, Reports Analyst, had sent this committee an RFAI last July concerning this committee's adherence to the five day rule as stated in 432(b). Following the response by the committee, she sent another request concerning 103.3, the 10 day rule for transfer of funds. It is obvious from the monthly reports filed by the committee that the ten day rule was not complied with but Beverly felt it necessary to ask for further information. The Steelworkers had stated that they needed more time to look into the problem and had ultimately received a RQ2* letter from the Commission asking for a response.

* second notice RFAI

TODAY:

Mr. Schmelling and I finally contacted each other after failing in our attempts during the last two weeks. Mr. Schmelling began by stating that he had read all of the information available with regard to this subject (10 day rule and overall fundraising procedures.) He said that the AFL CIO COPE PCC audit recommendations are not necessarily applicable to the USW situation. Mr. Schmelling explained their fundraising methods in the following manner: All fundraising is done in the field. This fundraising occurs over an extended period of time with individuals usually holding onto the money until there is enough to forward to the international. Sometimes the individuals open up separate accounts to hold the money in, other times they hold onto the cash. They do not commingle the funds with their personal accounts. The cost of operating these accounts is paid by either the local treasury (legal expense for administrative purposes) or by a portion of the voluntary contributions. Once the money is transferred to Pittsburgh it is reported. He stated that it is obvious that the ten day rule has not been complied with on all occasions but that the disclosure requirements of the Act have been met. He then had two questions: Since it is apparent from the reports filed that the ten day rule has not been met, how can they reply to the RFAI? and second, he would like some guidance on how to revamp their fundraising system in order to comply with the FECA. Toward this second question he proposed the following system: He could have the depository in Pittsburgh, Union National Bank, print deposit slips and have them sent to all of the locals. When an individual, acting as the collection agent, receives money he or she could then send the money directly to the bank, therefore negating the need for transmittal accounts. I told him that it sounded fine to me but I suggested that he firm up his idea and submit it as an advisory opinion request. This would give the Commission an opportunity to rule on subject for the public record. (By putting it on the public record, other Unions could look at it and possibly implement a similar system.)

Concerning his first question, I told him that I would look into what the commission would consider an adequate response to the RFAI and I would call him back later in the week.

(A)

81040301506

60

Telecon for files:

From: Bill Schmelling

To: Kevin Kelly

Date: 1/18/80

RE: Response to RFAI & RTB

Mr. Schmelling returned my call of earlier this afternoon. I advised him to respond to the Commission's request by stating that the information contained in their reports is the truth and accurately reflects the activity of the committee, if indeed this is the case. (See previous telecons) Mr. Schmelling inquired as to the result of this would be. I told him that presently the FEC was undergoing some internal adjustments (Change in referral policy) and that I could not advise him as to the problems. In the future, however, the committee will be filing under the requirements of the FECA as recently amended. I told Mr. Schmelling that the new requirements state that contributions under \$50 need not be transferred until 30 days which puts the committee in a more realistic position to comply with the Act. He asked for a copy of the amendments which I did not have. I referred him to the public law # for reference (PL96-187)

81040301507

("A")

61



FEDERAL ELECTION COMMISSION

125 A STREET NW
WASHINGTON, DC 20541

FEB 19 1980

Mr. Frank S. McKee, Treasurer
United Steelworkers of America
Political Action Fund
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

During review of the August Monthly - 1979 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Kevin Kelly in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

("A")

81040301508

62

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

TO United Steelworkers of America
Political Action Fund

DATE: FEB 19 1980
I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE August Monthly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 8/1/79 THROUGH 8/31/79
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☒ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the report. Please resubmit a signed copy of your report.*
- ☒ Other: Please see page three.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above addressee. If you have any questions regarding this request, please call the Reports Analysis Division toll free at 1-800-953-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House, Non-Party), or 523-4474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 1150 D St. N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

63

FEB 19 1980

Request for Additional Information
Page Three

United Steelworkers of America Political Action Fund
August Monthly Report

Your report discloses an expenditure on July 7, 1979 to Gold Star Hat & Cap. As the particulars of this expenditure you state "Pay for caps which were sold." Please be advised that 11 C.F.R. 114.5(a) prohibits a separate segregated fund from making contributions or expenditures which utilize monies obtained in any commercial transaction. Further, Advisory Opinions 1976-18 and 1979-63 reinforce this prohibition. (Copies Enclosed) Please amend your reports to disclose whether the monies obtained from the sale of the caps were deposited in the separate segregated fund. In addition, please explain why this July expenditure is reported in your August filing.

81040391510

(A)



64

FEDERAL ELECTION COMMISSION

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

10/23/76

REPORT OF THE COMPLIANCE REVIEW SECTION
OFFICE OF DISCLOSURE AND COMPLIANCE
FEDERAL ELECTION COMMISSION
ON
// UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

I. Background

81040391511

This report covers an audit of the United Steelworkers of America Political Action Fund undertaken by the Compliance Review Section staff of the Federal Election Commission to determine whether there has been compliance with the Federal Election Campaign Act ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of the Act which directs the Commission to conduct audits and field investigations with respect to reports and statements filed under the Act.

The United Steelworkers of American (USWA) is an affiliated member of the AFL-CIO. The USWA Political Action Fund was established for the purpose of receiving contributions from local union members and friends to be used to further the interests of the organization in the fields of political action and education.

The Political Action Fund Committee is financially administered by a committee of the International Officers of the USWA. The Committee is financed by voluntary contributions from its members by (1) a payroll check-off plan, (2) special fundraising activities, and (3) ongoing subscriptions. Campaign disbursements are made via written approval of the USWA Treasurer in response to requests generally originating at the district and local union levels.

During the period audited, January 1, 1975 through March 31, 1976, the USWA reported total receipts of \$348,117.61 and total expenditures of \$142,895.74. The officers of the Committee are Walter J. Burke, Treasurer, and I.W. Abel, Chairman. Committee offices are located at 5 Gateway Center, Pittsburgh, Pennsylvania, 15222.

II. Findings and Conclusions

A. The Committee Statement of Organization indicates that it has a single depository. Committee records indicate that several district and



local unions maintain transmittal accounts into which political contributions are deposited and from which transfers are made to the depository reflected on the Statement of Organization.

Title 2, U.S.C. Section 437b(a)(2) requires that all contributions received by a political committee be deposited in designated depositories, and all expenditures, except for petty cash, be made by check drawn on such account. Section 433(b)(9) requires that all banks, safety deposit boxes, and other depositories used by the committee be recorded on the Statement of Organization.

All expenditures made by a political committee must be made from a campaign depository unless the expenditure is made from treasury funds. If the local unions make expenditures (other than expenditures from treasury funds), either before or after the contributions are deposited in the "transmittal account," the account should be considered a campaign depository. The national union can either pay the local expenses from its designated campaign depository or designate the "transmittal account" a campaign depository and allow the local to pay for expenses from contributions received.

B. Committee records indicate that many local unions receive political contributions which are deposited in personal checking accounts, local union accounts, and in accounts of employer organizations, some of which are incorporated, and subsequently transferred to the Committee. Title 2, U.S.C. 432(b) states in part that funds of a political committee shall be segregated from and may not be commingled with the personal funds of any officers, members or associates of such committee. Members of local unions should be instructed not to deposit political contributions received in personal, union or corporate accounts for subsequent transfer to the Committee depository.

The Committee has advised their collectors at the local level that the USWA Political Action Fund will not accept any checks drawn on their personal accounts or union or corporate accounts.

C. Committee records indicate that the Committee is not consistent in reporting political contributions received from the voluntary payroll check-off program. Itemized contributions are reported in the time period during which the funds are withheld from the contributor's salary, but not yet received by the Committee. The unitemized contribution figure represents total receipts for the period less the amount of the itemized contributions. All contributions should be reported during the period received by the Committee (2 U.S.C. 434(b)(2)).

The Committee has advised that they are now reporting all contributions received by the Fund on a cash reporting basis.

D. Committee records indicate that political contributions received by the local and district unions are not transferred and reported to the Committee promptly. Title 2 U.S.C. 432(b) requires that any person

81040301512

("A")

66

who receives a contribution in excess of \$50.00, including those deposited in a transmittal account not considered a committee depository, shall make a detailed accounting to the committee of such receipts no more than five (5) days after receipt. The Committee should instruct fundraisers to make such an accounting.

Committee officials have stated that their fundraisers will be advised of the requirements of 2 U.S.C. 432(b).

E. Committee records indicate that some political contributions are received by local and district unions through collections and fundraising activities. Our review of Committee reports, however, discloses neither a separate reporting of the proceeds from such events, nor the expenditures made in connection with the events. Title 2, U.S.C. Section 434(b)(6), (9), (10) and (11) require the listing of all receipts and expenditures from collections and fundraising activities. Total receipts from such activities would be reported by date and event on FEC Schedule D and the expenses involved with such activities would be reported on FEC Schedule B.

Assuming the fundraising costs are being paid out of voluntary money, the Committee would be required to list the expenditures relating to each event. This can be accomplished by requiring the local union to inform the Committee of that part of the contribution total retained to meet expenditures. That figure would then be reported by the Committee as a fundraising expenditure. If the expenditures are not reported by the Committee, the local union will have been deemed to have made the expenditure.

III. Recommendations

It is recommended that the Commission accept the Compliance Review Section staff's position outlined above. It is further recommended that the Commission advise the Committee of these findings, particularly Finding A, in which the Commission determined that, if expenditures are made from the "transmittal accounts," these accounts are in fact depositories of the Committee and Finding E, in which the Commission determined that collection and fundraising expenditures, paid from voluntary money, have to be reported by the Committee.

81040391513

(A)

67

United Steelworkers of America

AFL-CIO JUL 26 AM 10:02

FIVE GATEWAY CENTER PITTSBURGH, PA. 15222

July 23, 1979

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

Dear Ms. Brown:

Confirming our telephone conversation of this date, enclosed is a copy of our letter of November 16, 1976 along with the Directives for Fundraisers. We never received a response from the Commission regarding this letter.

Sincerely,

Thomas F. Carpenter
Thomas F. Carpenter
Political Action

TFC:njt

Enclosure

8190430130348147

("A")

65
United Steelworkers of America

POLITICAL ACTION FUND

**FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
862-2400**

**I. W. ABEL
CHAIRMAN**

**WALTER J. BURKE
SECRETARY-TREASURER**

November 16, 1976

Mr. Vernon W. Thomson, Chairman
Mr. Thomas E. Harris, Vice Chairman
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Gentlemen:

I am in receipt of your letter dated October 28, 1976, concerning the Commission's adoption on that date of the FEC Compliance Review Section staff report on the United Steelworkers of America Political Action Fund.

With regard to Finding A, which you specifically noted in your letter, it is our understanding, based on a telephone conversation with Joseph Stoltz of the FEC's Compliance Review Staff, that as long as the "transmittal accounts" are used only to transmit contributions to the depository designated in our committee's Statement of Organization and are not used for any expenditures, such transmittal accounts will not be considered "campaign depositories" within the meaning of 2 U.S.C., Section 437b(a)(2) or bank accounts or other depositories of the USWA Political Action Fund within the meaning of 2 U.S.C., Section 433(b)(9). Accordingly, we will advise our local union, district and subdistrict offices that such transmittal accounts should not be used for any purpose other than prompt transmittal of collected contributions to our committee offices for deposit in the designated campaign depository.

With regard to Finding E of the Compliance Review Section staff report, we are advising our local fundraisers and collectors to avoid using voluntary money for fundraising activities wherever possible and to stay within the limitations, guidelines and reasonable practices set forth by the FEC in Section 114.5 of the proposed regulations. However, whenever voluntary funds are expended in fundraising activities, we are requiring our fundraisers and collectors to furnish us with the information suggested in Finding E. In this connection, please find enclosed an excerpt from a draft of written directives which we anticipate sending to our local fundraisers and collectors, many of whom already have been advised of these requirements concerning receipts for voluntary fund expenditures and records of fundraising events.

"A"

The United Steelworkers of America Political Action Fund is an independent political committee which does not ask for or accept authorization from any candidate and no candidate is responsible for its activities.
(A copy of our report is filed with the Federal Election Commission and is available for purchase from

69

-2-

Please advise me if the Commission does not approve of the steps we are taking in response to the FEC's adoption of its Compliance Review Section staff report.

Sincerely,

WALTER J. BURKE
Secretary-Treasurer

Enclosure: Directives for Fund Raisers,
8/3/76 draft, pages 12-15.

819031334819
81040301516

'A'

this five day report, indicating the date on which the original was sent to Walter J. Burke, should be retained by the collector. If a Voluntary Fund collector receives a check or other contribution in any amount from a corporation or a local union, the contribution should be returned to the contributor with the explanation that our Voluntary Fund cannot accept corporate or union contributions.

B. Receipts For Voluntary Fund Expenditures.

As we noted above in Part I, C of this memorandum, union dues funds may be used to raise voluntary funds and to establish and administer a separate segregated political action fund such as the Voluntary Account of the USWA Political Action Fund. Dues funds also may be used for communications by the Union to its members and in non-partisan voter registration and get-out-the-vote activities. Except for the purposes of fulfilling the new requirements for reporting the direct dues funds expenses of communications which expressly advocate the election or defeat of a clearly identified candidate and which cost more than \$2000, as described in Part I, B above, no records or reports of such dues fund expenditures are required by the Federal Election Campaign Act.

In the limited circumstances, however, where voluntary money is spent, for any purpose, the record keeping and reporting requirements of the law come into play. It could be argued that if such voluntary money expenditures are made at the local union, district or sub-district level with voluntary dollars before they are ever transmitted to Pittsburgh, then the record keeping requirements of the law should

18790433151820
"A"

not apply. Nonetheless, it will be more practicable from an internal accounting standpoint and in compliance with Section 102.9 of the Regulations proposed by the FEC if the following procedures are followed whenever voluntary dollars are spent:

1. A written account must be made of all voluntary money expenditures and must include:
 - a. The full name and the full address of every person to whom an expenditure is made,
 - b. The date of the expenditure,
 - c. The amount of the expenditure, and
 - d. The name of and office sought by any candidate to whom or on whose behalf such a voluntary fund expenditure is made.
2. Whenever a Voluntary Fund expenditure in excess of \$100 is made to any person or if expenditures in lesser amounts to such a person total more than \$100 in a calendar year, then either a receipted bill must be obtained from such person or an invoice must be obtained and retained with a Voluntary Fund canceled check. Either the receipted bill or invoice and check must contain the following information:
 - a. The full name and address of the person to whom the expenditure is made,
 - b. The amount of the expenditure,
 - c. The purpose of the expenditure, and
 - d. Date the expenditure was made.

Under the FEC's proposed regulations, the foregoing requirements are imposed on Walter Burke, the treasurer of our Voluntary Account, and on any "agent authorized by the treasurer to receive contributions" to the Voluntary Account. All district, sub-district and local union collectors are such agents and must therefore comply with these requirements.

(A)

1818246334931

C. Records of Fund Raising Events
 and Mass Collections

29
8
45
30
30
30
24
70
8
1

As we mentioned at the end of Part I, C, above, the FEC has indicated that a "reasonable practice" for a labor union to follow in conducting such fund raising endeavors as raffles, dinners and the like is to pay for the cost of such endeavors with dues funds to the extent that the voluntary money raised through a given affair or event is roughly three times as much as the dues money expended. There is no obligation to report such dues fund expenditures to the FEC. Occasionally there are situations, however, where our local union, district or sub-district fund raisers may find it more convenient to finance such fund raising efforts with part of the voluntary money which is collected. Moreover, it is difficult to know before the conclusion of some such events whether or not the total voluntary dollar proceeds will be roughly three times the cost of the event.

In any case, whenever voluntary funds are expended -- either before or after transmittal of such funds to the Pittsburgh office -- we will be able to account for such expenditures if all local union, district and sub-district fund raisers establish and maintain records of their fund raising activities so that appropriate information can accompany the funds which are transmitted to Pittsburgh for deposit in the Voluntary Account. Such records should include:

- ("A")
1. The date, location and nature of each dinner, rally, golf tournament or other fund raising event;
 2. The total proceeds received from ticket sales, mass collections, the sale of merchandise or other contributions to each such event;
- 1

- 8 7 2 2 3 4 3 7 7 4 2 3 5

IV.

Under our present procedures, the preferred and most feasible means of transmitting voluntary contributions which have been collected in the field are:

1. Checks drawn on USWA Political Action Fund Transmittal Accounts opened specifically and exclusively for the purpose of holding and transmitting voluntary funds;
2. Bank or cashiers' checks; and,
3. Postal money orders.

account sho
("A")

74

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

DIRECTIVES FOR FUNDRAISERS

TEXT

The following comments and directives are based upon our legal advisers' understanding of the requirements which are imposed on the political action fundraising and related activities of the United Steelworkers of America and the Voluntary Account of its Political Action Fund. Some of these requirements first became effective on May 11, 1976, when the most recent amendments to the Federal Election Campaign Act (FECA) were signed into law; others have been required by the law and been part of the United Steelworkers of America's procedure for some time and still others are set forth at this time pursuant to our continuing desire to follow practicable internal procedures which will enable the Political Action Fund to function efficiently and effectively:

These directives are grouped into six subject areas:

- I. Dues Fund Expenditures in Connection with Federal Elections;
- II. Soliciting Voluntary Contributions;
- III. Record Keeping by Fundraisers;
- IV. Segregation and Transmittal of Voluntary Funds;
- V. Contributions to Federal Candidates and Committees; and,
- VI. Penalties

NOTE: These directives deal with our attorneys' understandings of the legal requirements imposed by Federal law. Most states have laws that deal with some or all of the subjects covered in the following pages; however, the requirements of State Election Laws are not dealt with in these directives. If information is needed concerning State Election Laws, please seek assistance through your District Director.

I. DUES FUND EXPENDITURES IN CONNECTION WITH FEDERAL ELECTIONS

Important aspects of the collection, recording, segregation and transmittal of voluntary contributions to the United Steelworkers of America Political Action Fund are set forth in parts II through IV of these directives. In this first part, however, we discuss the permissible uses which can be made of union dues funds and a new record keeping and reporting requirement which applies to certain dues fund expenditures. **SUBJECT TO THE EXCEPTIONS DESCRIBED UNDER A, B, AND C BELOW, IT IS UNLAWFUL FOR A UNION TO USE DUES MONEY FOR ANY CONTRIBUTION OR EXPENDITURE IN CONNECTION WITH ANY FEDERAL ELECTION.**

HIGHLIGHTS

The Federal Election Campaign Act, as amended in 1976, (FECA) and the rules adopted by the Federal Election Commission (FEC) are now in effect. There are many important changes covered in these Directives.

These directives reflect the legal requirements imposed by **FEDERAL LAW**, and do not reflect any of the requirements of State law or laws which may be applicable.

It is unlawful to spend union dues money or union treasury funds in connection with any federal election unless such expenditures are made under any of the exceptions discussed in this part I.

"A"

75

TEXT

For example—

- ... union dues funds may not be used for making contributions to candidates for federal office;
- ... union dues funds may not be used for making contributions to political parties or political committees which support candidates for federal office;
- ... union dues funds may not be used for purchasing tickets to fund-raising events for candidates for federal office or for purchasing fund-raising items for such events;
- ... union dues funds may not be used for communications which are directed at the general public and which expressly advocate the election or defeat of a candidate or candidates for federal office;
- ... union dues funds may not be used to pay for any expenses for a candidate for federal office or members of his campaign staff.

There are specific exceptions to the general prohibitions against the use of union dues money in connection with federal elections. The details of these exceptions are set forth below.

A. UNION DUES FUNDS MAY BE USED FOR NON-PARTISAN VOTER REGISTRATION AND GET-OUT-THE-VOTE ACTIVITIES.

The cost of non-partisan activities to encourage or assist Steelworkers and their families to register to vote or to transport Steelworkers and their families to and from the polls may be paid with Steelworkers' dues money. For these purposes, "non-partisan activities" generally means that no effort is made to learn what party or candidates the member or his family supports in connection with such voter registration or get-out-the-vote activities.

The term "member" is used in more than one section of the FECA, but that term is not defined in the Act itself. However, Section 114.1(e) of the Federal Election Commission (FEC) regulations provides a definition of "member." Based on the legislative history of the 1974 amendments to the FECA, that regulation defines "members" of a labor organization as including:

"... all persons who are currently satisfying the requirements for membership in a local, national or international labor organization ... and of any federation with which the local, national or international union is affiliated."

It is the opinion of our legal advisers that this means, among other things, that unions may contribute their money and manpower to joint committees, such as those maintained by the AFL-CIO and state and local central AFL-CIO bodies, established to register or get-out-the-vote or, under the next exception, to communicate with AFL-CIO members and their families on either a national, state or local basis.

Dues money also may be used by the Steelworkers or any of its local unions to finance voter registration and get-out-the-vote activities aimed at the general public if such broader campaigns are (1) jointly sponsored with an organization—such as the League of Women Voters—which does not endorse candidates, and (2) actually conducted by such other organization.

B. UNION DUES FUNDS MAY BE USED FOR COMMUNICATIONS ON ANY SUBJECT FROM THE UNION TO ITS MEMBERS AND THEIR FAMILIES.

Dues money may be used to pay the indirect and direct costs of messages and communications on any subject—including those which urge our members and their families to vote for or against certain candidates for federal office—from the Union to its members and their families.

HIGHLIGHTS

Some examples of unlawful dues fund expenditures.

EXCEPTION A

Union dues funds may be used for non-partisan voter registration or get-out-the-vote activity among union members and their families.

"Member" as it is used in both these exceptions and the next one includes those persons who are members of a local, national or international labor organization or any federation with which the local, national or international is affiliated.

EXCEPTION B

Union dues funds may be used for communications on any subject from the union to its members and their families. For example—union dues funds may be used to urge our members and their families to vote for certain candidates for federal office.

"A"

76

TEXT

As noted above, the definition of "member" is such that the dues money or manpower of a union can be contributed to the AFL-CIO or a state or local central AFL-CIO body for use in communicating with AFL-CIO members about which candidates they should vote for or against.

The amount of dues money which a union can expend on political communications to its members and their families is unlimited, but, in certain very narrow circumstances, those dues fund expenditures which are directly attributable to such communications must be reported to the Federal Election Commission. The limited circumstances in which such union dues fund expenditures must be reported are when all three of the following exist:

- (1) If the communication expressly advocates the election or defeat of a clearly identified candidate(s) for federal office; and,
- (2) If the communication is not primarily devoted to subjects other than express advocacy of the election or defeat of such a clearly identified candidate(s); and,
- (3) If, in connection with any single election, the costs of such communications concerning such candidate(s) are more than \$2,000.

"Clearly identified candidate" is defined in the 1976 amendments to mean (1) the name of the candidate appears, (2) a photograph or drawing of the candidate appears or (3) the identity of the candidate is apparent by unambiguous reference. For the purpose of the \$2,000 reporting requirement only, all primary elections for federal office conducted during a calendar year are considered to be one election; and all general elections conducted in a calendar year are considered to be one election. The meaning of "directly attributable" costs of such limited communications is not defined in the law; but the legislative history shows that this phrase is intended to refer to such easily separable, added costs as those for paper and postage and not to such on-going overhead costs as those for union employee time or the value of the use of union equipment.

It is important to note that this limited reporting requirement, which is provided by 2 U.S.C. Section 431(f) (4) (C), does not impose a prohibition or limitation on the use of dues funds by a union for communications with its members or their families. The only requirement is that when dues fund expenditures—by any local union or by the International Union—exceed \$2,000 in any election and the other limited circumstances listed above exist, then those expenditures must be reported to the FEC*. Moreover, even this limited reporting requirement does not apply if the communication which expressly advocates the election or defeat of a candidate is part of a broader communication—such as *Steel Labor*, a district newsletter or a local union newspaper—which is "primarily devoted to subjects other than express advocacy of the election or defeat of a clearly identified candidate."

The following examples of internal political communications (those to our members and their families) may provide some guidance in understanding the scope of this new reporting requirement:

Example 1: If the International Union incurs printing and mailing costs of \$5,000 for a letter to its members in state A urging them to vote in the general election for X, a candidate for the United States Senate, the International Union is required to report that \$5,000 dues fund expenditure to the FEC.

Example 2A: If Local Union 0000 mails three different flyers to its members urging them to vote against Y, who is running in a primary

*Each local union which makes such express advocacy communication expenditures has its own responsibility to comply with this reporting requirement. If you have any reason to believe that your local union is required to report such expenditures to the Federal Election Commission, please seek assistance through your District Director.

HIGHLIGHTS

Caution—Such express advocacy expenditures must be reported to the FEC under certain conditions when specified threshold limits are reached.

If more than \$2000.00 is spent expressly advocating the election or defeat of a candidate for federal office in any election, reporting to the FEC on Form 7 is required.

NOTE:

1. All primary elections for federal offices conducted during any calendar year are considered to be one election.
2. All general elections for federal offices conducted during any calendar year are considered to be one election.

TEXT

HIGHLIGHTS

election for a United States House of Representatives seat and the printing and mailing costs of those three flyers totals \$1,500, those costs, paid with Local Union 0000 dues funds, do not have to be reported.

Example 2B: If Y wins the primary and in all of the issues of Local Union 0000's newspaper which are published between the primary and general election more than two pages of the four-page paper are devoted to general news and commentary, but one of the four pages is devoted entirely to Local Union's 0000's endorsement of Y, no part of the cost of printing and distribution of the local union paper has to be reported because the newspaper is primarily devoted to subjects other than express advocacy of the election of Y.

Example 3A: If, between the time of the national nominating convention and the general election, the International Union spends \$12,000 in dues funds for direct mailings to its members urging them not to vote for presidential candidate Z and the USWA District 00 spends an additional \$1,500 for printing flyers which also urge members not to vote for Z, the total \$13,500 dues fund expenditures must be reported by the International Union to the FEC.*

Example 3B: If, in addition, Local Union 0000 spends \$2,100 for printing and mailing similar flyers to its members urging them to vote against Z, Local Union 0000 has its own separate responsibility to report those expenditures to the FEC.

There are numerous variations of internal union communications, some of which the FEC may assert—in regulations or other action—are subject to these reporting requirements. The important point for each local union to observe, however, is that each local must keep careful records of all dues money expenditures which are directly incurred in urging its members and their families to vote for or against any candidate for federal office. If such expenditures exceed \$2,000 (except when such costs are incurred in the publication of a local union newspaper which is "primarily devoted" to non-political subjects) in connection with any single federal election, a report (FEC Form 7) concerning those expenditures must be filed with the FEC.†

In addition to the new reporting requirements which became effective on May 11, 1976, some mention should be made at this point of the types of communications which probably would not be considered lawful by the FEC under the internal communications exceptions which is discussed in this Part I-B of these directives. Section 321 of the Federal Election Campaign Act (2USC441b), as amended, formerly was contained in the federal criminal code as 18 U.S.C. Section 610 and was interpreted by the Supreme Court in certain landmark cases. Those cases and the legislative history of the 1971 Act and the 1976 amendments indicate that the dues fund financed communications permitted under 2 U.S.C. Section 441b are those which are in writing, by telephone or in the form of speeches or other direct oral comment directed by the Union to only its members and their families, but not to the general public. Thus, radio, television or other broadcast announcements in connection with federal elections by a local union aimed at its members and their families, but which also reaches the general public, would not be considered by the FEC to be within the internal communications exception. Similarly, a general circulation newspaper advertisement or notice by a union concerning federal elections, even if it purports to be

*Such "express advocacy" expenses by a District, in contrast to such expenditures by local unions, are International Union dues fund expenditures for the purpose of this reporting requirement.

†For the purposes of this reporting requirement, all primary elections for federal offices, wherever or whenever held, are considered to be one election; all general elections for federal offices, wherever or whenever held, are also considered to be one election.

78

TEXT

only for the benefit of the union's members and their families, also would be read by the general public and therefore would be considered unlawful by the FEC.

