



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1534

Date Filmed 6/15/83 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

1534

Routing Slip
Vote Sheet

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 M. Phelps
4/5/83

FEC 9-21-77

83040393807



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 5, 1983

Mr. Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
1636 Champa Street
Denver, Colorado 80202

RE: MUR 1534

Dear Mr. Ricigliano:

On March 30, 1983, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

However, after considering the circumstances of this matter, the Commission has decided to take no further action and close the file. Please be advised that the attached legal analysis finds the stated transactions to be a violation of the Act and you should take action ensuring that such violations do not occur in the future.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Danny L. McDonald
DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
1636 Champa Street
Denver, Colorado 80202

RE: MUR 1534

Dear Mr. Ricigliano:

On , 1983, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

However, after considering the circumstances of this matter, the Commission has decided to take no further action and close the file. Please be advised that the attached legal analysis finds the stated transactions to be a violation of the Act and you should take action ensuring that such violations do not occur in the future.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Suzanne
3/31/83

Enclosures
General Counsel's Factual and Legal Analysis
Procedures

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1534

RESPONDENT Oil, Chemical and Atomic
Atomic Workers International
Union Political and
Political and Legislative
League Fund

STAFF MEMBER & TEL. NO.
Suzanne Callahan
(202) 523-4529

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

SUMMARY OF ALLEGATIONS

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The 1981 March Monthly through the January 31 Year End Reports filed by the PLLF disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

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Requests for Additional Information ("RFAIs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions.

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAIs concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters.

No further response was received and therefore a Second Notice was sent on July 9, 1982. In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action.

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests.

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele.

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individual members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with

representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account."

A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend.

Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution.

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982.

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members.

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982, and \$1,075 on August 31, 1982) to its non-voluntary fund account.

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary

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account and notified the treasurer that the Commission may take further action on the matter.

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge that remedial steps were taken by the committee and also to provide notification that further legal steps may be taken.

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441b:

labor unions are prohibited from making contributions and expenditures in connection with federal elections. This section of the Act precludes the commingling of voluntary and non-voluntary funds as well.

In this case, the subject funds have now been segregated and voluntary compliance has been achieved. We believe that since the Committee has corrected its accounting problems and such violations are not likely to occur in the future, the Commission should find reason to believe that the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b and close the file.

RECOMMENDATION

1. Find reason to believe the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b and close the file.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund

MUR 1534

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 30, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1534:

1. Find reason to believe the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b (11 C.F.R. § 114.5(b)).
2. Close the file.
3. Send the notification as attached to the First General Counsel's Report dated March 25, 1983.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

3-20-80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

3-28-83, 9:17
3-28-83, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *DK*
DATE: March 25, 1983
SUBJECT: MUR 1534 - 1st GC Rpt

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
below) ☐

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 MAR 28 A 9: 17

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 3-25-83

MUR NO. 1534
STAFF MEMBER
Suzanne Callahan

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: Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund

RELEVANT STATUTES: 2 U.S.C. § 441b
11 C.F.R. § 114.5(b)

INTERNAL REPORTS CHECKED: Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division (RAD) in connection with the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund's ("PLLF") comingling of treasury and voluntary funds in violation of 2 U.S.C. § 441b.

SUMMARY OF ALLEGATIONS

The 1981 March Monthly through the January 31 Year End Reports filed by the PLLF disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were

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no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAIs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions. 1/

On June 29, 1982, the treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAIs concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters.

No further response was received and therefore a Second Notice was sent on July 9, 1982. 2/ In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action.

On July 15, 1982, the treasurer sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests.

1/ Requests for Additional Information were sent on the 1981 March Monthly through January 31 year End Reports with the exception of Informational Notices on the May and June Monthly Reports.

2/ The notice referenced the lack of response to the RFAIs noted in footnote 1, but did not include the May and June Monthly Reports.

On July 21, 1982, the treasurer sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele.

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from the treasurer. He explained that an immediate review of all records and reports had been initiated concerning the information requested by RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individual members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. He went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account."

A meeting was scheduled for August 4, 1982; however, due to travel complications, the treasurer was unable to attend. Instead, the Associate General Counsel of the OCAWIU and a local attorney, met with

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representatives of RAD. The participants discussed the problems and proposals for resolution.

On August 13, 1982, counsel placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982.

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members. 3/

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982, and \$1,075 on August 31, 1982) to its non-voluntary fund account.

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary account and notified the treasurer that the Commission may take further action on the matter.

On November 12, 1982, counsel placed a call to RAD after receiving the November 5th Informational Notice. He wanted to know how he could respond to the notice. He was informed that

3/ The response noted that since the report covering June of 1982, no contributions have been deposited into the account that contained commingled funds, nor have any disbursements in connection with Federal elections been made. A new voluntary account was opened in July, into which contributions have been deposited. In order to bring PLLF "into voluntary compliance with the Act," the "old" voluntary account has been closed out, with the funds therein being transferred to the non-voluntary account. Furthermore, the administrative and account procedures are being revamped, "so as to obviate the possibility of future errors."

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the basis for the notice was to acknowledge that remedial steps were taken by the committee and also to provide notification that further legal steps may be taken.

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with counsel on November 12th.

LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441b:

labor unions are prohibited from making contributions and expenditures in connection with federal elections. This section of the Act precludes the commingling of voluntary and non-voluntary funds as well.

In this case, the subject funds have now been segregated and voluntary compliance has been achieved. We believe that since the Committee has corrected its accounting problems and such violations are not likely to occur in the future, the Commission should find reason to believe and close the file.

RECOMMENDATIONS

1. Find reason to believe the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b (11 C.F.R. § 114.5(b)).
2. Close the file.
3. Send attached notification.

Charles N. Steele
General Counsel

March 23, 1983
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachment

Notification
Rad Referral
General Counsel's Factual and Legal Analysis
(49 total pages attached)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
1636 Champa Street
Denver, Colorado 80202

RE: MUR 1534

Dear Mr. Ricigliano:

On , 1983, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

However, after considering the circumstances of this matter, the Commission has decided to take no further action and close the file. Please be advised that the attached legal analysis finds the stated transactions to be a violation of the Act and you should take action ensuring that such violations do not occur in the future.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

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1

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 14 December 1982Analyst: Ed Ryan

I. COMMITTEE: Oil, Chemical and Atomic Workers
International Union Political & Legislative
League Fund (C00030635)
Michael Ricigliano, Treasurer
1636 Champa Street
Denver, Colorado 80202

II. RELEVANT STATUTE: 2 U.S.C. 441b(a) & 11 CFR 114.5(b)

III. BACKGROUND:

Commingleing of Treasury and Voluntary Funds 2 U.S.C.
441b(a) & 11 CFR 114.5(b)

The 1981 March Monthly through the January 31 Year End Reports filed by the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund ("PLLF") disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions (Attachment 2).^{1/}

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFA's concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters (Attachment #3).

1/ Requests for Additional Information (RFAs) were sent on the 1981 March Monthly through January 31 Year End Reports with exception of Informational Notices on the May and June Monthly Reports.

No further response was received and therefore a Second Notice was sent on July 9, 1982. 2/ In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action (Attachment #4).

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests (Attachment #5).

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele (Attachment #6).

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by the RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individuals members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account" (Attachment #7).

A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend. Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution (Attachment #8).

2/ The notice referenced the lack of response to the RFAIs noted in footnote 1, but did not include the May and June Monthly Reports.

3

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982 (Attachment#9).

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members (Attachment #10). 3/

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982 and \$1,075 on August 31, 1982) to its non-voluntary fund account (Attachment #11).

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary account and notified the treasurer that the Commission may take further action on the matter (Attachment #12).

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge the remedial steps taken by the committee and also to provide notification that further legal steps may be taken (Attachment #13).

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th (Attachment #14).

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring referral at this time for this committee.

3/ The response noted that since the report covering June of 1982, no contributions have been deposited into the account that contained commingled funds, nor have any disbursements in connection with Federal elections been made. A new voluntary account was opened in July, into which contributions have been deposited. In order to bring PLLF "into voluntary compliance with the Act," the "old" voluntary account has been closed out, with the funds therein being transferred to the non-voluntary account. Furthermore, the administrative and accounting procedures are being revamped, "so as to obviate the possibility of future errors."

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL UNION POLITICAL & LEGISLATIVE LEAGUE FUND CONNECTED ORGANIZATION: OIL CHEMICAL & ATOMIC WORKERS INT'L UNION				NON-PARTY QUALIFIED ID 0000030635		
1981	STATEMENT OF ORGANIZATION - AMENDMENT			24AUG81	2	01FEC/204/4732
	FEBRUARY MONTHLY	2,935	1,410	1JAN81 - 31JAN81	3	01FEC/190/4905
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN81 - 31JAN81	1	02FEC/254/0404
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 - 31JAN81	1	02FEC/253/4904
	MARCH MONTHLY	1,026	114	1FEB81 - 28FEB81	4	01FEC/192/2403
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 - 28FEB81	1	02FEC/239/3525
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 - 28FEB81	1	02FEC/254/0407
	REQUEST FOR ADDITIONAL INFORMATION			1FEB81 - 28FEB81	1	02FEC/234/0301
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB81 - 28FEB81	1	02FEC/236/2147
	1'ST LETTER INFORMATIONAL NOTICE			1FEB82 - 28FEB81	1	02FEC/253/4907
	APRIL MONTHLY	1,027	2,794	1MAR81 - 31MAR81	4	01FEC/193/4735
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 - 31MAR81	1	02FEC/239/3524
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 - 31MAR81	1	02FEC/254/0408
	REQUEST FOR ADDITIONAL INFORMATION			1MAR81 - 31MAR81	1	02FEC/234/0302
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR81 - 31MAR81	1	02FEC/236/2148
	1'ST LETTER INFORMATIONAL NOTICE			1MAR81 - 31MAR81	1	02FEC/253/4908
	MAY MONTHLY	448	250	1APR81 - 30APR81	4	01FEC/195/3212
	MAY MONTHLY - AMENDMENT	-	-	1APR81 - 30APR81	1	02FEC/239/3527
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 - 30APR81	1	02FEC/234/0262
	JUNE MONTHLY	589	1,760	1MAY81 - 31MAY81	4	01FEC/197/0121
	JUNE MONTHLY - AMENDMENT	-	-	1MAY81 - 31MAY81	1	02FEC/239/3528
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 - 31MAY81	1	02FEC/233/0425
	JULY MONTHLY	2,738	214	1JUN81 - 30JUN81	4	01FEC/200/1954
	JULY MONTHLY - AMENDMENT	-	-	1JUN81 - 30JUN81	1	02FEC/239/3529
	REQUEST FOR ADDITIONAL INFORMATION			1JUN81 - 30JUN81	1	02FEC/234/0303
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN81 - 30JUN81	1	02FEC/236/2149
	AUGUST MONTHLY	2,074	2,167	1JUL81 - 31JUL81	4	01FEC/204/0409
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 - 31JUL81	1	02FEC/239/3530
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 - 31JUL81	1	02FEC/254/0409
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 - 31JUL81	1	02FEC/234/0304
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 - 31JUL81	1	02FEC/236/2150
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 - 31JUL81	1	02FEC/253/4909
	SEPTEMBER MONTHLY	20,891	500	1AUG81 - 31AUG81	4	01FEC/205/2384
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 - 31AUG81	1	02FEC/239/3531
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 - 31AUG81	1	02FEC/254/0410
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 - 31AUG81	1	02FEC/233/0459
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 - 31AUG81	1	02FEC/235/1472
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 - 31AUG81	1	02FEC/253/4990
	OCTOBER MONTHLY	1,423	12,184	1SEP81 - 30SEP81	4	01FEC/204/5002
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP81 - 30SEP81	1	02FEC/239/3532
	REQUEST FOR ADDITIONAL INFORMATION			1SEP81 - 30SEP81	3	02FEC/233/0453
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP81 - 30SEP81	1	02FEC/236/2146
	NOVEMBER MONTHLY	3,890	405	1OCT81 - 31OCT81	4	01FEC/209/0447
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 - 31OCT81	1	02FEC/239/3533

NON-PARTY RELATED

COMMITTEE DOCUMENT

RECEIPTS

EXPENDITURES

TYPE OF FILER

OF MICROFILM

COVERAGE DATES PAGES LOCATION

NOVEMBER MONTHLY	- AMENDMENT	-	-	OCT01 -31OCT01	1	02FEC/254/0411
REQUEST FOR ADDITIONAL INFORMATION				OCT01 -31OCT01	1	02FEC/234/0305
REQUEST FOR ADDITIONAL INFORMATION 2ND				OCT01 -31OCT01	1	02FEC/236/215
1ST LETTER INFORMATIONAL NOTICE				OCT01 -31OCT01	1	02FEC/253/499
DECEMBER MONTHLY		4,161	0	NOV01 -30NOV01	3	01FEC/211/1260
DECEMBER MONTHLY	- AMENDMENT	-	-	NOV01 -30NOV01	1	02FEC/239/3534
REQUEST FOR ADDITIONAL INFORMATION				NOV01 -30NOV01	1	02FEC/234/0306
REQUEST FOR ADDITIONAL INFORMATION 2ND				NOV01 -30NOV01	1	02FEC/234/2152
YEAR-END		2,002	0	DEC01 -31DEC01	3	02FEC/212/2009
YEAR-END	- AMENDMENT	-	-	DEC01 -31DEC01	13	02FEC/239/2532
YEAR-END	- AMENDMENT	-	-	DEC01 -31DEC01	1	02FEC/254/0412
REQUEST FOR ADDITIONAL INFORMATION				DEC01 -31DEC01	1	02FEC/233/0457
REQUEST FOR ADDITIONAL INFORMATION 2ND				DEC01 -31DEC01	1	02FEC/236/2153
1ST LETTER INFORMATIONAL NOTICE				DEC01 -31DEC01	1	02FEC/253/4992
1982 MISCELLANEOUS REPORT				29JUN82 TO FEC	2	02FEC/234/2067
MISCELLANEOUS REPORT				16JUL82 TO FEC	2	02FEC/237/3505
MISCELLANEOUS REPORT				22JUL82 TO FEC	2	02FEC/239/2530
MISCELLANEOUS REPORT				13AUG82 TO FEC	4	02FEC/240/4010
FEBRUARY MONTHLY		5,550	0	1JAN82 -31JAN82	3	02FEC/223/2674
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN82 -31JAN82	2	02FEC/245/4094
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN81 -31JAN82	1	02FEC/254/0413
REQUEST FOR ADDITIONAL INFORMATION				1JAN82 -31JAN82	1	02FEC/244/3994
1ST LETTER INFORMATIONAL NOTICE				1JAN82 -31JAN82	1	02FEC/253/4993
MARCH MONTHLY		159	7,517	1FEB82 -28FEB82	4	02FEC/224/5296
APRIL MONTHLY		10,363	2,050	1MAR82 -31MAR82	4	02FEC/226/2004
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1	02FEC/245/4090
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1	02FEC/254/0414
REQUEST FOR ADDITIONAL INFORMATION				1MAR82 -31MAR82	1	02FEC/244/3995
1ST LETTER INFORMATIONAL NOTICE				1MAR82 -31MAR82	1	02FEC/253/4994
MAY MONTHLY		1,140	1,200	1APR82 -30APR82	4	02FEC/230/3302
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	1	02FEC/245/4097
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	2	02FEC/253/5260
REQUEST FOR ADDITIONAL INFORMATION				1APR82 -30APR82	1	02FEC/244/3996
1ST LETTER INFORMATIONAL NOTICE				1APR82 -30APR82	7	02FEC/253/3471
JUNE MONTHLY		1,332	750	1MAY82 -31MAY82	4	02FEC/232/2934
JUNE MONTHLY	- AMENDMENT	-	-	1MAY82 -31MAY82	2	02FEC/245/4900
REQUEST FOR ADDITIONAL INFORMATION				1MAY82 -31MAY82	2	02FEC/244/1985
JULY MONTHLY		2,460	300	1JUN82 -30JUN82	4	02FEC/254/4699
AUGUST MONTHLY		2,590	4,200	1JUL82 -31JUL82	4	02FEC/240/4022
SEPTEMBER MONTHLY		5,415	27,402	1AUG82 -31AUG82	5	02FEC/242/3134
OCTOBER MONTHLY		4,322	9,100	1SEP82 -30SEP82	4	02FEC/249/2400
PRE-GENERAL		2,181	825	1OCT82 -13OCT82	5	02FEC/251/0137

TOTAL

70,732

0

70,154

0

107 TOTAL PAGES

All letters received through 1982 July Monthly.