Under FEC regulations, political communications by a union to its members and their families must be the views of the union—not simply a restatement or reproduction of the candidates views or statements. Moreover, such communications must be printed or otherwise produced at the union's expense—not at the candidate's or some outside political organization's expense.

In addition, it is unlawful for a union to allow a candidate, a candidate's committee, or any other outside political organization to use the union's postage permits.

C. UNION DUES FUNDS MAY BE USED IN ESTABLISHING, ADMINISTERING AND SOLICITING CONTRIBUTIONS TO A SEPARATE SEGREGATED POLITICAL ACTION FUND.

A third permissible use of union dues money in connection with federal elections is that a union may spend dues money to solicit voluntary contributions from members of the Union and their families to a separate political fund and to establish and administer such a fund. Consistent with the policy adopted by the International Executive Board in 1973, the only political action fund of our Union which is used to support candidates for federal political office is the Voluntary Account of the United Steelworkers of America Political Action Fund. That Voluntary Account is used primarily for making contributions to candidates and the committees of candidates for various federal elective offices.

The establishment or restructuring of the Political Action Fund's separate Voluntary Account to meet both practical and legal requirements, as well as such day-to-day administrative expenses of the Voluntary Account as those incurred in compiling and filing reports, printing and mailing fundraising literature and the related overhead expenses associated with such activities are all clearly included within this third exception to the general prohibition of 2 U.S.C. Section 441b. More difficult questions under this third exception have arisen, however, concerning solicitation costs.

In FEC regulations, the FEC has suggested a "reasonable practice" which may be followed in using dues funds to cover costs incident to traditional fundraising activities. Such costs include those for raffle prizes, or prizes for the most successful ticket sellers, mailings, and those for food, beverage and hall rental which may be incurred in connection with fundraising dinners or other endeavors. The "reasonable practice" established by the FEC is that dues funds may be used to pay such costs to the extent that such costs do not exceed approximately one-third of the voluntary money raised, and that any costs in excess of one-third must be paid with as much of the voluntary money which is raised as is necessary to achieve that one for three ratio.

Certain record-keeping requirements which may be applicable to your fundraising activities are set forth in Part III of these Directives.

II. SOLICITING VOLUNTARY CONTRIBUTIONS

Any natural person may voluntarily contribute to our PAC fund. But, under the 1976 FECA Amendments, a labor union may ask for such contributions only from members and their families. Generally, corporations and their political action committees must limit their contribution requests to their stockholders and management employees. It continues to be unlawful for any corporation or labor organization,

HIGHLIGHTS

EXCEPTION C

Union dues funds may be used in establishing, administering and soliciting contributions to a separate segregated Political Action Fund. The USWA Political Action Fund-Voluntary Account is such a fund.

CAUTION—In spending dues funds to pay the costs of raising voluntary funds, the FEC has established a general rule that funds raised should be at least three times the amount of dues funds expended.

PAC VOLUNTARY COLLECTIONS

In soliciting voluntary contributions, including ticket sales:

- (1) Only Steelworkers and their families may be asked to contribute (other

8790431334833

("A")

79

TEXT

including a USWA local union or a non-Steelworker union, to make dues fund contributions—in the form of ticket purchases or otherwise—to our Political Action Fund's Voluntary Account.

In enacting the 1976 Amendments to the FECA, the Congress supplemented the existing prohibitions of 2 U.S.C. Section 441b (b) (3) against employer or union coercion in seeking political action contributions by adding the following additional safeguards:

"(3) It shall be unlawful . . .

(B) For any person soliciting an employee for a contribution to such a fund to fail to inform such employee of the political purposes of such fund at the time of such solicitation; and,

(C) For any person soliciting an employee for a contribution to such a fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without any reprisal."

Both the FEC's regulations and the legislative history of these new requirements confirm that "employee" as used in this section includes "members" of a labor union. These new safeguards are applicable to solicitations of \$2.00 PAC memberships, Victory 7- cards, dinner and raffle tickets and to all other fundraising activities.

One method of complying with the new requirements is for all United Steelworkers of America Political Action Fund receipts, Victory 7- cards, tickets and other fundraising material to carry a notice such as the following:

"The United Steelworkers of America Political Action Fund supports various candidates for federal and other elective office, is connected with the United Steelworkers of America, a labor organization, and solicits and accepts only voluntary contributions in its own fundraising efforts and in joint fundraising efforts with the AFL-CIO and its Committee on Political Education."

This and other legends which now are required for PAC receipts and other fundraising materials are set forth in Appendix A which is attached to these Directives. If the above-quoted notice is not printed or written on solicitation material or if no printed or written material is used in the solicitation process, any person who solicits voluntary contributions on behalf of the Voluntary Fund must orally give this notice.

A modification of the general rules limiting the classes of persons from whom corporations and labor unions may solicit contributions to voluntary PAC Funds is that twice each calendar year, a corporation may solicit such contributions from non-management personnel—including Union members—and a Union may make similar solicitations directed at non-members of the Union who are employees or stockholders of a corporation with which the Union has a collective bargaining relationship. Such twice yearly solicitations must be in writing. The FEC's regulations specify procedures which must be followed in making such twice yearly solicitations.

Questions concerning these procedures should be channeled through your District Director.

An important modification in the law which could make the collection of Voluntary PAC Contributions from our members easier was added to the FECA as one of the 1976 amendments. That amendment provides that "notwithstanding any other law, any method of soliciting voluntary contributions or of facilitating the making of voluntary contributions" to a political fund that a corporation may lawfully use is also available to

HIGHLIGHTS

persons may contribute but cannot be asked to do so).

(2) The contributor must be made aware that he is contributing to a political fund.

(3) The contributor must be made aware that he has a right to refuse to contribute.

Certain legends for printed materials, including solicitation material, are included in Appendix A.

If voluntary PAC contributions are solicited without the use of printed materials, then the person making such solicitation is required to inform the prospective donor that the contributions are being made to a political fund and that he has a right to refuse to contribute.

The law now permits two written solicitations each year by the Union of non-union management personnel and stockholders for voluntary PAC contributions under certain conditions.

Labor unions now, in certain circumstances, may utilize checkoff procedures designed to collect voluntary PAC contributions from their members.

"A"

80

TEXT

unions. The most obvious and important application of this provision is that since it is lawful for a corporation to establish a check-off system for management personnel, it is also lawful for a corporation to agree to permit union members to check off voluntary contributions to a union political fund.

The Congress coupled the foregoing provision with another which may also be of practical importance. It states:

"Any corporation, including its subsidiaries, branches, divisions and affiliates that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions and affiliates."

Thus, for example, if a corporation actually employs a check-off system for management personnel, any union representing one or more bargaining units of employees at that corporation—at the same or any other location or facility—is automatically entitled to use the check-off system as well, so long as the union reimburses the corporation for any added expenses incurred. By the same token, if the corporation utilizes a computer mailing system in soliciting management personnel, the union would be entitled, at its cost, also to use that system in soliciting its members. Or, if the corporation solicited management personnel on company time and company property, the union would have the same right. Enjoyment of these rights depends on a written union request.

Assistance in making such written requests is available through your District Director.

III. RECORD KEEPING BY COLLECTORS

In these Directives, the terms "solicitor," "collector" and "fundraiser" are used interchangeably to refer to local union, district or subdistrict representatives who receive contributions on behalf of the Political Action Fund's Voluntary Account. Although the PAC Section in our Pittsburgh office has assumed most of the record keeping obligations which are imposed by the law on committees such as the Political Action Fund, certain record keeping functions also are the responsibility of our collectors in the field. Both independent auditors and investigators from the Federal Election Commission reviewed our internal accounting procedures in 1976. Based upon their suggestions, as well as the requirements of the law, we have concluded that the following, uncomplicated procedures must be followed by all USWA Political Action Fund collectors.

If a Voluntary Fund collector receives a check or other contribution in any amount from a corporation or a local union, the contribution should be returned to the contributor with the explanation that our Voluntary Fund cannot accept corporation or union contributions.

A. CONTRIBUTIONS OF MORE THAN \$50 BY AN INDIVIDUAL

Whenever the contributions of any person aggregate more than \$50 during the calendar year, or whenever any person makes a single contribution of more than \$50, the collector who receives such contributions must send a written report of the dates and the amounts of the contributions and the full name and full address of the contributor to the Treasurer of the USWA's PAC Fund within five days of the receipt of the contribution. If such individual contributions exceed \$100, the report must also include the contributor's occupation.

*In June 1977, the FEC began the process of formulating proposed regulations concerning this new provision of the FECA and 2 U.S.C. 441b(b)(5).

HIGHLIGHTS

The International's PAC Fund-Voluntary Account is required by law—and by FEC regulations issued pursuant to that law—to keep certain records and to follow certain procedures, some of which are set forth below.

Individual reports are required within FIVE DAYS for those individuals who contribute more than \$50.00 at one time or more than \$50.00 in the aggregate during the calendar year. (See Appendix B for an example of a Collector's Report form.)

81

TEXT

In most instances, the collector will be able to obtain the required information from the personal check of the contributor. A copy of this five-day report, indicating the date on which the original was sent to the USWA-PAC Treasurer, should be retained by the collector. An example of such a five-day collector's report is attached as Appendix B.

B. RECEIPTS FOR VOLUNTARY FUND EXPENDITURES

As we noted before in Part I, C of these Directives, union dues funds may be used to raise voluntary funds and to establish and administer a separate segregated political action fund such as the Voluntary Account of the USWA Political Action Fund.

The type of funds which are expended for fundraising activities should be, wherever possible, dues funds. In some limited circumstances, however, it may be necessary or practical to use voluntary money to raise voluntary funds.

In such limited circumstances, where voluntary money is spent for any purpose, including such fundraising purposes, the record keeping and reporting requirements of the law come into play. Even when such voluntary money expenditures are made at the local union, district or sub-district level with voluntary dollars before they are ever transmitted to the USWA's PAC Treasurer the record keeping requirements of the law apply. Moreover, whenever voluntary dollars are expended at the local union, sub-district or district level, it is necessary from an internal accounting standpoint that the following procedures be followed:

1. A written account must be made of all expenditures of voluntary money and must include:
 - a. The full name and full address of every person to whom an expenditure is made,
 - b. The date of the expenditure,
 - c. The amount of the expenditure,
 - d. The purpose of the expenditure, and
 - e. If applicable, the name of and office sought by any candidate to whom or on whose behalf such a voluntary fund expenditure is made.
2. Whenever a Voluntary Fund expenditure in excess of \$100 is made to any person or if expenditures in lesser amounts to such a person total more than \$100 in a calendar year, then either a receipted bill must be obtained from such person or an invoice must be obtained and retained with a Voluntary Fund canceled check. Either the receipted bill or invoice and check must contain the information specified above.

Under the FEC's regulations, the foregoing requirements are imposed on USWA's PAC Treasurer, and on any "agent authorized by the treasurer to receive contributions" to the Voluntary Account. All district, sub-district and local union collectors are such agents and must therefore comply with these requirements.

C. RECORDS OF FUNDRAISING EVENTS AND MASS COLLECTIONS

As we mentioned at the end of Part I, C, above, the FEC has indicated that a "reasonable practice" for a labor union to follow in conducting such fundraising endeavors as raffles, dinners and the like is to pay for the cost of such endeavors with dues funds to the extent that the voluntary money raised through a given affair or event is approximately three

HIGHLIGHTS

Please note that such contributions exceeding \$50 could be in the form of ticket purchase payments as well as Victory 7_ or \$2.00 PAC membership card payments or direct contributions or contributions by check-off.

Wherever possible, dues funds should be used to finance fundraising activities. If it becomes necessary to use PAC Voluntary funds to pay expenses in connection with raising Voluntary funds (such as cost of printing, for prizes, etc.), it is most important that proper records be kept and that a receipt be obtained for each expenditure.

Record keeping for fundraising affairs and mass collections at rallies and meetings must be observed by local union, sub-district and district level collectors.

82

TEXT

times as much as the dues money expended. While there is no specific FEC reporting requirement with respect to such dues fund expenditures, the International Union must, nonetheless, have a full accounting of all such fundraisers. Aside from the fact that such an accounting is consistent with good financial practices and our general policy, we can never be certain whether it may become necessary to use some of the *voluntary money* to fund the event, thus invoking the reporting requirements of Part III, B above.

Therefore, all local union, district and sub-district fundraisers must establish and maintain records of each such fundraising activity so that appropriate information can accompany the funds which are transmitted to Pittsburgh for deposit in the Voluntary Account. Such records should include:

1. The date, location and nature of each dinner, rally, golf tournament or other fundraising event;
2. The total proceeds received from ticket sales, mass collections, the sale of merchandise or other contributions to each such event, (if any one purchaser of tickets spends more than \$50.00, then the information requested in Part III A must be reported promptly);
3. If any voluntary funds are expended to cover costs such as those for food, beverages, hall rental, printing, prizes, gifts, green fees, entertainment or similar expenses of each such event, prepare an itemized list of each expenditure showing the payee, the date, amount and the purpose of each expenditure.
4. The amount of dues money spent to cover the types of expenses enumerated in 3, above; and, -
5. The approximate number of people who participated in or attended each such event.

There is attached a sample reporting form for these purposes marked Appendix C.

Assistance in maintaining appropriate records for such fundraising activities is available through your District Director.

IV. SEGREGATION AND TRANSMITTAL OF VOLUNTARY FUNDS

All voluntary contributions which are received by local union, district or sub-district collectors must remain separate from and cannot be commingled with any personal, union or corporation funds. It is the policy of the United Steelworkers of America Political Action Fund to return to the sender any union, or corporation money or any personal check which appears to have been used as a vehicle to transmit contributions of other persons.

Under our present procedures, the preferred and most feasible means of transmitting voluntary contributions which have been collected in the field are:

1. Checks drawn on USWA Political Action Fund Transmittal Accounts opened specifically and exclusively for the purpose of holding and transmitting voluntary funds;
2. Bank or cashiers' checks; and,
3. Postal money orders.

HIGHLIGHTS

ALL FUNDRAISERS MUST FILE REPORTS

All fundraisers must prepare and file reports of each fundraising event with the Treasurer of the USWA PAC Fund.

Please pay strict attention to this list of five items of information required to be submitted with the proceeds of each fundraising affair.

If two or more fundraising events are held in conjunction with each other (i.e. a dinner-dance during which a drawing is held for a raffle that involved a separate sale of tickets) separate records must be kept for each such event.

Voluntary receipts are not to be commingled with receipts from dues fund sources, and separate records of such receipts must be maintained.

If PAC Transmittal Accounts are used, they may be used only to receive Voluntary PAC Funds collected, to hold such funds and to transmit the same, to the Treasurer of the PAC Fund in Pittsburgh.

Voluntary funds raised cannot be commingled with union, corporation or personal funds.

- a. No Local Union checks will be accepted.
- b. No corporation funds can be accepted, nor may a corporation be requested to act as transmittal agent for voluntary funds raised by local fundraisers.
- c. No personal check will be accepted unless it is clear that such personal check represents the personal contribution of the person signing the check.

83

TEXT

These drafts should be made payable as follows: "USWA Political Action Fund."

The cost of maintaining a Transmittal Account or of purchasing bank or cashiers' checks or money orders can be paid with union dues funds. If a Transmittal Account is used, the name of the account should include a reference to the local union, district or sub-district as well as "USWA Political Action Fund Transmittal Account." If the collection and transmittal activity of the local union, district or sub-district extends for only a few weeks or months, it is advisable to close out the account once all the voluntary funds collected for a given year have been transmitted.*

V. CONTRIBUTIONS TO FEDERAL CANDIDATES AND COMMITTEES

Under the policy adopted by the USWA's International Executive Board in 1973, the function of making contributions to or expenditures on behalf of federal candidates with voluntary money was centralized in the International Union's Political Action Fund and all district, sub-district and local union collectors were designated collection and transmittal agents for the Voluntary Account. The major purpose for that centralization was to remove the burden of the detailed record keeping and reporting required under the 1971 Act from local unions, districts and sub-districts. An additional reason to continue that policy has been created by the 1976 amendments.

The USWA Political Action Fund Voluntary Account falls within the definition of a "multi-candidate political committee" and as such is subject to a limitation of \$5000 on the amount of voluntary money it may contribute to any single candidate and such candidate's committees in connection with each primary, runoff, general, or special election. Such a multi-candidate committee also is subject to a yearly limitation of: (a) \$15,000 in contributions to any political committee established by a national political party; and (b) \$5,000 in contributions to any other political committee. UNDER THE FEC REGULATIONS, CONTRIBUTIONS BY A COMMITTEE SET UP BY ANY LOCAL UNION, DISTRICT OR SUB-DISTRICT OF THE USWA MUST BE ADDED TO THE CONTRIBUTIONS MADE BY THE USWA'S PAC VOLUNTARY ACCOUNT ITSELF FOR DETERMINING WHETHER OR NOT THOSE CONTRIBUTION LIMITATIONS HAVE BEEN REACHED. IN ORDER FOR THE VOLUNTARY ACCOUNT TO AVOID MAKING CONTRIBUTIONS BEYOND THOSE LIMITATIONS AND THEREBY BECOMING SUBJECT TO THE PENALTIES OF THE LAW, IT IS CRUCIALLY IMPORTANT THAT NO LOCAL UNION, DISTRICT OR SUB-DISTRICT MAKE ANY CONTRIBUTION OF VOLUNTARY DOLLARS TO CANDIDATES FOR FEDERAL OFFICE OR TO THE POLITICAL COMMITTEES ESTABLISHED BY POLITICAL PARTIES. This will be done by the International Political Action Committee in consultation with the appropriate district or districts.

VI. PENALTIES

Civil penalties for non-willful violations of the FECA can be imposed up to the greater of \$5,000 or the amount of the illegal contributions or expenditures. If the FEC establishes through clear and convincing evidence that the violation was "knowing and willful," the fine may be as high as \$10,000 or twice the amount of the contributions or expenditures in question. Moreover, whenever the FEC concludes that a "knowing and willful" violation involving a contribution or expenditure of \$1,000, or more has occurred, it may refer the matter to the United States Attorney

*It is the purpose and intent of the PAC Transmittal Account to receive, hold and transmit to the USWA's PAC Treasurer voluntary funds raised at the local, sub-district and district level. This was clearly stated in the September 27, 1973, PAC policy letter, and under no circumstances should PAC Transmittal Accounts be used for any other purpose.

HIGHLIGHTS

In transmitting voluntary PAC Funds to Pittsburgh, always use checks or money orders. **DO NOT SEND CASH.**

All drafts should be made payable as follows: "USWA Political Action Fund."

Contributions in any form—such as ticket purchases or direct contributions by a committee set up by any local union, district or sub-district of the USWA must be added to contributions made by the USWA's PAC Voluntary Account itself for determining whether or not the contribution limits established by the 1976 FECA amendments have been reached.

No local union, district or sub-district shall make any contribution of voluntary dollars to candidates for federal office or to political committees supporting such candidates.

84

TEXT

HIGHLIGHTS

General for prosecution and imposition of a criminal penalty which can be a fine up to the greater of \$25,000 or three times the amount of the illegal contributions or expenditures.

CONCLUSION

There undoubtedly are some aspects of voluntary fundraising and political action which have not been covered in these directives. It is reasonable to anticipate that some of the views and directives which are set forth above may be modified in the future.

Comments or questions concerning the foregoing directives should be submitted to the Treasurer of the USWA PAC Fund.

87190430130314583316

(A)

APPENDIX A

**UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
DIRECTIVES FOR FUNDRAISERS**

The following legends should appear on Political Action Fund Receipts, Victory 7_ cards, tickets and other fundraising material.

LEGEND 1

"A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D. C."

LEGEND 2

"The United Steelworkers of America Political Action Fund supports various candidates for federal and other elective office, is connected with the United Steelworkers of America, a labor organization, and solicits and accepts only voluntary contributions in its own fundraising efforts and in joint fundraising efforts with the AFL-CIO and its Committee on Political Education."

Legend 1 must appear on the face or front page of all printed fundraising literature and at the beginning or end of any broadcast solicitation.

Legend 2 which must be included on printed solicitation materials, is one means of satisfying the requirements of 2 U.S.C. Section 441b(b)(3) (i.e. prohibiting the use of coercion while soliciting contributions to the PAC Fund) discussed on page 6 of the foregoing Directives for Fundraisers.

All contribution receipts also should make the following reference to the AFL-CIO and/or its COPE.

LEGEND 3

"This receipt is for a voluntary contribution to a joint fundraising effort by the United Steelworkers of America and the AFL-CIO."

86

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
DIRECTIVES FOR FUNDRAISERS

UNITED STEELWORKERS OF AMERICA

Political Action Fund
Five Gateway Center
Pittsburgh, Pa. 15222

COLLECTOR'S REPORT

Of Voluntary Contributions by a single contributor aggregating more than \$50.00 in a calendar year.

(Note: This report is required to be filed with the Treasurer of the Political Action Fund within 5 days of receipt of the contribution(s)).

Name of Contributor _____

Address of Contributor _____

Occupation of Contributor _____

Date(s) of Contribution(s)	Amount(s) of Contribution(s)
_____	_____
_____	_____
_____	_____

Collector _____

Local Union _____

District _____

7
9
0
3
1
3
0
3
0
4
0
3
4
8
3
3
3
7

("A")

87

FEDERAL ELECTION
COMMISSION

APPENDIX C

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

REPORT OF FUNDRAISING EVENT

(Please report each event separately)

1. Name and/or Nature of Event _____
2. Date and location of Event _____
3. Sponsor of Event _____
4. Approximate number of people _____
5. District/Sub-District/Local _____

FINANCIAL DATA

	VOLUNTARY FUNDS	DUES (TREASURY) FUNDS
Ticket Sales/Receipts	\$. _____	\$ _____
Other receipts	_____	_____
Total receipts	\$. _____	\$ _____
Expenditures (Itemize showing name of payee, date & purpose.)	\$. _____	\$ _____
	_____	_____
	_____	_____
	_____	_____
Total Expenditures	\$. _____	\$ _____
Net Proceeds	\$ _____	\$ _____

NOTE: The commingling of Voluntary Fund receipts, disbursements and transmittals with Dues (treasury) Fund receipts, disbursements and transmittals is prohibited. Unless the District, Sub-District, or Local Fundraisers have the proper checking accounts to handle these funds, special temporary checking accounts should be established. Tickets purchased by individuals should be accounted for and processed through the Voluntary Fund checking account; tickets purchased by local unions should be accounted for and processed through the dues fund checking account. Additional details concerning the purpose and requirements of this form can be found in Part III-C of the Directives for Fundraisers.

(A)

**Itemized Receipts Sales and Collections
 For Line Number 15C Only of FEC Form 3**

Page 1 of 1 for
 LINE NUMBER 15C

(88)

(Instructions on back)

ME 5/1/77 - 5/31/77

Name of Candidate or Committee in full **United Steelworkers of America Political Action Fund**

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)* \$ 2,728.00
 2 Mass collections (List by event below)** \$ None
 3 Sale of items \$ None
 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) \$ 2,728.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
Legislative Dance, USWA Local 1054 Union Hall, 920 Millbrook Lane, Kokomo, Indiana	10/30/76	\$1,142.00	\$ None
The following two events were conducted at the Legislative Dance while it was in progress:			
Raffle		900.00	
Tip Board Sales		686.00	
Note: These above fundraising events were conducted prior to the time that our Committee was finally notified by the FEC that the financial details of such fund- raising events were to be included on Form 3. Consequently the local fund- raisers were not required to nor did they keep detailed records. Therefore, all items included in this Amended Form 3 for May '77, are based on such information and is the best record that we are able to provide.			

Subtotal this period this page (optional) \$ 2,728.00 \$ None
 Total this period (last page this line number only) \$ 2,728.00 \$ None

89

(the last clean on track)

... or Committee in full

United Steelworkers of America
Political Action Fund

117 6/1/77 - 6/30/77

Presented during the Reporting Period:

1	Sale of tickets (List by event below)	172.00
2	Mass collections (List by event below)	-
3	Sale of items	-
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 3, FSC Form 3)	172.00

List of Sales and Collections by Event

Location and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
St. Patrick's Day PAC (Raffle)	3/19/77	\$ 172.00	\$ None
USWA Local Union 1608 Hall			
1024 Herr Street, Harrisburg, PA.			
Subtotal this period this page		\$ 172.00	\$ None
Total this period (last page this line number only)		\$ 172.00	\$ None

Page

LINE NUMBER 15C

(see instructions on back)

148 7/1/77 - 7/31/77

**United Steelworkers of America
Political Action Fund**

2

948.00

NA

NA

948.00

[illegible]

\$ 948.00

S NA

.. 948.00

... NA

Itemized Receipts Sales and Collection
For Line Number 15C Only of FEC Form 3

Page 1 of 1 for
LINE NUMBER 15C

(91)
(see instructions on back)

M10 9/1/77 - 9/30/77

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)*	\$ 21,200.00
2 Mass collections (List by event below)**	\$ 719.26
3 Sale of items	None
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$ 21,919.26

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
LU 1688 - USWA			
Party and Dance		\$	\$
St. Anne's Catholic Church Auditorium			
7th and Reynders Ave.	7/23/77	15,000.00	719.26
Steelton, Penna. 17113			
Local Union 5739 - 50/50 Raffle	2nd Tues. of each month	260.00	None
Chester, Penna.	9/76 thru 6/77		
Local Union 5401 - 50/50 Raffle	3/10 &	200.00	None
Country Market, New Kingston, PA	7/14/77		
Local Union 6014 - PAC Raffle	8/13/77	785.00	None
844 E. Chestnut St., Lancaster, PA			
Local Union 3216 - PAC Raffle (3rd Wed. of each month) - Holy Saviour Hall, Norristown PA	2/16/77 thru 8/17/77	620.00	None
Local Union 3139 Dinner and Raffle	9/17/77	4,335.00	None
Brushton Fire Hall, Hanover, PA			
Subtotal this period this page (optional)		\$ 21,200.00	\$ 719.26
Total this period (list page this line number only)		\$ 21,200.00	\$ 719.26

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

Page _____ of _____ For
LINE NUMBER 15C

M11 10/1/77 - 10/31/77

(See instructions on back)

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

1	Sale of tickets (List by event below)	\$ 1,313.00
2	Mass collections (List by event below)**	141.00
3	Sale of items	None
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$ 1,654.00

Location (Site, City and State) and Type of Event LU 6326	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
Picnic and Raffle	9/3/77	\$ 151.00	\$
✓ The Barn-Mermaid Swim Club	9/3/77	58.00	
✓ Jolly Road			
✓ Blue Bell, Penna.			
3 PAC Collections taken up at Union Meetings	Various		141.00
6 Circus Trip - Spectrum, Penna.		128.00	
LU 3182 - Cabaret Night and Dance	9/24/77	1,176.00	
3230 Philadelphia Pike			
Claymont, DE			
Subtotal this period this page (optional)		\$ 1,513.00	\$ 141.00
Total this period (last page this line number only)		\$ 1,513.00	\$ 141.00

Page

"B"

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

13

(see instructions on back)

Page 1 of 1 for

THE NUMBER 15C

W12 11/1/77 - 11/30/77

Total Proceeds during the Reporting Period:

1	Sale of tickets (List by event below)*	3,685.00
2	Mass collections (List by event below)**	None
3	Sale of items	None
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FRC Form 3)	3,685.00

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Ma Collections this Per ..
L.U. 6627 Raffle	8/5/77	\$ 282.00	\$
L.U. 3182 Hall, 3230 Philadelphia Pike, Claymont, DEL.			
L.U. 3853 PAC Raffles	*	437.50	
Alloy Metal Wire Works, Prospect Park, Pa. *3/23/77; 3/30/77; 4/6/77; 4/13/77; 4/20/77; 4/27/77; 5/4/77			
L.U. 13866 50-50 PAC Raffle		138.00	
Marcus Hook Fire Hall 8th & Market Streets, Marcus Hook, PA.			
L.U. 1165: Local Union Hall, 750 Charles Street, Coatesville, PA 19320	10-76 thru 9-77	682.00	
1) 50-50 Raffles at each Local Union Meeting	12/8/76	618.75	
2) Drawing at Christmas Party	4/5/77	652.50	
3) Raffle	9/24/77	874.25	
4) Raffle (at L.U. Picnic)			
Subtotal this period this page (optional)		\$ 3,685.00	\$ None
Total this period (last page this line number only)		\$ 3,685.00	\$** None

Page

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

Page 1 of 1 for
LINE NUMBER 15C

YE 12/1/77 - 12/31/77

94
(Instructions on back)

Name of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1	Sale of Assets (List by event below)	\$ 589.00
2	Mass collections (List by event below)**	None
3	Sale of Items	None
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$ 589.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
LU 5542 Raffle		\$	\$
Messenger Bearing Inc. Plant-Carpenter Shop 3901 D Street Philadelphia, Pa.	9/8/77	78.00	None
LU 12886 Raffle	6/2/77	241.00	None
222 Philadelphia Pike Wilmington, DE			
LU 12886 Raffle	12/1/77	270.00	None
222 Philadelphia Pike Wilmington, DE			
Subtotal this period this page (optional)		\$ 589.00	\$ None
Total this period (last page this line number only)		\$ 589.00	\$** None

Page

("B")

Executive Commission
on Arms, N.W.
Washington, D.C. 20463

**United Steelworkers of America
Political Action Fund**

Page

("B")

**Itemized Receipts Sales and Collections
For Line Number 15C Only of FEC Form 3**

Page 1 of 1 for
LINE NUMBER 15C

Commission

20483

(96)
(see instructions on back)

M3- ARND

of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund**

Total Proceeds During the Reporting Period:

1 Sale of tickets (List by event below)*	\$ <u>9,863.00</u>
2 Mass collections (List by event below)**	\$ <u>None</u>
3 Sale of items	\$ <u>None</u>
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	\$ <u>9,863.00</u>

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
District 30 - Legislative Conference 1977	9/16 & 17	\$7,690.00	NA
Indianapolis, Indiana	1977		
LU 6816 USWA, Box 132, Collegeville, PA			
19426			
Thanksgiving Drawing (Local Union Hall)	11/21/76	315.00	NA
Christmas Drawing (Local Union Hall)	12/19/76	300.00	NA
Local Union Banquet Drawing			
Gilbertsville Fire Hall, Gilbertsville, PA	4/15/77	340.00	NA
Punch Board Sales	June-1977	600.00	NA
LU 1940 USWA, 519 Electric Street,	4th Tues.	618.00	NA
Lewistown, PA	each month		
Note: Fundraising events are reported during			
the month in which the funds raised			
and reports are received by the			
Treasurer's Office.			
Subtotal this period this page (optional)		\$ 9,863.00	NA
Total this period (last page this line number only)		\$ 9,863.00	NA

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for
LINE NUMBER 14c

Commission
Street, N.W.
Washington, D.C. 20463

(See Instructions on Back)

5/1/78 - 5/31/78

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

- | | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 1,959.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2; FEC Form 3). | \$ 1,959.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 12886, 222 Philadelphia Pike	1/5/78	\$ 214.00	\$ NA
Wilmington, DE	2/2/78	183.00	NA
Raffles	3/2/78	190.00	NA
	4/6/78	166.00	NA
	5/4/78	156.00	NA
LU 3182- LU 3182 Hall, 3230 Philadelphia Pike, Claymont, DE			
Dance	2/25/78	1,050.00	NA
Note: Fundraising events are reported during the month in which the report and transmittal funds raised are received by the Treasurer's Office.			
SUBTOTAL this period		\$ 1,959.00	** None

(See instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

Name of Candidate or Committee in Full **United Steelworkers of America**
Political Action Fund

6/1/78 - 6/30/78

Total Proceeds during the Reporting Period:

- | | | |
|---|----|------------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | 32,269.43 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ | <u>32,269.43</u> |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 5829 - 50-50 Raffle	5/12/78	\$ 153.00	\$ None
USWA - 136 E. Gay Street West Chester, Penna.			
District 20 - USWA PAC Committee Raffle	5/2/78	17,506.43	None
390 Ohio River Blvd Baden, Penna. 15005			
District 15 PAC Committee Raffle	5/2/78	14,610.00	None
1945 Lincoln Highway No. Versailles, PA 15137			
SUBTOTAL this period		\$ 32,269.43	None

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

M8 7/1/78 - 7/31/78

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

- | | |
|---|-----------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 526.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ 526.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
IN 6816, USWA - Raffle	4/15/78	\$ 526.00	\$ None
Gilbertsville, PA			
SUBTOTAL this period		\$ 526.00	\$ None

(17B)

303223030304030108

1978
Election Commission
1200 K Street, N.W.
Washington, D.C. 20483

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

8/1/78 - 8/31/78

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 9,752.25
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below). \$ None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 9,752.25

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
District 31, Sub-Dist. 4 Annual Raffle 5090 W. Harrison St., Chicago, IL-60644	6/9/78	\$ 8,648.25	\$ None
Lu 3182 50-50 Drawing 3230 Philadelphia Pike, Claymont, DE	7/25/78	520.00	None
LU 3566 Raffle St. Anthony's Hall, Claymont, DE	7/21/78	259.00	None
LU 12886 50-50 Raffle 222 Philadelphia Pike, Wilmington, DE	7/6/78	167.00	None
LU 1940 50-50 Raffle 519 Electric St., Lewistown, PA	Various Dates	158.00	None
Note: Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's Office.			
SUBTOTAL this period		\$ 9,752.25	\$.. None

3
5
14
54
44
75
8
17
08
40
03
00

(B)

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 1940, Dist. 7, USWA (50-50 Raffles) 519 Electric St. Lewistown, PA 17044	8/22/78	\$ 40.00	\$ NA
	9/4/78	380.00	
Dist. 7, USWA-Reading Sub-District PAC Fundraiser Picnic Flying Hills Grove, PA	6/11/78	3,838.00	
Note: Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's office.			
SUBTOTAL this period.....	TOTALS	\$4,258.00	** NONE

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

101

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of 1 for

LINE NUMBER 14c

LOG 10/1/78 - 10/23/78 -

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 7,670.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 198.00
3. Subtotal Receipts from the Sale of Items (not listed below). \$ NA
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 7,868.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 3182 Annual Party 3230 Philadelphia Pike Claymont, DE	9/23/78	\$ 966.00	\$ NONE
LU 3139 Annual Dinner, Brushton Fire Hall Hanover, PA	9/9/78	4410.00	
LU 6326-Mermaid Swim Club, Jolley Rd.)Vol. collect- Blue Bell, PA	tion at union various meeting dates picnic 6/24/78 raffle 6/24/78	769.00 110.00	198.00
LU 12698 Raffle, 222 Philadelphia Pike, Wilmington, DE	3/19/78*	376.00	
LU 3216 -- 50/50 Raffles, Holy Saviour Club 436 E. Main St., Norristown, PA	various-at mo. union meets.	564.00	
LU 5739 - Raffle, Friendship Fire Hall Linwood, PA	various-at union meetings	415.00	
LU 2151, 1852, 6014 & 6880, Philadelphia, PA Area Sale of Golf Caps	various	603.00	
*Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's office.			
SUBTOTAL this period		\$ 7,670.00	\$ 198.00

8 1708400330914514049

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

106-AMEND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 12,553.25
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 198.00
3. Subtotal Receipts from the Sale of Items (not listed below). NA
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 12,751.25

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 3182 Annual Party 3230 Philadelphia Pike Claymont, DE	9/23/78	\$ 966.00	\$ None
Local Union 3139 Annual Dinner, Brushton Fire Hall, Hanover, PA	9/9/78	4,410.00	
LU 6326-Mermaid Swin Club, Jolley Rd. Blue Bell, PA (Vol. Collection at Union Meeting) Picnic Raffle	Various Dates 6/24/78 6/24/78		198.00
LU 12698 Raffle, 222 Philadelphia Pike, Wilmington, DE	3/19/78*	376.00	
LU 3216 -50/50 Raffles, Holy Saviour Club 436 E. Main St., Norristown, PA	Various MO. Union Meetings	564.00	
LU 5739 Raffle, Friendship Fire Hall Linwood, PA	Various-at Un. Meet.	415.00	
LU 2151, 1852, 6014 & 6880, Philadelphia, PA Area - Sale of Golf Caps	Various	60.00	
*Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's Office.			
SUBTOTAL this period		\$	\$

(See Instructions on Back)

106. Amend

United Steelworkers of America
Political Action Fund

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*	\$	
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)**	\$	
3. Subtotal Receipts from the Sale of Items (not listed below)	\$	
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3)	\$	

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
LU 6014 Raffle - 2401 Willow St. Pike Willow Street, PA 17584	8/26/78	\$ 1,000.00	\$
LU 1165 - 750 Charles St. Coatesville, PA			
Christmas Drawing	12/14/77	651.25	
Annual Picnic Raffle	8/26/78	916.50	
50/50 Raffle-Monthly		690.50	
Union Meetings			
LU 3853 - 50/50 Raffles - 1978 Alloy Metal Wire Works Plant Prospect Park, PA	8/30;9/6; 9/13;9/22	225.00	
LU 1852 - Raffle IBEW Bldg, York, PA	10/20/78	1,400.00	
SUBTOTAL this period		\$12,553.25	\$** 198.00

"B")

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM

(See instructions on back)

Page 1 of 1 for

LINE NUMBER 14c

306 10/24/78 - 11/27/78

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 1,577.87
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below) \$
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) \$ 1,577.87

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 7528 Raffle 2889 Fairfield Avenue, Bridgeport, CT 06605	10/15/78	\$ 102.00	\$ None
LU 13866 Raffle	9/8/78 &	186.00	None
Marcus Hook, PA 19061	10/7/78		
District 38, Sub-District 1 1520 W. Cameron Avenue, Suite 245 West Covina, CA 91790	October '78	96.87	None
LU 3182 - Sale of Item 3230 Philadelphia Pike Claymont, DE		795.00	None
LU 6627 Raffles 3230 Philadelphia Pike Claymont, DE		398.00	None
SUBTOTAL this period		\$ 1,577.87	\$ None

(14B)

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
District 19 Legislative Conference	10/13 &	\$ 498.00	\$ None
50/50 Raffle, 400 Lock Street,	10/15/78		
Tarentum, PA 15084			
(The Hilton Airport Inn, Imperial, PA)			
District 26 PAC Fundraising Comm.	9/18/78 &	480.00	None
400 Realty Bldg., Youngstown, OH	9/22/78		
44503			
(Sale of Items during International			
Convention at Atlantic City, NJ)			
LU 7528 Raffle	10/15/78	102.00	None
USWA - 2889 Fairfield Avenue			
Bridgeport, CT 06605			
SUBTOTAL this period		\$ 1,080.00	** None

Page 1 of 1 for
LINE NUMBER 14c

106
(See Instructions on Back)

M2 1/1/79 - 1/31/79

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*	\$	None
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)**	\$	726.12
3. Subtotal Receipts from the Sale of Items (not listed below).	\$	1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3).	\$	

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
District 7, USWA	Various	\$ 1,750.00	\$
General Lafayette Building			
210 Goddard Blvd			
King of Prussia, PA 19406			
(Sale of Hats)			
Ohio Legislative Committee	1/10 & 11,		726.12
13th Floor, 8 E. Broad St.	1979		
Columbus, OH 43215			
SUBTOTAL this period		\$ 1,750.00	\$ 726.12

("B")

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 1374, USWA - 50-50 Raffle		\$	\$
134 Cumberland Street	2 - '79	200.00	
Lebanon, PA 17042			
LU 1940, USWA - 50-50 Raffle	8 - '78	133.00	
519 Electric St.,			
Lewistown, PA 17044			
SUBTOTAL this period.....		\$ 333.00	**None

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
U- 338, District 38, USWA	October '78	\$ 848.00	\$ NA
E. 14015 Trent Avenue, Spokane, WA 99215 (Raffle)			
District 7, USWA	4/3/79	1,376.00	NA
Suite 200, General Lafayette Bldg 210 Goddard Blvd King of Prussia, PA 19406 (Raffle)			
SUBTOTAL this period		\$2,224.00	** NA

109

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

Page 1 of 1 for
LINE NUMBER 14c

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

(See Instructions on Back)

1/16 5/1/79 - 5/31/79

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 5,901.27...
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** None
3. Subtotal Receipts from the Sale of Items (not listed below). None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 5,901.27

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
LU 1150 Raffle - 218 S. Addison, Indianapolis, IN	10/16/78	\$ 489.00	\$
Muncie Area Legislative Dance USWA - District 30 206 1/2 E. Willard St Muncie, IN 47302	10/28/79	1,155.00 1,328.27	
District 30, USWA Legislative Fund 50-50 Raffle Opryland Hotel., Nashville, TN	3/10/79	1,230.00	
Kokomo Area Legislative Dance 920 Millbrook Lane, Kokomo, IN -Tickets Raffle	10/28/78	880.00 819.00	
SUBTOTAL (11B) this period		\$ 5,901.27	\$** None

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for
LINE NUMBER 14c

(See Instructions on Back)

M7 6/1/79 - 6/30/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 592.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below) \$ None
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 592.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 8498 Raffle	11/15/78	\$ 592.00	\$
4530 Pebble Lane			
Winston-Salem, North Carolina 27107			
SUBTOTAL this period		\$ 592.00	\$** None

81049031331206

Page 1 of 1 for
* LINE NUMBER 14c

148 7/1/79 - 7/31/79

Total Proceeds during the Reporting Period:

- ## LIST OF SALES AND COLLECTIONS BY EVENT

* Fund Raising events are reported during the month in which the report and transmittal of funds are received in the Treasurer's office.

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of for
LINE NUMBER 14c

(See Instructions on Back)

M9 8/1/79 - 8/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*	\$ 23,099.57
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)**	\$ None
3. Subtotal Receipts from the Sale of Items (not listed below)	\$ 1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3)	\$ 24,849.57

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Local Union 14543 - District 7 - 50-50 Raffle	7/11/79	\$ 60.00	\$ None
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
Local Union 5030 - District 7 USWA Raffle	Various	1,540.00	
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
Local Union 3216 - District 7 - 50-50 Raffle	6/79-7/79	154.00	
301 Chestnut Street			
Harrisburg, Pennsylvania 17101			
District 31 - Sub-District 4, USWA	6/10/79	7,706.57	
Annual Raffle			
5090 W. Harrison Street			
Chicago, Illinois 60644			
District 27, USWA Raffle	6/15/79	13,639.00	
1330 Market Avenue, North Canton, Ohio 44714			
SUBTOTAL this period		\$ 23,099.57	\$..

AMENDED

113

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 1 for

NUMBER 14c

8/1/79 - 8/31/79

Name of Committee in Full

Steelworkers of America Political Action Campaign Fund

Period during the Reporting Period:

- Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 23,379.77
- Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 25,129.77

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 14543, District 7, 50-50 Raffle	7/11/79	\$ 60.00	\$
Local Union 14378, District 7, 50-50 Raffle	7/10/79	144.00	
Local Union 4425, District 7, 50-50 Raffle	8/3/79	136.20	
Local Union 3216, District 7, 50-50 Raffle	7/8/79	154.00	
Local Union 5031, District 7, Raffle	Various	1,540.00	
210 Goddard Boulevard			
King of Prussia, Pennsylvania 19406			
District 31 - Sub-District 4	6/10/79	7,706.57	
Annual Raffle			
5090 W. Harrison Street			
Chicago, Illinois			
District 27 Raffle	6/15/79	13,639.00	
1330 Market Avenue, North			
Canton, Ohio 44714			
SUBTOTAL this period		\$ 23,379.77	\$

1 9 0 0 1 4 0 3 5 2 4

114
ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

M10 9/1/79 - 9/30/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Campaign Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 11,549.20
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 100.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 11,649.20

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 3216, District 7, 50-50 Raffle 210 Goddard Boulevard King of Prussia, Pennsylvania 19406	Various	\$ 354.00	\$
Local Union 6017, District 7, 50-50 Raffle	6/2/79	42.00	
Local Union 12781, District 7, 50-50 Raffle	8/10/79	122.00	
Local Union 1940, District 7, 50-50 Raffle	9/3/79	260.00	
Local Union 1940, District 7, 50-50 Raffle	1/1/79-8/79	351.00	
Local Union 3566, District 7, 50-50 Raffle	8/10/79	284.00	
Local Union 12698, District 7, 50-50 Raffle	9/16/79	266.00	
Local Union 5424, District 7, 50-50 Raffle	9/4/79	103.00	
Local Union 6014, District 7, 50-50 Raffle	8/4/79	500.00	
Local Union 7825, District 7, 50-50 Raffle	9/15/79	48.00	
Local Union 15534, District 7, 50-50 Raffle	9/15/79	197.00	
Local Union 15253, District 7, 50-50 Raffle	9/13/79	84.00	
Local Union 12916, District 7, 50-50 Raffle	9/18/79	64.00	
Local Union 4425, District 7, 50-50 Raffle	9/9/79	60.20	
SUBTOTAL this period		\$*	\$**

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See instructions on Mark)

Page 2

Page 2
9/1/79 - 9/30/79

Name of Candidate or Committee in Full

~~United Steelworkers of America Political Action Campaign Fund~~

Total Proceeds during the Reporting Period:

- | | | |
|---|----|--|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ | |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ | |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period
Local Union 14378, District 7, 50-50 Raffle	9/14/79	\$ 146.00	\$
District 15 Legislative Committee	7/18/79	8,668.00	
1945 Lincoln Highway			
North Versailles, Pennsylvania 15137			
SUBTOTAL this period		\$11,549.20	\$

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See instructions on Back)

Page 1 of for
LINE NUMBER 14c

M11 10/1/79 - 10/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 25,413.00
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 120.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 25,533.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 6627, District 7, Raffle	8/10/79	\$ 358.00	\$ None
210 Goddard Boulevard			
King of Prussia, Pennsylvania 19406			
Local Union 6465, District 7, 50-50 Raffle	9/8/79	32.00	
Local Union 7936, District 7, 50-50 Raffle	9/19/79	48.00	
Local Union 12974, District 7, 50-50 Raffle	9/20/79	14.00	
Local Union 14700, District 7, 50-50 Raffle	9/15/79	26.00	
Local Union 15139, District 7, 50-50 Raffle	9/25/79	25.00	
Local Union 8695, District 7, 50-50 Raffle	9/20/79	20.00	
Local Union 3853, District 7, 50-50 Raffle	Various	400.00	
Local Union 5808, District 7, 50-50 Raffle	9/6/79	409.00	
Local Union 4993, District 7, 50-50 Raffle	9/11/79	55.00	
Local Union 6326, District 7, Raffle	8/30/79	186.00	
Local Union 1852, District 7, Raffle	9/28/79	2,305.00	
Local Union 8739, District 7, 50-50 Raffle	9/27/79	24.00	
Local Union 13866, District 7, 50-50 Raffle	9/26/79	126.00	
Local Union 12886, District 7, 50-50 Raffle	Various	476.00	
SUBTOTAL this period		\$	\$

25,413.00 -

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of for
 LINE NUMBER 14c

M12 11/1/79 - 11/30/79

Name of Candidate or Committee in Full

UNITED STEELWORKERS OF AMERICA - POLITICAL ACTION FUND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 3,518.50
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 1,750.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 5,268.50

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period*
Local Union 3216, Dist. 7 50-50 Raffle	10/17/79	\$ 84.00	\$
210 Goddard Blvd.			
King of Prussia, PA 19406			
LU 5740, District 7, 50-50 Raffle	10/7/79	184.00	
LU 7038, District 7, 50-50 Raffle	10/7/79	320.00	
LU 5739, District 7, 50-50 Raffle	Various	186.50	
LU 12886, District 7, 50-50 Raffle	10/4/79	185.00	
LU 14378, District 7, 50-50 Raffle	11/6/79	124.00	
District 7, Reading, Pa. Office (Balance from the			
Reading 50-50 Raffle previously reported on the			
October 1979 form)	9/28/79	165.00	
District 38 Raffle			
P.O. Box 2428			
West Covina, Calif. 91793	9/29/79	1,270.00	
SUBTOTAL this period		\$	\$

310403015660

Washington, D.C. 20463

119

(See Instructions on Back)

Page 2 of 2 for
LINE NUMBER 14c

M12 11/1/79 - 11/30/79

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

Total Proceeds during the Reporting Period:

- | | | |
|---|----|--|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ | |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ | |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period
District 23 Raffle	9/21/79	\$ 1,000.00	\$
2084 National Road			
Wheeling, WV 26003			
SUBTOTAL this period		\$	\$3,518.50

[illegible]



FEDERAL ELECTION COMMISSION

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

10/28/76

**REPORT OF THE COMPLIANCE REVIEW SECTION
OFFICE OF DISCLOSURE AND COMPLIANCE
FEDERAL ELECTION COMMISSION
ON
UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND**

I. Background

This report covers an audit of the United Steelworkers of America Political Action Fund undertaken by the Compliance Review Section staff of the Federal Election Commission to determine whether there has been compliance with the Federal Election Campaign Act ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of the Act which directs the Commission to conduct audits and field investigations with respect to reports and statements filed under the Act.

The United Steelworkers of American (USWA) is an affiliated member of the AFL-CIO. The USWA Political Action Fund was established for the purpose of receiving contributions from local union members and friends to be used to further the interests of the organization in the fields of political action and education.

The Political Action Fund Committee is financially administered by a committee of the International Officers of the USWA. The Committee is financed by voluntary contributions from its members by (1) a payroll check-off plan, (2) special fundraising activities, and (3) ongoing subscriptions. Campaign disbursements are made via written approval of the USWA Treasurer in response to requests generally originating at the district and local union levels.

During the period audited, January 1, 1975 through March 31, 1976, the USWA reported total receipts of \$348,117.61 and total expenditures of \$142,895.74. The officers of the Committee are Walter J. Burke, Treasurer, and I.W. Abel, Chairman. Committee offices are located at 5 Gateway Center, Pittsburgh, Pennsylvania, 15222.

II. Findings and Conclusions

A. The Committee Statement of Organization indicates that it has a single depository. Committee records indicate that several district and



local unions maintain transmittal accounts into which political contributions are deposited and from which transfers are made to the depository reflected on the Statement of Organization.

Title 2, U.S.C. Section 437b(a)(2) requires that all contributions received by a political committee be deposited in designated depositories, and all expenditures, except for petty cash, be made by check drawn on such account. Section 433(b)(9) requires that all banks, safety deposit boxes, and other depositories used by the committee be recorded on the Statement of Organization.

All expenditures made by a political committee must be made from a campaign depository unless the expenditure is made from treasury funds. If the local unions make expenditures (other than expenditures from treasury funds), either before or after the contributions are deposited in the "transmittal account," the account should be considered a campaign depository. The national union can either pay the local expenses from its designated campaign depository or designate the "transmittal account" a campaign depository and allow the local to pay for expenses from contributions received.

B. Committee records indicate that many local unions receive political contributions which are deposited in personal checking accounts, local union accounts, and in accounts of employer organizations, some of which are incorporated, and subsequently transferred to the Committee. Title 2, U.S.C. 432(b) states in part that funds of a political committee shall be segregated from and may not be commingled with the personal funds of any officers, members or associates of such committee. Members of local unions should be instructed not to deposit political contributions received in personal, union or corporate accounts for subsequent transfer to the Committee depository.

The Committee has advised their collectors at the local level that the USWA Political Action Fund will not accept any checks drawn on their personal accounts or union or corporate accounts.

C. Committee records indicate that the Committee is not consistent in reporting political contributions received from the voluntary payroll check-off program. Itemized contributions are reported in the time period during which the funds are withheld from the contributor's salary, but not yet received by the Committee. The unitemized contribution figure represents total receipts for the period less the amount of the itemized contributions. All contributions should be reported during the period received by the Committee (2 U.S.C. 434(b)(2)).

The Committee has advised that they are now reporting all contributions received by the Fund on a cash reporting basis.

D. Committee records indicate that political contributions received by the local and district unions are not transferred and reported to the Committee promptly. Title 2 U.S.C. 432(b) requires that any person

81040301570

(c)

who receives a contribution in excess of \$50.00, including those deposited in a transmittal account not considered a committee depository, shall make a detailed accounting to the committee of such receipts no more than five (5) days after receipt. The Committee should instruct fundraisers to make such an accounting.

Committee officials have stated that their fundraisers will be advised of the requirements of 2 U.S.C. 432(b).

E. Committee records indicate that some political contributions are received by local and district unions through collections and fundraising activities. Our review of Committee reports, however, discloses neither a separate reporting of the proceeds from such events, nor the expenditures made in connection with the events. Title 2, U.S.C. Section 434(b)(6), (9), (10) and (11) require the listing of all receipts and expenditures from collections and fundraising activities. Total receipts from such activities would be reported by date and event on FEC Schedule D and the expenses involved with such activities would be reported on FEC Schedule B.

Assuming the fundraising costs are being paid out of voluntary money, the Committee would be required to list the expenditures relating to each event. This can be accomplished by requiring the local union to inform the Committee of that part of the contribution total retained to meet expenditures. That figure would then be reported by the Committee as a fundraising expenditure. If the expenditures are not reported by the Committee, the local union will have been deemed to have made the expenditure.

III. Recommendations

It is recommended that the Commission accept the Compliance Review Section staff's position outlined above. It is further recommended that the Commission advise the Committee of these findings, particularly Finding A in which the Commission determined that, if expenditures are made from the "transmittal accounts," these accounts are in fact depositories of the Committee and Finding E, in which the Commission determined that collection and fundraising expenditures, paid from voluntary money, have to be reported by the Committee.

81040301571

(C^u)

(Typed Name of Treasurer or Clerk)

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COL Amount Collections
L.U. 12886 - District 7...50-50 Raffle 210 Goddard Boulevard King of Prussia, Pa. 19406	11/1/79	\$ 141.00	\$
L.U. 12886 - District 7...50-50 Raffle	12/6/79	132.00	
District 30 Legislative Conference 9000 Keystone Crossing Indianapolis, Indiana 46240	10/25-10/26/79	13,880.00	
(page)			

126

RECEIVED

FORM 7000-2
REVISED
JANUARY 1978
Federal Election Commission
1200 K Street, N.W.
Washington, D.C. 20540

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)

APR 18 PM 4

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

1 United Steelworkers of America Political Action Fdb ID No. C-000 3590
Name of Candidate or Committee (in full) Candidate/Committee
Five Gateway Center 3 NA
Address (number and street) Office (number, street/office) (if applicable)
Pittsburgh, PA 15222
City, State and ZIP Code ☐ Check if address is different than previously reported. Year of Election

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 _____ ☐ Amendment for: _____
(date) (which report)
☐ October 10 Quarterly Report ☐ Thirtieth day report following _____ election (primary, general or convention)
☐ January 31 Annual Report on _____ in the State of _____
☐ Monthly Report March 1980 on _____ in the State of _____
(month) (date)

This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (specify, runoff, etc.)