ENDING CASH (10-15-82) = \$4,503.09



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
 Oil Chemical & Atomic Workers International
 Union Political & Legislative League Fund
 1636 Champa Street
 Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
 Reports Analyst
 Reports Analysis Division

68230042030943-2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1635 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: September Monthly Report (8/1/81 - 8/31/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total for Line 6(a) of the Summary Page. (2 U.S.C. 434(b))

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(2)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

3 0 4 0 3 9 3 8 3 1



Political and Legislative League

P.O. Box 2212
Denver, Colorado 80201-9804
Phone (303) 658-6111

ROBERT F. GOTT, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COTL, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

Re: OCANTU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,

M. Ricigliano
MICHAEL RICIGLIANO
Secretary-Treasurer

MR/bb, cps
ocsv



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly (9/1/81-9/30/81), March Monthly
(2/1/81-2/28/81), April Monthly (3/1/81-3/31/81),
July Monthly (6/1/81-6/30/81), August Monthly
(7/1/81-7/31/81), November Monthly (10/1/81-
10/31/81), December Monthly (11/1/81-11/30/81),
January 31 Year-End (12/1/81-12/31/81), and
September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the
above-referenced report(s) raised questions as to specific
contributions and/or expenditures, and the reporting of certain
information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29,
1982. Please amend your reports to provide the requested
information.

If this information is not received by the Commission within
fifteen (15) days from the date of this notice, the Commission
may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter,
please contact Edward Ryan on our toll-free number (800)424-9530
or our local number (202)357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

88203 4235916 B 43

oil chemical

00026

WESTERN UNION

MAILGRAM

ATTACHMENT # 5

1-028534C196 07/15/82 ICS IPMWGWF WSH WSHA
04280 (01641) MGM WASHINGTON DC 50 07-13 0618P EST

JOHN D GIBSON ASST STAFF DIR
REPORTS ANALYSIS DIV-FEDL ELECTION COMM-
1325 K STREET NW 3RD FLR
WASHINGTON DC 20463

(DUPE OF TELEPHONED TELEGRAM)

00073971196 07/15/82
TX OCAW DVR
001 DENVER, CO. JULY 13, 1982
MS JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION
FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

FEI OCAWU POLITICAL AND LEGISLATIVE LEAGUE FUND
ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7,
1982 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED
SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM
THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND
REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS
CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MRICH

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18153 EST

MGMCOMP

TO REPLY BY MAILGRAM SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

12 JUL 16 1982

WJA189(1715)(1-023704A202) PD 07/21/82 1706

1982 JUL 21 PH 6:34

ICS IPMWJCS WSH

07231 07-21 0554P EST

ICS IPMWJCS

1-0129121202 07/21/82

TRX OCAW DVR

001 DENVER, CO. JULY 21, 1982

FRS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

RE: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL

1201-27 (12-00)

Telegram

UNION POLITICAL AND LEGISLATIVE LEAGUE FUND
I.D. NO. C00030635

PLEASE BE ADVISED THAT I HAVE WRITTEN TO FEC GENERAL
COUNSEL CHARLES N. STEELE RELATIVE TO THE REPORT ANALYSIS DIVISION'S
JUNE 16, 1982 REQUESTS FOR AMENDMENT TO OR CLARIFICATION OF CERTAIN
1981 MONTHLY REPORTS FILED BY OCAWIU PLL.

MICHAEL RICIGLIANO
TREASURER
OCAWIU PLL

1653 EST

NNNN



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-0984
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

July 21, 1982

JUL 22 P 3: 22

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Re: Oil, Chemical & Atomic Workers
International Union Political &
Legislative League Fund
I.D. Number/C00030635

Dear Mr. Steele:

This is in reference to the attached communications between the Federal Election Commission's Reports Analysis Division and my office.

I am the Treasurer of the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund (OCAWIU PLL) to which office I succeeded effective August 14, 1981, upon my election as Secretary-Treasurer of the International Union. On June 22, 1982, while I was out of town, I received the attached letters dated June 16, 1982, requesting amendment to or clarification of certain information contained in OCAWIU PLL's 1981 monthly reports. Upon my return on June 29th, I requested an extension of time within which to respond until July 15, 1982. I subsequently received a letter dated July 9, 1982, from John Gibson, Assistant Staff Director, in which he indicated that the requested information should be submitted by July 24, 1982. On July 15, 1982, I dispatched a telegram to Mr. Gibson acknowledging receipt of his letter.

In view of the following, I believe it appropriate to communicate at this time with you:

1. Immediately upon returning to my office on June 29th, I requested a review of all OCAWIU PLL records and reports pertaining to the information for which the Reports Analysis Division requested amendments or clarification as a preliminary to our preparation of a response

July 21, 1982

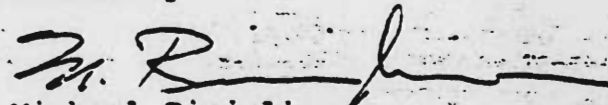
During the course of this review, it was discovered that a transfer in the amount of \$20,000.00, which OCAWIU PLL received from the International Representatives Committee Union, that was thought to represent individual contributions in amounts of \$200.00 or less from I.R.C.U. members (who are also members of OCAWIU) and was deposited into OCAWIU PLL's voluntary account, was in fact a transfer of treasury funds from I.R.C.U. and should, therefore, have been deposited into OCAWIU PLL's treasury account.

In light of the aforementioned discovery, it seems pointless for OCAWIU PLL to respond to the Commission's requests for additional information by simply amending or clarifying its reports. Instead, I hereby request an immediate meeting with you or a member of your staff to discuss the proper means by which the error described above can be rectified through voluntary conciliation. In the meantime, I have directed that no disbursements be made from OCAWIU PLL's voluntary fund account and that voluntary contributions received subsequent to said discovery be deposited into a new separate segregated voluntary fund account.

2. The requests for additional information also inquire about a 9/2/81 contribution from OCAWIU PLL to AFL-CIO COPE in the amount of \$11,842.00. That transfer was made pursuant to a joint fundraising effort between OCAWIU and the AFL-CIO on behalf of OCAWIU PLL and AFL-CIO COPE. This joint fundraising effort is reflected in the attached excerpt from the minutes of the OCAWIU Executive Board meeting on February 24, 1981, which provides for 50% of the OCAWIU PLL/COPE collections to be transferred to AFL-CIO COPE. Thus, all other matters being equal, that transaction should have been labelled "transfer of joint fundraising proceeds", not "contribution", and we would file an amendment to our report to that effect. However, in light of the facts that have come to light and are described above, such an amendment does not appear to be the proper course until we have reached an appropriate agreement with the Commission on the handling of the matter described in Item #1 above.

I look forward to an early and favorable response to our request for a meeting so that OCAWIU PLL can begin to take the necessary steps to bring ourselves into compliance with the FECA.

Sincerely,


Michael Ricigliano
Secretary-Treasurer

MR:lh

Attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

M. Fickens, Secy-Treas.

JUN 22 1982

Referred ACCOUNTING

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

104-3004-0393839

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers Int'l Union Political & Legislative League

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AFL-CIO COPE 815 Sixteenth St., N.W. Washington, DC 20006	Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/2/81	11,482.68
B. Full Name, Mailing Address and ZIP Code Hawkins for Congress Committee c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	Purpose of Disbursement U.S. Congress Calif. - 29th District Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/9/81	50.00
C. Full Name, Mailing Address and ZIP Code Howard M. Metzenbaum for Senate Room 347, RSOB Washington, DC	Purpose of Disbursement U.S. Senate State of Ohio Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/16/81	200.00
D. Full Name, Mailing Address and ZIP Code Colorado COPE 360 Acoma St., Room 300 Denver, CO 80223	Purpose of Disbursement Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/30/81	104.00
E. Full Name, Mailing Address and ZIP Code Congressman Way Dowdy Campaign Comm. c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	Purpose of Disbursement U.S. Congress Mississippi - 4th Dist. Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/30/81	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			12,186.60

21



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: September Monthly Report (8/1/81 - 8/31/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total for Line 6(a) of the Summary Page. (2 U.S.C. 434(b))

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



Political and Legislative League

Deputy, C. Trade 80201-0964
Pho 303) 293-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

Re: OCAWIU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,


MICHAEL RICIGLIANO
Secretary-Treasurer

MR/bb, cps
ocaw



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUL 13 1982

Re: Mr

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: - October Monthly (9/1/81-9/30/81), March Monthly
(2/1/81-2/28/81), April Monthly (3/1/81-3/31/81),
July Monthly (6/1/81-6/30/81), August Monthly
(7/1/81-7/31/81), November Monthly (10/1/81-
10/31/81), December Monthly (11/1/81-11/30/81),
January 31 Year-End (12/1/81-12/31/81), and
September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the
above-referenced report(s) raised questions as to specific
contributions and/or expenditures, and the reporting of certain
information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29,
1982. Please amend your reports to provide the requested
information.

If this information is not received by the Commission within
fifteen (15) days from the date of this notice, the Commission
may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter,
please contact Edward Ryan on our toll-free number (800)424-9530
or our local number (202)357-0026.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

1823004039384

WU INFOMASTER

OCAW DVR

007397I196 1127EST

001 DENVER, CO. JULY 15, 1982

PMS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR

REPORTS ANALYSIS DIVISION

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.

WASHINGTON, D.C. 20463

RE: OCAWIU POLITICAL AND LEGISLATIVE LEAGUE FUND

ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7, 1982 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MR: LH

ACCEPTED

00001

1-PC

Feb. 11

6. Recommendations will be made regarding alternative data sources for ascertainment of illnesses and injuries by the companies. Recommendations also will be made regarding the future specificity of illness and injury reporting by the companies. Justification will be made for each recommendation.
7. A data system will be proposed for future use in receiving and controlling of company submitted morbidity data.
8. A final report will be prepared.
9. A briefing will be held for personnel in the Health and Safety office of OCAW.

It is estimated that this project will take 2½ to 3 months to complete."

There was a MOTION by Board Member Barnes, seconded by Board Member Sullivan to approve the recommendation.

On the roll call the Motion was unanimously approved.

Subject: DISTRIBUTION OF PLL MONEY TO THE AFL-CIO COPE

Secretary-Treasurer Palmer recommended that again this year we support the AFL-CIO COPE operations to the extent of 50% of our 1981 PLL/COPE collections.

There was a MOTION by Board Member Donohue, seconded by Board Member Perry to approve this recommendation.

On the roll call the Motion was unanimously approved.

The Meeting recessed at noon, in order to allow time for the various committees to function, to reconvene Wednesday, February 25, 1981, at 9:00 a.m.

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21

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82 JUL 22 9 35

82 JUL 22

EXPRESS MAIL

POST OFFICE TO ADDRESS SEE

TO REMOVE PEEL BACK HERE

FROM: Michael Riggio
OCAWIU Political and Legislat
ive League
P.O. Box 2812
Denver, Colorado 80201

TO: Charles H. Steele, Enquire
General Council
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20006

ORIGIN:

Initials of Receiving Clerk: *[Signature]*

P.O. ZIP: *1307*

Date In: *7-22-82*

Time In: *1:00*

Weight: *1* Lbs. *3* Oz.

Postage: *934*

DESTINATION:

Date of Delivery: *7-22-82*

Time of Delivery: *1:10*

Initials of Delivering Employee: *231*

Signature of Addressee or Agent: *[Signature]*

DELIVERY WAS ATTEMPTED

Date: *7-22-82* Time: *1:10*

Notice Left By: *[Signature]*

EXPRESS MAIL SERVICE

LABEL 115 JUNE 79 U.S.P.O. 1979-301-303

MEMORANDUM TO THE FILE

FROM : Edward D. Ryan
DATE : August 4, 1982
SUBJECT : Meeting with Representatives of OCAWIU-PLLF

This meeting was requested by Mr. Michael Ricigliano, Secretary Treasurer of the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund in his July 21, 1982 letter to the Commission. In that letter Mr. Ricigliano outlined several discoveries made in responding to RFAIs sent on June 16, 1982.

Unfortunately, Mr. Ricigliano was unable to attend this meeting because of a conflict in travel schedules. Those in attendance were: James J. Cronin, Associate General Counsel of the Oil, Chemical and Atomic Workers International Union-AFL-CIO-CLC; Peggy McCormick, a local attorney; Ed Ryan, Reports Analyst; and Mike Filler, Non-Party/Party Branch Chief in the Reports Analysis Division.

Mr. Cronin began the meeting by saying that once the RFAIs were received, a review of all 1981 reports was started. During the course of this review, it was discovered that union treasury funds were transferred into OCAWIU-PLLF voluntary account. Mr. Cronin said this money was given to officials during a convention, and due to the activities going on, the source of funds was not determined. Mr. Cronin acknowledged that this was not a good excuse and even an embarrassment but felt this was pertinent to the case.

After further discussion Mike Filler suggested the following:

- 1.) Additional research to determine if any more union treasury funds were commingled with voluntary funds;
- 2.) A complete description of the steps OCAWIU-PLLF took to segregate voluntary funds from non-voluntary funds (i.e. the point at which the new account was established and the name of the new depository).
- 3.) Clarification of the disbursement to the SSF of the AFL-CIO, and an explanation concerning the relationship between OCAWIU-PLL and COLORADO COPE based upon the periodic transfers made to COLORADO COPE.

Mr. Cronin said he would supply all that was requested and take Mr. Filler's suggestions into consideration. He said it was his intent to comply fully with the FECA and the FEC's regulations. A response would be submitted as soon as the treasurer was briefed.

21

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
DATE : AUGUST 13, 1982
SUBJECT : FOLLOW-UP TO AUGUST 4 MEETING WITH REPRESENTATIVES
OF THE OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL
UNION POLITICAL & LEGISLATIVE LEAGUE FUND ("PLLIF")

On August 4, 1982, a meeting was held with Mr. Jim Cronin, Associate General Counsel for PLLF and Peggy Mc Cormick. At that meeting, it was suggested that PLLF respond as soon as possible to the commingling problem.

Mr. Cronin called today to say that the union's executive board had met to discuss the commingling problem, and that a response should be received at the Commission sometime during the week of August 16th. I mentioned that in addition to the commingling problem, we had requested certain figures on the Detailed Summary Pages. Mr. Cronin stated that he would ensure that the appropriate amendments were filed.

8304039350

30



Political and Legislative League

P.O. Box 2712
Denver, Colorado 80221-0024
Phone (303) 633-6111

ROBERT F. GORE, Chairman
MICHAEL RICHMOND, Secretary-Treasurer

Affiliated with OCAW, AFL-CIO

August 13, 1982

CERTIFIED RETURN RECEIPT REQUESTED

Michael B. Filler
Chief, Political Party/Special Interest
Committee Section
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
I.D. No. C00030535

Dear Mr. Filler:

During your August 4, 1982, meeting with OCAWIU Associate General Counsel Jim Cronin and attorney Peggy McCormick, you requested that OCAWIU PLL provide to the Commission certain additional information in connection with the matter raised in my July 21, 1982, letter to FEC General Counsel, Charles Steele. Subsequent to that meeting I initiated a more detailed review of OCAWIU PLL's records. Based on that review the information you requested at the August 4th meeting is detailed below.

1. The circumstances surrounding the erroneous deposit of a \$20,000 treasury contribution from the International Representatives Committee Union into OCAWIU PLL's voluntary account are as follows: The check was presented to the then OCAWIU Secretary-Treasurer, who by reason of his office is the Treasurer of OCAWIU PLL, on August 13, 1961, at a regular session of the International Union Convention being held in Denver. At the time of the Convention there was a vigorous contest being waged in connection with the election of all the International Union officers. The check in question was then delivered to the accounting office at OCAWIU's headquarters building, apparently without specific instructions, but with the thought that it would be handled following the Convention.

62 AUG 17 1982 P 1:33

Michael B. Piller

-2-

August 13, 1982

The following day, August 14, 1981, elections of the International Union officers were conducted with the result that I defeated the incumbent Secretary-Treasurer. Following the Convention, without consultation or instructions, the accounting office erroneously deposited the \$20,000 check along with receipts of voluntary contributions in the voluntary fund account, apparently mistakenly believing the check represented individual contributions by members of IRCU. When I took over my responsibilities, neither I nor anyone else in my office realized the check had been erroneously deposited until that fact was discovered upon a review of the OCAWIU PLL records following receipt of the Commission's June 16, 1982 requests for clarifying information.

2. Our further review of OCAWIU PLL's records for the period from January 1981 through June 1982 revealed several instances in which small amounts of treasury funds intended for OCAW's non-voluntary account were erroneously deposited into OCAWIU PLL's voluntary account. In most instances, the error was discovered immediately and the sums were transferred forthwith to our treasury account. (See Appendix I for detailed accounting of such deposits/transfers out.)

We did, however, find that a small number of treasury contributions totalling \$152.00 in 1981 (Mar. \$40, July \$52, Oct. \$30, Dec. \$30) and \$72.00 in 1982 (Jan. \$40, Mar. \$32), which represented PLL treasury contribution credits to Locals purchasing belt buckles from the International, were mistakenly deposited in OCAWIU PLL's voluntary account instead of the non-voluntary account and were not transferred out.

Our detailed review of OCAWIU PLL's 1981 and 1982 records also revealed that two contributions received in 1982, in the amount of \$125.00 (March 1982) and \$50.00 (April 1982), respectively, came from sources other than OCAWIU members or their families. These contributions have been returned to their respective contributors and I have specifically reiterated to OCAWIU Locals and Staff that contributions to OCAWIU PLL are to be accepted only from the Union's members and their families.