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

5 Covering Period	Column A This Period	Column Calendar Year
<u>3/1/80</u> Through <u>3/31/80</u>		
6 Cash on hand January 1, 1980		\$ 287,630.1
7 Cash on hand at beginning of reporting period	\$ 286,560.94	
8 Total receipts (from line 19)	\$ 36,054.26	\$ 92,687.4
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 322,615.20	\$ 380,317.6
9 Total expenditures (from line 25)	\$ 32,990.90	\$ 90,693.3
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 289,624.30	\$ 289,624.3
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)	\$ None	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ None	

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

4/11/80

Frank S. Miller

(141)

128

PSC FORM 3
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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

RECEIVED
FEDERAL ELECTION
COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

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

1 United Steelworkers of America Political Action Fd. I.D. No. C-000 3590
Name of Candidate or Committee (in full) Five Gateway Center Candidates/Committee
Address (number and street) Pittsburgh, Pa. 15222
City, State and ZIP Code Pittsburgh, Pa. 15222 Office Sought, State/District (if applicable) NA
☐ Check if address is different than previously reported. Year of Election _____

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 _____ election
(primary, general or convention) (which report)
☐ January 31 Annual Report
☐ Monthly Report Feb. 1980 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	Column A This Period	Column B Calendar Year-To-Date
<u>2/1/80</u> Through <u>2/29/80</u>		
6 Cash on hand January 1, 1980		\$ 287,630.18
7 Cash on hand at beginning of reporting period	\$ 303,667.90	
8 Total receipts (from line 19)	\$ 26,255.66	\$ 56,633.18
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 329,923.56	\$ 344,263.36
9 Total expenditures (from line 25)	\$ 43,362.62	\$ 57,702.42
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 286,560.94	\$ 286,560.94
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)	\$ None	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ None	

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

3/17/80
(Date)

Frank S. McKee
(Typed Name of Treasurer or Candidate)

129

FORM 280-2
REVISED

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

Page _____ of _____ for
LINE NUMBER 14c

(See Instructions on Back)

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period.

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)** \$ 4,599.88
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below) \$
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 4,599.88

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period
LU 4425 District 7 Raffle 210 Goddard Blvd. King of Prussia, PA 19406	2/1/80	\$ 110.00	\$
✓ LU 3216 - District 7 50-50 Raffle	9/19/79	90.00	
✓ LU 3216 - District 7 50-50 Raffle	12/19/79	64.00	
LU 3216 - District 7 50-50 Raffle	1/16/80	86.00	
LU 4425 - District 7 Raffle	1/4/80	151.00	
✓ District 30, USWA 9000 Keystone Crossing Indianapolis, IND 46240	12/31/79	2,284.00	
✓ District 30 USWA	10/27/79	1,814.88	

Schedule D

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

Itemized Receipts Sales and Collections For Line Number 15C Only of FEC Form 3

(see instructions on back)

 Page 1 of 1 for
LINE NUMBER 15C

156 5/1/77 - 5/31/77

Name of Candidate or Committee in full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below) \$ 2,728.00
 2 Mass collections (List by event below) .. \$ None
 3 Sale of items \$ None
 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) \$ 2,728.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
Legislative Dance, USWA Local 1054 Union Hall, 920 Millbrook Lane, Kokomo, Indiana	10/30/76	\$1,142.00	\$ None
The following two events were conducted at the Legislative Dance while it was in progress:			
Raffle		900.00	
Tip Board Sales		686.00	
Note: These above fundraising events were conducted prior to the time that our Committee was finally notified by the FEC that the financial details of such fund- raising events were to be included on Form 3. Consequently the local fund- raisers were not required to nor did they keep detailed records. Therefore, all items included in this Amended Form 3 for May '77, are based on such information and is the best record that we are able to provide.			

Subtotal this period this page (optional) \$2,728.00 \$ None

Total this period (last page this line number only) \$ 2,728.00 \$.. None

(see front cover for details)

... or Committee in full

United Steelworkers of America
Political Action Fund

117 6/1/77 - 6/30/77

Personal Presents during the Reporting Period:

1	Sale of tickets (List by event below)	172.00
2	Mass collections (List by event below)	-
3	Sale of items	-
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	172.00

List of Sales and Collections by Event

[illegible]

LINE NUMBER 15C

148 7/2/77 - 7/31/77

Name of Candidate or Committee in full

Total Proceeds during the Reporting Period:

List of Sales and Collections by Event

Page

("D")

Itemized Receipts Sales and Collection
For Line Number 15C Only of FEC Form 3

Page _____ of _____
LINE NUMBER 15C

(123)
(see instructions on back)

M10 9/1/77 - 9/30/77

Commission
for agent, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:		
1 Sale of tickets (List by event below)*		\$ 21,200.00
2 Mass collections (List by event below)**		\$ 719.26
3 Sale of items		None
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)		\$ 21,919.26

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
LU 1688 - USWA			
Party and Dance		\$	\$
St. Anne's Catholic Church Auditorium			
7th and Reynders Ave.	7/23/77	15,000.00	719.26
Steelton, Penna. 17113			
Local Union 5739 - 50/50 Raffle	2nd Tues. of each month	260.00	None
Chester, Penna.	9/76 thru 6/77		
Local Union 5401 - 50/50 Raffle	3/10 &	200.00	None
Country Market, New Kingston, PA	7/14/77		
Local Union 6014 - PAC Raffle	8/13/77	785.00	None
844 E. Chestnut St., Lancaster, PA			
Local Union 3216 - PAC Raffle (3rd Wed. of each month) - Holy Saviour Hall, Norristown PA	2/16/77 thru 8/17/77	620.00	None
Local Union 3139 Dinner and Raffle	9/17/77	4,335.00	None
Brushton Fire Hall, Hanover, PA			
Subtotal this period this page (optional)		\$ 21,200.00	\$ 719.26
Total this period (last page this line number only)		\$ 21,200.00	\$ 719.26

77030594146

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

LINE NUMBER 150

(see instructions on back)

M11 10/1/77 - 10/31/77

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1	Sale of tickets (List by event below)	1,513.00
2	Mass collections (List by event below)**	141.00
3	Sale of items	None
4	Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	1,654.00

List of Sales and Collections by Event

[illegible]

Page

185
January 16, 1979

AO 1978-98

Mr. Thomas E. Seus
Kelly, Moran & Harrington
Lewis Tower Building, Suite 512
Fifteenth and Locust Streets
Philadelphia, Pennsylvania 19102

Dear Mr. Seus:

This is in response to your letter of November 16, 1978, requesting an advisory opinion on behalf of Plumbers Union Local 690 Political Action and Social Fund ("the Fund") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the use of a clearing or transmittal account by the Fund.

Your letter states that voluntary contributions to the Fund are made by union members through payroll checkoff plans administered by the members' employers. Each member is paid by each employer on a weekly basis and contributes approximately \$2 per week to the Fund. However, funds deducted from the members for other purposes--pension, health, welfare and union dues--are remitted by the employer to the union in a single check issued monthly. This monthly check is deposited by the union in a clearing account maintained by the union to receive and separate the proceeds of these checks.

You explain that since beginning collection of political contributions for the Fund via payroll deduction, employers have included in their one check to the union both the monthly total of union dues (and other union funds) and the monthly total of contributions to the Fund from all employee/members. When a check from the employer is received and deposited in this clearing account, the political contribution portion is sent to the Fund and the remaining portion is remitted to the union. You state that checks are received from employers and deposited in the clearing account almost daily. Once every ten days you propose that a check, made

81040301583
("E")

payable to the Fund, be drawn on the clearing account for all voluntary political contributions received in the clearing account during the previous ten days. You ask whether this procedure would be permitted under the Act and Commission regulations.

Under 2 U.S.C. §441b(b)(2) the Fund may accept voluntary contributions from individual members of the union and deposit them in a "separate segregated fund to be utilized for political purposes by" the union. Since it is a necessary administrative mechanism to accomplish the required separation and segregation, the clearing account may be used for the deposit and negotiation (for bank payment) of checks from employers for combined dues and political contributions.

81040301584
This conclusion rests upon two assumptions on which the Commission conditions its approval. First, the checks representing combined union dues and political contributions from union members are regarded as contributions received by the treasurer of the Fund, or his/her agent, at the time the checks are received by an employee or representative of the union. 2 U.S.C. §432 and 11 CFR 102.9. Secondly, since the proceeds representing political contributions are deemed to be received when the union representative receives the employer's check, on that date the 10 day deposit period begins to run. Accordingly, by the 10th day after receipt of the employer's check, a separate check must be drawn on the clearing account and deposited into a separate checking account maintained by the Fund at a bank depository designated by the Fund. 2 U.S.C. §§433(b)(9), 437b(a); see also 11 CFR 103.3(a) and Advisory Opinion 1978-42, copy enclosed.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Joan D. Aikens
Chairman for the
Federal Election Commission

Enclosures (AO 1978-42)

(F)
NBLitchfield:bwl:1/11/79
D. Litchfield 1/11/79



137

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 10, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1979-63

Mr. Cooper T. Holt
Director
VFW-Political Action Committee
200 Maryland Avenue, N.E., Suite 201
Washington, D.C. 20002

Dear Mr. Holt:

This responds to your letter of October 30, 1979, requesting an advisory opinion on the applicability of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the acceptance of certain monies by the VFW-Political Action Committee (VFW-PAC) which is the separate segregated fund of the National Organization of the Veterans of Foreign Wars of the United States, a nonprofit, tax exempt corporation.

Your letter states that VFW-PAC has recently received many unsolicited donations from local VFW Posts and Ladies Auxiliaries of the VFW. These donations have been made by the Posts and Auxiliaries from "funds accumulated... from dues and receipts from the sale of food and beverages." You add that these funds are currently being accumulated for deposit into the VFW-PAC bank account pending issuance of this advisory opinion. Under these circumstances you ask whether it is lawful under the Act for VFW-PAC to accept the funds described above.

Under 2 U.S.C. §441b(a) and §114.2(b) of the Commission's regulations, it is unlawful for "any corporation whatever... to make a contribution or expenditure in connection with any [Federal] election." While a corporation may use general treasury funds, comprised of dues monies or membership fees, for the establishment, administration, and solicitation of contributions to its separate segregated fund, it may not contribute any portion of such funds to candidates for Federal office or other political committees. 11 CFR 114.5(b).

("F")

81040301585

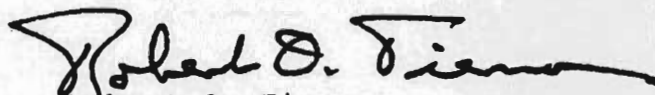
Furthermore, a separate segregated fund may not utilize (i.e., make political contributions or expenditures from) monies obtained in any commercial transaction. See 11 CFR 114.5(a);*/ also see Advisory Opinion 1976-18, copy enclosed.

The monies that local VFW Posts and Auxiliaries wish to donate to VFW-PAC are comprised of general treasury funds of Posts and Auxiliaries (i.e. dues) and monies obtained in commercial transactions involving the sale of food and beverages by those organizations. Accordingly, the Commission concludes that VFW-PAC is prohibited under the Act from accepting such funds. The Commission notes, however, that while VFW-PAC may not accept these funds, the Act would not prohibit the use of such funds by the National Organization of the Veterans of Foreign Wars (a corporation) to pay for expenses of administration and solicitation of contributions to VFW-PAC. 11 CFR 114.1(b) and 114.5(b).

The Commission expresses no opinion as to any Federal income tax ramifications or the applicability of any other Federal law, since those issues are not within its jurisdiction.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,



Robert O. Tiernan
Chairman for the
Federal Election Commission

Enclosures

*/A separate segregated fund of a corporation may utilize monies obtained by a raffle, or other fundraising device which involves a prize, and not be subject to this prohibition so long as such fundraising is restricted to those persons who may be solicited for contributions to that fund. In this case the solicitable persons would include only the membership of the VFW and not the general public. See 11 CFR 114.5(b)(2), and 114.7(a); see also Advisory Opinion 1979-57.

81040301586



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harry Dougherty
District Director
District 30 of the United-
Steelworkers of America
9000 Keystone Crossing
Indianapolis, Indiana 46240

Re: MUR 1220

Dear Mr. Dougherty:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that District 30 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to beleive that District 30 violated 2 U.S.C. § 432(b)(2) (A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstates that no further action should be taken against District 30, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

81040301587



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert J. Peters
District Director
District 38 of the United
Steelworkers of America
P.O. Box 2428
West Covina, CA 91793

Re: MUR 1220

Dear Mr. Peters:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that District 38 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act")

Upon review of the information available to the Commission and information supplied by you, the Commission determined on , 1980, that there is reason to believe that District 38 violated 2 U.S.C. § 432(b)(2)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against District 38, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

81040301588



(142)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank S. McKee
Five Gateway Center
Pittsburgh, PA 15222

Re: MUR 1220

Dear Mr. McKee:

On , 1980, the Commission found reason to believe that your committee violated 2 U.S.C. § 437b and 2 U.S.C. § 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above captioned matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that failure of the United Steelworkers of America Political Action Fund to deposit the contributions in question within 10 days and the receipt of money obtained from commercial transactions nevertheless appears to be a violation of 2 U.S.C. § 437b and 1 U.S.C. § 441b(b)(3)(A), respectively and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

81040301589



146
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Local Union #3216, District 7
of the United Steelworkers
c/o Walter Kunknowski
200 General Lafayette Building
210 Goddard Blvd.
King of Prussia, PA 19406

Re: MUR 1220

Dear Mr. Kunknowski:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found evidence that Local Union #3216 violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that Local Union #3216 violated 2 U.S.C. § 432 (b)(2)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against Local Union #3216, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact William E. Taylor, Jr., the attorney assigned to this matter at 202-523-5071.

Sincerely,

81040301590

REPORTS ANALYSIS REFERRAL SHEET

DATE April 2, 1980 ANALYST Kevin M. Kelly *KK*
TO: Office of General Counsel TEAM CHIEF Steve Hims *SH*
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: United Steelworkers of America Political Action Fund
TREASURER: Frank S. McKee
ADDRESS: Five Gateway Center
Pittsburgh, PA 15222

AFFILIATE(S): N/A

ALLEGATION(S): Failure to timely deposit and report proceeds from fundraising events. CITE: 2.U.S.C. 432(b) ATTACHMENT(S) #2
11 CFR 103.3

DATE INITIATED: 7/16/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review ☐ Other:
☐ Special Project:

ATTACHMENT

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

PERIOD COVERED FROM January 1, 1977 TO December 31, 1979

TOTAL RECEIPTS \$ 1,043,209 TOTAL EXPENDITURES \$ 978,251

CASH ON HAND \$ 287,630 DEBTS \$ None

HISTORY:

RESULTS OF REVIEW:

Request For Additional Information sent(YE 77 & 78) 7/16/79 ATTACHMENT #3
RFAI sent (more specific request) 8/21/79 #5
Second letter request sent 12/18/79 #8

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon 7/23/79 ATTACHMENT #4
Telecon 10/18/79 #6
Telecon 11/19/79 #7
Telecon 1/3/80 #9
Telecon 1/18/80 #10

REASON(S) FOR REFERRAL:

No response received

ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD:

RFAI sent regarding sale of articles (violation of 11 CFR 114.5(a)) 2/19/80 #11

(No response received to date - a Second letter is being processed)

OTHER RELEVANT INFORMATION:

ATTACHMENT

Audit report findings D & E relate to the requirements or reporting and transmitting proceeds from fundraising events (Audit report released 10/28/76) #12

United Steelworkers P.A.F. submits an outline of procedures for Commission approval. The FEC did not comment on these procedures. (Note: these procedures did not mention the 10 day requirement of transferring receipts from fundraisers.) 11/16/76 #13

After the 7/23/79 conversation with Beverly Brown, USWPAF sends another copy of the 11/76 outline.

JOHN PARTY RELATION

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 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. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 835. 836. 837. 838. 839. 840. 84

RECEIPTS

EXFUNDITURES

| COVERAGE DATES | # OF PAGES |
|--------------------|------------|
| 12/1/68 - 12/31/68 | 1 |
| 1/1/69 - 1/31/69 | 1 |
| 2/1/69 - 2/28/69 | 1 |
| 3/1/69 - 3/31/69 | 1 |
| 4/1/69 - 4/30/69 | 1 |
| 5/1/69 - 5/31/69 | 1 |
| 6/1/69 - 6/30/69 | 1 |
| 7/1/69 - 7/31/69 | 1 |
| 8/1/69 - 8/31/69 | 1 |
| 9/1/69 - 9/30/69 | 1 |
| 10/1/69 - 10/31/69 | 1 |
| 11/1/69 - 11/30/69 | 1 |
| 12/1/69 - 12/31/69 | 1 |
| 1/1/70 - 1/31/70 | 1 |
| 2/1/70 - 2/28/70 | 1 |
| 3/1/70 - 3/31/70 | 1 |
| 4/1/70 - 4/30/70 | 1 |
| 5/1/70 - 5/31/70 | 1 |
| 6/1/70 - 6/30/70 | 1 |
| 7/1/70 - 7/31/70 | 1 |
| 8/1/70 - 8/31/70 | 1 |
| 9/1/70 - 9/30/70 | 1 |
| 10/1/70 - 10/31/70 | 1 |
| 11/1/70 - 11/30/70 | 1 |
| 12/1/70 - 12/31/70 | 1 |
| 1/1/71 - 1/31/71 | 1 |
| 2/1/71 - 2/28/71 | 1 |
| 3/1/71 - 3/31/71 | 1 |
| 4/1/71 - 4/30/71 | 1 |
| 5/1/71 - 5/31/71 | 1 |
| 6/1/71 - 6/30/71 | 1 |
| 7/1/71 - 7/31/71 | 1 |
| 8/1/71 - 8/31/71 | 1 |
| 9/1/71 - 9/30/71 | 1 |
| 10/1/71 - 10/31/71 | 1 |
| 11/1/71 - 11/30/71 | 1 |
| 12/1/71 - 12/31/71 | 1 |
| 1/1/72 - 1/31/72 | 1 |
| 2/1/72 - 2/28/72 | 1 |
| 3/1/72 - 3/31/72 | 1 |
| 4/1/72 - 4/30/72 | 1 |
| 5/1/72 - 5/31/72 | 1 |
| 6/1/72 - 6/30/72 | 1 |
| 7/1/72 - 7/31/72 | 1 |
| 8/1/72 - 8/31/72 | 1 |
| 9/1/72 - 9/30/72 | 1 |
| 10/1/72 - 10/31/72 | 1 |
| 11/1/72 - 11/30/72 | 1 |
| 12/1/72 - 12/31/72 | 1 |
| 1/1/73 - 1/31/73 | 1 |
| 2/1/73 - 2/28/73 | 1 |
| 3/1/73 - 3/31/73 | 1 |
| 4/1/73 - 4/30/73 | 1 |
| 5/1/73 - 5/31/73 | 1 |
| 6/1/73 - 6/30/73 | 1 |
| 7/1/73 - 7/31/73 | 1 |
| 8/1/73 - 8/31/73 | 1 |
| 9/1/73 - 9/30/73 | 1 |
| 10/1/73 - 10/31/73 | 1 |
| 11/1/73 - 11/30/73 | 1 |
| 12/1/73 - 12/31/73 | 1 |
| 1/1/74 - 1/31/74 | 1 |
| 2/1/74 - 2/28/74 | 1 |
| 3/1/74 - 3/31/74 | 1 |
| 4/1/74 - 4/30/74 | 1 |
| 5/1/74 - 5/31/74 | 1 |
| 6/1/74 - 6/30/74 | 1 |
| 7/1/74 - 7/31/74 | 1 |
| 8/1/74 - 8/31/74 | 1 |
| 9/1/74 - 9/30/74 | 1 |
| 10/1/74 - 10/31/74 | 1 |
| 11/1/74 - 11/30/74 | 1 |
| 12/1/74 - 12/31/74 | 1 |
| 1/1/75 - 1/31/75 | 1 |
| 2/1/75 - 2/28/75 | 1 |
| 3/1/75 - 3/31/75 | 1 |
| 4/1/75 - 4/30/75 | 1 |
| 5/1/75 - 5/31/75 | 1 |
| 6/1/75 - 6/30/75 | 1 |
| 7/1/75 - 7/31/75 | 1 |
| 8/1/75 - 8/31/75 | 1 |
| 9/1/75 - 9/30/75 | 1 |
| 10/1/75 - 10/31/75 | 1 |
| 11/1/75 - 11/30/75 | 1 |
| 12/1/75 - 12/31/75 | 1 |
| 1/1/76 - 1/31/76 | 1 |
| 2/1/76 - 2/28/76 | 1 |
| 3/1/76 - 3/31/76 | 1 |
| 4/1/76 - 4/30/76 | 1 |
| 5/1/76 - 5/31/76 | 1 |
| 6/1/76 - 6/30/76 | 1 |
| 7/1/76 - 7/31/76 | 1 |
| 8/1/76 - 8/31/76 | 1 |
| 9/1/76 - 9/30/76 | 1 |
| 10/1/76 - 10/31/76 | 1 |
| 11/1/76 - 11/30/76 | 1 |
| 12/1/76 - 12/31/76 | 1 |
| 1/1/77 - 1/31/77 | 1 |
| 2/1/77 - 2/28/77 | 1 |
| 3/1/77 - 3/31/77 | 1 |
| 4/1/77 - 4/30/77 | 1 |
| 5/1/77 - 5/31/77 | 1 |
| 6/1/77 - 6/30/77 | 1 |
| 7/1/77 - 7/31/77 | 1 |
| 8/1/77 - 8/31/77 | 1 |
| 9/1/77 - 9/30/77 | 1 |
| 10/1/77 - 10/31/77 | 1 |
| 11/1/77 - 11/30/77 | 1 |
| 12/1/77 - 12/31/77 | 1 |
| 1/1/78 - 1/31/78 | 1 |
| 2/1/78 - 2/28/78 | 1 |
| 3/1/78 - 3/31/78 | 1 |
| 4/1/78 - 4/30/78 | 1 |
| 5/1/78 - 5/31/78 | 1 |
| 6/1 | |

**MICROFILM
LOCATION**

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND
CONNECTING ORGANIZATION: STEEL WORKERS OF AMERICA, UNITED

ALL 77-78
DOCUMENTS HAVE
BEEN REVIEWED

ID A590003593

1977 STATEMENT OF ORGANIZATION - AMENDMENT
MISCELLANEOUS REPORT
STATEMENT OF ORGANIZATION - AMENDMENT
MISCELLANEOUS REPORT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
STATEMENT OF ORGANIZATION - AMENDMENT
FEBRUARY MONTHLY
MARCH MONTHLY
APRIL MONTHLY
MAY MONTHLY
JUNE MONTHLY
JUNE MONTHLY - AMENDMENT
JULY MONTHLY
AUGUST MONTHLY
SEPTEMBER MONTHLY
OCTOBER MONTHLY
NOVEMBER MONTHLY
DECEMBER MONTHLY
DECEMBER MONTHLY - AMENDMENT
YEAR END
YEAR END - AMENDMENT
REQUEST FOR ADDITIONAL INFORMATION
REQUEST FOR ADDITIONAL INFORMATION
REQUEST FOR ADDITIONAL INFORMATION

11,103
11,347
8,249
10,748
11,774
10,212
15,557
13,592
47,156
56,486
43,937
48,937
34,328

15,679

1,100
9,675
2,100
13,250
14,209
2,750
543
1,928
24,119
6,271
5,083
6,083
2,978

1,162

| | | |
|----------------------|----|----------------|
| 1 FEB 77 | 4 | 77FEC/048/4808 |
| 22 FEB 77 | 2 | 77FEC/048/5128 |
| 4 MAR 77 | 4 | 77FEC/049/3129 |
| 13 MAR 77 | 1 | 77FEC/050/0279 |
| 5 APR 77 | 4 | 77FEC/051/5112 |
| 27 APR 77 | 1 | 77FEC/052/5025 |
| 31 MAY 77 | 5 | 77FEC/054/0267 |
| 9 JUL 77 | 4 | 77FEC/055/5211 |
| 20 SEP 77 | 4 | 77FEC/057/4980 |
| 7 OCT 77 | 4 | 77FEC/059/4148 |
| 7 NOV 77 | 3 | 77FEC/061/3051 |
| 10 DEC 77 | 4 | 77FEC/062/4050 |
| 1 JAN 77 - 31 JAN 77 | 5 | 77FEC/048/5130 |
| 1 FEB 77 - 29 FEB 77 | 5 | 77FEC/049/3134 |
| 1 MAR 77 - 31 MAR 77 | 5 | 77FEC/051/5107 |
| 1 APR 77 - 30 APR 77 | 5 | 77FEC/053/0826 |
| 1 MAY 77 - 31 MAY 77 | 4 | 77FEC/054/1983 |
| 1 MAY 77 - 31 MAY 77 | 16 | 77FEC/055/5224 |
| 1 JUN 77 - 30 JUN 77 | 9 | 77FEC/055/5215 |
| 1 JUL 77 - 31 JUL 77 | 8 | 77FEC/057/1651 |
| 1 AUG 77 - 31 AUG 77 | 7 | 77FEC/057/4973 |
| 1 SEP 77 - 30 SEP 77 | 12 | 77FEC/059/4135 |
| 1 OCT 77 - 31 OCT 77 | 13 | 77FEC/061/3055 |
| 1 NOV 77 - 30 NOV 77 | 61 | 77FEC/062/3894 |
| 1 NOV 77 - 30 NOV 77 | 3 | 78FEC/065/0776 |
| 1 DEC 77 - 31 DEC 77 | 92 | 78FEC/064/5419 |
| 1 DEC 77 - 31 DEC 77 | 4 | 78FEC/066/5005 |
| 1 DEC 77 - 31 DEC 77 | 2 | 78FEC/065/4938 |
| 1 JAN 77 - 31 DEC 77 | 2 | 79FEC/132/4148 |
| 1 JAN 77 - 31 DEC 77 | 2 | 79FEC/135/1333 |
| 27 JAN 78 | 4 | 78FEC/065/1812 |
| 4 FEB 78 | 5 | 79FEC/066/4112 |
| 15 FEB 78 | 5 | 78FEC/067/2539 |
| 27 FEB 78 | 6 | 78FEC/067/3939 |
| 9 MAR 78 | 1 | 79FEC/121/2820 |
| 1 MAR 78 | 4 | 78FEC/068/2316 |
| 31 MAR 78 | 4 | 78FEC/069/3987 |
| 5 MAY 78 | 19 | 79FEC/073/4925 |
| 15 MAY 78 TO DEC | 2 | 79FEC/074/1915 |
| 15 MAY 78 | 4 | 78FEC/074/1182 |
| 3 JUN 78 | 7 | 79FEC/075/2361 |
| 7 JUL 78 | 5 | 79FEC/079/3080 |
| 7 AUG 78 | 5 | 79FEC/082/2305 |
| 8 SEP 78 | 4 | 79FEC/084/4433 |

81040301593
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-73)

DATE 24MAR80
 PAGE 2

NON-PARTY RELATED

| COMMITTEE | DOCUMENT | RECEIPTS | EXPENDITURES | COVERAGE DATES | # OF
PAGES | MICROFILM
LOCATION |
|-----------|---------------------------------------|----------|--------------|-------------------|---------------|-----------------------|
| | STATEMENT OF ORGANIZATION - AMENDMENT | | | 11OCT79 | 9 | 78FEC/089/1801 |
| | STATEMENT OF ORGANIZATION - AMENDMENT | | | 27OCT79 | 9 | 78FEC/094/1014 |
| | STATEMENT OF ORGANIZATION - AMENDMENT | | | 1OCT79 | 7 | 78FEC/116/0093 |
| | FEBRUARY MONTHLY | 16,758 | 38,150 | 1JAN78 - 31JAN78 | 5 | 78FEC/086/5015 |
| | MARCH MONTHLY | 31,748 | 20,294 | 1FEB78 - 28FEB78 | 7 | 78FEC/088/2178 |
| | MARCH MONTHLY - AMENDMENT | - | - | 3FEB78 - 072/2735 | 3 | 78FEC/072/2735 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1FEB78 - 28FEB78 | 3 | 78FEC/071/0037 |
| | APRIL MONTHLY | 10,823 | 10,300 | 1MAR78 - 31MAR78 | 4 | 78FEC/070/3007 |
| | APRIL MONTHLY - AMENDMENT | - | - | 1MAR78 - 31MAR78 | 4 | 78FEC/075/4314 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1MAR78 - 31MAR78 | 3 | 78FEC/073/2438 |
| | MAY MONTHLY | 15,723 | 72,275 | 1APR78 - 30APR78 | 8 | 78FEC/073/4935 |
| | JUNE MONTHLY | 12,339 | 77,928 | 1MAY78 - 31MAY78 | 14 | 78FEC/074/2368 |
| | JULY MONTHLY | 48,519 | 75,121 | 1JUN78 - 30JUN78 | 14 | 78FEC/079/3066 |
| | AUGUST MONTHLY | 30,485 | 39,326 | 1JUL78 - 31JUL78 | 12 | 78FEC/082/2293 |
| | SEPTEMBER MONTHLY | 52,202 | 42,728 | 1AUG78 - 31AUG78 | 14 | 78FEC/084/4441 |
| | SEPTEMBER MONTHLY - AMENDMENT | 51,202 | 42,728 | 1AUG78 - 31AUG78 | 3 | 79FEC/120/3780 |
| | OCTOBER MONTHLY | 23,137 | 81,313 | 1SEP78 - 30SEP78 | 19 | 78FEC/089/1782 |
| | OCTOBER MONTHLY - AMENDMENT | 23,137 | 81,313 | 1SEP78 - 30SEP78 | 5 | 79FEC/120/3783 |
| | 10 DAY PRE-GENERAL | 60,411 | 200,468 | 1OCT78 - 23OCT78 | 39 | 78FEC/094/1022 |
| | 10 DAY PRE-GENERAL - AMENDMENT | - | - | 1OCT78 - 23OCT78 | 2 | 78FEC/099/0200 |
| | 10 DAY PRE-GENERAL - AMENDMENT | 62,975 | 203,053 | 1OCT78 - 23OCT78 | 4 | 79FEC/120/3784 |
| | 10 DAY POST-GENERAL | 54,556 | 54,178 | 24OCT78 - 27NOV78 | 57 | 78FEC/099/0143 |
| | 10 DAY POST-GENERAL - AMENDMENT | 55,515 | 55,112 | 24OCT78 - 27NOV78 | 5 | 79FEC/120/3792 |
| | 10 DAY POST-GENERAL - AMENDMENT | - | - | 24OCT78 - 27NOV78 | 4 | 79FEC/130/1374 |
| | YEAR END | 30,143 | 1,923 | 28NOV78 - 31DEC78 | 82 | 79FEC/117/5053 |
| | YEAR END - AMENDMENT | 30,159 | 1,938 | 28NOV78 - 31DEC78 | 4 | 79FEC/120/3797 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1JAN78 - 31DEC78 | 2 | 79FEC/132/4150 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 1JAN78 - 31DEC78 | 3 | 79FEC/135/1332 |
| | TOTAL | 458,153 | 15,679 | 809,938 | 1,100 | 714 TOTAL PAGES |

NON-PARTY RELATED

| COMMITTEE | DOCUMENT | RECEIPTS | EXPENDITURES | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|--|----------|----------|--------------|------------------|------------|--------------------|
| UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND | | | | | | |
| CONNECTED ORGANIZATION: STEEL WORKERS OF AMERICA; UNITED | | | | | | |
| 1979 STATEMENT OF ORGANIZATION - AMENDMENT | | | | | | |
| MISCELLANEOUS REPORT | | | | | | |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | | | |
| MISCELLANEOUS REPORT | | | | | | |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | | | |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | | | |
| FEBRUARY MONTHLY | | 24,019 | 12,196 | 3JUN79 | 4 | 79FEC/128/4349 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 26JUL79 TO FEC | 23 | 79FEC/133/4917 |
| MARCH MONTHLY | | 9,200 | 3,100 | 3AUG79 | 4 | 79FEC/134/1432 |
| MARCH MONTHLY - AMENDMENT | | 9,200 | 3,100 | 4SEP79 TO FEC | 2 | 79FEC/135/3915 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 9OCT79 | 4 | 79FEC/139/1420 |
| APRIL MONTHLY | | 10,983 | 7,095 | 5DEC79 | 4 | 79FEC/142/2189 |
| APRIL MONTHLY - AMENDMENT | | 0 | 0 | 1JAN79 - 31JAN79 | 8 | 79FEC/120/5257 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 1JAN79 - 31JAN79 | 4 | 79FEC/132/4122 |
| MAY MONTHLY | | 11,983 | 15,391 | 1FEB79 - 28FEB79 | 4 | 79FEC/121/2718 |
| JUNE MONTHLY | | 16,177 | 3,779 | 1FEB79 - 28FEB79 | 5 | 79FEC/122/2524 |
| JULY MONTHLY | | 19,205 | 25,950 | 1FEB79 - 28FEB79 | 4 | 79FEC/122/0894 |
| AUGUST MONTHLY | | 10,144 | 2,451 | 1MAR79 - 31MAR79 | 7 | 79FEC/123/0919 |
| SEPTEMBER MONTHLY | | 27,709 | 6,187 | 1MAR79 - 31MAR79 | 2 | 79FEC/126/3845 |
| SEPTEMBER MONTHLY - AMENDMENT | | 41,642 | 3,458 | 1MAR79 - 31MAR79 | 4 | 79FEC/126/1633 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 1APR79 - 30APR79 | 7 | 79FEC/127/3444 |
| OCTOBER MONTHLY | | 41,065 | 50,859 | 1MAY79 - 31MAY79 | 7 | 79FEC/128/3151 |
| NOVEMBER MONTHLY | | 57,459 | 28,070 | 1JUN79 - 30JUN79 | 13 | 79FEC/133/1195 |
| DECEMBER MONTHLY | | 71,319 | 8,218 | 1JUL79 - 31JUL79 | 17 | 79FEC/134/3597 |
| YEAR END | | 43,422 | 9,403 | 1AUG79 - 31AUG79 | 16 | 79FEC/136/1559 |
| 1980 MISCELLANEOUS REPORT | | | | 1AUG79 - 31AUG79 | 4 | 79FEC/140/3522 |
| MISCELLANEOUS REPORT | | | | 1AUG79 - 31AUG79 | 9 | 80FEC/149/1648 |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | 1SEP79 - 30SEP79 | 22 | 79FEC/140/3500 |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | 1OCT79 - 31OCT79 | 66 | 79FEC/141/3627 |
| FEBRUARY MONTHLY | | 30,377 | 44,339 | 1NOV79 - 30NOV79 | 64 | 79FEC/142/4251 |
| MARCH MONTHLY | | 26,255 | 43,342 | 1DEC79 - 31DEC79 | 75 | 80FEC/144/2194 |
| TOTAL | | 422,287 | 0 210,575 | 7JAN80 TO FEC | 3 | 80FEC/143/4225 |
| | | | | 21JAN80 TO FEC | 2 | 80FEC/145/1471 |
| | | | | 22JAN80 | 4 | 80FEC/145/3008 |
| | | | | 27FEB80 | 5 | 80FEC/149/4792 |
| | | | | 1JAN80 - 31JAN80 | 7 | 80FEC/148/5000 |
| | | | | 1FEB80 - 29FEB80 | 7 | 80FEC/150/3950 |
| 405 TOTAL PAGES | | | | | | |

ALL 1979 DOCUMENTS
HAVE BEEN REVIEWED

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

Summary of fundraising activity* 1977-1979

\$174,447

- 1977 Totals

- 1) Amount raised through Sale of Tickets** (Schedule D, Line 1) \$30,835
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$4,605
 - a) % of total received within 1976 requirements 14.93%
- 3) Amount received within the 30 day requirement of the 1979 amendments. 11 C.F.R. 103.3 \$8,471
 - a) % of total received within 1979 requirements 27.47%

1978 Totals

- 1) Amount raised through Sale of Tickets (Schedule D, Line 1) \$67,665
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$2,124
 - a) % of total received within 1976 requirements 3.14%
- 3) Amount received within the 30 day requirement of the 1979 amendments.* 11 C.F.R. 103.3 \$39,528
 - a) % of total received within 1979 requirements 58.42%

1979 Totals

- 1) Amount raised through Sale of Tickets (Schedule D, Line 1) \$75,947
- 2) Amount received within the 10 day requirement of the 1976 amendments. 11 C.F.R. 103.3 \$9,464
 - a) % of total received with 1976 requirements %12.46
- 3) Amount received within the 30 day requirement of the 1979 amendments. 11 C.F.R. 103.3 \$12,568
 - a) % of total received within 1979 requirements %16.55

* This assumes that all contributions raised through this fundraising activity are each less than \$50.00.

** This does not include receipts from mass collections or from the sale of articles.

81040301595

United Steelworkers of America

POLITICAL ACTION FUND

FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
882-2400

July 8, 1977

Lloyd McBride
CHAIRMAN

Frank S. McKee
TREASURER

77 JUL 11 PM 3:48

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: USWA Political Action Fund
I.D. C 0000 3590

Dear Sirs:

Please find enclosed an amended report of receipts and expenditures (FEC Form 3) for May, 1977, by the above-referenced committee. The modifications, primarily in Schedules B and D, of this amended report provide as much information as is available concerning certain fundraising activities which were conducted on behalf of this committee, in October, 1976, in Kokomo, Indiana. The proceeds from those fundraising activities were received by the reporting committee during the May, 1977 reporting period.

Also enclosed are photocopies of a covering letter, dated October 28, 1976, of the report by the FEC Compliance Review Section concerning the USWA Political Action Fund, and of the response to that report which was made, in a letter dated November 16, 1976, by the Treasurer of the United Steelworkers of America Political Action Fund. Although the United Steelworkers of America Political Action Fund has been informing those who engage in fundraising activities on its behalf of the record keeping steps which now are being followed pursuant to that report and correspondence, the particular fundraising activities covered in the enclosed report were undertaken before the understandings represented in that

81704305013529264

July 8, 1977

Page 2

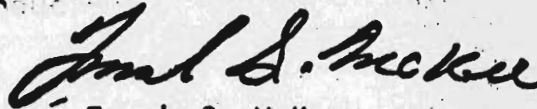
Federal Election Commission

Re: USWA Political Action Fund
I.D. C0000 3590

correspondence were reached. Consequently, the records of the October, 1976 fundraising activities in question are not adequate to supply all of the information which we expect will be included in future reports concerning such activities.

I trust that the information in this amended report, as explained in this letter, constitutes sufficient compliance with the FEC's requirements; but please do not hesitate to contact us if you have any questions regarding this matter.

Very truly yours,



Frank S. McKee
Treasurer

81040301597

Schedule D

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

Itemized Receipts Sales and Collections For Line Number 15C Only of FEC Form 3

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

M6 5/1/77 - 5/31/77

Name of Candidate or Committee in full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)* \$ 2,728.00
 2 Mass collections (List by event below)** \$ None
 3 Sale of items \$ None
 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) \$ 2,728.00

List of Sales and Collections by Event

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Mass
Collections this Period
** |
|---|-------------------------------------|---|---|
| Legislative Dance, USWA Local 1054 Union
Hall, 920 Millbrook Lane, Kokomo, Indiana | 10/30/76 | \$1,142.00 | \$ None |
| | | | |
| | | | |
| The following two events were conducted at
the Legislative Dance while it was in
progress: | | | |
| Raffle | | 900.00 | |
| Tip Board Sales | | 686.00 | |
| | | | |
| Note: These above fundraising events were
conducted prior to the time that our
Committee was finally notified by the FEC
that the financial details of such fund-
raising events were to be included on
Form 3. Consequently the local fund-
raisers were not required to nor did they
keep detailed records. Therefore, all items
included in this Amended Form 3 for May '77,
are based on such information and is the
best record that we are able to provide. | | | |
| | | | |
| | | | |
| Subtotal this period this page (optional) | | \$2,728.00 | \$ None |
| Total this period (last page this line number only) | | \$ 2,728.00 | \$.. None |

8717004300352988

LINE NUMBER 150

(see instructions on back)

Committee or Committee in full

United Steelworkers of America
Political Action Fund

117 6/1/77 - 6/30/77

Presented during the Reporting Period:

| | | |
|---|---|--------|
| 1 | Sale of tickets (List by event below) | 172.00 |
| 2 | Mass collections (List by event below) | |
| 3 | Sale of books | |
| 4 | Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) | 172.00 |

List of Sales and Collections by Event

| Location and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Mass
Collections this Period |
|---|-------------------------------------|---|---|
| St. Patrick's Day PAC (Raffle) | 3/19/77 | \$ 172.00 | \$ None |
| USWA Local Union 1608 Hall | | | |
| 1024 Hert Street, Harrisburg, PA. | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Subtotal this period this page | | \$ 172.00 | \$ None |
| Total this period (last page this line number only) | | \$ 172.00 | \$ None |

Page

8 | 07 47 00 33 00 15 55 95 92 | 8

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

148 7/1/77 - 7/31/77

Name of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund**

| | | |
|---|---|--------|
| 1 | Sale of tickets (List by event below)* | 948.00 |
| 2 | Mass collections (List by event below)** | NA |
| 3 | Sale of items | NA |
| 4 | Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) | 948.00 |

[illegible]

| | | |
|---|-----------|-------|
| Subtotal this period this page (optional) | \$ 948.00 | \$ NA |
| Total this period (last page this line number only) | \$ 948.00 | \$ NA |

Page

Item 2 Receipts Sales and Collection
For Line Number 15C Only of FEC Form 3

Page 1 of 1 for
LINE NUMBER 15C

M10 9/1/77 - 9/30/77

Station Commission
1000 Street, N.W.
Washington, D.C. 20543

(see instructions on back)

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

| | |
|---|--------------|
| 1 Sale of tickets (List by event below)* | \$ 21,200.00 |
| 2 Mass collections (List by event below)** | \$ 719.26 |
| 3 Sale of items | \$ None |
| 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) | \$ 21,919.26 |

List of Sales and Collections by Event

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| LU 1688 - USWA | | | |
| Party and Dance | | \$ | \$ |
| St. Anne's Catholic Church Auditorium | | | |
| 7th and Reynders Ave. | 7/23/77 | 15,000.00 | 719.26 |
| Steelton, Penna. 17113 | | | |
| Local Union 5739 - 50/50 Raffle | 2nd Tues. of
each month | 260.00 | None |
| Chester, Penna. | 9/76 thru
6/77 | | |
| Local Union 5401 - 50/50 Raffle | 3/10 & | 200.00 | None |
| Country Market, New Kingston, PA | 7/14/77 | | |
| Local Union 6014 - PAC Raffle | 8/13/77 | 785.00 | None |
| 844 E. Chestnut St., Lancaster, PA | | | |
| Local Union 3216 - PAC Raffle (3rd Wed. of
each month) - Holy Saviour Hall, Norristown
PA | 2/16/77 thru
8/17/77 | 620.00 | None |
| Local Union 3339 Dinner and Raffle | 9/17/77 | 4,335.00 | None |
| Brushton Fire Hall, Hanover, PA | | | |
| Subtotal this period this page (optional) | | \$ 21,200.00 | \$ 719.26 |
| Total this period (last page this line number only) | | \$ 21,200.00 | \$ 719.26 |

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

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

M11 10/1/77 - 10/31/77

Name of Candidate or Committee in full **United Steelworkers of America
Political Action Fund**

| | | | |
|---|---|----|----------|
| 1 | Sale of tickets (List by event below) | \$ | 1,513.00 |
| 2 | Mass collections (List by event below)** | \$ | 141.00 |
| 3 | Sale of items | \$ | None |
| 4 | Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, PEC Form 3) | \$ | 1,654.00 |

List of Sales and Collections by Event

[illegible]

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

(see instructions on back)

THE NUMBER 15C

M12 11/1/77 - 11/30/77

| | | | |
|---|---|----|----------|
| 1 | Sale of tickets (List by event below) | \$ | 3,685.00 |
| 2 | Mass collections (List by event below)** | \$ | None |
| 3 | Sale of items | \$ | None |
| 4 | Total (Carry forward to Line 18C of Detailed Summary Schedule Page 2, FEC Form 3) | \$ | 3,685.00 |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Me
Collections this Pe
** |
|---|-------------------------------------|---|---|
| L.U. 6627 Raffle | 8/5/77 | \$ 282.00 | \$ |
| L.U. 3182 Hall, 3230 Philadelphia Pike,
Claymont, DEL. | | | |
| L.U. 3853 PAC Raffles | * | 437.50 | |
| Alloy Metal Wire Works, Prospect Park, Pa.
*3/23/77; 3/30/77; 4/6/77; 4/13/77; 4/20/77;
4/27/77; 5/4/77 | | | |
| L.U. 13866 50-50 PAC Raffle | | 138.00 | |
| Marcus Hook Fire Hall
8th & Market Streets, Marcus Hook, PA. | | | |
| L.U. 1165: Local Union Hall, 750 Charles Street,
Coatesville, PA 19320 | 10-76 thru
9-77 | 682.00 | |
| 1) 50-50 Raffles at each Local Union Meeting | 12/8/76 | 618.75 | |
| 2) Drawing at Christmas Party | 4/5/77 | 652.50 | |
| 3) Raffle | 9/24/77 | 874.25 | |
| 4) Raffle (at L.U. Picnic) | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Subtotal this period this page (optional) | | \$ 3,685.00 | \$ None |
| Total this period (last page this line number only) | | \$ 3,685.00 | ** None |

**July 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463**

Page 1 of 1 for
LINE NUMBER 15C

(see instructions on back)

YE 12/1/77 - 12/31/77

**United Steelworkers of America
Political Action Fund**

| | | | |
|---|---|----|--------|
| 1 | Sale of tickets (List by event below) | \$ | 589.00 |
| 2 | Mass collections (List by event below)** | \$ | None |
| 3 | Sale of items | \$ | None |
| 4 | Total (Carry forward to Line 18C of Detailed Summary Schedule Page 2, FEC Form 3) | \$ | 589.00 |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Mass
Collections this Period** |
|--|-------------------------------------|---|---|
| LU 5542 Raffle | | \$ | \$ |
| Messenger Bearing Inc. Plant-Carpenter
Shop
3901 D Street
Philadelphia, Pa. | 9/8/77 | 78.00 | None |
| LU 12886 Raffle | 6/2/77 | 241.00 | None |
| 222 Philadelphia Pike
Wilmington, DE | | | |
| LU 12886 Raffle | 12/1/77 | 270.00 | None |
| 222 Philadelphia Pike
Wilmington, DE | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Subtotal this period this page (optional) | | \$ 589.00 | \$ None |
| Total this period (last page this line number only) | | \$ 589.00 | ** None |

For Line Number 15C Only of FEC Form 3

(see instructions on back)

103 2/1/78 - 2/28/78

Station Commission
1100 M Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in full

United Steelworkers of America
Political Action Fund

Total Proceeds during the Reporting Period:

| | |
|---|-------------|
| 1 Sale of tickets (List by event below)* | \$ 9,86 |
| 2 Mass collections (List by event below)** | None |
| 3 Sale of items | None |
| 4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) | \$ 9,863.00 |

List of Sales and Collections by Event

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| District 30 - Legislative Conference 1977 | 9/16 & 17 | \$7,690.00 | \$ NA |
| Indianapolis, Indiana | 1977 | | |
| LU 6816 USWA, Box 132, Collegeville, PA | 19426 | | |
| Thanksgiving Drawing (Local Union Hall) | 11/21/76 | 315.00 | NA |
| Christmas Drawing (Local Union Hall) | 12/19/76 | 300.00 | NA |
| Local Union Banquet Drawing | | | |
| Gilbertsville Fire Hall, Gilbertsville, PA | 4/15/77 | 340.00 | NA |
| Punch Board Sales | June-1977 | 600.00 | NA |
| LU 1940 USWA, 519 Electric Street, | 4th Tues. | 618.00 | NA |
| Lewistown, PA | each month | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Subtotal this period this page (optional) | | \$ 9,863.00 | \$ NA |
| Total this period (last page this line number only) | | \$ 9,863.00 | \$ NA |

810403016201593

111121

omission

20463

(see instructions on back)

M3. Amend

of Candidate or Committee in full

**United Steelworkers of America
Political Action Fund.**



Total Processed during the Reporting Period:

| | | | |
|---|---|----|----------|
| 1 | Sale of tickets (List by event below) | \$ | 9,863.00 |
| 2 | Mass collections (List by event below)** | \$ | None |
| 3 | Sale of items | \$ | None |
| 4 | Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) | \$ | 9,863.00 |

List of Sales and Collections by Event

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | Amount from Sale of
Tickets this Period* | Amount from P.A.
Collections this Pe-
riod |
|---|-------------------------------------|---|--|
| District 30 - Legislative Conference 1977 | 9/16 & 17 | \$7,690.00 | \$ NA |
| Indianapolis, Indiana | 1977 | | |
| LU 6816 USWA, Box 132, Collegeville, PA | | | |
| 19426 | | | |
| Thanksgiving Drawing (Local Union Hall) | 11/21/76 | 315.00 | NA |
| Christmas Drawing (Local Union Hall) | 12/19/76 | 300.00 | NA |
| Local Union Banquet Drawing | | | |
| Gilbertsville Fire Hall, Gilbertsville, PA | 4/15/77 | 340.00 | NA |
| Punch Board Sales | June-1977 | 600.00 | NA |
| | | | |
| LU 1940 USWA, 519 Electric Street, | 4th Tues. | 618.00 | NA |
| Lewistown, PA | each month | | |
| | | | |
| Note: Fundraising events are reported during | | | |
| the month in which the funds raised | | | |
| and reports are received by the | | | |
| Treasurer's Office. | | | |
| | | | |
| | | | |
| Subtotal this period this page (optional) | | \$ 9,863.00 | \$ NA |
| Total this period (last page this line number only) | | \$ 9,863.00 | \$ NA |

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for
LINE NUMBER 14c

(See Instructions on Back)

5/1/78 - 5/31/78

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

| | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 1,959.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ 1,959.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month; day; year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| LU 12886, 222 Philadelphia Pike | 1/5/78 | \$ 214.00 | \$ NA |
| Wilmington, DE | 2/2/78 | 183.00 | NA |
| Raffles | 3/2/78 | 190.00 | NA |
| | 4/6/78 | 166.00 | NA |
| | 5/4/78 | 156.00 | NA |
| LU 3182- LU 3182 Hall, 9230 Philadelphia
Pike, Claymont, DE | | | |
| Dance | 2/25/78 | 1,050.00 | NA |
| Note: Fundraising events are reported
during the month in which the
report and transmittal funds
raised are received by the
Treasurer's Office. | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 1,959.00 | ** None |

(See instructions on back)

Page 1 of 1 for
LINE NUMBER 14c

Total Proceeds during the Reporting Period:

| | |
|---|--------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 32,269.43 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ 32,269.43 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| LU 5829 - 50-50 Raffle | 5/12/78 | \$ 153.00 | \$ None |
| USWA - 136 E. Gay Street
West Chester, Penna. | | | |
| District 20 - USWA PAC Committee Raffle | 5/2/78 | 17,506.43 | None |
| 390 Ohio River Blvd
Baden, Penna. 15005 | | | |
| District 15 PAC Committee Raffle | 5/2/78 | 14,610.00 | None |
| 1945 Lincoln Highway
No. Versailles, PA 15137 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 32,269.43 | ** None |

ITEMIZED RECEIPTS SALES AND COLLECTIONS FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

M8 7/1/78 - 7/31/78

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

- | | |
|---|------------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 526.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ <u>526.00</u> |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| 44 6816, USWA - Raffle
Gilbertsville, PA | 4/15/78 | \$ 526.00 | \$ None |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 526.00 | \$** None |

30309900803040108

(See Instructions on Back)

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|-------------------------------------|---|---|
| District 31, Sub-Dist. 4 Annual Raffle | 6/9/78 | \$ 8,648.25 | \$ None |
| 5090 W. Harrison St., Chicago, IL-60644 | | | |
| Lu 3182 50-50 Drawing | 7/25/78 | 520.00 | None |
| 3230 Philadelphia Pike, Claymont, DE | | | |
| LU 3566 Raffle | | | |
| St. Anthony's Hall, Claymont, DE | 7/21/78 | 259.00 | None |
| LU 12886 50-50 Raffle | 7/6/78 | 167.00 | None |
| 222 Philadelphia Pike, Wilmington, DE | | | = |
| LU 1940' 50-50 Raffle | Various Dates | 158.00 | None |
| 519 Electric St., Lewistown, PA | | | |
| | | | |
| Note: Fundraising events are reported during the month in which the report and transmittal of funds raised are received in the Treasurer's Office. | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 9,752.25 | \$.. None |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| Local Union 1940, Dist. 7, USWA (50-50 Raffles)
519 Electric St.
Lewistown, PA 17044 | 8/22/78

9/4/78 | \$ 40.00

380.00 | \$ NA |
| Dist. 7, USWA-Reading Sub-District PAC
Fundraiser Picnic
Flying Hills Grove, PA | 6/11/78 | 3,838.00 | |
| Note: Fundraising events are reported during the month in which the report
and transmittal of funds raised are received in the Treasurer's office. | | | |
| TOTALS | | \$4,258.00 | ** NONE |

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of 1 for

LINE NUMBER 14c

LOG 10/1/78 - 10/23/78

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

| | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 7,670.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ 198.00 |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ NA |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ 7,868.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|--|---|---|
| Local Union 3182 Annual Party
3230 Philadelphia Pike.
Claymont, DE | 9/23/78 | \$ 966.00 | \$ NONE |
| LU 3139 Annual Dinner, Brushton Fire Hall
Hanover, PA | 9/9/78 | 4410.00 | |
| LU 6326-Mermaid Swim Club, Jolley Rd.) Vol. collect-
Blue Bell, PA)tion at union various | meeting
dates
picnic
6/24/78
raffle
6/24/78 | 769.00
110.00 | 198.00 |
| LU 12698 Raffle, 222 Philadelphia Pike,
Wilmington, DE | 3/19/78* | 376.00 | |
| LU 3216 -- 50/50 Raffles, Holy Saviour Club
436 E. Main St., Norristown, PA | various-at
mo. union meets. | 564.00 | |
| LU 5739 -- Raffle Friendship Fire Hall
Linwood, PA | various-at
union meetings | 415.00 | |
| LU 2151, 1852, 6014 & 6880, Philadelphia, PA Area
Sale of Golf Caps | various | 604.00 | |
| *Fundraising events are reported during the month in which the report
and transmittal of funds raised are received in the Treasurer's office. | | | |
| SUBTOTAL this period | | \$ 7,670.00 | \$ 198.00 |

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

Name of Candidate or Committee in Full

United Steelworkers of America
Political Action Fund

106-AMEND

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 12,553.25
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 198.00
3. Subtotal Receipts from the Sale of Items (not listed below) \$ NA
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) \$ 12,751.25

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|--|---|---|
| Local Union 3182 Annual Party
3230 Philadelphia Pike
Claymont, DE | 9/23/78 | \$ 966.00 | \$ None |
| Local Union 3139 Annual Dinner, Brushton
Fire Hall, Hanover, PA | 9/9/78 | 4,410.00 | |
| LU 6326-Mermaid Swin Club, Jolley Rd.
Blue Bell, PA (Vol. Collection at
Union Meeting)
Picnic
Raffle | Various
Dates
6/24/78
6/24/78 | | 198.00 |
| LU 12698 Raffle, 222 Philadelphia Pike,
Wilmington, DE | 3/19/78* | 376.00 | |
| LU 3216 -50/50 Raffles, Holy Saviour Club
436 E. Main St., Norristown, PA | Various
MO. Union
Meetings | 564.00 | |
| LU 5739 Raffle, Friendship Fire Hall
Linwood, PA | Various-at
Un. Meet. | 415.00 | |
| LU-2151, 2,6014 & 6880, Philadelphia,
PA Area Sale of Golf Caps | Various | 60.00 | |
| *Fundraising events are reported during the month in which the report and
transmittal of funds raised are received in the Treasurer's Office. | | | |
| SUBTOTAL this period | | \$ | \$ |

81004030161411

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

Page 1 of 1 for

LINE NUMBER 14c

306 10/24/78 - 11/27/78

Commission
Washington, D.C. 20463

(See Instructions on Back)

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 1,577.87
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ -----
3. Subtotal Receipts from the Sale of Items (not listed below). \$ -----
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 1,577.87