3. With respect to the joint fundraising effort mentioned in my July 21st letter, OCAWIU PLL's joint fundraising effort with AFL-CIO COPE is joint fundraising for voluntary contributions to OCAWIU PLL FUND (OCAWIU PLL's separate segregated voluntary account) and AFL-CIO COPE Political Contributions Committee (AFL-CIO COPE's separate segregated voluntary account). Thus, transfers from OCAWIU PLL of the proceeds of its joint fundraising efforts with AFL-CIO COPE PCC should have been reported as transfers of the proceeds of a joint fundraising effort to AFL-CIO COPE PCC.

Michael E. Piller

-3-

RECEIVED
62 AUG 17 P 1: 53
August 13, 1982

4. With respect to OCAWIU PLL's periodic transfers of voluntary funds to COLORADO COPE, those transfers were intended to be used by COLORADO COPE for non-federal purposes and in fact were transfers to a non-voluntary account of Colorado COPE. Colorado COPE does not, we believe, have a separate segregated voluntary account for federal election purposes.

5. As I indicated in my letter dated July 21, 1982 to General Counsel Steel, since our report for the month of June 1982, no contributions received have been deposited into OCAWIU PLL's registered voluntary contributions account (the Bank of Denver being the depository), and no disbursements in connection with federal elections have been made from that account. However, in July, prior to my letter, disbursements had been made to non-federal election candidates, which will be reflected in the report for the month of July.

Also, as indicated in my July 21st letter, a new voluntary contributions account was opened in July, the depository being the Central Bank of Denver, 1515 Arapahoe Street, Denver, Colorado 80202. All voluntary contributions received since the report for the month of June have been deposited in this new account. As previously indicated, this action was taken because of the discovery of the erroneous deposit of the above mentioned \$20,000. Please accept this information in lieu of an amendment to our Statement of Organization, FEC Form 1.

6. In view of the errors uncovered both during our initial review of OCAWIU PLL's records, following our receipt of the Commission's requests for additional information, and our further review following the August 4 meeting with you, we have determined to offer to bring ourselves into voluntary compliance with the Act by closing out OCAWIU PLL's "old" voluntary account (Bank of Denver account) and to transfer the funds therein in their entirety to our non-voluntary or treasury fund account, and to henceforth use only our "new" voluntary account (Central Bank account) for deposits and disbursements of voluntary funds. This action is being taken in order to remove any question as to OCAWIU PLL's voluntary contribution fund's (separate segregated fund) compliance with the law.

In further keeping with our intent to maintain compliance with the FECA and with the FEC's regulations, I have communicated to all principal OCAWIU Local and Council Officers and our International Union Directors and Staff the necessity for conducting our activities covered by the Act in strict conformance with the law and with the regulations. In addition, I am in the

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62 AUG 17 10 13 AM '82

Michael B. Filler

-4-

August 13, 1982

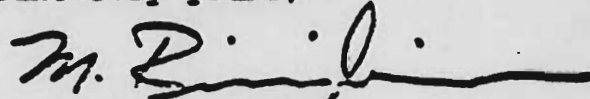
process of completely revamping the administrative and accounting procedures on OCAWIU PLL FUND matters, so as to obviate the possibility of future errors.

I trust that you will find the foregoing responsive to your request for additional clarification of the matters raised in my July 21, 1982 letter to Mr. Steele. I hope, too, that since the information provided herein responds to the Commission's initial requests for additional information and clarification of OCAWIU PLL's reports, you will accept this letter in lieu of amendments to those reports.

Finally, I want to express my appreciation for the Commission's (and your personal) willingness to meet with attorneys Cronin and McCormick on August 4, 1982. I regret that I was unable to attend that conference.

If I can be of further assistance, please advise.

Sincerely yours,



Michael Ricigliano
Secretary-Treasurer

MR:lh

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APPENDIX I

Amount	Deposited in Voluntary Account	Transferred to Treasury Account
500.00	1/29/81	2/2/81
100.00	2/2/81	2/2/81
27.00	7/1/81	7/1/81
560.00	1/18/82	1/20/82
40.00	4/2/82	4/2/82
17.50	4/2/82	4/2/82

NOTE: These deposits and refunds are not reflected in OCAWIU PLL's monthly FEC reports it having been believed unnecessary to do so since the erroneous deposits were discovered and corrected promptly.

3-3-04039383

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Than an Authorized Committee
(Summary Page)

ATTACHMENT # 11
1982 SEPTEMBER MONTHLY
82 SEP 7 P1:27
9-2-82

1. Name of Committee (in Full) Oil, Chemical & Atomic Workers International Union Political & Legislative League Fund Address (Number and Street) 1636 Champa Street City, State and ZIP Code Denver, Colorado 80202 ☐ Check if address is different than previously reported. 2. FEC Identification Number C00030635 3. This Committee qualified as a multicandidate committee during this Reporting Period on _____ (date)	4. TYPE OF REPORT (check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ July 15 Quarterly Report ☐ October 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-election Year Only) ☒ Monthly Report for <u>August, 1982</u> (Type of Election) ☐ Twelfth day report preceding _____ election on _____ in the State of _____ ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
---	--

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>August 1</u> Through <u>August 31, 1982</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>			\$ 25,206.64
(b) Cash on Hand at Beginning of Reporting Period		\$ 29,992.91	
(c) Total Receipts (from Line 18)		\$ 5,415.89	\$ 29,019.38
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 35,408.80	\$ 54,226.02
7. Total Disbursements (from Line 28)		\$ 27,402.86	\$ 46,220.08
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 8,005.94	\$ 8,005.94
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Michael Ricigliano

Type or Print Name of Treasurer

September 1, 1982

SIGNATURE OF TREASURER

(See letter dated August 13, 1982, to Michael B. Filler)

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

11/1/82	11/1/82	11/1/82	11/1/82	11/1/82	11/1/82	11/1/82	11/1/82	11/1/82	11/1/82
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FEC FORM 3

20

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

82 SEP 7 P1:27

Name of Committee (in Full) **Oil, Chemical & Atomic Workers
International Union Political & Legislative League**
Fund

Report Covering the Period:

From: **8/1/82** To: **8/31/82**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitized \$ **5,415.89**)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

12. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES** (See Sch. B)

22. INDEPENDENT EXPENDITURES (Use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441e(d)) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS (See Sch. B)

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

\$5,415.89

\$29,019.38

\$5,415.89

\$29,019.38

\$5,415.89

\$29,019.38

(-\$1,075.00)

\$13,542.22

\$28,477.86

\$32,677.86

\$27,402.86

\$46,220.08

\$5,415.89

\$29,019.38

-0-

-0-

\$5,415.89

\$29,019.38

-0-

-0-

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Contribution checks unreturned and never cashed)

Page 1 of 1 for
LINE NUMBER 21
(Use separate schedule(s) for each
category of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers International Union
Political & Legislative League Fund

A. Full Name, Mailing Address and ZIP Code John Conyers Room 2313 C00053-32 Rayburn House Office Bldg. Washington, D.C. 20515 24K	Purpose of Disbursement Honorarium to John Conyers, H.R. 1st Dist., Mich. for speech (8/5/81) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period -\$500.00 -- Unreturned check never cashed)
B. Full Name, Mailing Address and ZIP Code Thomas L. Driskell P. O. Box 1067 Crockett, Texas 75835	Purpose of Disbursement Contribution to Non-Federal Candidate (4/10/80) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period -\$200.00 -- Unreturned check never cashed)
C. Full Name, Mailing Address and ZIP Code Benny Bonanno 3186 W. 52nd St. Cleveland, Ohio 44102	Purpose of Disbursement Contribution to Non-Federal Candidate (12/19/78) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period -\$75.00 -- Unreturned check never cashed)
D. Full Name, Mailing Address and ZIP Code Anthony Mazzocchi C000114-1 1126 - 16th Street, N.W. Washington, D.C. 20036 24K	Purpose of Disbursement Dinner tickets - Michael J. Harrington, H.R. 6th Dist. Mass. Fund Raiser (7/17/75) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period -\$200.00 -- Unreturned check never cashed)
E. Full Name, Mailing Address and ZIP Code Russo For Congress Committee 134 Pulaski C02049635 Calumet City, Illinois 60409 24K	Purpose of Disbursement Contribution to Marty Russo, H.R. Candidate, 3rd Dist., (11/17/75) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period -\$100.00 -- Unreturned check never cashed)
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

(-\$1,075.00)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 LINE NUMBER 27
 (Use separate schedules for each
 category of the Detailed
 Summary Page)

(Other Disbursements)
 (See letter dated August 13, 1982, to Michael B. Filler)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers International Union
 Political & Legislative League Fund

A. Full Name, Mailing Address and ZIP Code

OCAWIU PLL Fund (Non-Voluntary
 1636 Champa Street Fund)
 Denver, Colorado 80202

Purpose of Disbursement Transfer
 of Voluntary Funds to
 Non-Voluntary Fund Account

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
 day, year)

8/13/82

Amount of Each
 Disbursement This Period

\$27,402.86

B. Full Name, Mailing Address and ZIP Code

OCAWIU PLL FUND (Non-Voluntary
 1636 Champa Street (Fund)
 Denver, Colorado 80202

Purpose of Disbursement Transfer
 of Voluntary Funds to
 Non-Voluntary Fund Account

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
 day, year)

8/31/82

Amount of Each
 Disbursement This Period

\$1,075.00
 (See Sch. B for
 line 21)

C. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
 day, year)

Amount of Each
 Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$28,477.86

Oil, Chemical and Atomic Workers

88

International Union
of Marine Workers

2

AFTER FIVE DAYS RETURN TO:

1636 Champa Street
P.O. Box 2812
Denver, CO. 80201

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P20 1124342

Federal Election Commission
Public Records Division
1325 K Street, N.W.
Washington, DC 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

5 November 1982

Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: February Monthly (1/1/81-1/31/81), March Monthly (2/1/81-2/28/81), April Monthly (3/1/81-3/31/81), August Monthly (7/1/81-7/31/81), September Monthly (8/1/81-8/31/81), November Monthly (10/1/81-10/31/81), Year End (12/1/81-12/31/81), February Monthly (1/1/82-1/31/82), April Monthly (3/1/82-3/31/82) and May Monthly (4/1/82-4/30/82) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your letter of August 13, 1982 disclosed the receipt of funds from a labor organization (pertinent portions attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. 441b(a))

The Commission notes the transfers of the prohibited contributions to your non-voluntary fund, as noted in your August 13th letter and your 1982 September Monthly Report. Although the Commission may take further legal steps concerning the acceptance of prohibited funds, the transfers to the non-voluntary fund will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel

free to contact me on our toll-free number, (800) 424-9530. My
local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

83040393852

TELECONANALYST Ed Ryan
initiated call? TELECON WITH: James J. Cronin, Associate General Counsel
initiated call? XCandidate/Committee: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL-
POLITICAL AND LEGISLATIVE LEAGUE

DATE: November 12, 1982

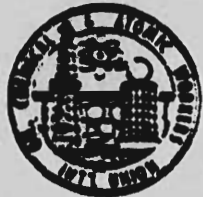
SUBJECT(S): Receipt of Informational Notice dated November 5, 1982

Mr. Cronin called after receiving an informational notice dated November 5, 1982. In that notice the Commission recognized the receipt of prohibited funds and the subsequent transfer out to a non-voluntary account. I advised him that the Commission, as a matter of policy, notifies a committee in such situations and advises that further legal steps may be taken. Mr. Cronin asked if any response should be submitted and I advised him that for the Public Record, he could submit a letter disclosing the receipt of the notice and our subsequent phone conversation.

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OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO

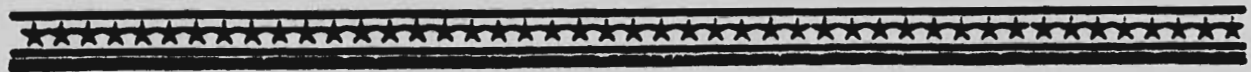


Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-9964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO



November 12, 1982

Edward Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

RE: Oil, Chemical and Atomic
Workers International Union
Political and Legislative
League Fund I.D. No. C00030635

Dear Mr. Ryan:

This will confirm Associate General Counsel
James J. Cronin's telephone conversation with you this
date, to the effect that your letter dated November 5,
1982, is in the nature of an information notice and
does not require any additional information or response
from OCAWIU - PLL FUND.

If we can be of further assistance, please
advise.

Sincerely yours,

M. Ricigliano
Michael Ricigliano
Secretary-Treasurer

MR:gz

83040393864

14

RECEIVED THE FEC

82 NOV 15 A10:35

12 NOV 1982
11 PM

20

Edward Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Oil, Chemical and Atomic Workers

International Union

E. K. Ryan, Jr.

AFTER FIVE DAYS RETURN TO:

AMERICAN OVERSIGHT

P.O. Box 2812
Denver, CO. 80201

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1534

RESPONDENT Oil, Chemical and Atomic
Atomic Workers International
Union Political and
Political and Legislative
League Fund

STAFF MEMBER & TEL. NO.
Suzanne Callahan
(202) 523-4529

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

SUMMARY OF ALLEGATIONS

8 3 0 4 0 3 9 3 3 6 6 E
The 1981 March Monthly through the January 31 Year End Reports filed by the PLLF disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions.

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAs concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters.

46

No further response was received and therefore a Second Notice was sent on July 9, 1982. In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action.

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests.

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele.

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individual members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with

47

representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account."

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A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend. Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution.

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982.

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A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members.

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982, and \$1,075 on August 31, 1982) to its non-voluntary fund account.

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary

48

account and notified the treasurer that the Commission may take further action on the matter.

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge that remedial steps were taken by the committee and also to provide notification that further legal steps may be taken.

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th.

FACTUAL AND LEGAL ANALYSIS

As set forth in 2 U.S.C. § 441b:

labor unions are prohibited from making contributions and expenditures in connection with federal elections. This section of the Act precludes the commingling of voluntary and non-voluntary funds as well.

In this case, the subject funds have now been segregated and voluntary compliance has been achieved. We believe that since the Committee has corrected its accounting problems and such violations are not likely to occur in the future, the Commission should find reason to believe that the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b and close the file.

RECOMMENDATION

1. Find reason to believe the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund violated 2 U.S.C. § 441b and close the file.
- 49

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Oil Chemical and Atomic Workers) RAD Referral 82L-40
International Union Political)
and Legislative League Fund)

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission meeting on March 8, 1983, do hereby certify that the Commission decided in a vote of 4-0 to refer the above-captioned matter to the Office of General Counsel for the purpose of opening a MUR.

Commissioner Aikens, Elliott, McGarry, and Reiche voted affirmatively in this decision. Commissioners Harris and McDonald were not present at the time of the vote.

Attest:

3-10-83

Date

Lena L. Stafford

Recording Secretary

83040393870



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 18, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: George Demougeot *GD*

SUBJECT: RAD Referral 82L-40

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

Attachment

83040393871



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 18, 1983

83 FEB 18 A11: 42

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: RAD Referral 82L-40 - Oil Chemical and Atomic
Workers International Union Political
& Legislative League Fund

The Office of General Counsel has prepared for Commission review seventeen critiques of referrals from the Reports Analysis Division.

Attached to this referral is a critique prepared by this Office, a copy of the referral from the Reports Analysis Division, and a 48-hour tally vote sheet. The OGC critique summarizes the facts, presents an analysis of the legal issues involved, and makes a recommendation as to the disposition of the referrals. The copy of the RAD referral is attached for informational purposes; and the separate vote sheet provides for a vote on this referral.

Attachments
Critique and Referral

RAD REFERRAL NUMBER: 82L-40

SUBJECT: Oil, Chemical and Atomic Workers International
Union Political and Legislative League Fund

BACKGROUND

1. **Date of Referral:** December 14, 1982
2. **Financial Background:**
 - a. Total 1981-1982 receipts: \$ 78,732.00
 - b. Total 1981-1982 disbursements: \$ 78,156.00
 - c. Cash on hand (as of 10/13/82): \$ 4,583.89
 - d. Debts owed to the Committee
(as of 10/82): \$ 0
 - e. Debts owed by the Committee
(as of 10/82): \$ 0
3. **Status of Candidate**

Non-applicable.

SUMMARY OF RAD ACTIONS

Referral category 4: (Commingling of Treasury and Voluntary Funds, 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.5(b))

The 1981 March Monthly through the January 31 Year End Reports filed by the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund ("PLLIF") disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAIs") were sent to PLLIF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions. 1/

1/ Requests for Additional Information were sent on the 1981 March Monthly through January 31 year End Reports with the exception of Informational Notices on the May and June Monthly Reports.

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAIs concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters.

No further response was received and therefore a Second Notice was sent on July 9, 1982. ^{2/} In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action.

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests.

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele.

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individual members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account."

A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend.

^{2/} The notice referenced the lack of response to the RFAIs noted in footnote 1, but did not include the May and June Monthly Reports.

83040393874

Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution.

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982.

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members. 3/

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982, and \$1,075 on August 31, 1982) to its non-voluntary fund account.

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary account and notified the treasurer that the Commission may take further action on the matter.

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge that remedial steps were taken by the committee and also to provide notification that further legal steps may be taken.

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th.