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|-------------------------------------|---|---|
| Local Union 7528 Raffle | 10/15/78 | \$ 102.00 | \$ None |
| 2889 Fairfield Avenue, Bridgeport, CT
06605 | | | |
| LU 13866 Raffle | 9/8/78 & | 186.00 | None |
| Marcus Hook, PA 19061 | 10/7/78 | | |
| District 38, Sub-District 1 | October '78 | 96.87 | None |
| 1520 W. Cameron Avenue, Suite 245
West Covina, CA 91790 | | | |
| LU 3182 - Sale of Item | | 795.00 | None |
| 3230 Philadelphia Pike
Claymont, DE | | | |
| LU 6627 Raffles | | 398.00 | None |
| 3230 Philadelphia Pike
Claymont, DE | | | |
| SUBTOTAL this period | | \$ 1,577.87 | \$ None |

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

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See instructions on Back)

Page 1 of 1 for

LINE NUMBER 14c

11/28/78 - 12/31/78

Name of Candidate or Committee in Full

**United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

| | |
|---|---------------------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 600.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ 480.00 |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ <u>1,080.00</u> |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period** | COLUMN B
Amount from Mass
Collections this Period** |
|---|---|---|--|
| District 19 Legislative Conference
50/50 Raffle, 400 Lock Street,
Tarentum, PA 15084
(The Hilton Airport Inn, Imperial,PA) | 10/13 &
10/15/78 | \$ 498.00 | \$ None |
| District 26 PAC Fundraising Comm.
400 Realty Bldg., Youngstown, OH
44503
(Sale of Items during International
Convention at Atlantic City, NJ) | 9/18/78 &
9/22/78 | 480.00 | None |
| LU 7528 Raffle
USWA - 2889 Fairfield Avenue
Bridgeport, CT 06605 | 10/15/78 | 102.00 | None |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 1,080.00 | ** None |

| Location (Sts., City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|--|---|
| LU 1374, USWA - 50-50 Raffle | | \$ | \$ |
| 134 Cumberland Street | 2 - '79 | 200.00 | |
| Lebanon, PA 17042 | | | |
| LU 1940, USWA - 50-50 Raffle | 8 - '78 | 133.00 | |
| 519 Electric St., | | | |
| Lewistown, PA 17044 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 333.00 | **None |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| U- 338, District 38, USWA | October '78 | \$ 848.00 | \$ NA |
| E. 14015 Trent Avenue,
Spokane, WA 99215 (Raffle) | | | |
| District 7, USWA | 4/3/79 | 1,376.00 | NA |
| Suite 200. General Lafayette Bldg
210 Goddard Blvd
King of Prussia, PA 19406 (Raffle) | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$2,224.00 | ** NA |

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

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 1 for
LINE NUMBER 14c

1/16 5/1/79 - 5/31/79

Name of Candidate or Committee in Full **United Steelworkers of America
Political Action Fund**

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 5,901.27...
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None...
3. Subtotal Receipts from the Sale of Items (not listed below). \$ None...
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 5,901.27

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|-------------------------------------|---|---|
| LU 1150 Raffle -
218 S. Addison, Indianapolis, IN | 10/16/78 | \$ 489.00 | \$ |
| Muncie Area Legislative Dance
USWA - District 30
206 E. Willard St
Muncie, IN 47302 | 10/28/79 | 1,155.00
1,328.27 | |
| District 30, USWA Legislative Fund
50-50 Raffle
Opryland Hotel., Nashville, TN | 3/10/79 | 1,230.00 | |
| Kokomo Area Legislative Dance
920 Millbrook Lane, Kokomo, IN - Tickets
Raffle | 10/28/78 | 880.00
819.00 | |
| SUBTOTAL this period | | \$ 5,901.27 | \$ None |

Page 1 of 1 for
LINE NUMBER 14c

(See Instructions on Back)

№7 6/1/79 - 6/30/79

United Steelworkers of America Political Action Fund

| | | |
|---|----|---------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | 592.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ | <u>592.00</u> |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| Local Union 8498 Raffle | 11/15/78 | \$ 592.00 | \$ |
| 4530 Pebble Lane | | | |
| Winston-Salem, North Carolina 27107 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 592.00 | ** None |

Page 1 of 1 for
LINE NUMBER 14c

(See Instructions on Back)

148 7/1/79 - 7/31/79

Name of Candidate or Committee in Full

| | | |
|---|----|--------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | 500.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | None |
| 3. Subtotal Receipts from the Sale of Items (not listed below). | \$ | None |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). | \$ | 500.00 |

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| Loyal Union 6014 Raffle | 4/7/79 | \$ 500.00 | \$ NONE |
| Lafayette Fire Hall | | | |
| Lancaster, Pa. | | | |
| 6 | | | |
| 1 | | | |
| 0 | | | |
| 3 | | | |
| 0 | | | |
| 4 | | | |
| 0 | | | |
| 1 | | | |
| 0 | | | |
| 8 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| * Fund Raising events are reported during the month in which the report and transmittal
of funds are received in the Treasurer's office. | | | |
| SUBTOTAL this period | | \$ 500.00 | ** NONE |

ITEMIZED RECEIPTS SALES AND COLLECTIONS FOR LINE NUMBER 14c ONLY OF FEC FORM 3

Page 1 of for
LINE NUMBER 14c

(See Instructions on Back)

19 8/1/79 - 8/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

| | |
|---|--------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 23,099.57 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ None |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ 1,750.00 |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ 24,849.57 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|---|-------------------------------------|---|---|
| Local Union 14543 - District 7 - 50-50 Raffle | 7/11/79 | 60.00 | None |
| 301 Chestnut Street | | | |
| Harrisburg, Pennsylvania 17101 | | | |
| Local Union 5030 - District 7 | Various | 1,540.00 | |
| USWA Raffle | | | |
| 301 Chestnut Street | | | |
| Harrisburg, Pennsylvania 17101 | | | |
| Local Union 3216 - District 7 - 50-50 Raffle | 6/79-7/79 | 154.00 | |
| 301 Chestnut Street | | | |
| Harrisburg, Pennsylvania 17101 | | | |
| District 31 - Sub-District 4, USWA | 6/10/79 | 7,706.57 | |
| Annual Raffle | | | |
| 5090 W. Harrison Street | | | |
| Chicago, Illinois 60644 | | | |
| District 27, USWA Raffle | 6/15/79 | 13,639.00 | |
| 1330 Market Avenue, North | | | |
| Canton, Ohio 44714 | | | |
| SUBTOTAL this period | | 23,099.57 | \$.. |

AMENDED

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of for

8/1/79 - 8/31/79
MARER 14c

Name of Committee in Full

Steelworkers of America Political Action Campaign Fund

Period during the Reporting Period:

Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ **23,379.77**
Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$
3. Subtotal Receipts from the Sale of Items (not listed below) \$ **1,750.00**
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ **25,129.77**

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period* |
|---|-------------------------------------|---|--|
| Local Union 14543, District 7, 50-50 Raffle | 7/11/79 | \$ 60.00 | \$ |
| Local Union 14378, District 7, 50-50 Raffle | 7/10/79 | 144.00 | |
| Local Union 4425, District 7, 50-50 Raffle | 8/3/79 | 136.20 | |
| Local Union 3216, District 7, 50-50 Raffle | 7/8/79 | 154.00 | |
| Local Union 5031, District 7, Raffle | Various | 1,540.00 | |
| 210 Goddard Boulevard | | | |
| King of Prussia, Pennsylvania 19406 | | | |
| District 31 - Sub-District 4 | 6/10/79 | 7,706.57 | |
| Annual Raffle | | | |
| 5090 W. Harrison Street | | | |
| Chicago, Illinois | | | |
| District 27 Raffle | 6/15/79 | 13,639.00 | |
| 1330 Market Avenue, North | | | |
| Canton, Ohio 44714 | | | |
| SUBTOTAL this period | | \$ 23,379.77 | \$.. |

8190403101624

SCHEDULE D
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 2 for
LINE NUMBER 14c

H10 9/1/79 - 9/30/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Campaign Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* \$ 11,549.20
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ None
3. Subtotal Receipts from the Sale of Items (not listed below). \$ 100.00
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 11,649.20

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period* |
|--|-------------------------------------|---|--|
| Local Union 3216, District 7, 50-50 Raffle
210 Goddard Boulevard
King of Prussia, Pennsylvania 19406 | Various | \$ 354.00 | \$ |
| Local Union 6017, District 7, 50-50 Raffle | 6/2/79 | 42.00 | |
| Local Union 12781, District 7, 50-50 Raffle | 8/10/79 | 122.00 | |
| Local Union 1940, District 7, 50-50 Raffle | 9/3/79 | 260.00 | |
| Local Union 1940, District 7, 50-50 Raffle | 1/1/79-8/79 | 351.00 | |
| Local Union 3566, District 7, 50-50 Raffle | 8/10/79 | 284.00 | |
| Local Union 12698, District 7, 50-50 Raffle | 9/16/79 | 266.00 | |
| Local Union 5424, District 7, 50-50 Raffle | 9/4/79 | 103.00 | |
| Local Union [REDACTED] District 7, 50-50 Raffle | 8/4/79 | 500.00 | |
| Local Union [REDACTED] District 7, 50-50 Raffle | 9/15/79 | 48.00 | |
| Local Union 15534, District 7, 50-50 Raffle | 9/15/79 | 197.00 | |
| Local Union 15253, District 7, 50-50 Raffle | 9/13/79 | 84.00 | |
| Local Union 12916, District 7, 50-50 Raffle | 9/18/79 | 64.00 | |
| Local Union 4425, District 7, 50-50 Raffle | 9/9/79 | 60.20 | |

8190040140135215

Washington, D.C. 20463

(See Instructions on Back.)

Page 2
9/1/79 - 9/30/79

LIST OF SALES AND COLLECTIONS BY EVENT

[illegible]

8-11-20 1950

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of for
LINE NUMBER 14c

M11 10/1/79 - 10/31/79

Name of Candidate or Committee in Full

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

- | | |
|---|--------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 25,413.00 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ 120.00 |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ 25,533.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (Site, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period** |
|--|-------------------------------------|---|---|
| Local Union 6627, District 7, Raffle
210 Goddard Boulevard
King of Prussia, Pennsylvania 19406 | 8/10/79 | \$ 358.00 | \$ None |
| Local Union 6465, District 7, 50-50 Raffle | 9/8/79 | 32.00 | |
| Local Union 7936, District 7, 50-50 Raffle | 9/19/79 | 48.00 | |
| Local Union 12974, District 7, 50-50 Raffle | 9/20/79 | 14.00 | |
| Local Union 14700, District 7, 50-50 Raffle | 9/15/79 | 26.00 | |
| Local Union 15139, District 7, 50-50 Raffle | 9/25/79 | 25.00 | |
| Local Union 8695, District 7, 50-50 Raffle | 9/20/79 | 20.00 | |
| Local Union 3853, District 7, 50-50 Raffle | Various | 400.00 | |
| Local Union 5808, District 7, 50-50 Raffle | 9/6/79 | 409.00 | |
| Local Union 4993, District 7, 50-50 Raffle | 9/11/79 | 55.00 | |
| Local Union 6326, District 7, Raffle | 8/30/79 | 186.00 | |
| Local Union 1852, District 7, Raffle | 9/28/79 | 2,305.00 | |
| Local Union 8739, District 7, 50-50 Raffle | 9/27/79 | 24.00 | |
| Local Union 13866, District 7, 50-50 Raffle | 9/26/79 | 126.00 | |
| Local Union 12886, District 7, 50-50 Raffle | Various | 476.00 | |
| | | \$ | \$ |

879040116290

Washington, D.C. 20463

(See Instructions on Back)

LINE NUMBER 14c

LINE NUMBER 14c

M11 10/1/79 - 10/31/79

United Steelworkers of America Political Action Fund

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*. \$

2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$

3. Subtotal Receipts from the Sale of Items (not listed below). \$

4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ _____

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (State, City and State) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period* |
|--|-------------------------------------|---|--|
| Local Union 3853, District 7, 50-50 Raffle | 9/5/79 | \$ 64.00 | \$ |
| Local Union 14378, District 7, 50-50 Raffle | 10/2/79 | 146.00 | |
| Local Union 3182, District 7, Raffle | 9/25/79 | 1,081.00 | |
| | | | |
| District 20 Raffle | 6/14/79 | 16,822.00 | |
| 390 Ohio River Boulevard | | | |
| Baden, Pennsylvania 15005 | | | |
| | | | |
| District 7 - 50-50 Raffle | 9/28/79 | 2,796.00 | |
| 230 North Fifth Street | | | |
| Reading, Penna. 19601 | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| SUBTOTAL this period | | \$ 25,413.00 | |

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of for
LINE NUMBER 14c

112 11/1/79 - 11/30/79

Name of Candidate or Committee in Full

UNITED STEELWORKERS OF AMERICA - POLITICAL ACTION FUND

Total Proceeds during the Reporting Period:

| | |
|---|-------------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ 3,518.50 |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ 1,750.00 |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ 5,268.50 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (State, City and Street) and Type of Event | Date of Event
(month, day, year) | COLUMN A
Amount from Sale of
Tickets this Period* | COLUMN B
Amount from Mass
Collections this Period |
|---|-------------------------------------|---|---|
| Local Union 3216, Dist. 7 50-50 Raffle | 10/17/79 | \$ 84.00 | \$ |
| 210 Goddard Blvd. | | | |
| King of Prussia, PA 19406 | | | |
| LU 5740, District 7, 50-50 Raffle | 10/7/79 | 184.00 | |
| LU 7038, District 7, 50-50 Raffle | 10/7/79 | 320.00 | |
| LU 5739, District 7, 50-50 Raffle | Various | 186.50 | |
| LU 12886, District 7, 50-50 Raffle | 10/4/79 | 185.00 | |
| LU 14378, District 7, 50-50 Raffle | 11/6/79 | 124.00 | |
| District 7, Reading, Pa. Office (Balance from the | | | |
| Reading 50-50 Raffle previously reported on the | | | |
| Oct. 1978 | 9/28/79 | 165.00 | |
| District 38 Raffle | | | |
| P.O. Box 2428 | | | |
| West Covina, Calif. 91793 | 9/29/79 | 1,270.00 | |
| SUBTOTAL for Period | | | |

010803102433

\$ 3,518.50

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14, ONLY OF FEC FORM 1**

THE UNIVERSITY OF CHICAGO

YE 12/1/79 - 12/31/79

History of Creation or Contribution to Field

United Steelworkers of America Political Action Fund

Total Payments during the Reporting Period:

- | | | |
|---|---|----------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from authorized Column A) ¹ | 0 | 1,000.50 |
| 2. Subtotal Receipts from Miscellaneous (list by event below and enter from authorized Column B) ² | 0 | |
| 3. Subtotal Receipts from the Sale of Goods (not listed below)..... | 0 | |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, PSC Form 21)..... | 0 | 1,000.50 |

LIST OF SALES AND COLLECTIONS BY EVENT

| Location (City, State and Zip) and Type of Event | Date of Event
(Month, day, year) | COLUMN A
Amount from Sale of
Tickets (in Period) | COLUMN B
Amount from Other
Collections (in Period) |
|--|-------------------------------------|--|--|
| LU 3216- District 7 50-50 Raffle
210 Goddard Blvd.
King of Prussia, PA 19406 | 11/21/79 | \$ 76.00 | \$ |
| LU 4425 - District 7 Raffle | 12/7/79 | 233.50 | |
| LU 8298- District 1 Raffle
100 S. Turnpike Rd.
Wallingford, Conn 06492 | 9/23/79 | 138.00 | |
| LU 524 District 1 Raffle
[redacted]
[redacted], N.H. 03301 | 11/79 | 103.00 | |
| LU 7477 - District 36 Raffle
1825 Morris Avenue
Birmingham, AL 35203 | 11/3/79 | 518.00 | |



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

July 16, 1979

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
Mr. Frank S. McKee, Treasurer
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

Year End 1977, Year End 1978 &

During review of the February Monthly 1979 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

81040301632

TO: UNITED STEELWORKERS OF AMERICA

DATE: _____

POLITICAL ACTION FUNDI.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1977 REPORT OF RECEIPTS
 AND EXPENDITURES COVERING THE PERIOD 1/1/77 THROUGH 12/31/77
 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

☐ Coverage Dates: ☐ omitted or ☐ incorrect

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

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

☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☒ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☒ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☒ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☒ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule

☐ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20540. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

TO: UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

DATE: _____
 I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1978 REPORT OF RECEIPTS
 AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 12/31/78
 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ Other: Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

The disclosure of proceeds from fundraisers and raffles on Schedule D for Line 14c of the Detailed Summary Page indicates that political contributions received by local and district unions are not transferred and reported to your committee promptly. Title 2 U.S.C. 432(b) requires that any person who receives a contribution in excess of \$50.00, including those deposited in a transmittal account not considered a committee depository, shall make a detailed accounting to the committee of such receipts no more than five (5) days after receipt.

On October 28, 1976, the Commission issued a final audit report of your committee. Pursuant to the 1976 audit recommendation in Finding E of that report, you were advised to instruct fundraisers of the requirements of 2 U.S.C. 432(b) (See the attached audit report). Please provide an explanation for late reporting of contributions received through fundraisers, raffles and drawings in 1977 and 1978.

81040301635

TO: United Steelworkers of America
Political Action Fund

DATE: _____
I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE February Monthly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/79 THROUGH 1/31/79
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☒ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☒ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☒ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☒ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ Other: On Schedule A for Line 14a of the Detailed Summary Page you disclose contribution
received outside of this reporting period. Please provide an explanation for
your late reporting of these receipts.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

TELECON:

COMMITTEE: UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

COMMITTEE CONTACTS: TOM CARPENTER

BILL SMELLING

DORIS HARRIS

ANALYST: BEVERLY BROWN

DATE: 7/23/79

RE: REQUEST FOR ADDITIONAL INFORMATION FOR 1977, 1978 & 1979 REPORTS
POSSIBLE VIOLATION OF 2 U.S.C. 432(b)- failure to render detailed
accounting of receipts to the treasurer of the international PAC
within five (5) days after the local's receipt thereof.

PHONE NUMBER: 412 562-2371

Background: On Schedule D for Line 14c of the Detailed Summary Page, the
above committee discloses the receipt of proceeds from local
raffles and fundraising events. At the bottom of the page the
following notation is provided:

~~Fundraising events are reported during the month in~~
which the report and transmittal funds raised are
received by the Treasurer's Office.

Since it was evident from the committee's disclosure that
accounting records were not being transferred within the
five (5) day period, a RFAI was sent to request an explanation
for the delay. Referenced in the RFAI was the final audit
recommendations pertaining the requirements of 2 U.S.C. 432(b).

Today: Mr. Carpenter called this day and asked that I listen to what he,
Mr. Smeller and Ms. Harris had to say with regard to the above matter.
According to these representatives, letters to Bob Costa, Vernon
Thompson and Thomas Harris were sent on 5/22/76, 6/2/76 and 11/16/76.
The letter set forth guidelines that the committee requested to
implement upon approval from the Commission. It essentially requested
permission for the Locals to transfer their funds upon the close of
business (ie. end of their fundraising drives). Once the funds
were transferred from the locals to the international PAC, the
locals would close out their transmittal accounts and the inter-
national would disclose the receipt of funds from locals on
Schedule D.

At the close of their 11/16/76 letter to Vernon Thompson and Thomas
Harris the United Steelworkers of America stated that they would
implement these procedures unless otherwise notified by the Commission.
Not having heard from the Commission, the Political Action Fund
attempted to establish procedures based upon their recommendations
to the Commission.

Manuals entitled "Directives to Fundraisers" were prepared and distributed
to all affiliated local unions. Through these directives, locals were
advised of FEC regulations and the manner in which they were to comply.

As I found no record of letters which suggest that local committees
should transfer funds and records upon the close of business, I advised
the committee representative to send me copies of the letters and any
additional information pertaining to this issue.

(* see att #13)

81040301637



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

8/21/79

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
Mr. Frank S. McKee, Treasurer
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

Year End 1977 &

During review of the Year End 1978 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
Form 12

81040301638

TO: UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

DATE: _____
I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1977 REPORT OF RECEIPT
AND EXPENDITURES COVERING THE PERIOD 1/1/77 THROUGH 12/31/77
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ Other: Please see page 4

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

TO: UNITED STEELWORKERS OF AMERICA

DATE: _____

POLITICAL ACTION FUND

I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE Year End 1978 REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 12/31/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

☐ Coverage Dates: ☐ omitted or ☐ incorrect

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

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

☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule

☐ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: Please see page 4.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

On Schedule D for Line 14c of the Detailed Summary Page you disclose the receipt of proceeds from local raffles and joint fundraising events. On these Schedules you disclose funds received outside the reporting period for which you are filing and the following notation is provided:

Fundraising events are reported during the month in which the report and transmittal funds raised are received by the Treasurer's Office.

11 CFR 103.3(a) of the Commission's Regulations which implement 2 U.S.C. 437b(a) requires all contributions received by a political committee to be deposited in a checking account in the appropriate campaign depository by the treasurer of the committee or his or her agent within ten (10) days of the treasurer's receipt thereof. Advisory Opinion 1978-98 (attached) further states that the ten (10) day deposit period begins to run when the contribution is received by a local union representative. Please provide an explanation for your failure to deposit proceeds into your campaign depository within ten (10) days of the Local's receipt thereof.

For further information, enclosed please find Advisory Opinion 1978-42 and the final audit report of AFL-CIO COPE PCC which was approved by the Commission in public session on June 7, 1979.

81040301641

WASHINGTON, D.C. 20540

TELECON:

COMMITTEE: UNITED STEELWORKERS OF AMERICA

COMMITTEE CONTACT: DORRIS JARRETT

ANALYST: BEVERLY BROWN

DATE: 10/18/79

PHONE NUMBER: 412-562-2371

RE: LATE FILING OF OCTOBER MONTHLY REPORT & RESPONSE TO RFAI

Ms. Jarrett called this day to request an extension of time in which to submit the committee's October Monthly Report due 10/20/79. Ms. Jarrett stated that they are running a little behind on their paperwork as many of their employees have been ill and out of the office for some time. The report will be a few days late.

I informed Ms. Jarrett that I would make note of our conversation, however, I am not authorized to give extensions. I then asked Ms. Jarrett if the committee had responded to the commission's inquiry regarding their member union's failure to transfer funds within the 10 day period required by 11 CFR 103.3. Ms. Jarrett stated that Mr. Smelling was still investigating the matter. I suggested to Ms. Jarrett that the committee inform the Commission that they are still investigating the matter as their response is overdue.

81040301642

TELECON FOR FILES

FROM: William Schmelling, Atty. (312) 467-1995
TO: Kevin Kelly
DATE: 11/19/79
CMTE: United Steel Workers Political Action Fund
RE: RFAI for Y.E. '77 & '78, Violation of 103.3 (10 day rule)

BACKGROUND

Beverly Brown, Reports Analyst sent a RFAI to this committee after a comprehensive review of their reports. She noted that this committee was reporting receipt of funds raised through fundraising by the locals during different reporting periods. Oftentimes the national would show receipts from local fundraisers 10 months after the fundraising occurred. Beverly sent this committee copies of the AOs defining the pertinent sections of the ACT and asked for explanations.

CONVERSATION 11/20/79

Mr. Schmelling called to say that he had just been placed in charge of this problem. He stated that he had discussed these areas with Ms. Brown in the past but he wasn't up to date on the procedures. He wanted to know how he should reply to the request. I told him that he would have to make that decision, not me. The information that he had on hand did not go into detail as to whether a transmittal account would be classified as the PAC depository, therefore meeting the 10 day limitation. I replied that the AFL-CIO Audit report stated that all accounts must be transferred and reported within the ten day limitation. I suggested to Mr. Schmelling that he review the information that we had sent him and let me gather together all relevant information before we discuss these problems any further.

81040301643



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 18, 1979

Frank S. McKee, Treasurer
United Steelworkers of America Political
Action Committee
Five Gateway Center
Pittsburgh, PA 15222

REFERENCE: 1977 and 1978 Year End Reports

Dear Mr. McKee:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated August 21, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact Kevin Kelly on our toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

81040301644

TELECON FOR FILES

FROM: William Schmelling, Counsel for USWA
TO: Kevin Kelly
DATE: 1/8/80
CMTE: United Steelworkers of America Political Action Fund
Subject: Failure to respond to RFAI of 8/21/79.

BACKGROUND:

Beverly Brown, Reports Analyst, had sent this committee an RFAI last July concerning this committee's adherence to the five day rule as stated in 432(b). Following the response by the committee, she sent another request concerning 103.3, the 10 day rule for transfer of funds. It is obvious from the monthly reports filed by the committee that the ten day rule was not complied with but Beverly felt it necessary to ask for further information. The Steelworkers had stated that they needed more time to look into the problem and had ultimately received a RQ2* letter from the Commission asking for a response.

* second notice RFAI

TODAY:

Mr. Schmelling and I finally contacted each other after failing in our attempts during the last two weeks. Mr. Schmelling began by stating that he had read all of the information available with regard to this subject (10 day rule and overall fundraising procedures.) He said that the AFL CIO COPE PCC audit recommendations are not necessarily applicable to the USW situation. Mr. Schmelling explained their fundraising methods in the following manner: All fundraising is done in the field. This fundraising occurs over an extended period of time with individuals usually holding onto the money until there is enough to forward to the international. Sometimes the individuals open up separate accounts to hold the money in, other times they hold onto the cash. They do not comingle the funds with their personal accounts. The cost of operating these accounts is paid by either the local treasury (legal expense for administrative purposes) or by a portion of the voluntary contributions. Once the money is transferred to Pittsburgh it is reported. He stated that it is obvious that the ten day rule has not been complied with on all occasions but that the disclosure requirements of the Act have been met. He then had two questions: Since it is apparent from the reports filed that the ten day rule has not been met, how can they reply to the RFAI? and second, he would like some guidance on how to revamp their fundraising system in order to comply with the FECA. Toward this second question he proposed the following system: He could have the depository in Pittsburgh, Union National Bank, print deposit slips and have them sent to all of the locals. When an individual, acting as the collection agent, receives money he could then send the money directly to the bank, therefore negating the need for transmittal accounts. I told him that it sounded fine to me and suggested that he firm up his idea and submit it as an advisory opinion request. This would give the Commission an opportunity to rule on subject for the public record. (By putting it on the public record, other Unions could look at it and possibly implement a similar system.)

Concerning his first question, I told him that I would look into what the commission would consider an adequate response to the RFAI and I would call him back later in the week.

81040301645

Telecon for files:

From: Bill Schmelling

To: Kevin Kelly

Date: 1/18/80

RE: Response to RFAI & RTB

Mr. Schmelling returned my call of earlier this afternoon. I advised him to respond to the Commission's request by stating that the information contained in their reports is the truth and accurately reflects the activity of the committee, if indeed this is the case. (See previous telecons) Mr. Schmelling inquired as to the result of this would be. I told him that presently the FEC was undergoing some internal adjustments (Change in referral policy) and that I could not advise him as to the problems. In the future, however, the committee will be filing under the requirements of the FECA as recently amended. I told Mr. Schmelling that the new requirements state that contributions under \$50 need not be transferred until 30 days which puts the committee in a more realistic position to comply with the Act. He asked for a copy of the amendments which I did not have. I referred him to the public law # for reference (PL96-187)

81040301646



FEDERAL ELECTION COMMISSION

125 A STREET NW
WASHINGTON, DC 20541

FEB 19 1980

Mr. Frank S. McKee, Treasurer
United Steelworkers of America
Political Action Fund
Five Gateway Center
Pittsburgh, PA 15222

Dear Mr. McKee:

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

During review of the August Monthly - 1979 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Kevin Kelly in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

81040301647
91663

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

TO United Steelworkers of America

DATE: FEB 19 1980

Political Action Fund

I.D. NO.: C00003590

REQUEST FOR ADDITIONAL INFORMATION FOR THE August Monthly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 8/1/79 THROUGH 8/31/79
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☒ inadequate for Schedule(s) ☐ Line(s) 203
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the report. Please resubmit a signed copy of your report.*
- ☐ Other: Please see page three.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above addressee. If you have any questions regarding this request, please call the Reports Analysis Division toll free at 1-800-453-6530. The local Washington, D.C. telephone numbers are (202) 523-4045 (Senate, Non-Party), 523-4175 (House, Non-Party), or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 1050 N.E. Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Public Records and Registration, 1036 Longwain House Office Building, Washington, D.C. 20515.

FEB 19 1980

Request for Additional Information
Page Three

United Steelworkers of America Political Action Fund
August Monthly Report

Your report discloses an expenditure on July 7, 1979 to Gold Star Hat & Cap. As the particulars of this expenditure you state "Pay for caps which were sold." Please be advised that 11 C.F.R. 114.5(a) prohibits a separate segregated fund from making contributions or expenditures which utilize monies obtained in any commercial transaction. Further, Advisory Opinions 1976-18 and 1979-63 reinforce this prohibition. (Copies Enclosed). Please amend your reports to disclose whether the monies obtained from the sale of the caps were deposited in the separate segregated fund. In addition, please explain why this July expenditure is reported in your August filing.

7 8 1 0 4 0 3 0 1 6 4 9
1 1 0 1 6 6 7



FEDERAL ELECTION COMMISSION

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

10/28/76

REPORT OF THE COMPLIANCE REVIEW SECTION OFFICE OF DISCLOSURE AND COMPLIANCE FEDERAL ELECTION COMMISSION ON

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

I. Background

This report covers an audit of the United Steelworkers of America Political Action Fund undertaken by the Compliance Review Section staff of the Federal Election Commission to determine whether there has been compliance with the Federal Election Campaign Act ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of the Act which directs the Commission to conduct audits and field investigations with respect to reports and statements filed under the Act.

The United Steelworkers of American (USWA) is an affiliated member of the AFL-CIO. The USWA Political Action Fund was established for the purpose of receiving contributions from local union members and friends to be used to further the interests of the organization in the fields of political action and education.

The Political Action Fund Committee is financially administered by a committee of the International Officers of the USWA. The Committee is financed by voluntary contributions from its members by (1) a payroll check-off plan, (2) special fundraising activities, and (3) ongoing subscriptions. Campaign disbursements are made via written approval of the USWA Treasurer in response to requests generally originating at the district and local union levels.

During the period audited, January 1, 1975 through March 31, 1976, the USWA reported total receipts of \$348,117.61 and total expenditures of \$14,744. The officers of the Committee are Walter J. Burke, Treasurer, Abel, Chairman. Committee offices are located at 5 Gateway Center, Pennsylvania, 15222.

II. Findings and Conclusions

The Committee Statement of Organization indicates that it has a single depository. Committee records indicate that several district and

81040391650



local unions maintain transmittal accounts into which political contributions are deposited and from which transfers are made to the depository reflected on the Statement of Organization.

Title 2, U.S.C. Section 437b(a)(2) requires that all contributions received by a political committee be deposited in designated depositories, and all expenditures, except for petty cash, be made by check drawn on such account. Section 433(b)(9) requires that all banks, safety deposit boxes, and other depositories used by the committee be recorded on the Statement of Organization.

All expenditures made by a political committee must be made from a campaign depository unless the expenditure is made from treasury funds. If the local unions make expenditures (other than expenditures from treasury funds), either before or after the contributions are deposited in the "transmittal account," the account should be considered a campaign depository. The national union can either pay the local expenses from its designated campaign depository or designate the "transmittal account" a campaign depository and allow the local to pay for expenses from contributions received.

B. Committee records indicate that many local unions receive political contributions which are deposited in personal checking accounts, local union accounts, and in accounts of employer organizations, some of which are incorporated, and subsequently transferred to the Committee. Title 2, U.S.C. 432(b) states in part that funds of a political committee shall be segregated from and may not be commingled with the personal funds of any officers, members or associates of such committee. Members of local unions should be instructed not to deposit political contributions received in personal, union or corporate accounts for subsequent transfer to the Committee depository.

The Committee has advised their collectors at the local level that the USWA Political Action Fund will not accept any checks drawn on their personal accounts or union or corporate accounts.

C. Committee records indicate that the Committee is not consistent in reporting political contributions received from the voluntary payroll check-off program. Itemized contributions are reported in the time period during which the funds are withheld from the contributor's salary, but not yet received by the Committee. The unitemized contribution figure represents total receipts for the period less the amount of the itemized contributions. All contributions should be reported during the period received by the Committee (2 U.S.C. 434(b)(2)).

The Committee has advised that they are now reporting all contributions received by the Fund on a cash reporting basis.

D. Committee records indicate that political contributions received by local and district unions are not transferred and reported to the Committee promptly. Title 2 U.S.C. 432(b) requires that any person

81040391651

who receives a contribution in excess of \$50.00, including those deposited in a transmittal account not considered a committee depository, shall make a detailed accounting to the committee of such receipts no more than five (5) days after receipt. The Committee should instruct fundraisers to make such an accounting.

Committee officials have stated that their fundraisers will be advised of the requirements of 2 U.S.C. 432(b).

E. Committee records indicate that some political contributions are received by local and district unions through collections and fundraising activities. Our review of Committee reports, however, discloses neither a separate reporting of the proceeds from such events, nor the expenditures made in connection with the events. Title 2, U.S.C. Section 434(b) (6), (9), (10) and (11) require the listing of all receipts and expenditures from collections and fundraising activities. Total receipts ~~from such activities would be reported by date and event on FEC Schedule D~~ and the expenses involved with such activities would be reported on FEC Schedule B.

Assuming the fundraising costs are being paid out of voluntary money, the Committee would be required to list the expenditures relating to each event. This can be accomplished by requiring the local union to inform the Committee of that part of the contribution total retained to meet expenditures. That figure would then be reported by the Committee as a fundraising expenditure. If the expenditures are not reported by the Committee, the local union will have been deemed to have made the expenditure.

III. Recommendations

It is recommended that the Commission accept the Compliance Review Section staff's position outlined above. It is further recommended that the Commission advise the Committee of these findings, particularly Finding A, in which the Commission determined that, if expenditures are made from the "transmittal accounts," these accounts are in fact depositories of the Committee and Finding E, in which the Commission determined that collection and fundraising expenditures, paid from voluntary money, have to be reported by the Committee.

81040391652

United Steelworkers of America

AFL-CIO JUL 25 AM 10:02

FIVE GATEWAY CENTER PITTSBURGH, PA. 15222

July 23, 1979

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

Dear Ms. Brown:

Confirming our telephone conversation of this date, enclosed is a copy of our letter of November 16, 1976 along with the Directives for Fundraisers. We never received a response from the Commission regarding this letter.

Sincerely,

Thomas F. Carpenter
Thomas F. Carpenter
Political Action

TFC:njt

Enclosure

8 19 01 43 01 33 03 14 68 51 3

United Steelworkers of America



POLITICAL ACTION FUND

FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
862-2400

I. W. ABEL
CHAIRMAN

WALTER J. BURKE
SECRETARY-TREASURER

November 16, 1976

Mr. Vernon W. Thomson, Chairman
Mr. Thomas E. Harris, Vice Chairman
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Gentlemen:

I am in receipt of your letter dated October 28, 1976, concerning the Commission's adoption on that date of the FEC Compliance Review Section staff report on the United Steelworkers of America Political Action Fund.

With regard to Finding A, which you specifically noted in your letter, it is our understanding, based on a telephone conversation with Joseph Stoltz of the FEC's Compliance Review Staff, that as long as the "transmittal accounts" are used only to transmit contributions to the depository designated in our committee's Statement of Organization and are not used for any expenditures, such transmittal accounts will not be considered "campaign depositories" within the meaning of 2 U.S.C., Section 437b(a)(2) or bank accounts or other depositories of the USWA Political Action Fund within the meaning of 2 U.S.C., Section 453(b)(9). Accordingly, we will advise our local union, district and subdistrict offices that such transmittal accounts should not be used for any purpose other than prompt transmittal of collected contributions to our committee offices for deposit in the designated campaign depository.

With regard to Finding E of the Compliance Review Section staff report, we are advising our local fundraisers and collectors to avoid using voluntary money for fundraising activities wherever possible and to stay within the limitations, guidelines and reasonable practices set forth by the FEC in Section 114.5 of the proposed regulations. However, whenever voluntary funds are expended in fundraising activities, we are requiring our fundraisers and collectors to furnish us with the information suggested in Finding E. In this connection, please find enclosed an excerpt from a draft of written directives which we anticipate sending to our local fundraisers and collectors, many of whom already have been advised of these requirements concerning receipts for voluntary fund expenditures and records of fundraising events.

81900430130314685148

Sincerely,

**Enclosure: Directives for Fund Raisers,
8/3/76 draft, pages 12-15.**

this five day report, indicating the date on which the original was sent to Walter J. Burke, should be retained by the collector. If a Voluntary Fund collector receives a check or other contribution in any amount from a corporation or a local union, the contribution should be returned to the contributor with the explanation that our Voluntary Fund cannot accept corporate or union contributions.

B. Receipts For Voluntary Fund Expenditures.

As we noted above in Part I, C of this memorandum, union dues funds may be used to raise voluntary funds and to establish and administer a separate segregated political action fund such as the Voluntary Account of the USWA Political Action Fund. Dues funds also may be used for communications by the Union to its members and in non-partisan voter registration and get-out-the-vote activities. Except for the purposes of fulfilling the new requirements for reporting the direct dues funds expenses of communications which expressly advocate the election or defeat of a clearly identified candidate and which cost more than \$2000, as described in Part I, B above, no records or reports of such dues fund expenditures are required by the Federal Election Campaign Act.

In the limited circumstances, however, where voluntary money is spent, for any purpose, the record keeping and reporting requirements ~~shall~~ come into play. It could be argued that if such voluntary money expenditures are made at the local union, district or sub-district level with voluntary dollars before they are ever transmitted to Pittsburgh, then the record keeping requirements of the law should

8719004301330314685269

not apply. Nonetheless, it will be more practicable from an internal accounting standpoint and in compliance with Section 102.9 of the Regulations proposed by the FEC if the following procedures are followed whenever voluntary dollars are spent:

1. A written account must be made of all voluntary money expenditures and must include:
 - a. The full name and the full address of every person to whom an expenditure is made,
 - b. The date of the expenditure,
 - c. The amount of the expenditure, and
 - d. The name of and office sought by any candidate to whom or on whose behalf such a voluntary fund expenditure is made.
2. Whenever a Voluntary Fund expenditure in excess of \$100 is made to any person or if expenditures in lesser amounts to such a person total more than \$100 in a calendar year, then either a receipted bill must be obtained from such person or an invoice must be obtained and retained with a Voluntary Fund canceled check. Either the receipted bill or invoice and check must contain the following information:
 - a. The full name and address of the person to whom the expenditure is made,
 - b. The amount of the expenditure,
 - c. The purpose of the expenditure, and
 - d. Date the expenditure was made.

Under the FEC's proposed regulations, the foregoing requirements are imposed on Walter Burke, the treasurer of our Voluntary Account, ~~and any agent authorized by the treasurer to receive contributions~~ to the Voluntary Account. All district, sub-district and ~~local union collectors~~ are such agents and must therefore comply with these requirements.

8/1904301330314685271

C. Records of Fund Raising Events
and Mass Collections

As we mentioned at the end of Part I, C, above, the FEC has indicated that a "reasonable practice" for a labor union to follow in conducting such fund raising endeavors as raffles, dinners and the like is to pay for the cost of such endeavors with dues funds to the extent that the voluntary money raised through a given affair or event is roughly three times as much as the dues money expended.

There is no obligation to report such dues fund expenditures to the FEC. Occasionally there are situations, however, where our local union, district or sub-district fund raisers may find it more convenient to finance such fund raising efforts with part of the voluntary money which is collected. Moreover, it is difficult to know before the conclusion of some such events whether or not the total voluntary dollar proceeds will be roughly three times the cost of the event.

In any case, whenever voluntary funds are expended -- either before or after transmittal of such funds to the Pittsburgh office -- we will be able to account for such expenditures if all local union, district and sub-district fund raisers establish and maintain their fund raising activities so that appropriate records accompany the funds which are transmitted to Pittsburgh for deposit in the Voluntary Account. Such records should include:

1. The date, location and nature of each dinner, rally, or other fund raising event;
2. The total proceeds received from ticket sales, mass collections, the sale of merchandise or other contributions to each such event;

8719004013031468528

3. The amount, if any, of voluntary funds expended to cover such costs as those for food, beverages, hall rental, printing, prizes, gifts, green fees, entertainment or similar expenses of each such event;
4. The amount of dues money spent to cover the types of expenses enumerated in 3, above; and
5. The approximate number of people who participated in or attended each such event.

IV. SEGREGATION AND TRANSMITTAL OF VOLUNTARY FUNDS

8719024301370314685293
All voluntary contributions which are received by local union, district or sub-district collectors must remain separate from and cannot be commingled with any personal, union or corporation funds. It is the policy of the United Steelworkers of America Political Action Fund to return to the sender any union or corporation check and any personal check which appears to have been used as a vehicle to transmit contributions of other persons.

Under our present procedures, the preferred and most feasible means of transmitting voluntary contributions which have been collected in the field are:

1. Checks drawn on USWA Political Action Fund Transmittal Accounts opened specifically and exclusively for the purpose of holding and transmitting voluntary funds;
2. Bank or cashiers' checks; and,
3. Postal money orders.

The costs of maintaining a transmittal checking account or of purchasing bank or cashiers' checks or money orders can be paid with union dues funds. If a transmittal account is used, the name of the account should include a reference to the local union, district or

UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND

DIRECTIVES FOR FUNDRAISERS

TEXT

The following comments and directives are based upon our legal advisers' understanding of the requirements which are imposed on the political action fundraising and related activities of the United Steelworkers of America and the Voluntary Account of its Political Action Fund. Some of these requirements first became effective on May 11, 1976, when the most recent amendments to the Federal Election Campaign Act (FECA) were signed into law; others have been required by the law and been part of the United Steelworkers of America's procedure for some time and still others are set forth at this time pursuant to our continuing desire to follow practicable internal procedures which will enable the Political Action Fund to function efficiently and effectively:

These directives are grouped into six subject areas:

- I. Dues Fund Expenditures in Connection with Federal Elections;
- II. Soliciting Voluntary Contributions;
- III. Record Keeping by Fundraisers;
- IV. Segregation and Transmittal of Voluntary Funds;
- V. Contributions to Federal Candidates and Committees; and,
- VI. Penalties

NOTE: These directives deal with our attorneys' understandings of the legal requirements imposed by Federal law. Most states have laws that deal with some or all of the subjects covered in the following pages; however, the requirements of State Election Laws are not dealt with in these directives. If information is needed concerning State Election Laws, please seek assistance through your District Director.

I. DUES FUND EXPENDITURES IN CONNECTION WITH FEDERAL ELECTIONS

Important aspects of the collection, recording, segregation and transmittal of voluntary contributions to the United Steelworkers of America Political Action Fund are set forth in parts II, through IV of these directives. In this part, however, we discuss the permissible uses which can be made of dues fund money and a new record keeping and reporting requirement which applies to certain dues fund expenditures. **SUBJECT TO THE EXCEPTIONS DESCRIBED UNDER A, B, AND C BELOW, IT IS UNLAWFUL FOR A UNION TO USE DUES MONEY FOR ANY CONTRIBUTION OR EXPENDITURE IN CONNECTION WITH ANY FEDERAL ELECTION.**

HIGHLIGHTS

The Federal Election Campaign Act, as amended in 1976, (FECA) and the rules adopted by the Federal Election Commission (FEC) are now in effect. There are many important changes covered in these Directives.

These directives reflect the legal requirements imposed by **FEDERAL LAW**, and do not reflect any of the requirements of State law or laws which may be applicable.

It is unlawful to spend union dues money or union treasury funds in connection with any federal election unless such expenditures are made under any of the exceptions discussed in this part I.

TEXT

For example—

- ... union dues funds may not be used for making contributions to candidates for federal office;
- ... union dues funds may not be used for making contributions to political parties or political committees which support candidates for federal office;
- ... union dues funds may not be used for purchasing tickets to fund-raising events for candidates for federal office or for purchasing fund-raising items for such events;
- ... union dues funds may not be used for communications which are directed at the general public and which expressly advocate the election or defeat of a candidate or candidates for federal office;
- ... union dues funds may not be used to pay for any expenses for a candidate for federal office or members of his campaign staff.

There are specific exceptions to the general prohibitions against the use of union dues money in connection with federal elections. The details of these exceptions are set forth below.

A. UNION DUES FUNDS MAY BE USED FOR NON-PARTISAN VOTER REGISTRATION AND GET-OUT-THE-VOTE ACTIVITIES.

The cost of non-partisan activities to encourage or assist Steelworkers and their families to register to vote or to transport Steelworkers and their families to and from the polls may be paid with Steelworkers' dues money. For these purposes, "non-partisan activities" generally means that no effort is made to learn what party or candidates the member or his family supports in connection with such voter registration or get-out-the-vote activities.

The term "member" is used in more than one section of the FECA, but that term is not defined in the Act itself. However, Section 114.1(e) of the Federal Election Commission (FEC) regulations provides a definition of "member." Based on the legislative history of the 1974 amendments to the FECA, that regulation defines "members" of a labor organization as including:

"... all persons who are currently satisfying the requirements for membership in a local, national or international labor organization ... and of any federation with which the local, national or international union is affiliated."

It is the opinion of our legal advisers that this means, among other things, that unions may contribute their money and manpower to joint committees, such as those maintained by the AFL-CIO and state and local central AFL-CIO bodies, established to register or get-out-the-vote or, under the next exception, to communicate with AFL-CIO members and their families on either a national, state or local basis.

Dues money also may be used by the Steelworkers or any of its local unions to finance voter registration and get-out-the-vote activities aimed at the general public in such broad-based campaigns as (1) jointly sponsored with an organization such as the League of Women Voters—which does not endorse candidates—and (2) actually conducted by such other organi-

B. UNION DUES FUNDS MAY BE USED FOR COMMUNICATIONS ON ANY SUBJECT FROM THE UNION TO ITS MEMBERS AND THEIR FAMILIES.

Dues money may be used to pay the indirect and direct costs of messages and communications on any subject—including those which urge our members and their families to vote for or against certain candidates for federal office—from the Union to its members and their families.

HIGHLIGHTS

Some examples of unlawful dues fund expenditures.

EXCEPTION A

Union dues funds may be used for non-partisan voter registration or get-out-the-vote activity among union members and their families.

"Member" as it is used in both these exceptions and the next one includes those persons who are members of a local, national or international labor organization or any federation with which the local, national or international is affiliated.

EXCEPTION B

Union dues funds may be used for communications on any subject from the union to its members and their families. For example—union dues funds may be used to urge our members and their families to vote for certain candidates for federal office.

87 90 04 30 13 31 46 83 0

TEXT

As noted above, the definition of "member" is such that the dues money or manpower of a union can be contributed to the AFL-CIO or a state or local central AFL-CIO body for use in communicating with AFL-CIO members about which candidates they should vote for or against.

The amount of dues money which a union can expend on political communications to its members and their families is unlimited, but, in certain very narrow circumstances, those dues fund expenditures which are directly attributable to such communications must be reported to the Federal Election Commission. The limited circumstances in which such union dues fund expenditures must be reported are when all three of the following exist:

- (1) If the communication expressly advocates the election or defeat of a clearly identified candidate(s) for federal office; and,
- (2) If the communication is not primarily devoted to subjects other than express advocacy of the election or defeat of such a clearly identified candidate(s); and,
- (3) If, in connection with any single election, the costs of such communications concerning such candidate(s) are more than \$2,000.

"Clearly identified candidate" is defined in the 1976 amendments to mean (1) the name of the candidate appears, (2) a photograph or drawing of the candidate appears or (3) the identity of the candidate is apparent by unambiguous reference. For the purpose of the \$2,000 reporting requirement only, all primary elections for federal office conducted during a calendar year are considered to be one election; and all general elections conducted in a calendar year are considered to be one election. The meaning of "directly attributable" costs of such limited communications is not defined in the law; but the legislative history shows that this phrase is intended to refer to such easily separable, added costs as those for paper and postage and not to such on-going overhead costs as those for union employee time or the value of the use of union equipment.

It is important to note that this limited reporting requirement, which is provided by 2 U.S.C. Section 431(f) (4) (C), does not impose a prohibition or limitation on the use of dues funds by a union for communications with its members or their families. The only requirement is that when dues fund expenditures—by any local union or by the International Union—exceed \$2,000 in any election and the other limited circumstances listed above exist, then those expenditures must be reported to the FEC*. Moreover, even this limited reporting requirement does not apply if the communication which expressly advocates the election or defeat of a candidate is part of a broader communication—such as *Steel Labor*, a district newsletter or a local union newspaper—which is "primarily devoted to subjects other than express advocacy of the election or defeat of a clearly identified candidate."

The following examples of internal political communications (those to our members and their families) may provide some guidance in understanding the reporting requirement:

Example 1A: A Union incurs printing and mailing costs of \$2,000 to its members in state A urging them to vote in the general election for X, a candidate for the United States Senate, the International Union is required to report that \$2,000 dues fund expenditures were used.

Example 2A: Union 0000 mails three different flyers to its members urging them to vote against Y, who is running in a primary

*Each local union which makes such express advocacy communication expenditures must report such expenditures to the Federal Election Commission. For assistance, contact your Regional Director.

HIGHLIGHTS

Caution—Such express advocacy expenditures must be reported to the FEC under certain conditions when specified threshold limits are reached.

If more than \$2000.00 is spent expressly advocating the election or defeat of a candidate for federal office in any election, reporting to the FEC on Form 7 is required.

NOTE:

1. All primary elections for federal offices conducted during any calendar year are considered to be one election.
2. All general elections for federal offices conducted during any calendar year are considered to be one election.

TEXT

election for a United States House of Representatives seat and the printing and mailing costs of those three flyers totals \$1,500, those costs, paid with Local Union 0000 dues funds, do not have to be reported.

Example 2B: If Y wins the primary and in all of the issues of Local Union 0000's newspaper which are published between the primary and general election more than two pages of the four-page paper are devoted to general news and commentary, but one of the four pages is devoted entirely to Local Union's 0000's endorsement of Y, no part of the cost of printing and distribution of the local union paper has to be reported because the newspaper is primarily devoted to subjects other than express advocacy of the election of Y.

Example 3A: If, between the time of the national nominating convention and the general election, the International Union spends \$12,000 in dues funds for direct mailings to its members urging them not to vote for presidential candidate Z and the USWA District 00 spends an additional \$1,500 for printing flyers which also urge members not to vote for Z, the total \$13,500 dues fund expenditures must be reported by the International Union to the FEC.*

Example 3B: If, in addition, Local Union 0000 spends \$2,100 for printing and mailing similar flyers to its members urging them to vote against Z, Local Union 0000 has its own separate responsibility to report those expenditures to the FEC.

There are numerous variations of internal union communications, some of which the FEC may assert—in regulations or other action—are subject to these reporting requirements. The important point for each local union to observe, however, is that each local must keep careful records of all dues money expenditures which are directly incurred in urging its members and their families to vote for or against any candidate for federal office. If such expenditures exceed \$2,000 (except when such costs are incurred in the publication of a local union newspaper which is "primarily devoted" to non-political subjects) in connection with any single federal election, a report (FEC Form 7) concerning those expenditures must be filed with the FEC.†

In addition to the new reporting requirements which became effective on May 11, 1976, some mention should be made at this point of the types of communications which probably would not be considered lawful by the FEC under the internal communications exceptions which is discussed in this Part I-B of these directives. Section 321 of the Federal Election Campaign Act (2USC441b), as amended, formerly was contained in the federal criminal code as 18 U.S.C. Section 610 and was interpreted by the Supreme Court in certain landmark cases. Those cases and the legislative history of the 1971 Act and the 1976 amendments indicate that the dues fund financed communications permitted under 2 U.S.C. Section 441b are those which are in writing, by telephone or in the form of speeches or other direct oral comment directed by the Union to only its members and their families, but not to the general public. Thus, radio, television or other broadcast announcements in connection with federal elections by a local union aimed at its members and their families, but which also reaches the general public, would not be considered by the FEC to be within the internal communications exception. Similarly, a general circulation newspaper advertisement or notice concerning federal elections, even if it purports to be

*Such "express advocacy" expenses by a District, in contrast to such expenditures by local unions, are International Union dues fund expenditures for the purpose of this reporting requirement.

†For the purposes of this reporting requirement, all primary elections for federal offices, wherever or whenever held, are considered to be one election; all general elections for federal offices, wherever or whenever held, are also considered to be one election.

HIGHLIGHTS

37190430133146239

TEXT

only for the benefit of the union's members and their families, also would be read by the general public and therefore would be considered unlawful by the FEC.

Under FEC regulations, political communications by a union to its members and their families must be the views of the union—not simply a restatement or reproduction of the candidates views or statements. Moreover, such communications must be printed or otherwise produced at the union's expense—not at the candidate's or some outside political organization's expense.

In addition, it is unlawful for a union to allow a candidate, a candidate's committee, or any other outside political organization to use the union's postage permits.

C. UNION DUES FUNDS MAY BE USED IN ESTABLISHING, ADMINISTERING AND SOLICITING CONTRIBUTIONS TO A SEPARATE SEGREGATED POLITICAL ACTION FUND.

A third permissible use of union dues money in connection with federal elections is that a union may spend "dues" money to solicit voluntary contributions from members of the Union and their families to a separate political fund and to establish and administer such a fund. Consistent with the policy adopted by the International Executive Board in 1973, the only political action fund of our Union which is used to support candidates for federal political office is the Voluntary Account of the United Steelworkers of America Political Action Fund. That Voluntary Account is used primarily for making contributions to candidates and the committees of candidates for various federal elective offices.

The establishment or restructuring of the Political Action Fund's separate Voluntary Account to meet both practical and legal requirements, as well as such day-to-day administrative expenses of the Voluntary Account as those incurred in compiling and filing reports, printing and mailing fundraising literature and the related overhead expenses associated with such activities are all clearly included within this third exception to the general prohibition of 2 U.S.C. Section 441b. More difficult questions under this third exception have arisen, however, concerning solicitation costs.

In FEC regulations, the FEC has suggested a "reasonable practice" which may be followed in using dues funds to cover costs incident to traditional fundraising activities. Such costs include those for raffle prizes, or prizes for the most successful ticket sellers, mailings, and those for food, beverage and hall rental which may be incurred in connection with fundraising dinners or other endeavors. The "reasonable practice" established by the FEC is that dues funds may be used to pay such costs to the extent that such costs do not exceed approximately one-third of the voluntary money raised, and that any costs in excess of one-third must be paid with as much of the voluntary money which is raised as is necessary to achieve that one for three ratio.

Certain record-keeping requirements which may be applicable to your fundraising activities are set forth in Part III of these Directives.

SOLICITING VOLUNTARY CONTRIBUTIONS

A union cannot solicit voluntary contributions to its PAC fund. But, under the 1976 FECA Amendments, a labor union may ask for such contributions only from members and their families. Generally, corporations and their political action committees must limit their contributions to their stockholders and management employees. It is unlawful for any corporation or labor organization, federal or state, to solicit contributions from any other person or organization.

HIGHLIGHTS

EXCEPTION C

Union dues funds may be used in establishing, administering and soliciting contributions to a separate segregated Political Action Fund. The USWA Political Action Fund-Voluntary Account is such a fund.

CAUTION—In spending dues funds to pay the costs of raising voluntary funds, the FEC has established a general rule that funds raised should be at least three times the amount of dues funds expended.