3/ The response noted that since the report covering June of 1982, no contributions have been deposited into the account that contained commingled funds, nor have any disbursements in connection with Federal elections been made. A new voluntary account was opened in July, into which contributions have been deposited. In order to bring PLLF "into voluntary compliance with the Act," the "old" voluntary account has been closed out, with the funds therein being transferred to the non-voluntary account. Furthermore, the administrative and account procedures are being revamped, "so as to obviate the possibility of future errors."

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OGC ANALYSIS

As set forth in 2 U.S.C. § 441b:

labor unions are prohibited from making contributions and expenditures in connection with federal elections. This section of the Act precludes the commingling of voluntary and non-voluntary funds as well.

In this case, the subject funds have now been segregated and voluntary compliance has been achieved. We believe no MUR status is warranted based on the fact that the Committee has corrected its accounting problems and such violations are not likely to occur in the future.

RECOMMENDATION

Decline to open a MUR.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

14 December 1982

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *BAC*
STAFF DIRECTOR

FROM : JOHN D. GIBSON *JD*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : REFERRAL OF OIL, CHEMICAL AND ATOMIC WORKERS
INTERNATIONAL UNION POLITICAL & LEGISLATIVE LEAGUE
FUND

This is a referral of the Oil, Chemical and Atomic Workers International Union Political Legislative League Fund. The committee has commingled union treasury funds with voluntary funds, which according to the Review and Referral Procedures (Chart #22) requires further examination by your office.

If there are any questions, please contact Ed Ryan at 357-0023.

Attachment

cc: Commissioners

83040393877

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 14 December 1982Analyst: Ed Ryan

I. COMMITTEE: Oil, Chemical and Atomic Workers
International Union Political & Legislative
League Fund (C00030635)
Michael Ricigliano, Treasurer
1636 Champa Street
Denver, Colorado 80202

II. RELEVANT STATUTE: 2 U.S.C. 441b(a) & 11 CFR 114.5(b)

III. BACKGROUND:

Commingling of Treasury and Voluntary Funds 2 U.S.C.
441b(a) & 11 CFR 114.5(b)

The 1981 March Monthly through the January 31 Year End Reports filed by the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund ("PLLF") disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAIs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions (Attachment 2).^{1/}

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAI's concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters (Attachment #3).

1/ Requests for Additional Information (RFAIs) were sent on the 1981 March Monthly through January 31 Year End Reports with exception of Informational Notices on the May and June Monthly Reports.

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No further response was received and therefore a Second Notice was sent on July 9, 1982. ^{2/} In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action (Attachment #4).

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests (Attachment #5).

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele (Attachment #6).

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by the RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individuals members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account" (Attachment #7).

A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend. Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution (Attachment #8).

^{2/} The notice referenced the lack of response to the RFAs noted in footnote 1, but did not include the May and June Monthly Reports.

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982 (Attachment#9).

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members. (Attachment #10). 3/

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982 and \$1,075 on August 31, 1982) to its non-voluntary fund account (Attachment #11).

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary account and notified the treasurer that the Commission may take further action on the matter (Attachment #12).

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge the remedial steps taken by the committee and also to provide notification that further legal steps may be taken (Attachment #13).

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th (Attachment #14).

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring referral at this time for this committee.

3/ The response noted that since the report covering June of 1982, no contributions have been deposited into the account that contained commingled funds, nor have any disbursements in connection with Federal elections been made. A new voluntary account was opened in July, into which contributions have been deposited. In order to bring PLLF "into voluntary compliance with the Act," the "old" voluntary account has been closed out, with the funds therein being transferred to the non-voluntary account. Furthermore, the administrative and accounting procedures are being revamped, "so as to obviate the possibility of future errors."

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL UNION POLITICAL & LEGISLATIVE LEAGUE FOND CONNECTED ORGANIZATION: OIL CHEMICAL & ATOMIC WKRS INT'L UNION				NON-PARTY QUALIFIED		ID #C00030635
1981	STATEMENT OF ORGANIZATION - AMENDMENT			24AUG81	2	81FEC/204/4732
	FEBRUARY MONTHLY	2,935	1,618	1JAN81 -31JAN81	3	81FEC/190/4905
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN81 -31JAN81	1	82FEC/254/0406
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 -31JAN81	1	82FEC/253/4986
	MARCH MONTHLY	1,026	114	1FEB81 -28FEB81	4	81FEC/192/2683
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 -28FEB81	1	82FEC/239/3525
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 -28FEB81	1	82FEC/254/0407
	REQUEST FOR ADDITIONAL INFORMATION			1FEB81 -28FEB81	1	82FEC/234/0301
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB81 -28FEB81	1	82FEC/236/2147
	1'ST LETTER INFORMATIONAL NOTICE			1FEB82 -28FEB81	1	82FEC/253/4987
	APRIL MONTHLY	1,027	2,796	1MAR81 -31MAR81	4	81FEC/193/4755
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 -31MAR81	1	82FEC/239/3526
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 -31MAR81	1	82FEC/254/0408
	REQUEST FOR ADDITIONAL INFORMATION			1MAR81 -31MAR81	1	82FEC/234/0302
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR81 -31MAR81	1	82FEC/236/2148
	1'ST LETTER INFORMATIONAL NOTICE			1MAR81 -31MAR81	1	82FEC/253/4988
	MAY MONTHLY	448	250	1APR81 -30APR81	4	81FEC/195/3212
	MAY MONTHLY - AMENDMENT	-	-	1APR81 -30APR81	1	82FEC/239/3527
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 -30APR81	1	82FEC/234/0262
	JUNE MONTHLY	589	1,760	1MAY81 -31MAY81	4	81FEC/197/0121
	JUNE MONTHLY - AMENDMENT	-	-	1MAY81 -31MAY81	1	82FEC/239/3528
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	82FEC/233/0625
	JULY MONTHLY	2,738	216	1JUN81 -30JUN81	4	81FEC/200/1954
	JULY MONTHLY - AMENDMENT	-	-	1JUN81 -30JUN81	1	82FEC/239/3529
	REQUEST FOR ADDITIONAL INFORMATION			1JUN81 -30JUN81	1	82FEC/234/0303
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN81 -30JUN81	1	82FEC/236/2149
	AUGUST MONTHLY	2,074	2,167	1JUL81 -31JUL81	4	81FEC/204/0609
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	1	82FEC/239/3530
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	1	82FEC/254/0409
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31JUL81	1	82FEC/234/0304
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31JUL81	1	82FEC/236/2150
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31JUL81	1	82FEC/253/4989
	SEPTEMBER MONTHLY	20,891	500	1AUG81 -31AUG81	4	81FEC/205/2384
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 -31AUG81	1	82FEC/239/3531
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 -31AUG81	1	82FEC/254/0410
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	82FEC/233/0659
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	1	82FEC/235/1672
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 -31AUG81	1	82FEC/253/4990
	OCTOBER MONTHLY	1,423	12,186	1SEP81 -30SEP81	4	81FEC/206/5002
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP81 -30SEP81	1	82FEC/239/3532
	REQUEST FOR ADDITIONAL INFORMATION			1SEP81 -30SEP81	3	82FEC/233/0653
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP81 -30SEP81	1	82FEC/236/2146
	NOVEMBER MONTHLY	3,898	405	1OCT81 -31OCT81	4	81FEC/209/0669
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 -31OCT81	1	82FEC/239/3533

NON-PARTY RELATED

COMMITTEE DOCUMENT RECEIPTS EXPENDITURES TYPE OF FILER # OF MICROFILM

COVERAGE DATES PAGES LOCATION

NOVEMBER MONTHLY	- AMENDMENT	-	-	10CT81 -310CT81	1 82FEC/254/0411
REQUEST FOR ADDITIONAL INFORMATION				10CT81 -310CT81	1 82FEC/234/0305
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT81 -310CT81	1 82FEC/236/2151
1'ST LETTER INFORMATIONAL NOTICE				10CT81 -310CT81	1 82FEC/253/4991
DECEMBER MONTHLY		4,161	0	1NOV81 -30NOV81	3 81FEC/211/1260
DECEMBER MONTHLY	- AMENDMENT	-	-	1NOV81 -30NOV81	1 82FEC/239/3534
REQUEST FOR ADDITIONAL INFORMATION				1NOV81 -30NOV81	1 82FEC/234/0306
REQUEST FOR ADDITIONAL INFORMATION 2ND				1NOV81 -30NOV81	1 82FEC/236/2152
YEAR-END		2,002	0	1DEC81 -31DEC81	3 82FEC/212/2009
YEAR-END	- AMENDMENT	-	-	1DEC81 -31DEC81	13 82FEC/239/2532
YEAR-END	- AMENDMENT	-	-	1DEC81 -31DEC81	1 82FEC/254/0412
REQUEST FOR ADDITIONAL INFORMATION				1DEC81 -31DEC81	1 82FEC/233/0457
REQUEST FOR ADDITIONAL INFORMATION 2ND				1DEC81 -31DEC81	1 82FEC/236/2153
1'ST LETTER INFORMATIONAL NOTICE				1DEC81 -31DEC81	1 82FEC/253/4992
1982 MISCELLANEOUS REPORT				29JUN82 TO FEC	2 82FEC/234/2867
MISCELLANEOUS REPORT				16JUL82 TO FEC	2 82FEC/237/3505
MISCELLANEOUS REPORT				22JUL82 TO FEC	2 82FEC/239/2530
MISCELLANEOUS REPORT				13AUG82 TO FEC	6 82FEC/240/4810
FEBRUARY MONTHLY		5,550	0	1JAN82 -31JAN82	3 82FEC/223/2676
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN82 -31JAN82	2 82FEC/245/4896
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN81 -31JAN82	1 82FEC/254/0413
REQUEST FOR ADDITIONAL INFORMATION				1JAN82 -31JAN82	1 82FEC/244/3994
1'ST LETTER INFORMATIONAL NOTICE				1JAN82 -31JAN82	1 82FEC/253/4993
MARCH MONTHLY		159	9,517	1FEB82 -28FEB82	4 82FEC/224/5296
APRIL MONTHLY		10,363	2,850	1MAR82 -31MAR82	6 82FEC/226/2804
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1 82FEC/245/4898
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1 82FEC/254/0414
REQUEST FOR ADDITIONAL INFORMATION				1MAR82 -31MAR82	1 82FEC/244/3995
1'ST LETTER INFORMATIONAL NOTICE				1MAR82 -31MAR82	1 82FEC/253/4994
MAY MONTHLY		1,140	1,200	1APR82 -30APR82	4 82FEC/230/3302
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	1 82FEC/245/4899
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	2 82FEC/253/5260
REQUEST FOR ADDITIONAL INFORMATION				1APR82 -30APR82	1 82FEC/244/3996
1'ST LETTER INFORMATIONAL NOTICE				1APR82 -30APR82	7 82FEC/253/3471
JUNE MONTHLY		1,332	750	1MAY82 -31MAY82	4 82FEC/232/2934
JUNE MONTHLY	- AMENDMENT	-	-	1MAY82 -31MAY82	2 82FEC/245/4900
REQUEST FOR ADDITIONAL INFORMATION				1MAY82 -31MAY82	2 82FEC/244/1585
JULY MONTHLY		2,468	300	1JUN82 -30JUN82	4 82FEC/234/4699
AUGUST MONTHLY		2,590	4,200	1JUL82 -31JUL82	4 82FEC/240/4822
SEPTEMBER MONTHLY		5,415	27,402	1AUG82 -31AUG82	5 82FEC/242/3134
OCTOBER MONTHLY		4,322	9,100	1SEP82 -30SEP82	6 82FEC/249/2488
PRE-GENERAL		2,181	825	1OCT82 -13OCT82	5 82FEC/251/0137
TOTAL		78,732	0	78,156	0

187 TOTAL PAGES

ALL REPORTS REVIEWED THROUGH 1982 JULY MONTHLY.
NO REPORTS DISCLOSED.

ENDING CASH (10-13-82) = \$4,583.89



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

082303403393833



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Charpa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

-8-3-0 4-0 3 9 3 8 3



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: September Monthly Report (8/1/81 - 8/31/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total for Line 6(a) of the Summary Page. (2 U.S.C. 434(b))

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

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Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

8304039387



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-9944
Phone (303) 873-0811

ROBERT F. GOST, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COTE, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

Re: OCAWIU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,

M. Ricigliano
MICHAEL RICIGLIANO
Secretary-Treasurer

MR/bb, cps
ocav



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly (9/1/81-9/30/81), March Monthly (2/1/81-2/28/81), April Monthly (3/1/81-3/31/81), July Monthly (6/1/81-6/30/81), August Monthly (7/1/81-7/31/81), November Monthly (10/1/81-10/31/81), December Monthly (11/1/81-11/30/81), January 31 Year-End (12/1/81-12/31/81), and September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29, 1982. Please amend your reports to provide the requested information.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Edward Ryan on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

882083 4 235916 722

oil chemical

00030635

Western Union

Mailgram

ATTACHMENT # 5

1-028534C196 07/15/82 ICS IPMNGWF WSH WSHA
04280 (01641) MGM WASHINGTON DC 50 07-15 0614P EST

JOHN D GIBSON ASST STAFF DIR
REPORTS ANALYSIS DIV-FEDL ELECTION COMM
1325 K STREET NW 3RD FLR
WASHINGTON DC 20463

(DUPE OF TELEPHONED TELEGRAM)

00073971196 07/15/82
INX OCAW DVR
001 DENVER, CO. JULY 15, 1982
FMS JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION
FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

REI OCAWU POLITICAL AND LEGISLATIVE LEAGUE FUND
ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7,
1982 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED
SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM
THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND
REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS
CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MR:LM

1153 EST

18153 EST

MGMCOMP

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

02 JUL 16 400:24

WJA18X1715)(1-023704A202)PD 07/21/82 1706

1982 JUL 21 PM 6:34

ICS IPMWVC WSH

07331 07-21 0554P EST

ICS IPMWJOB

1-0129121202 07/21/82

IWX OCAW DVR

001 DENVER, CO. JULY 21, 1982

PMS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR

REPORTS ANALYSIS DIVISION

FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.

WASHINGTON, D.C. 20463

RE: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL

1201-57 (R-00)

Telegram

UNION POLITICAL AND LEGISLATIVE LEAGUE FUND

I.D. NO. C00030635

PLEASE BE ADVISED THAT I HAVE WRITTEN TO FEC GENERAL
COUNSEL CHARLES N. STEELE RELATIVE TO THE REPORT ANALYSIS DIVISION'S
JUNE 16, 1982 REQUESTS FOR AMENDMENT TO OR CLARIFICATION OF CERTAIN
1981 MONTHLY REPORTS FILED BY OCAWIU PLL.

MICHAEL RICIGLIANO

TREASURER

OCAWIU PLL

1653 EST

NNNN

OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-9964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

July 21, 1982

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Re: Oil, Chemical & Atomic Workers
International Union Political &
Legislative League Fund
I.D. Number/C00030635

Dear Mr. Steele:

This is in reference to the attached communications between the Federal Election Commission's Reports Analysis Division and my office.

I am the Treasurer of the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund (OCAWIU PLL) to which office I succeeded effective August 14, 1981, upon my election as Secretary-Treasurer of the International Union. On June 22, 1982, while I was out of town, I received the attached letters dated June 16, 1982, requesting amendment to or clarification of certain information contained in OCAWIU PLL's 1981 monthly reports. Upon my return on June 29th, I requested an extension of time within which to respond until July 15, 1982. I subsequently received a letter dated July 9, 1982, from John Gibson, Assistant Staff Director, in which he indicated that the requested information should be submitted by July 24, 1982. On July 15, 1982, I dispatched a telegram to Mr. Gibson acknowledging receipt of his letter.

In view of the following, I believe it appropriate to communicate at this time with you:

1. Immediately upon returning to my office on June 29th, I requested a review of all OCAWIU PLL records and reports pertaining to the information for which the Reports Analysis Division requested amendments or clarification as a preliminary to our preparation of a response.

Charles N. Steele, Esquire

-2-

July 21, 1982

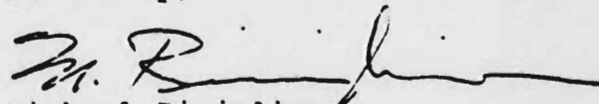
During the course of this review, it was discovered that a transfer in the amount of \$20,000.00, which OCAWIU PLL received from the International Representatives Committee Union, that was thought to represent individual contributions in amounts of \$200.00 or less from I.R.C.U. members (who are also members of OCAWIU) and was deposited into OCAWIU PLL's voluntary account, was in fact a transfer of treasury funds from I.R.C.U. and should, therefore, have been deposited into OCAWIU PLL's treasury account.

In light of the aforementioned discovery, it seems pointless for OCAWIU PLL to respond to the Commission's requests for additional information by simply amending or clarifying its reports. Instead, I hereby request an immediate meeting with you or a member of your staff to discuss the proper means by which the error described above can be rectified through voluntary conciliation. In the meantime, I have directed that no disbursements be made from OCAWIU PLL's voluntary fund account and that voluntary contributions received subsequent to said discovery be deposited into a new separate segregated voluntary fund account.

2. The requests for additional information also inquire about a 9/2/81 contribution from OCAWIU PLL to AFL-CIO COPE in the amount of \$11,842.00. That transfer was made pursuant to a joint fundraising effort between OCAWIU and the AFL-CIO on behalf of OCAWIU PLL and AFL-CIO COPE. This joint fundraising effort is reflected in the attached excerpt from the minutes of the OCAWIU Executive Board meeting on February 24, 1981, which provides for 50% of the OCAWIU PLL/COPE collections to be transferred to AFL-CIO COPE. Thus, all other matters being equal, that transaction should have been labelled "transfer of joint fundraising proceeds", not "contribution", and we would file an amendment to our report to that effect. However, in light of the facts that have come to light and are described above, such an amendment does not appear to be the proper course until we have reached an appropriate agreement with the Commission on the handling of the matter described in Item #1 above.

I look forward to an early and favorable response to our request for a meeting so that OCAWIU PLL can begin to take the necessary steps to bring ourselves into compliance with the FECA.

Sincerely,


Michael Ricigliano
Secretary-Treasurer

MR:lh
Attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
M. Ricigliano, Secy-Treas.

JUN 22 1982

Referred ACCOUNTING

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

332300342033992338391



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

38230034203399233839

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

18 23 20 34 20 33 29 23 28 33 36

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers (Int'l) Union Political & Legislative League

A. Full Name, Mailing Address and ZIP Code AFL-CIO COPE 815 Sixteenth St., N.W. Washington, DC 20006	Purpose of Disbursement Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9/2/81	Amount of Each Disbursement This Period 11,482.60
B. Full Name, Mailing Address and ZIP Code Hawkins for Congress Committee c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	Purpose of Disbursement U.S. Congress Calif. - 29th District Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9/9/81	Amount of Each Disbursement This Period 50.00
C. Full Name, Mailing Address and ZIP Code Howard M. Metzenbaum for Senate Room 347, RSOB Washington, DC	Purpose of Disbursement U.S. Senate State of Ohio Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9/16/81	Amount of Each Disbursement This Period 200.00
D. Full Name, Mailing Address and ZIP Code Colorado COPE 360 Acoma St., Room 300 Denver, CO 80223	Purpose of Disbursement Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9/30/81	Amount of Each Disbursement This Period 104.00
E. Full Name, Mailing Address and ZIP Code Congressmen Way Dowdy Campaign Comm. c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	Purpose of Disbursement U.S. Congress Mississippi - 4th Dist. Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9/30/81	Amount of Each Disbursement This Period 250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			12,186.60



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

33 23 00 34 0 3 9 8 3 9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: September Monthly Report (8/1/81 - 8/31/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total for Line 6(a) of the Summary Page. (2 U.S.C. 434(b))

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division



Political and Legislative League

P.O. Box 12
Denver, Colorado 80201-0964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

Re: OCAWIU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,


MICHAEL RICIGLIANO
Secretary-Treasurer

MR/bb, cps
ocaw



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUL 13 1982

Released in R

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly (9/1/81-9/30/81), March Monthly
(2/1/81-2/28/81), April Monthly (3/1/81-3/31/81),
July Monthly (6/1/81-6/30/81), August Monthly
(7/1/81-7/31/81), November Monthly (10/1/81-
10/31/81), December Monthly (11/1/81-11/30/81),
January 31 Year-End (12/1/81-12/31/81), and
September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the
above-referenced report(s) raised questions as to specific
contributions and/or expenditures, and the reporting of certain
information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29,
1982. Please amend your reports to provide the requested
information.

If this information is not received by the Commission within
fifteen (15) days from the date of this notice, the Commission
may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter,
please contact Edward Ryan on our toll-free number (800)424-9530
or our local number (202)357-0026.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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WU INFOMASTER

OCAW DVR

0073971196 1127EST

001 DENVER, CO. JULY 15, 1982

PMS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR

REPORTS ANALYSIS DIVISION

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.

WASHINGTON, D.C. 20463

RE: OCAWIU POLITICAL AND LEGISLATIVE LEAGUE FUND
ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7, 1982 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MR:LH

ACCEPTED
00001

1-PC

6. Recommendations will be made regarding alternative data sources for ascertainment of illnesses and injuries by the companies. Recommendations also will be made regarding the future specificity of illness and injury reporting by the companies. Justification will be made for each recommendation.
7. A data system will be proposed for future use in receiving and controlling of company submitted morbidity data.
8. A final report will be prepared.
9. A briefing will be held for personnel in the Health and Safety office of OCAW.

It is estimated that this project will take 2½ to 3 months to complete."

There was a MOTION by Board Member Barnes, seconded by Board Member Sullivan to approve the recommendation.

On the roll call the Motion was unanimously approved.

Subject: DISTRIBUTION OF PLL MONEY TO THE AFL-CIO COPE

Secretary-Treasurer Palmer recommended that again this year we support the AFL-CIO COPE operations to the extent of 50% of our 1981 PLL/COPE collections.

There was a MOTION by Board Member Donohue, seconded by Board Member Perry to approve this recommendation.

On the roll call the Motion was unanimously approved.

The Meeting recessed at noon, in order to allow time for the various committees to function, to reconvene Wednesday, February 25, 1981, at 9:00 a.m.

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3/29/81

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RECEIVED

82 JUL 22 91

EXPRESS MAIL REGISTERED MAIL SERVICE		POST OFFICE TO ADDRESSEE	
FROM: Michael Picigliano CCWU Political and Legislative League P.O. Box 1812 Denver, Colorado 80201		TO: Charles H. Stoele, Esquire General Counsel Federal Election Commission 1325 K Street N.W. Washington, D.C. 20006	
ORIGIN: Initials of Receiving Clerk: <i>[Signature]</i> P.O. ZIP: <i>80201</i> Date In: <i>7-22-82</i> Time In: <i>1410</i>		DESTINATION: Date of Delivery: <i>7-22-82</i> Time of Delivery: <i>1410</i> Initials of Delivering Employee: <i>[Signature]</i> Signature of Addressee or Agent: <i>[Signature]</i>	
Weight: <i>1</i> Lbs. <i>5</i> Postage: <i>934</i>		DELIVERY WAS ATTEMPTED Date: <i>7-22-82</i> Time: <i>1410</i> Notice Left By: <i>[Signature]</i>	
Customer Number, if any:		EXPRESS MAIL SERVICE	

LABEL 118 JUNE 79 U.S.P.O. 1979-301-203

MEMORANDUM TO THE FILE

FROM : Edward D. Ryan
DATE : August 4, 1982
SUBJECT : Meeting with Representatives of OCAWIU-PLLF

This meeting was requested by Mr. Michael Ricigliano, Secretary Treasurer of the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund in his July 21, 1982 letter to the Commission. In that letter Mr. Ricigliano outlined several discoveries made in responding to RFAIs sent on June 16, 1982.

Unfortunately, Mr. Ricigliano was unable to attend this meeting because of a conflict in travel schedules. Those in attendance were: James J. Cronin, Associate General Counsel of the Oil, Chemical and Atomic Workers International Union-AFL-CIO-CLC; Peggy McCormick, a local attorney; Ed Ryan, Reports Analyst; and Mike Filler, Non-Party/Party Branch Chief in the Reports Analysis Division.

Mr. Cronin began the meeting by saying that once the RFAIs were received, a review of all 1981 reports was started. During the course of this review, it was discovered that union treasury funds were transferred into OCAWIU-PLLF voluntary account. Mr. Cronin said this money was given to officials during a convention, and due to the activities going on, the source of funds was not determined. Mr. Cronin acknowledged that this was not a good excuse and even an embarrassment but felt this was pertinent to the case.

After further discussion Mike Filler suggested the following:

- 1.) Additional research to determine if any more union treasury funds were commingled with voluntary funds;
- 2.) A complete description of the steps OCAWIU-PLLF took to segregate voluntary funds from non-voluntary funds(i.e. the point at which the new account was established and the name of the new depository).
- 3.) Clarification of the disbursement to the SSF of the AFL-CIO, and an explanation concerning the relationship between OCAWIU-PLL and COLORADO COPE based upon the periodic transfers made to COLORADO COPE.

Mr. Cronin said he would supply all that was requested and take Mr. Filler's suggestions into consideration. He said it was his intent to comply fully with the FECA and the FEC's regulations. A response would be submitted as soon as the treasurer was briefed.

330403905

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
DATE : AUGUST 13, 1982
SUBJECT : FOLLOW-UP TO AUGUST 4 MEETING WITH REPRESENTATIVES
OF THE OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL
UNION POLITICAL & LEGISLATIVE LEAGUE FUND ("PLLF")

On August 4, 1982, a meeting was held with Mr. Jim Cronin, Associate General Counsel for PLLF and Peggy Mc Cormick. At that meeting, it was suggested that PLLF respond as soon as possible to the commingling problem.

Mr. Cronin called today to say that the union's executive board had met to discuss the commingling problem, and that a response should be received at the Commission sometime during the week of August 16th. I mentioned that in addition to the commingling problem, we had requested certain figures on the Detailed Summary Pages. Mr. Cronin stated that he would ensure that the appropriate amendments were filed.

83040393906

: 33



Political and Legislative League

P.O. Box 2212
Denver, Colorado 80201-0212
Phone (303) 655-4011

ROBERT F. GORE, Chairman
MICHAEL RICHMOND, Secretary-Treasurer

Affiliated with CIO, AFL-CIO

August 13, 1982

CERTIFIED RETURN RECEIPT REQUESTED

Michael B. Filler
Chief, Political Party/Special Interest
Committee Section
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
I.D. No. C00030635

Dear Mr. Filler:

During your August 4, 1982, meeting with OCAWIU Associate General Counsel Jim Cronin and attorney Peggy McCormick, you requested that OCAWIU PLL provide to the Commission certain additional information in connection with the matter raised in my July 21, 1982, letter to FEC General Counsel, Charles Steele. Subsequent to that meeting I initiated a more detailed review of OCAWIU PLL's records. Based on that review the information you requested at the August 4th meeting is detailed below.

1. The circumstances surrounding the erroneous deposit of a \$20,000 treasury contribution from the International Representatives Committee Union into OCAWIU PLL's voluntary account are as follows: The check was presented to the then OCAWIU Secretary-Treasurer, who by reason of his office is the Treasurer of OCAWIU PLL, on August 13, 1981, at a regular session of the International Union Convention being held in Denver. At the time of the Convention there was a vigorous contest being waged in connection with the election of all the International Union officers. The check in question was then delivered to the accounting office at OCAWIU's headquarters building, apparently without specific instructions, but with the thought that it would be handled following the Convention.

02 AUG 17 11:33

Michael B. Filler

-2-

August 13, 1982

The following day, August 14, 1981, elections of the International Union officers were conducted with the result that I defeated the incumbent Secretary-Treasurer. Following the Convention, without consultation or instructions, the accounting office erroneously deposited the \$20,000 check along with receipts of voluntary contributions in the voluntary fund account, apparently mistakenly believing the check represented individual contributions by members of IRCU. When I took over my responsibilities, neither I nor anyone else in my office realized the check had been erroneously deposited until that fact was discovered upon a review of the OCAWIU PLL records following receipt of the Commission's June 16, 1982 requests for clarifying information.

2. Our further review of OCAWIU PLL's records for the period from January 1981 through June 1982 revealed several instances in which small amounts of treasury funds intended for OCAW's non-voluntary account were erroneously deposited into OCAWIU PLL's voluntary account. In most instances, the error was discovered immediately and the sums were transferred forthwith to our treasury account. (See Appendix I for detailed accounting of such deposits/transfers out.)

We did, however, find that a small number of treasury contributions totalling \$152.00 in 1981 (Mar. \$40, July \$52, Oct. \$30, Dec. \$30) and \$72.00 in 1982 (Jan. \$40, Mar. \$32), which represented PLL treasury contribution credits to Locals purchasing belt buckles from the International, were mistakenly deposited in OCAWIU PLL's voluntary account instead of the non-voluntary account and were not transferred out.

Our detailed review of OCAWIU PLL's 1981 and 1982 records also revealed that two contributions received in 1982, in the amount of \$125.00 (March 1982) and \$50.00 (April 1982), respectively, came from sources other than OCAWIU members or their families. These contributions have been returned to their respective contributors and I have specifically reiterated to OCAWIU Locals and Staff that contributions to OCAWIU PLL are to be accepted only from the Union's members and their families.

3. With respect to the joint fundraising effort mentioned in my July 21st letter, OCAWIU PLL's joint fundraising effort with AFL-CIO COPE is joint fundraising for voluntary contributions to OCAWIU PLL FUND (OCAWIU PLL's separate segregated voluntary account) and AFL-CIO COPE Political Contributions Committee (AFL-CIO COPE's separate segregated voluntary account). Thus, transfers from OCAWIU PLL of the proceeds of its joint fundraising efforts with AFL-CIO COPE PCC should have been reported as transfers of the proceeds of a joint fundraising effort to AFL-CIO COPE PCC.

Michael B. Piller

-3-

RECEIVED
82 AUG 17 11:33
August 13, 1982

4. With respect to OCAWIU PLL's periodic transfers of voluntary funds to COLORADO COPE, those transfers were intended to be used by COLORADO COPE for non-federal purposes and in fact were transfers to a non-voluntary account of Colorado COPE. Colorado COPE does not, we believe, have a separate segregated voluntary account for federal election purposes.

5. As I indicated in my letter dated July 21, 1982 to General Counsel Steel, since our report for the month of June 1982, no contributions received have been deposited into OCAWIU PLL's registered voluntary contributions account (the Bank of Denver being the depository), and no disbursements in connection with federal elections have been made from that account. However, in July, prior to my letter, disbursements had been made to non-federal election candidates, which will be reflected in the report for the month of July.

Also, as indicated in my July 21st letter, a new voluntary contributions account was opened in July, the depository being the Central Bank of Denver, 1515 Arapahoe Street, Denver, Colorado 80202. All voluntary contributions received since the report for the month of June have been deposited in this new account. As previously indicated, this action was taken because of the discovery of the erroneous deposit of the above mentioned \$20,000. Please accept this information in lieu of an amendment to our Statement of Organization, FEC Form 1.

6. In view of the errors uncovered both during our initial review of OCAWIU PLL's records, following our receipt of the Commission's requests for additional information, and our further review following the August 4 meeting with you, we have determined to offer to bring ourselves into voluntary compliance with the Act by closing out OCAWIU PLL's "old" voluntary account (Bank of Denver account) and to transfer the funds therein in their entirety to our non-voluntary or treasury fund account, and to henceforth use only our "new" voluntary account (Central Bank account) for deposits and disbursements of voluntary funds. This action is being taken in order to remove any question as to OCAWIU PLL's voluntary contribution fund's (separate segregated fund) compliance with the law.

In further keeping with our intent to maintain compliance with the FECA and with the FEC's regulations, I have communicated to all principal OCAWIU Local and Council Officers and our International Union Directors and Staff the necessity for conducting our activities covered by the Act in strict conformance with the law and with the regulations. In addition, I am in the

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62 AUG 17 10 04 AM '82

Michael B. Filler

-4-

August 13, 1982

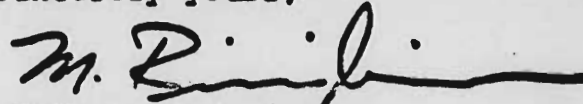
process of completely revamping the administrative and accounting procedures on OCAWIU PLL FUND matters, so as to obviate the possibility of future errors.

I trust that you will find the foregoing responsive to your request for additional clarification of the matters raised in my July 21, 1982 letter to Mr. Steele. I hope, too, that since the information provided herein responds to the Commission's initial requests for additional information and clarification of OCAWIU PLL's reports, you will accept this letter in lieu of amendments to those reports.

Finally, I want to express my appreciation for the Commission's (and your personal) willingness to meet with attorneys Cronin and McCormick on August 4, 1982. I regret that I was unable to attend that conference.

If I can be of further assistance, please advise.

Sincerely yours,



Michael Ricigliano
Secretary-Treasurer

MR:lh

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APPENDIX I

Amount	Deposited in Voluntary Account	Transferred to Treasury Account
200.00	1/29/81	2/2/81
100.00	2/2/81	2/2/81
27.00	7/1/81	7/1/81
500.00	1/18/82	1/20/82
40.00	4/2/82	4/2/82
17.50	4/2/82	4/2/82

NOTE: These deposits and refunds are not reflected in OCAWIU PLL's monthly FEC reports it having been believed unnecessary to do so since the erroneous deposits were discovered and corrected promptly.