PAC VOLUNTARY COLLECTIONS

In soliciting voluntary contributions, including ticket sales:

- (1) Only Steelworkers and their families may be asked to contribute (other

TEXT

including a USWA local union or a non-Steelworker union, to make dues fund contributions—in the form of ticket purchases or otherwise—to our Political Action Fund's Voluntary Account.

In enacting the 1976 Amendments to the FECA, the Congress supplemented the existing prohibitions of 2 U.S.C. Section 441b (b) (3) against employer or union coercion in seeking political action contributions by adding the following additional safeguards:

“(3) It shall be unlawful . . .

(B) For any person soliciting an employee for a contribution to such a fund to fail to inform such employee of the political purposes of such fund at the time of such solicitation; and,

(C) For any person soliciting an employee for a contribution to such a fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without any reprisal.”

Both the FEC's regulations and the legislative history of these new requirements confirm that “employee” as used in this section includes “members” of a labor union. These new safeguards are applicable to solicitations of \$2.00 PAC memberships, Victory 7_ cards, dinner and raffle tickets and to all other fundraising activities.

One method of complying with the new requirements is for all United Steelworkers of America Political Action Fund receipts, Victory 7_ cards, tickets and other fundraising material to carry a notice such as the following:

“The United Steelworkers of America Political Action Fund supports various candidates for federal and other elective office, is connected with the United Steelworkers of America, a labor organization, and solicits and accepts only voluntary contributions in its own fundraising efforts and in joint fundraising efforts with the AFL-CIO and its Committee on Political Education.”

This and other legends which now are required for PAC receipts and other fundraising materials are set forth in Appendix A which is attached to these Directives. If the above-quoted notice is not printed or written on solicitation material or if no printed or written material is used in the solicitation process, any person who solicits voluntary contributions on behalf of the Voluntary Fund must orally give this notice.

A modification of the general rules limiting the classes of persons from whom corporations and labor unions may solicit contributions to voluntary PAC Funds is that twice each calendar year, a corporation may solicit such contributions from non-management personnel—including Union members—and a Union may make similar solicitations directed at non-members of the Union who are employees or stockholders of a corporation with which the Union has a collective bargaining relationship. Such twice yearly solicitations must be in writing. The FEC's regulations specify procedures to be followed in making such twice yearly solicitations.

Questions concerning these procedures should be channeled through your local union.

An important modification in the law which could make the collection of Voluntary PAC Contributions from our members easier was added to the FECA as one of the 1976 amendments. That amendment provides that “notwithstanding any other law, any method of soliciting voluntary contributions from or for a corporation, any individual, or any other entity, which is available to a corporation, may be used to also solicit contributions from or for a labor union.”

HIGHLIGHTS

persons may contribute but cannot be asked to do so).

(2) The contributor must be made aware that he is contributing to a political fund.

(3) The contributor must be made aware that he has a right to refuse to contribute.

Certain legends for printed materials, including solicitation material, are included in Appendix A.

If voluntary PAC contributions are solicited without the use of printed materials, then the person making such solicitation is required to inform the prospective donor that the contributions are being made to a political fund and that he has a right to refuse to contribute.

The law now permits two written solicitations each year by the Union of non-union management personnel and stockholders for voluntary PAC contributions under certain conditions.

Labor unions now, in certain circumstances, may utilize checkoff procedures designed to collect voluntary PAC contributions from their members.

TEXT

unions. The most obvious and important application of this provision is that since it is lawful for a corporation to establish a check-off system for management personnel, it is also lawful for a corporation to agree to permit union members to check off voluntary contributions to a union political fund.

The Congress coupled the foregoing provision with another which may also be of practical importance. It states:

"Any corporation, including its subsidiaries, branches, divisions and affiliates that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions and affiliates."

Thus, for example, if a corporation actually employs a check-off system for management personnel, any union representing one or more bargaining units of employees at that corporation—at the same or any other location or facility—is automatically entitled to use the check-off system as well, so long as the union reimburses the corporation for any added expenses incurred. By the same token, if the corporation utilizes a computer mailing system in soliciting management personnel, the union would be entitled, at its cost, also to use that system in soliciting its members. Or, if the corporation solicited management personnel on company time and company property, the union would have the same right. Enjoyment of these rights depends on a written union request.

Assistance in making such written requests is available through your District Director.

III. RECORD KEEPING BY COLLECTORS

In these Directives, the terms "solicitor," "collector" and "fundraiser" are used interchangeably to refer to local union, district or subdistrict representatives who receive contributions on behalf of the Political Action Fund's Voluntary Account. Although the PAC Section in our Pittsburgh office has assumed most of the record keeping obligations which are imposed by the law on committees such as the Political Action Fund, certain record keeping functions also are the responsibility of our collectors in the field. Both independent auditors and investigators from the Federal Election Commission reviewed our internal accounting procedures in 1976. Based upon their suggestions, as well as the requirements of the law, we have concluded that the following, uncomplicated procedures must be followed by all USWA Political Action Fund collectors.

If a Voluntary Fund collector receives a check or other contribution in any amount from a corporation or a local union, the contribution should be returned to the contributor with the explanation that our Voluntary Fund cannot accept corporation or union contributions.

A. CONTRIBUTIONS OF MORE THAN \$50 BY AN INDIVIDUAL

Whenever the contributions of any person aggregate more than \$50 during the calendar year, or whenever any person makes a single contribution of more than \$50, the collector who receives such contributions must submit a written report of the dates and the amounts of the contributions and the full name and full address of the contributor to the Treasurer of the USWA's PAC Fund within five days of the receipt of the contribution. If such individual contributions exceed \$100, the report must also include the contributor's occupation.

In 1970, the FEC began the process of formulating proposed regulations concerning the new provision of the FECA and 2 U.S.C. 441b(b)(5).

HIGHLIGHTS

The International's PAC Fund-Voluntary Account is required by law—and by FEC regulations issued pursuant to that law—to keep certain records and to follow certain procedures, some of which are set forth below.

Individual reports are required within FIVE DAYS for those individuals who contribute more than \$50.00 at one time or more than \$50.00 in the aggregate during the calendar year. (See Appendix B for an example of a Collector's Report form.)

871900430330314686364

TEXT

In most instances, the collector will be able to obtain the required information from the personal check of the contributor. A copy of this five-day report, indicating the date on which the original was sent to the USWA-PAC Treasurer, should be retained by the collector. An example of such a five-day collector's report is attached as Appendix B.

B. RECEIPTS FOR VOLUNTARY FUND EXPENDITURES

As we noted before in Part I, C of these Directives, union dues funds may be used to raise voluntary funds and to establish and administer a separate segregated political action fund such as the Voluntary Account of the USWA Political Action Fund.

The type of funds which are expended for fundraising activities should be, wherever possible, dues funds. In some limited circumstances, however, it may be necessary or practical to use voluntary money to raise voluntary funds.

In such limited circumstances, where voluntary money is spent for any purpose, including such fundraising purposes, the record keeping and reporting requirements of the law come into play. Even when such voluntary money expenditures are made at the local union, district or sub-district level with voluntary dollars before they are ever transmitted to the USWA's PAC Treasurer the record keeping requirements of the law apply. Moreover, whenever voluntary dollars are expended at the local union, sub-district or district level, it is necessary from an internal accounting standpoint that the following procedures be followed:

1. A written account must be made of all expenditures of voluntary money and must include:
 - a. The full name and full address of every person to whom an expenditure is made,
 - b. The date of the expenditure,
 - c. The amount of the expenditure,
 - d. The purpose of the expenditure, and
 - e. If applicable, the name of and office sought by any candidate to whom or on whose behalf such a voluntary fund expenditure is made.
2. Whenever a Voluntary Fund expenditure in excess of \$100 is made to any person or if expenditures in lesser amounts to such a person total more than \$100 in a calendar year, then either a receipted bill must be obtained from such person or an invoice must be obtained and retained with a Voluntary Fund canceled check. Either the receipted bill or invoice and check must contain the information specified above.

Under the FEC's regulations, the foregoing requirements are imposed on USWA's PAC Treasurer and on any "agent authorized by the treasurer to receive contributions" to the Voluntary Account. All district, sub-district and local union collectors are such agents and must therefore comply with these requirements.

C. RECORDS OF FUNDRAISING EVENTS AND MASS COLLECTIONS

As we mentioned at the end of Part I, C, above, the FEC has indicated that a reasonable practice for a labor union to follow in conducting mass fundraising endeavors, at rallies, dinners and the like is to pay for the cost of such endeavors with dues funds to the extent that the voluntary money raised through a given affair or event is approximately three

HIGHLIGHTS

Please note that such contributions exceeding \$50 could be in the form of ticket purchase payments as well as Victory 7 or \$2.00 PAC membership card payments or direct contributions or contributions by check-off.

Wherever possible, dues funds should be used to finance fundraising activities. If it becomes necessary to use PAC Voluntary funds to pay expenses in connection with raising Voluntary funds (such as cost of printing, for prizes, etc.), it is most important that proper records be kept and that a receipt be obtained for each expenditure.

Record keeping for fundraising affairs and mass collections at rallies and meetings must be observed by local union, sub-district and district level collectors.

TEXT

times as much as the dues money expended. While there is no specific FEC reporting requirement with respect to such dues fund expenditures, the International Union must, nonetheless, have a full accounting of all such fundraisers. Aside from the fact that such an accounting is consistent with good financial practices and our general policy, we can never be certain whether it may become necessary to use some of the *voluntary money* to fund the event, thus invoking the reporting requirements of Part III, B above.

Therefore, all local union, district and sub-district fundraisers must establish and maintain records of each such fundraising activity so that appropriate information can accompany the funds which are transmitted to Pittsburgh for deposit in the Voluntary Account. Such records should include:

1. The date, location and nature of each dinner, rally, golf tournament or other fundraising event;
2. The total proceeds received from ticket sales, mass collections, the sale of merchandise or other contributions to each such event, (if any one purchaser of tickets spends more than \$50.00, then the information requested in Part III A must be reported promptly);
3. If any voluntary funds are expended to cover costs such as those for food, beverages, hall rental, printing, prizes, gifts, green fees, entertainment or similar expenses of each such event, prepare an itemized list of each expenditure showing the payee, the date, amount and the purpose of each expenditure.
4. The amount of dues money spent to cover the types of expenses enumerated in 3, above; and,
5. The approximate number of people who participated in or attended each such event.

There is attached a sample reporting form for these purposes marked Appendix C.

Assistance in maintaining appropriate records for such fundraising activities is available through your District Director.

IV. SEGREGATION AND TRANSMITTAL OF VOLUNTARY FUNDS

All voluntary contributions which are received by local union, district or sub-district collectors must remain separate from and cannot be commingled with any personal, union or corporation funds. It is the policy of the United Steelworkers of America Political Action Fund to return to the sender any union, or corporation money or any personal check which appears to have been used as a vehicle to transmit contributions of other persons.

Under our present procedures, the preferred and most feasible means of transmitting voluntary contributions which have been collected in the field are:

1. **USWA Political Action Fund Transmittal Accounts** opened specifically and exclusively for the purpose of holding and transmitting voluntary funds;

2. **Personal money orders**

3. **Personal checks**

As we mentioned at the end of Part I, it is the policy of the USWA that a "reasonable practice" for a labor union to follow in conducting such fundraising endeavors is to file, under and in the name of the union, all such funds with dues money to the extent the union

HIGHLIGHTS

ALL FUNDRAISERS MUST FILE REPORTS

All fundraisers must prepare and file reports of each fundraising event with the Treasurer of the USWA PAC Fund.

Please pay strict attention to this list of five items of information required to be submitted with the proceeds of each fundraising affair.

If two or more fundraising events are held in conjunction with each other (i.e. a dinner-dance during which a drawing is held for a raffle that involved a separate sale of tickets) separate records must be kept for each such event.

Voluntary receipts are not to be commingled with receipts from dues fund sources, and separate records of such receipts must be maintained.

If PAC Transmittal Accounts are used, they may be used only to receive Voluntary PAC Funds collected, to hold such funds and to transmit the same, to the Treasurer of the PAC Fund in Pittsburgh.

Voluntary funds raised cannot be commingled with union, corporation or personal funds.

- a. No Local Union checks will be accepted.
- b. No corporation funds can be accepted, nor may a corporation be requested to act as transmittal agent for voluntary funds raised by local fundraisers.
- c. No personal check will be accepted unless it is clear that such personal check represents the personal contribution of the person signing the check.

TEXT

These drafts should be made payable as follows: "USWA Political Action Fund."

The cost of maintaining a Transmittal Account or of purchasing bank or cashiers' checks or money orders can be paid with union dues funds. If a Transmittal Account is used, the name of the account should include a reference to the local union, district or sub-district as well as "USWA Political Action Fund Transmittal Account." If the collection and transmittal activity of the local union, district or sub-district extends for only a few weeks or months, it is advisable to close out the account once all the voluntary funds collected for a given year have been transmitted.*

V. CONTRIBUTIONS TO FEDERAL CANDIDATES AND COMMITTEES

Under the policy adopted by the USWA's International Executive Board in 1973, the function of making contributions to or expenditures on behalf of federal candidates with voluntary money was centralized in the International Union's Political Action Fund and all district, sub-district and local union collectors were designated collection and transmittal agents for the Voluntary Account. The major purpose for that centralization was to remove the burden of the detailed record keeping and reporting required under the 1971 Act from local unions, districts and sub-districts. An additional reason to continue that policy has been created by the 1976 amendments.

The USWA Political Action Fund Voluntary Account falls within the definition of a "multi-candidate political committee" and as such is subject to a limitation of \$5000 on the amount of voluntary money it may contribute to any single candidate and such candidate's committees in connection with each primary, runoff, general, or special election. Such a multi-candidate committee also is subject to a yearly limitation of: (a) \$15,000 in contributions to any political committee established by a national political party; and (b) \$5,000 in contributions to any other political committee. UNDER THE FEC REGULATIONS, CONTRIBUTIONS BY A COMMITTEE SET UP BY ANY LOCAL UNION, DISTRICT OR SUB-DISTRICT OF THE USWA MUST BE ADDED TO THE CONTRIBUTIONS MADE BY THE USWA'S PAC VOLUNTARY ACCOUNT ITSELF FOR DETERMINING WHETHER OR NOT THOSE CONTRIBUTION LIMITATIONS HAVE BEEN REACHED. IN ORDER FOR THE VOLUNTARY ACCOUNT TO AVOID MAKING CONTRIBUTIONS BEYOND THOSE LIMITATIONS AND THEREBY BECOMING SUBJECT TO THE PENALTIES OF THE LAW, IT IS CRUCIALLY IMPORTANT THAT NO LOCAL UNION, DISTRICT OR SUB-DISTRICT MAKE ANY CONTRIBUTION OF VOLUNTARY DOLLARS TO CANDIDATES FOR FEDERAL OFFICE OR TO THE POLITICAL COMMITTEES ESTABLISHED BY POLITICAL PARTIES. This will be done by the International Political Action Committee in consultation with the appropriate district or districts.

VI. PENALTIES

Civil penalties for violations of the FECA can be imposed up to the greater of the amount of the illegal contributions or expenditures or \$10,000. If the violation is "knowing and willful," the fine may be as high as \$10,000 or twice the amount of the contributions or expenditures in question. If the FEC concludes that a violation has occurred, it may refer the case to the U.S. Attorney for the district in which the violation occurred. The U.S. Attorney may then bring a civil action in federal court to enforce the penalties.

*It is the purpose and intent of the PAC Transmittal Account to receive, hold and transmit to the USWA's PAC Treasurer voluntary funds raised at the local, sub-district and district level. This was clearly stated in the September 27, 1973, PAC policy letter, and under no circumstances should the PAC Transmittal Account be used for any other purpose.

HIGHLIGHTS

In transmitting voluntary PAC Funds to Pittsburgh, always use checks or money orders. DO NOT SEND CASH.

All drafts should be made payable as follows: "USWA Political Action Fund."

Contributions in any form—such as ticket purchases or direct contributions by a committee set up by any local union, district or sub-district of the USWA must be added to contributions made by the USWA's PAC Voluntary Account itself for determining whether or not the contribution limits established by the 1976 FECA amendments have been reached.

No local union, district or sub-district shall make any contribution of voluntary dollars to candidates for federal office or to political committees supporting such candidates.

TEXT

General for prosecution and imposition of a criminal penalty which can be a fine up to the greater of \$25,000 or three times the amount of the illegal contributions or expenditures.

CONCLUSION

There undoubtedly are some aspects of voluntary fundraising and political action which have not been covered in these directives. It is reasonable to anticipate that some of the views and directives which are set forth above may be modified in the future.

Comments or questions concerning the foregoing directives should be submitted to the Treasurer of the USWA PAC Fund.

HIGHLIGHTS

871900430130314687306

APPENDIX A

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
DIRECTIVES FOR FUNDRAISERS

The following legends should appear on Political Action Fund Receipts, Victory 7_ cards, tickets and other fundraising material.

LEGEND 1

"A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D. C."

LEGEND 2

"The United Steelworkers of America Political Action Fund supports various candidates for federal and other elective office, is connected with the United Steelworkers of America, a labor organization, and solicits and accepts only voluntary contributions in its own fundraising efforts and in joint fundraising efforts with the AFL-CIO and its Committee on Political Education."

Legend 1 must appear on the face or front page of all printed fundraising literature and at the beginning or end of any broadcast solicitation.

Legend 2 which must be included on printed solicitation materials, is one means of satisfying the requirements of 2 U.S.C. Section 441b(b)(3) (i.e. prohibiting the use of coercion while soliciting contributions to the PAC Fund) discussed on page 6 of the foregoing Directives for Fundraisers.

All contribution receipts also should make the following reference to the AFL-CIO and/or its COPE.

LEGEND 3

"This receipt is for a voluntary contribution to a joint fundraising effort by the United Steelworkers of America and the AFL-CIO."

APPENDIX B

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND
DIRECTIVES FOR FUNDRAISERS

UNITED STEELWORKERS OF AMERICA

Political Action Fund
Five Gateway Center
Pittsburgh, Pa. 15222

COLLECTOR'S REPORT

Of Voluntary Contributions by a single contributor aggregating more than \$50.00 in a calendar year.

(Note: This report is required to be filed with the Treasurer of the Political Action Fund within 5 days of receipt of the contribution(s)).

Name of Contributor _____

Address of Contributor _____

Occupation of Contributor _____

Date(s) of Contribution(s) _____ Amount(s) of Contribution(s) _____

Collector _____

Local Union _____

District _____

8790401330148327

UNITED STEELWORKERS OF AMERICA
POLITICAL ACTION FUND

REPORT OF FUNDRAISING EVENT

(Please report each event separately)

1. Name and/or Nature of Event _____
2. Date and location of Event _____
3. Sponsor of Event _____
4. Approximate number of people _____
5. District/Sub-District/Local _____

FINANCIAL DATA

| | VOLUNTARY FUNDS | DUES (TREASURY)
FUNDS |
|---|-----------------|--------------------------|
| Ticket Sales/Receipts | \$. _____ | \$ _____ |
| Other receipts | _____ | _____ |
| Total receipts | \$. _____ | \$ _____ |
| Expenditures (Itemize
showing name of payee,
date & purpose.) | \$. _____ | \$ _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | \$. _____ |
| _____ | _____ | \$ _____ |

Disbursements and transmittals with Dues (treasury) Fund receipts, disbursements and transmittals is prohibited. Unless the District, Sub-District, or Local Fundraisers have the proper checking accounts to handle these funds, special temporary checking accounts should be established. Tickets purchased by individuals should be deposited in the dues fund checking account; tickets purchased by _____ through the dues fund checking account. Additional details concerning the purpose and requirements of this form can be found in Part III-C of the Directives for Fundraisers.

81904031334824



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1220

Date Filmed 10/23/81 Camera No. --- 2

Cameraman JRC



FEDERAL ELECTION COMMISSION

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

83040400108

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1220.



83 MAR 29 11:28
CCH 9762

United Steelworkers of America

AFL-CIO-CLC

ONE EAST WACKER DRIVE

SUITE 1910

CHICAGO, ILLINOIS 60601-1980

(312) 467-1995

March 28, 1983

Mr. Thomas J. Whitehead
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 1220

Dear Mr. Whitehead:

This will confirm our recent telephone conversations concerning compliance with the Conciliation Agreement in the above-referenced MUR case.

Your present inquiry concerns the status of separate bank accounts, which in my March 17, 1981 letter to FEC Attorney William Taylor, I indicated could be established near each USWA District office in the United States. It is not clear in my recollection of my discussions with Mr. Taylor that, after further correspondence with the FEC, the establishment of such separate bank accounts was considered to be a fundamental basis for the entering into by the FEC of the Conciliation Agreements. Nonetheless I will look into this matter and report to you my findings.

In addition to my March 17, 1981 letter to FEC attorney Taylor, please refer also to FEC General Counsel Charles N. Steele's April 14, 1981 letter to me concerning this matter and to my June 10, 1981 response to the FEC General Counsel.

The focus of the parties in that correspondence was the FEC's position that the running of the 10 and 30-day periods of Section 432(b)(2) begins upon the receipt by any representative of the PAC Fund of any amount of contribution, rather than at the time of the fund-raising event in relation to which such contribution is made. Despite the practical difficulties that position of the FEC presents to the USWA PAF; it nonetheless agreed for the purposes of MUR 1220, to accept the FEC's position.

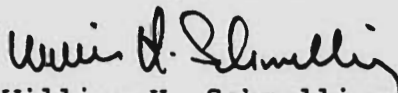
Mr. Thomas J. Whitehead
Assistant General Counsel, FEC

March 28, 1983

23040400110
The USWA PAF has endeavored to comply with that position of the FEC. For example, in the attached photocopies of pages 15 through 17 of a USWA PAC manual, local union and district level pac activists are reminded of Section 432(b)(2)'s 10 and 30-day requirements. This requirement was stressed in presentations to five regional pac conferences conducted by the USWA PAF in 1982 and at other pac meetings or instructional sessions. In addition, whenever the USWA PAF office in Pittsburgh is uncertain as to whether the 10 and 30-day requirements of Section 432(b)(2) have been followed, the contributions received are deposited in a separate bank account from the PAF's federal candidates fund. Consequently, I'm not certain that the establishment of separate, special bank accounts in each USWA district city, as described in my March 17, 1981 letter, is necessary.

I will, nonetheless, determine the status of such accounts and relay any information which I receive concerning them to you.

Very truly yours,



William H. Schmelling
Assistant General Counsel

WHS/am
Enclosures

cc: Frank S. McKee, Treasurer, USWA PAF
Ernest Post, Director, USWA PAC Department
Paul Bour, Section Head, USWA, PAC Department

United Steelworkers of America



Lloyd McBride
President

Lynn Williams
Secretary

Joseph Odorcich
Vice President

Frank McKee
Treasurer

Leon Lynch
Vice President

United Steelworkers of America Political Action Department
Ernest Post, *Director*

815 16th Street, N.W.
Washington, D.C. 20006



Where We Get PAC Funds

The three principal methods of collecting voluntary funds for PAC are:

1. Payroll deductions through the PAC check-off.
2. Victory Card campaigns, primarily for locals which do not yet have a PAC check-off agreement with the employer.
3. Political Action Committee fund drives.

Handling Voluntary Contributions

Voluntary contributions collected through a PAC check-off are sent directly from the employer to the United Steelworkers of America Political Action Fund (USWA PAF).

Voluntary contributions from a Victory Card campaign or any other

fund-raising effort are sent to the District Director to be forwarded to USWA PAF.

If a local union maintains a voluntary funds account during a collection campaign, the following legal requirements must be met:

1. Voluntary contributions and treasury funds from union dues must never be mingled.
2. Voluntary funds may be held only in a separate, segregated, non-interest-bearing account, but only briefly because:

- Under the Federal Election Campaign Act, any individual contribution in excess of \$50, *together with the name and address of the contributor*, must be received by the USWA Political Action Fund in Pittsburgh within ten days after it is made.
- Contributions of \$50 or less must be received by the USWA Political Action Fund in Pittsburgh within thirty days after they are made.
- For these purposes, the date the contribution was made is the date on which it was received by the local union solicitor.
- All contributions should be forwarded through the appropriate district or subdistrict transmittal account.

Keeping Records of Contributors

Keep a file of the names and complete addresses of all contributing members. That is the best source of volunteers for other political activities and will be helpful in your next fund-raising campaign.

Making Contributions to Candidates

Federal election laws limit each International Union's contributions to candidates and impose strict reporting requirements. Under the law, the local unions, Districts and International Union headquarters are regarded as a single entity.

To be certain that the legal limitations are never exceeded and that the reporting requirements are met, all contributions must be made by USWA PAF of the International Union in Pittsburgh.

Requests for contributions to candidates must be made through your District Office.

DO'S AND DON'T'S FOR HANDLING VOLUNTARY PAC FUNDS

17

DO Keep in a separate, non-interest-bearing account. Transmit to District Office by separate account check or money order.

DO Transmit contributions of \$50 or less within a few days to District Director's transmittal account.

DO Transmit contributions of more than \$50 immediately to District Director's transmittal account, together with names and addresses of contributors.

DO Request donations to candidates for federal office through your District Office.

DO Keep detailed records, bills and receipts, contributors, prizes, etc. in connection with special fund-raising events and transmit funds raised immediately to District Office.

DO Contact your staff representative or District Director if you are in doubt about correct procedures.

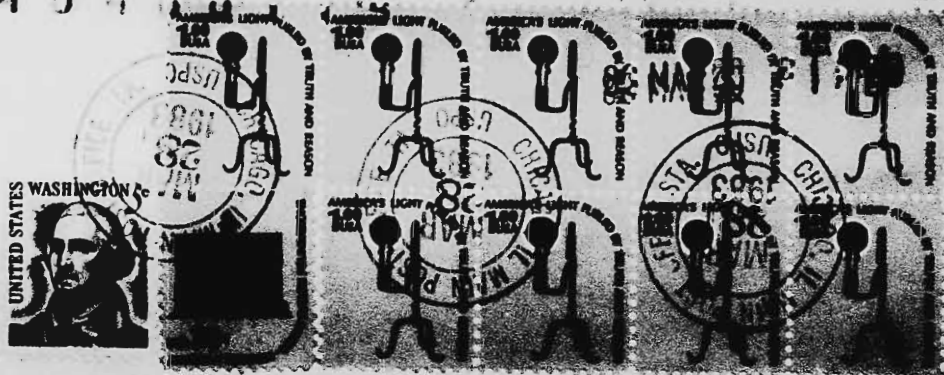
DON'T Commingle voluntary money with treasury funds or personal funds. Personal checks or local union treasury checks may not be used to transmit voluntary funds.

DON'T Make contributions to candidates for federal office. Federal law limits contributions from USWA as a single entity, and we can comply with this law only by making all such contributions from the International Union.

DON'T Provide goods or services for federal candidates. (This counts as a contribution.)

DON'T Purchase tickets for fund-raising events for federal candidates. (This counts as a contribution; therefore such purchases from treasury funds are illegal.)

3 3 0 4 0 1 0

**FROM:**

William H. Schmelling, Esquire
 United Steelworkers of America
 One East Wacker Drive - Suite 1910
 Chicago, Illinois 60601

TO:

THOMAS J. WHITEHEAD, ESQ.
 Assistant General Counsel
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

LABEL 118, MARCH 1968 • U.S.G.P.O. 1963-270-814

EXPRESS MAILPOST OFFICE
TO ADDRESSEE**B 86222121**

| | |
|----------------------|--------|
| ORIGIN | |
| Address of Recipient | City |
| State | Zip |
| Post Office | County |
| Weight | Lbs |
| Postage & Fees | |

| | |
|------------------------|--------|
| DESTINATION | |
| Address of Recipient | City |
| State | Zip |
| Post Office | County |
| DELIVERY WAS ATTEMPTED | |
| Date | |
| Notice Left By | |

EXPRESS MAIL SERVICE

▼ TO REMOVE PEEL BACK HERE ▼

PRESS HARD

FOUR ARE MAKING 4 COPIES



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MR 1220.

83040400116