-3-3-040393911

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Than an Authorized Committee
(Summary Page)

RECEIVED AT THE FEC
ATTACHMENT # 11
1982 SEPTEMBER MONTHLY

82 SEP 7 P1:27

9-2-82

1. Name of Committee (in Full)
Oil, Chemical & Atomic Workers
International Union Political &
Legislative League Fund

Address (Number and Street)
1636 Champa Street

City, State and ZIP Code
Denver, Colorado 80202

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00030635

3. ☐ This Committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☒ Monthly Report for August, 1982
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>August 1</u> Through <u>August 31, 1982</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>			\$ 25,206.64
(b) Cash on Hand at Beginning of Reporting Period		\$ 29,992.91	
(c) Total Receipts (from Line 18)		\$ 5,415.89	\$ 29,019.38
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 35,408.80	\$ 54,226.02
7. Total Disbursements (from Line 28)		\$ 27,402.86	\$ 46,220.08
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 8,005.94	\$ 8,005.94
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Michael Ricigliano
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

September 1, 1982

(See letter dated August 13, 1982, to Michael B. Filler)

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

11/19/82	11/19/82	11/19/82	11/19/82	11/19/82	11/19/82	11/19/82	11/19/82
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FEC FORM 3X (3/80)

02032423984

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

82 SEP 7 P1:27

Name of Committee (in Full) **Oil, Chemical & Atomic Workers
International Union Political & Legislative League**
Fund

Report Covering the Period:

From: 8/1/82 To: 8/31/82

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	\$5,415.89	\$29,019.38
(Memo Entry Unitemized \$ <u>5,415.89</u>)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	\$5,415.89	\$29,019.38
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	\$5,415.89	\$29,019.38
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES (See Sch. B)	(\$1,075.00)	\$13,542.22
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS (See Sch. B)	\$28,477.86	\$32,677.86
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	\$27,402.86	\$46,220.08
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	\$5,415.89	\$29,019.38
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	-0-	-0-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	\$5,415.89	\$29,019.38
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	-0-	-0-

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
Oil, Chemical & Atomic Workers International Union Political & Legislative League Fund			
A. Full Name, Mailing Address and ZIP Code John Conyers Room 2313 Rayburn House Office Bldg. Washington, D.C. 20515	Purpose of Disbursement Honorarium to John Conyers, H.R. 1st Dist., Mich. for speech (8/6/81) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$500.00 -- Unreturned check never cashed)
B. Full Name, Mailing Address and ZIP Code Thomas L. Driskell P. O. Box 1067 Crockett, Texas 75835	Purpose of Disbursement Contribution to Non-Federal Candidate (4/10/80) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$200.00 -- Unreturned check never cashed)
C. Full Name, Mailing Address and ZIP Code Benny Bonanno 3186 W. 52nd St. Cleveland, Ohio 44102	Purpose of Disbursement Contribution to Non-Federal Candidate (12/19/78) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (- \$75.00 -- Unreturned check never cashed)
D. Full Name, Mailing Address and ZIP Code Anthony Mazzocchi 1126 - 16th Street, N.W. Washington, D.C. 20036	Purpose of Disbursement Dinner tickets - Michael J. Harrington, H.R. 6th Dist. Mass. Fund Raiser (7/17/75) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$200.00 -- Unreturned check never cashed)
E. Full Name, Mailing Address and ZIP Code Russo For Congress Committee 134 Pulaski Calumet City, Illinois 60409	Purpose of Disbursement Contribution to Marty Russo, H.R. Candidate, 3rd Dist., Ill. (11/11/75) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$100.00 -- Unreturned check never cashed)
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			(-\$1,075.00)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 LINE NUMBER 27
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

(Other Disbursements)

(See letter dated August 13, 1982, to Michael B. Filler)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers International Union
 Political & Legislative League Fund

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Transfer of Voluntary Funds to Non-Voluntary Fund Account	Date (month, day, year)	Amount of Each Disbursement This Period
OCAWIU PLL Fund (Non-Voluntary Fund) 1636 Champa Street Denver, Colorado 80202	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/13/82	\$27,402.86
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Transfer of Voluntary Funds to Non-Voluntary Fund Account	Date (month, day, year)	Amount of Each Disbursement This Period
OCAWIU PLL FUND (Non-Voluntary Fund) 1636 Champa Street Denver, Colorado 80202	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/31/82	\$1,075.00 (See Sch. B for line 21)
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$28,477.86

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RQ-5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

5 November 1982

Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: February Monthly (1/1/81-1/31/81), March Monthly (2/1/81-2/28/81), April Monthly (3/1/81-3/31/81), August Monthly (7/1/81-7/31/81), September Monthly (8/1/81-8/31/81), November Monthly (10/1/81-10/31/81), Year End (12/1/81-12/31/81), February Monthly (1/1/82-1/31/82), April Monthly (3/1/82-3/31/82) and May Monthly (4/1/82-4/30/82) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your letter of August 13, 1982 disclosed the receipt of funds from a labor organization (pertinent portions attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. 441b(a))

The Commission notes the transfers of the prohibited contributions to your non-voluntary fund, as noted in your August 13th letter and your 1982 September Monthly Report. Although the Commission may take further legal steps concerning the acceptance of prohibited funds, the transfers to the non-voluntary fund will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel

330403917

free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

33040393918

TELECONANALYST Ed Ryan
initiated call? TELECON WITH: James J. Cronin, Associate General Counsel
initiated call? XCandidate/Committee: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL-
POLITICAL AND LEGISLATIVE LEAGUE

DATE: November 12, 1982

SUBJECT(S): Receipt of Informational Notice dated November 5, 1982

Mr. Cronin called after receiving an informational notice dated November 5, 1982. In that notice the Commission recognized the receipt of prohibited funds and the subsequent transfer out to a non-voluntary account. I advised him that the Commission, as a matter of policy, notifies a committee in such situations and advises that further legal steps may be taken. Mr. Cronin asked if any response should be submitted and I advised him that for the Public Record, he could submit a letter disclosing the receipt of the notice and our subsequent phone conversation.

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22 NOV 15 AID 35

OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-9964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

November 12, 1982

-Edward Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

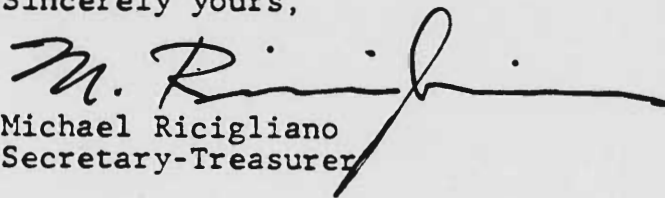
RE: Oil, Chemical and Atomic
Workers International Union
Political and Legislative
League Fund I.D. No. C00030635

Dear Mr. Ryan:

This will confirm Associate General Counsel
James J. Cronin's telephone conversation with you this
date, to the effect that your letter dated November 5,
1982, is in the nature of an information notice and
does not require any additional information or response
from OCAWIU - PLL FUND.

If we can be of further assistance, please
advise.

Sincerely yours,


Michael Ricigliano
Secretary-Treasurer

MR:gz

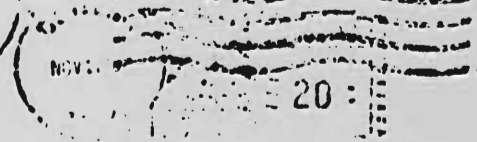
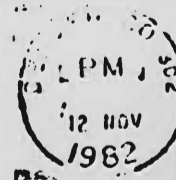
Oil, Chemical and Atomic Workers

International Union

AFTER FIVE DAYS RETURN TO:

**P.O. Box 2812
Denver, CO. 80201**

**Edward Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463**



82NOV15 AID: 35

NOV 15 1982



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

14 December 1982

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *BAC*
STAFF DIRECTOR

FROM : JOHN D. GIBSON *JDG*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : REFERRAL OF OIL, CHEMICAL AND ATOMIC WORKERS
INTERNATIONAL UNION POLITICAL & LEGISLATIVE LEAGUE
FUND

830403932
This is a referral of the Oil, Chemical and Atomic Workers International Union Political Legislative League Fund. The committee has commingled union treasury funds with voluntary funds, which according to the Review and Referral Procedures (Chart #22) requires further examination by your office.

If there are any questions, please contact Ed Ryan at 357-0023.

Attachment

cc: Commissioners

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 14 December 1982Analyst: Ed Ryan

I. COMMITTEE: Oil, Chemical and Atomic Workers
International Union Political & Legislative
League Fund (C00030635)
Michael Ricigliano, Treasurer
1636 Champa Street
Denver, Colorado 80202

II. RELEVANT STATUTE: 2 U.S.C. 441b(a) & 11 CFR 114.5(b)

III. BACKGROUND:

Commingle of Treasury and Voluntary Funds 2 U.S.C.
441b(a) & 11 CFR 114.5(b)

The 1981 March Monthly through the January 31 Year End Reports filed by the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund ("PLLFF") disclosed contributions from individuals/persons other than political committees totalling \$40,279.10. The total amount for each period was listed on Line 11a of the Detailed Summary Page; however, the memo entry line for unitemized contributions was left blank and there were no supporting schedules itemizing contributions in excess of \$200.

Requests for Additional Information ("RFAIs") were sent to PLLF on June 16, 1982, notifying the treasurer that supporting schedules needed to be provided and/or an amount listed on the memo entry line disclosing the total of unitemized contributions (Attachment 2).^{1/}

On June 29, 1982, Michael Ricigliano, Treasurer of the PLLF, sent a letter to the FEC explaining that he had been out of town and unable to review thoroughly the RFAI's concerning their 1981 monthly reports. In addition, he requested an extension of time, until July 15, 1982, to respond to the matters (Attachment #3).

1/ Requests for Additional Information (RFAIs) were sent on the 1981 March Monthly through January 31 Year End Reports with exception of Informational Notices on the May and June Monthly Reports.

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No further response was received and therefore a Second Notice was sent on July 9, 1982. ^{2/} In this letter, the Commission acknowledged the June 29, 1982 letter and advised the treasurer that if the requested information was not received within 15 days, the Commission may choose to initiate audit or legal enforcement action (Attachment #4).

On July 15, 1982, Mr. Ricigliano sent a telegram acknowledging receipt of the Second Notice and reiterating his intention to comply with the requests (Attachment #5).

On July 21, 1982, Mr. Ricigliano sent a telegram to the Reports Analysis Division ("RAD"), which referenced a correspondence to the Commission's General Counsel, Charles N. Steele (Attachment #6).

On July 22, 1982, the Commission received a letter addressed to Mr. Steele from Mr. Ricigliano. He explained that an immediate review of all records and reports had been initiated concerning the information requested by the RAD. While this review was being conducted, PLLF discovered a \$20,000 transfer from the International Representatives Committee Union ("IRCU"). This amount was originally thought to be voluntary contributions from individuals members of IRCU in amounts of \$200 or less, but actually contained general treasury funds. Mr. Ricigliano went on to say that in view of this discovery it would be "pointless" for PLLF to respond by "simply amending or clarifying its reports." He thought it would be better to set up a meeting with representatives of the FEC to discuss the problems and the proper way of solving them. Until this meeting was arranged, he instructed his staff that no disbursements be made from the voluntary fund account and that all funds received after this discovery "be deposited into a new separate segregated voluntary fund account" (Attachment #7).

A meeting was scheduled for August 4, 1982; however, due to travel complications, Mr. Ricigliano was unable to attend. Instead, James J. Cronin, Associate General Counsel of the OCAWIU and Ms. Peggy McCormack, a local attorney, met with representatives of RAD. The participants discussed the problems and proposals for resolution (Attachment #8).

^{2/} The notice referenced the lack of response to the RFAIs noted in footnote 1, but did not include the May and June Monthly Reports.

PLLF

Page 3

On August 13, 1982, Mr. Cronin placed a phone call to the Chief of the Party/Non-Party Branch informing him that a response to the suggestions made during the August 4, 1982 meeting would arrive during the week of August 16, 1982 (Attachment#9).

A letter was received on August 17, 1982, which provided a detailed account of what had transpired, including the discovery of an additional \$1,248.50 in treasury funds and \$175 received from non-union members (Attachment #10). 3/

The 1982 September Monthly Report filed by PLLF disclosed the disbursement of \$28,477.86 (\$27,402.86 on August 13, 1982 and \$1,075 on August 31, 1982) to its non-voluntary fund account (Attachment #11).

An Informational Notice was sent on November 5, 1982, which acknowledged the transfer-out of funds to the non-voluntary account and notified the treasurer that the Commission may take further action on the matter (Attachment #12).

On November 12, 1982, Mr. Cronin placed a call to RAD after receiving the November 5th Informational Notice. Mr. Cronin wanted to know how he could respond to the notice. He was informed that the basis for the notice was to acknowledge the remedial steps taken by the committee and also to provide notification that further legal steps may be taken (Attachment #13).

A letter from the treasurer was received on November 15, 1982, which confirmed what had been discussed with Mr. Cronin on November 12th (Attachment #14).

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring referral at this time for this committee.

3/ The response noted that since the report covering June of 1982, no contributions have been deposited into the account that contained commingled funds, nor have any disbursements in connection with Federal elections been made. A new voluntary account was opened in July, into which contributions have been deposited. In order to bring PLLF "into voluntary compliance with the Act," the "old" voluntary account has been closed out, with the funds therein being transferred to the non-voluntary account. Furthermore, the administrative and accounting procedures are being revamped, "so as to obviate the possibility of future errors."

83 FEDERAL ELECTION COMMISSION 6
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 8DEC82
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL UNION POLITICAL & LEGISLATIVE LEAGUE FUND CONNECTED ORGANIZATION: OIL CHEMICAL & ATOMIC WKRS INT'L UNION				NON-PARTY QUALIFIED		ID 0C00030635
1981	STATEMENT OF ORGANIZATION - AMENDMENT			24AUG81	2	81FEC/204/4732
	FEBRUARY MONTHLY	2,935	1,618	1JAN81 -31JAN81	3	81FEC/190/4905
	FEBRUARY MONTHLY - AMENDMENT	-	-	1JAN81 -31JAN81	1	82FEC/254/0406
	1'ST LETTER INFORMATIONAL NOTICE			1JAN81 -31JAN81	1	82FEC/253/4986
	MARCH MONTHLY	1,026	114	1FEB81 -28FEB81	4	81FEC/192/2683
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 -28FEB81	1	82FEC/239/3525
	MARCH MONTHLY - AMENDMENT	-	-	1FEB81 -28FEB81	1	82FEC/254/0407
	REQUEST FOR ADDITIONAL INFORMATION			1FEB81 -28FEB81	1	82FEC/234/0301
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB81 -28FEB81	1	82FEC/236/2147
	1'ST LETTER INFORMATIONAL NOTICE			1FEB82 -28FEB81	1	82FEC/253/4987
	APRIL MONTHLY	1,027	2,796	1MAR81 -31MAR81	4	81FEC/193/4755
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 -31MAR81	1	82FEC/239/3526
	APRIL MONTHLY - AMENDMENT	-	-	1MAR81 -31MAR81	1	82FEC/254/0408
	REQUEST FOR ADDITIONAL INFORMATION			1MAR81 -31MAR81	1	82FEC/234/0302
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR81 -31MAR81	1	82FEC/236/2148
	1'ST LETTER INFORMATIONAL NOTICE			1MAR81 -31MAR81	1	82FEC/253/4988
	MAY MONTHLY	448	250	1APR81 -30APR81	4	81FEC/195/3212
	MAY MONTHLY - AMENDMENT	-	-	1APR81 -30APR81	1	82FEC/239/3527
	1'ST LETTER INFORMATIONAL NOTICE			1APR81 -30APR81	1	82FEC/234/0262
	JUNE MONTHLY	589	1,760	1MAY81 -31MAY81	4	81FEC/197/0121
	JUNE MONTHLY - AMENDMENT	-	-	1MAY81 -31MAY81	1	82FEC/239/3528
	1'ST LETTER INFORMATIONAL NOTICE			1MAY81 -31MAY81	1	82FEC/233/0625
	JULY MONTHLY	2,738	216	1JUN81 -30JUN81	4	81FEC/200/1954
	JULY MONTHLY - AMENDMENT	-	-	1JUN81 -30JUN81	1	82FEC/239/3529
	REQUEST FOR ADDITIONAL INFORMATION			1JUN81 -30JUN81	1	82FEC/234/0303
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN81 -30JUN81	1	82FEC/236/2149
	AUGUST MONTHLY	2,074	2,167	1JUL81 -31JUL81	4	81FEC/204/0609
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	1	82FEC/239/3530
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL81 -31JUL81	1	82FEC/254/0409
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31JUL81	1	82FEC/234/0304
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31JUL81	1	82FEC/236/2150
	1'ST LETTER INFORMATIONAL NOTICE			1JUL81 -31JUL81	1	82FEC/253/4989
	SEPTEMBER MONTHLY	20,891	500	1AUG81 -31AUG81	4	81FEC/205/2384
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 -31AUG81	1	82FEC/239/3531
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG81 -31AUG81	1	82FEC/254/0410
	REQUEST FOR ADDITIONAL INFORMATION			1AUG81 -31AUG81	1	82FEC/233/0659
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1AUG81 -31AUG81	1	82FEC/235/1672
	1'ST LETTER INFORMATIONAL NOTICE			1AUG81 -31AUG81	1	82FEC/253/4990
	OCTOBER MONTHLY	1,423	12,186	1SEP81 -30SEP81	4	81FEC/206/5002
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP81 -30SEP81	1	82FEC/239/3532
	REQUEST FOR ADDITIONAL INFORMATION			1SEP81 -30SEP81	3	82FEC/233/0653
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP81 -30SEP81	1	82FEC/236/2146
	NOVEMBER MONTHLY	3,898	405	1OCT81 -31OCT81	4	81FEC/209/0669
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 -31OCT81	1	82FEC/239/3533

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 8DEC82
PAGE 2

NON-PARTY RELATED

COMMITTEE DOCUMENT RECEIPTS EXPENDITURES TYPE OF FILER # OF MICROFILM

COVERAGE DATES PAGES LOCATION

NOVEMBER MONTHLY	- AMENDMENT	-	-	10CT81 -310CT81	1	82FEC/254/0411
REQUEST FOR ADDITIONAL INFORMATION				10CT81 -310CT81	1	82FEC/234/0305
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT81 -310CT81	1	82FEC/236/2151
1'ST LETTER INFORMATIONAL NOTICE				10CT81 -310CT81	1	82FEC/253/4991
DECEMBER MONTHLY		4,161	0	1NOV81 -30NOV81	3	81FEC/211/1260
DECEMBER MONTHLY	- AMENDMENT	-	-	1NOV81 -30NOV81	1	82FEC/239/3534
REQUEST FOR ADDITIONAL INFORMATION				1NOV81 -30NOV81	1	82FEC/234/0306
REQUEST FOR ADDITIONAL INFORMATION 2ND				1NOV81 -30NOV81	1	82FEC/236/2152
YEAR-END		2,002	0	1DEC81 -31DEC81	3	82FEC/212/2009
YEAR-END	- AMENDMENT	-	-	1DEC81 -31DEC81	13	82FEC/239/2532
YEAR-END	- AMENDMENT	-	-	1DEC81 -31DEC81	1	82FEC/254/0412
REQUEST FOR ADDITIONAL INFORMATION				1DEC81 -31DEC81	1	82FEC/233/0657
REQUEST FOR ADDITIONAL INFORMATION 2ND				1DEC81 -31DEC81	1	82FEC/236/2153
1'ST LETTER INFORMATIONAL NOTICE				1DEC81 -31DEC81	1	82FEC/253/4992
1982 MISCELLANEOUS REPORT				29JUN82 TO FEC	2	82FEC/234/2867
MISCELLANEOUS REPORT				16JUL82 TO FEC	2	82FEC/237/3505
MISCELLANEOUS REPORT				22JUL82 TO FEC	2	82FEC/239/2530
MISCELLANEOUS REPORT				13AUG82 TO FEC	6	82FEC/240/4810
FEBRUARY MONTHLY		5,550	0	1JAN82 -31JAN82	3	82FEC/223/2676
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN82 -31JAN82	2	82FEC/245/4896
FEBRUARY MONTHLY	- AMENDMENT	-	-	1JAN81 -31JAN82	1	82FEC/254/0413
REQUEST FOR ADDITIONAL INFORMATION				1JAN82 -31JAN82	1	82FEC/244/3994
1'ST LETTER INFORMATIONAL NOTICE				1JAN82 -31JAN82	1	82FEC/253/4993
MARCH MONTHLY		159	9,517	1FEB82 -28FEB82	4	82FEC/224/5296
APRIL MONTHLY		10,363	2,850	1MAR82 -31MAR82	6	82FEC/226/2804
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/245/4898
APRIL MONTHLY	- AMENDMENT	-	-	1MAR82 -31MAR82	1	82FEC/254/0414
REQUEST FOR ADDITIONAL INFORMATION				1MAR82 -31MAR82	1	82FEC/244/3995
1'ST LETTER INFORMATIONAL NOTICE				1MAR82 -31MAR82	1	82FEC/253/4994
MAY MONTHLY		1,140	1,200	1APR82 -30APR82	4	82FEC/230/3302
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	1	82FEC/245/4899
MAY MONTHLY	- AMENDMENT	-	-	1APR82 -30APR82	2	82FEC/253/5260
REQUEST FOR ADDITIONAL INFORMATION				1APR82 -30APR82	1	82FEC/244/3996
1'ST LETTER INFORMATIONAL NOTICE				1APR82 -30APR82	7	82FEC/253/3471
JUNE MONTHLY		1,332	750	1MAY82 -31MAY82	4	82FEC/232/2934
JUNE MONTHLY	- AMENDMENT	-	-	1MAY82 -31MAY82	2	82FEC/245/4900
REQUEST FOR ADDITIONAL INFORMATION				1MAY82 -31MAY82	2	82FEC/244/1585
JULY MONTHLY		2,468	300	1JUN82 -30JUN82	4	82FEC/234/4699
AUGUST MONTHLY		2,590	4,200	1JUL82 -31JUL82	4	82FEC/240/4822
SEPTEMBER MONTHLY		5,415	27,402	1AUG82 -31AUG82	5	82FEC/242/3134
OCTOBER MONTHLY		4,322	9,100	1SEP82 -30SEP82	6	82FEC/249/2488
PRE-GENERAL		2,181	825	1OCT82 -13OCT82	5	82FEC/251/0137
TOTAL		78,732	0	78,156	0	187 TOTAL PAGES

ALL REPORTS REVIEWED THROUGH 1982 JULY MONTHLY.
NO DATA DISCLOSED.

ENDING CASH (10-15-82) = \$4,583.89



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

032040393918



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

3304039332

RECEIVED

ATTACHMENT # 3

ONL, CHRONICAL OF ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO 64



Political and Legislative League

P.O. Box 8818
Denver, Colorado 80201-0884
Phone (303) 892-0811

ROBERT F. COSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

Re: OCAWIU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,

M. Ricigliano
MICHAEL RICIGLIANO
Secretary-Treasurer

MR/bb, cps
ocaw



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly (9/1/81-9/30/81), March Monthly (2/1/81-2/28/81), April Monthly (3/1/81-3/31/81), July Monthly (6/1/81-6/30/81), August Monthly (7/1/81-7/31/81), November Monthly (10/1/81-10/31/81), December Monthly (11/1/81-11/30/81), January 31 Year-End (12/1/81-12/31/81), and September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29, 1982. Please amend your reports to provide the requested information.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Edward Ryan on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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ATTACHMENT # 5

1-028534C196 07/15/82 ICS IPMWWNF WSH WSHA
04280 (01641) WGH WASHINGTON DC 50 07-15 0614P EST

JOHN D GIBSON ASST STAFF DIR
REPORTS ANALYSIS DIV-FEDL ELECTION COMM
1325 K STREET NW 3RD FLR
WASHINGTON DC 20463

'(DUPE OF TELEPHONED TELEGRAM)

5-0073971196 07/15/82
 INX OCAW DVR
 1001 DENVER, CO. JULY 15, 1982
 PMS JOHN D. GIBSON
 ASSISTANT STAFF DIRECTOR
 REPORTS ANALYSIS DIVISION
 FEDERAL ELECTION COMMISSION
 1325 K STREET N.W.
 WASHINGTON, D.C. 20463

REF: OCAWU POLITICAL AND LEGISLATIVE LEAGUE FUND
ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7, 1962 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MR. LEE

1153 EST

18:53 EST

HGMCOMP

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

12 JUL 10 10:23

Telegram

WJA18X(1715)(1-023704A202)PD 07/21/82 1706

1982 JUL 21 PH 6:34

ICS IPMWGWC WSH

07331 07-21 0554P EST

ICS IPMWJ08

1-0129121202 07/21/82

TWX OCAW DVR

001 DENVER, CO. JULY 21, 1982

FMS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR

REPORTS ANALYSIS DIVISION

FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.

WASHINGTON, D.C. 20463

RE: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL

WJ 1201-87 (RS-88)

Telegram

UNION POLITICAL AND LEGISLATIVE LEAGUE FUND

I.D. NO. C00030635

PLEASE BE ADVISED THAT I HAVE WRITTEN TO FEC GENERAL
COUNSEL CHARLES N. STEELE RELATIVE TO THE REPORT ANALYSIS DIVISION'S
JUNE 16, 1982 REQUESTS FOR AMENDMENT TO OR CLARIFICATION OF CERTAIN
1981 MONTHLY REPORTS FILED BY OCAWIU PLL.

MICHAEL RICIGLIANO
TREASURER
OCAWIU PLL

1653 EST

NNNN

RECEIVED

ATTACHMENT # 7

OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO

55



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-0964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO



July 21, 1982

JUL 22 P 3: 22

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Re: Oil, Chemical & Atomic Workers
International Union Political &
Legislative League Fund
I.D. Number/C00030635

Dear Mr. Steele:

This is in reference to the attached communications between the Federal Election Commission's Reports Analysis Division and my office.

I am the Treasurer of the Oil, Chemical and Atomic Workers International Union Political and Legislative League Fund (OCAWIU PLL) to which office I succeeded effective August 14, 1981, upon my election as Secretary-Treasurer of the International Union. On June 22, 1982, while I was out of town, I received the attached letters dated June 16, 1982, requesting amendment to or clarification of certain information contained in OCAWIU PLL's 1981 monthly reports. Upon my return on June 29th, I requested an extension of time within which to respond until July 15, 1982. I subsequently received a letter dated July 9, 1982, from John Gibson, Assistant Staff Director, in which he indicated that the requested information should be submitted by July 24, 1982. On July 15, 1982, I dispatched a telegram to Mr. Gibson acknowledging receipt of his letter.

In view of the following, I believe it appropriate to communicate at this time with you:

1. Immediately upon returning to my office on June 29th, I requested a review of all OCAWIU PLL records and reports pertaining to the information for which the Reports Analysis Division requested amendments or clarification as a preliminary to our preparation of a response.

July 21, 1982

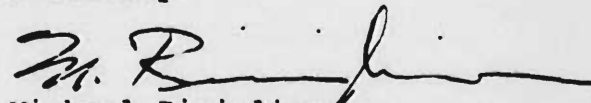
During the course of this review, it was discovered that a transfer in the amount of \$20,000.00, which OCAWIU PLL received from the International Representatives Committee Union, that was thought to represent individual contributions in amounts of \$200.00 or less from I.R.C.U. members (who are also members of OCAWIU) and was deposited into OCAWIU PLL's voluntary account, was in fact a transfer of treasury funds from I.R.C.U. and should, therefore, have been deposited into OCAWIU PLL's treasury account.

In light of the aforementioned discovery, it seems pointless for OCAWIU PLL to respond to the Commission's requests for additional information by simply amending or clarifying its reports. Instead, I hereby request an immediate meeting with you or a member of your staff to discuss the proper means by which the error described above can be rectified through voluntary conciliation. In the meantime, I have directed that no disbursements be made from OCAWIU PLL's voluntary fund account and that voluntary contributions received subsequent to said discovery be deposited into a new separate segregated voluntary fund account.

2. The requests for additional information also inquire about a 9/2/81 contribution from OCAWIU PLL to AFL-CIO COPE in the amount of \$11,842.00. That transfer was made pursuant to a joint fundraising effort between OCAWIU and the AFL-CIO on behalf of OCAWIU PLL and AFL-CIO COPE. This joint fundraising effort is reflected in the attached excerpt from the minutes of the OCAWIU Executive Board meeting on February 24, 1981, which provides for 50% of the OCAWIU PLL/COPE collections to be transferred to AFL-CIO COPE. Thus, all other matters being equal, that transaction should have been labelled "transfer of joint fundraising proceeds", not "contribution", and we would file an amendment to our report to that effect. However, in light of the facts that have come to light and are described above, such an amendment does not appear to be the proper course until we have reached an appropriate agreement with the Commission on the handling of the matter described in Item #1 above.

I look forward to an early and favorable response to our request for a meeting so that OCAWIU PLL can begin to take the necessary steps to bring ourselves into compliance with the FECA.

Sincerely,


Michael Ricigliano
Secretary-Treasurer

MR:lh

Attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
M. Ricigliano, Secy-Treas.

JUN 22 1982

Referred ACCOUNTING

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: May Monthly (4/1/81 - 4/30/81) & June Monthly (5/1/81 - 5/31/81) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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END R

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly Report (9/1/81 - 9/30/81)

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-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. 441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

33 25 00 34 20 33 99 23 39 31 5

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1
 LINE NUMBER 2
 (Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Oil, Chemical & Atomic Workers (Int'l) Union Political & Legislative League

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AFL-CIO COPE 815 Sixteenth St., N.W. Washington, DC 20006	Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/2/81	11,482.68
B. Full Name, Mailing Address and ZIP Code Hawkins for Congress Committee c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	U.S. Congress Calif. - 29th District Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/9/81	50.00
C. Full Name, Mailing Address and ZIP Code Howard M. Metzenbaum for Senate Room 347, RSOB Washington, DC	U.S. Senate State of Ohio Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/16/81	200.00
D. Full Name, Mailing Address and ZIP Code Colorado COPE 360 Acoma St., Room 300 Denver, CO 80223	Contribution to COPE Program Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/30/81	104.00
E. Full Name, Mailing Address and ZIP Code Congressmen Way Dowdy Campaign Comm. c/o Nolan Hancock 1126 Sixteenth St., N.W. Washington, DC 20036	U.S. Congress Mississippi - 4th Dist. Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/30/81	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			12,186.60



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: March Monthly (2/1/81 - 2/28/81), April Monthly (3/1/81 - 3/31/81), July Monthly (6/1/81 - 6/30/81), August Monthly (7/1/81 - 7/31/81), November Monthly (10/1/81 - 10/31/81), December Monthly (11/1/81 - 11/30/81) & January 31 Year-End (12/1/81 - 12/31/81) Reports

Dear Mr. Ricigliano:

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-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

33 2031 292318



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16 June 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: September Monthly Report (8/1/81 - 8/31/81)

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total for Line 6(a) of the Summary Page. (2 U.S.C. 434(b))

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

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Political and Legislative League

P.O. Box 813
Denver, Colorado 80201-0864
Phone (303) 593-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

Certified
Return Receipt Requested

June 29, 1982

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

Attention: Edward D. Ryan, Reports Analyst
Reports Analysis Division

Gentlemen:

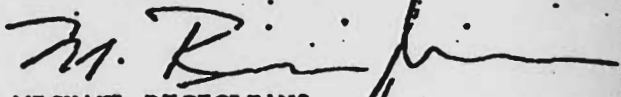
Re: OCAWIU Political and Legislative League Fund
Identification No. C00030635

Reference your four (4) letters all dated June 16, 1982 concerning amendments and/or clarification of monthly reports filed during the year 1981. You indicated that correcting amendments should be filed with fifteen (15) days of the date of your letters.

Please be advised that I have been out of town away from my office since your letters were received on June 22nd, until today. For that reason I have not as yet had an opportunity to thoroughly review your letters in conjunction with our 1981 monthly reports.

Therefore, this is to request an extension of time within which to respond further until July 15, 1982. Thank you for your cooperation.

Sincerely,


MICHAEL RICIGLIANO
Secretary-Treasurer

NR/bb, cps
ocaw



Gent.
P.L.L./C.F.E.

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED
M. J. D. Services

JUL 13 1982

Referred *MR*

July 9, 1982

Michael Ricigliano, Treasurer
Oil Chemical & Atomic Workers International
Union Political & Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: October Monthly (9/1/81-9/30/81), March Monthly
(2/1/81-2/28/81), April Monthly (3/1/81-3/31/81),
July Monthly (6/1/81-6/30/81), August Monthly
(7/1/81-7/31/81), November Monthly (10/1/81-
10/31/81), December Monthly (11/1/81-11/30/81),
January 31 Year-End (12/1/81-12/31/81), and
September Monthly (8/1/81-8/31/81) Reports

Dear Mr Ricigliano:

On June 16, 1982 you were notified that a review of the
above-referenced report(s) raised questions as to specific
contributions and/or expenditures, and the reporting of certain
information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated June 29,
1982. Please amend your reports to provide the requested
information.

If this information is not received by the Commission within
fifteen (15) days from the date of this notice, the Commission
may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter,
please contact Edward Ryan on our toll-free number (800)424-9530
or our local number (202)357-0026.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

16 41 39 23 30 34 20 33 41 16

WU INFOMASTER

OCAW DVR

0073971196 1127EST

001 DENVER, CO. JULY 15, 1982

PMS JOHN D. GIBSON

ASSISTANT STAFF DIRECTOR

REPORTS ANALYSIS DIVISION

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.

WASHINGTON, D.C. 20463

RE: OCAWIU POLITICAL AND LEGISLATIVE LEAGUE FUND
ID NO. C00030635

THIS IS TO ACKNOWLEDGE RECEIPT OF YOUR LETTER DATED JULY 7, 1982 IN WHICH YOU INDICATED THAT INFORMATION PREVIOUSLY REQUESTED SHOULD BE RECEIVED BY THE COMMISSION WITHIN FIFTEEN (15) DAYS FROM THAT DATE.

WE HAVE EVERY INTENTION OF COMPLYING WITH YOUR REQUEST, AND REGRET ANY INCONVENIENCE OUR UNAVOIDABLE DELAY IN RESPONDING HAS CAUSED YOUR OFFICE. THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

MICHAEL RICIGLIANO
SECRETARY-TREASURER

MR:LH

ACCEPTED
00001

1-PC

6. Recommendations will be made regarding alternative data sources for ascertainment of illnesses and injuries by the companies. Recommendations also will be made regarding the future specificity of illness and injury reporting by the companies. Justification will be made for each recommendation.
7. A data system will be proposed for future use in receiving and controlling of company submitted morbidity data.
8. A final report will be prepared.
9. A briefing will be held for personnel in the Health and Safety office of OCAW.

It is estimated that this project will take 2½ to 3 months to complete."

There was a MOTION by Board Member Barnes, seconded by Board Member Sullivan to approve the recommendation.

On the roll call the Motion was unanimously approved.

Subject: DISTRIBUTION OF PLL MONEY TO THE AFL-CIO COPE

Secretary-Treasurer Palmer recommended that again this year we support the AFL-CIO COPE operations to the extent of 50% of our 1981 PLL/COPE collections.

There was a MOTION by Board Member Donohue, seconded by Board Member Perry to approve this recommendation.

On the roll call the Motion was unanimously approved.

The Meeting recessed at noon, in order to allow time for the various committees to function, to reconvene Wednesday, February 25, 1981, at 9:00 a.m.

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1/81

8 2 0 3 2 3 9 2 3 4 1 4



EXPRESS MAIL POST OFFICE TO ADDRESSEE

3 51072982

FROM:
Michael Picigliano
CCAWIU Political and Legislat
ive League
P.O. Box 1812
Denver, Colorado 80201

Customer Number, if any:

TO: Charles M. Steele, Esquire
General Counsel
Federal Election Commission
1225 K Street N.W.
Washington, D.C. 20006

ORIGIN:	
Initials of Receiving Clerk:	
P.O. ZIP	
Date in:	
Time in:	
Weight:	Postage:
Lbs	\$

DESTINATION:	
Date of Delivery:	
Time of Delivery:	
Initials of Delivering Employee:	
Signature of Addressee or Agent:	
DELIVERY WAS ATTEMPTED	
Date	Time:
Notice Left By:	

EXPRESS MAIL SERVICE

LABEL 118 JUNE 79 U.S.G.P.O. 1979-301-203

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MEMORANDUM TO THE FILE

FROM : Edward D. Ryan
DATE : August 4, 1982
SUBJECT : Meeting with Representatives of OCAWIU-PLLF

This meeting was requested by Mr. Michael Ricigliano, Secretary Treasurer of the Oil, Chemical and Atomic Workers International Union Political & Legislative League Fund in his July 21, 1982 letter to the Commission. In that letter Mr. Ricigliano outlined several discoveries made in responding to RFAIs sent on June 16, 1982.

Unfortunately, Mr. Ricigliano was unable to attend this meeting because of a conflict in travel schedules. Those in attendance were: James J. Cronin, Associate General Counsel of the Oil, Chemical and Atomic Workers International Union-AFL-CIO-CLC; Peggy McCormick, a local attorney; Ed Ryan, Reports Analyst; and Mike Filler, Non-Party/Party Branch Chief in the Reports Analysis Division.

Mr. Cronin began the meeting by saying that once the RFAIs were received, a review of all 1981 reports was started. During the course of this review, it was discovered that union treasury funds were transferred into OCAWIU-PLLF voluntary account. Mr. Cronin said this money was given to officials during a convention, and due to the activities going on, the source of funds was not determined. Mr. Cronin acknowledged that this was not a good excuse and even an embarrassment but felt this was pertinent to the case.

After further discussion Mike Filler suggested the following:

- 1.) Additional research to determine if any more union treasury funds were commingled with voluntary funds;
- 2.) A complete description of the steps OCAWIU-PLLF took to segregate voluntary funds from non-voluntary funds(i.e. the point at which the new account was established and the name of the new depository).
- 3.) Clarification of the disbursement to the SSF of the AFL-CIO, and an explanation concerning the relationship between OCAWIU-PLL and COLORADO COPE based upon the periodic transfers made to COLORADO COPE.

Mr. Cronin said he would supply all that was requested and take Mr. Filler's suggestions into consideration. He said it was his intent to comply fully with the FECA and the FEC's regulations. A response would be submitted as soon as the treasurer was briefed.

330403950

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
DATE : AUGUST 13, 1982
SUBJECT : FOLLOW-UP TO AUGUST 4 MEETING WITH REPRESENTATIVES
OF THE OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL
UNION POLITICAL & LEGISLATIVE LEAGUE FUND ("PLLF")

On August 4, 1982, a meeting was held with Mr. Jim Cronin, Associate General Counsel for PLLF and Peggy Mc Cormick. At that meeting, it was suggested that PLLF respond as soon as possible to the commingling problem.

Mr. Cronin called today to say that the union's executive board had met to discuss the commingling problem, and that a response should be received at the Commission sometime during the week of August 16th. I mentioned that in addition to the commingling problem, we had requested certain figures on the Detailed Summary Pages. Mr. Cronin stated that he would ensure that the appropriate amendments were filed.

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RECEIVED

OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-0864
Phone (303) 593-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with OCPA, AFL-CIO

August 13, 1982

CERTIFIED RETURN RECEIPT REQUESTED

Michael B. Filler
Chief, Political Party/Special Interest
Committee Section
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Oil, Chemical and Atomic Workers
International Union Political and
Legislative League Fund
I.D. No. C00030635

Dear Mr. Filler:

During your August 4, 1982, meeting with OCAWIU Associate General Counsel Jim Cronin and attorney Peggy McCormick, you requested that OCAWIU PLL provide to the Commission certain additional information in connection with the matter raised in my July 21, 1982, letter to FEC General Counsel, Charles Steele. Subsequent to that meeting I initiated a more detailed review of OCAWIU PLL's records. Based on that review the information you requested at the August 4th meeting is detailed below.

1. The circumstances surrounding the erroneous deposit of a \$20,000 treasury contribution from the International Representatives Committee Union into OCAWIU PLL's voluntary account are as follows: The check was presented to the then OCAWIU Secretary-Treasurer, who by reason of his office is the Treasurer of OCAWIU PLL, on August 13, 1981, at a regular session of the International Union Convention being held in Denver. At the time of the Convention there was a vigorous contest being waged in connection with the election of all the International Union officers. The check in question was then delivered to the accounting office at OCAWIU's headquarters building, apparently without specific instructions, but with the thought that it would be handled following the Convention.

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Michael B. Piller

-2-

August 13, 1982

The following day, August 14, 1981, elections of the International Union officers were conducted with the result that I defeated the incumbent Secretary-Treasurer. Following the Convention, without consultation or instructions, the accounting office erroneously deposited the \$20,000 check along with receipts of voluntary contributions in the voluntary fund account, apparently mistakenly believing the check represented individual contributions by members of IRCU. When I took over my responsibilities, neither I nor anyone else in my office realized the check had been erroneously deposited until that fact was discovered upon a review of the OCAWIU PLL records following receipt of the Commission's June 16, 1982 requests for clarifying information.

2. Our further review of OCAWIU PLL's records for the period from January 1981 through June 1982 revealed several instances in which small amounts of treasury funds intended for OCAW's non-voluntary account were erroneously deposited into OCAWIU PLL's voluntary account. In most instances, the error was discovered immediately and the sums were transferred forthwith to our treasury account. (See Appendix I for detailed accounting of such deposits/transfers out.)

We did, however, find that a small number of treasury contributions totalling \$152.00 in 1981 (Mar. \$40, July \$52, Oct. \$30, Dec. \$30) and \$72.00 in 1982 (Jan. \$40, Mar. \$32), which represented PLL treasury contribution credits to Locals purchasing belt buckles from the International, were mistakenly deposited in OCAWIU PLL's voluntary account instead of the non-voluntary account and were not transferred out.

Our detailed review of OCAWIU PLL's 1981 and 1982 records also revealed that two contributions received in 1982, in the amount of \$125.00 (March 1982) and \$50.00 (April 1982), respectively, came from sources other than OCAWIU members or their families. These contributions have been returned to their respective contributors and I have specifically reiterated to OCAWIU Locals and Staff that contributions to OCAWIU PLL are to be accepted only from the Union's members and their families.

3. With respect to the joint fundraising effort mentioned in my July 21st letter, OCAWIU PLL's joint fundraising effort with AFL-CIO COPE is joint fundraising for voluntary contributions to OCAWIU PLL FUND (OCAWIU PLL's separate segregated voluntary account) and AFL-CIO COPE Political Contributions Committee (AFL-CIO COPE's separate segregated voluntary account). Thus, transfers from OCAWIU PLL of the proceeds of its joint fundraising efforts with AFL-CIO COPE PCC should have been reported as transfers of the proceeds of a joint fundraising effort to AFL-CIO COPE PCC.

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August 17, 1982

Michael B. Filler

-3-

4. With respect to OCAWIU PLL's periodic transfers of voluntary funds to COLORADO COPE, those transfers were intended to be used by COLORADO COPE for non-federal purposes and in fact were transfers to a non-voluntary account of Colorado COPE. Colorado COPE does not, we believe, have a separate segregated voluntary account for federal election purposes.

5. As I indicated in my letter dated July 21, 1982 to General Counsel Steel, since our report for the month of June 1982, no contributions received have been deposited into OCAWIU PLL's registered voluntary contributions account (the Bank of Denver being the depository), and no disbursements in connection with federal elections have been made from that account. However, in July, prior to my letter, disbursements had been made to non-federal election candidates, which will be reflected in the report for the month of July.

Also, as indicated in my July 21st letter, a new voluntary contributions account was opened in July, the depository being the Central Bank of Denver, 1515 Arapahoe Street, Denver, Colorado 80202. All voluntary contributions received since the report for the month of June have been deposited in this new account. As previously indicated, this action was taken because of the discovery of the erroneous deposit of the above mentioned \$20,000. Please accept this information in lieu of an amendment to our Statement of Organization, FEC Form 1.

6. In view of the errors uncovered both during our initial review of OCAWIU PLL's records, following our receipt of the Commission's requests for additional information, and our further review following the August 4 meeting with you, we have determined to offer to bring ourselves into voluntary compliance with the Act by closing out OCAWIU PLL's "old" voluntary account (Bank of Denver account) and to transfer the funds therein in their entirety to our non-voluntary or treasury fund account, and to henceforth use only our "new" voluntary account (Central Bank account) for deposits and disbursements of voluntary funds. This action is being taken in order to remove any question as to OCAWIU PLL's voluntary contribution fund's (separate segregated fund) compliance with the law.

In further keeping with our intent to maintain compliance with the FECA and with the FEC's regulations, I have communicated to all principal OCAWIU Local and Council Officers and our International Union Directors and Staff the necessity for conducting our activities covered by the Act in strict conformance with the law and with the regulations. In addition, I am in the

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Michael B. Filler

-4-

August 13, 1982

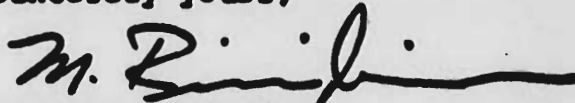
process of completely revamping the administrative and accounting procedures on OCAWIU PLL FUND matters, so as to obviate the possibility of future errors.

I trust that you will find the foregoing responsive to your request for additional clarification of the matters raised in my July 21, 1982 letter to Mr. Steele. I hope, too, that since the information provided herein responds to the Commission's initial requests for additional information and clarification of OCAWIU PLL's reports, you will accept this letter in lieu of amendments to those reports.

Finally, I want to express my appreciation for the Commission's (and your personal) willingness to meet with attorneys Cronin and McCormick on August 4, 1982. I regret that I was unable to attend that conference.

If I can be of further assistance, please advise.

Sincerely yours,



Michael Ricigliano
Secretary-Treasurer

MR:lh

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APPENDIX I

Amount	Deposited in Voluntary Account	Transferred to Treasury Account
280.00	1/29/81	2/2/81
100.00	2/2/81	2/2/81
27.00	7/1/81	7/1/81
560.00	1/18/82	1/20/82
40.00	4/2/82	4/2/82
17.50	4/2/82	4/2/82

NOTE: These deposits and refunds are not reflected in OCAWU PLL's monthly FEC reports it having been believed unnecessary to do so since the erroneous deposits were discovered and corrected promptly.

330403936

RECEIVED AT THE FEC
ATTACHMENT # 11
1982 SEPTEMBER MONTHLY
82 SEP 7 P 1: 27

9-2-82

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FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

82 SEP 7 P 1: 27

Name of Committee (in Full) **Oil, Chemical & Atomic Workers
International Union Political & Legislative League**

Report Covering the Period:

From: 8/1/82 To: 8/31/82

Fund

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

I. RECEIPTS**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitized \$ 5,415.89)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**13. ALL LOANS RECEIVED****14. LOAN REPAYMENTS RECEIVED****15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)****16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES****17. OTHER RECEIPTS (Dividends, Interest, etc.)****18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17).****II. DISBURSEMENTS****19. OPERATING EXPENDITURES****20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES****21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES (See Sch. B)****22. INDEPENDENT EXPENDITURES (Use Schedule E)****23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441a(d)) (Use Schedule F)****24. LOAN REPAYMENTS MADE****25. LOANS MADE****26. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS (See Sch. B)**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)****III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES****29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d****30. TOTAL CONTRIBUTION REFUNDS from Line 26d****31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)****32. TOTAL OPERATING EXPENDITURES from Line 19****33. OFFSETS TO OPERATING EXPENDITURES from Line 15****34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)**

\$5,415.89

\$29,019.38

\$5,415.89

\$29,019.38

\$5,415.89

\$29,019.38

(-\$1,075.00)

\$13,542.22

\$28,477.86

\$32,677.86

\$27,402.86

\$46,220.08

\$5,415.89

\$29,019.38

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\$5,415.89

\$29,019.38

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Contribution checks unreturned and never cashed)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

**Oil, Chemical & Atomic Workers International Union
 Political & Legislative League Fund**

A. Full Name, Mailing Address and ZIP Code John Conyers Room 2313 C00057-32 Rayburn House Office Bldg. Washington, D.C. 20515 24K	Purpose of Disbursement Honorarium to John Conyers, H.R. 1st Dist., Mich. for speech (8/6/81) Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$500.00 -- Unreturned check never cashed)
B. Full Name, Mailing Address and ZIP Code Thomas L. Driskell P. O. Box 1067 Crockett, Texas 75835	Purpose of Disbursement Contribution to Non-Federal Candidate (4/10/80) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$200.00 -- Unreturned check never cashed)
C. Full Name, Mailing Address and ZIP Code Benny Bonanno 3186 W. 52nd St. Cleveland, Ohio 44102	Purpose of Disbursement Contribu- tion to Non-Federal Candidate (12/19/78) Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (- \$75.00 -- Unreturned check never cashed)
D. Full Name, Mailing Address and ZIP Code Anthony Mazzocchi C000114-1 1126 - 16th Street, N.W. Washington, D.C. 20036 24K	Purpose of Disbursement Dinner tickets - Michael J. Harrington, H.R. 6th Dist. Mass. Fund Raiser (7/17/75) Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$200.00 -- Unreturned check never cashed)
E. Full Name, Mailing Address and ZIP Code Russo For Congress Committee 134 Pulaski C000496-35 Calumet City, Illinois 60409 24K	Purpose of Disbursement Contribu- tion to Marty Russo, H.R. Candidate 3rd Dist., Ill. (11/11/75) Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 8/31/82	Amount of Each Disbursement This Period (-\$100.00 -- Unreturned check never cashed)
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

(-\$1,075.00)

Oil, Chemical and Atomic Workers

8 International Union

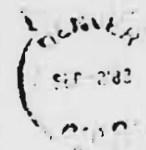
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AFTER FIVE DAYS RETURN TO:

1636 Champa Street
P.O. Box 2812
Denver, CO. 80201

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Federal Election Commission
Public Records Division
1325 K Street, N.W.
Washington, DC 20463

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-5

5 November 1982

Michael Ricigliano, Treasurer
Oil, Chemical and Atomic Workers
International Union Political
and Legislative League Fund
1636 Champa Street
Denver, CO 80202

Identification Number: C00030635

Reference: February Monthly (1/1/81-1/31/81), March Monthly
(2/1/81-2/28/81), April Monthly (3/1/81-3/31/81),
August Monthly (7/1/81-7/31/81), September Monthly
(8/1/81-8/31/81), November Monthly (10/1/81-10/31/81),
Year End (12/1/81-12/31/81), February Monthly (1/1/82-
1/31/82), April Monthly (3/1/82-3/31/82) and May
Monthly (4/1/82-4/30/82) Reports

Dear Mr. Ricigliano:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your letter of August 13, 1982 disclosed the receipt of funds from a labor organization (pertinent portions attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. 441b(a))

The Commission notes the transfers of the prohibited contributions to your non-voluntary fund, as noted in your August 13th letter and your 1982 September Monthly Report. Although the Commission may take further legal steps concerning the acceptance of prohibited funds, the transfers to the non-voluntary fund will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel

330403962

free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Edward D. Ryan

Edward Ryan
Reports Analyst
Reports Analysis Division

330403939663

TELECONANALYST Fd Ryan
initiated call? TELECON WITH: James J. Cronin, Associate General Counsel
initiated call? XCandidate/Committee: OIL, CHEMICAL AND ATOMIC WORKERS INTERNATIONAL-
POLITICAL AND LEGISLATIVE LEAGUE

DATE: November 12, 1982

SUBJECT(S): Receipt of Informational Notice dated November 5, 1982

Mr. Cronin called after receiving an informational notice dated November 5, 1982. In that notice the Commission recognized the receipt of prohibited funds and the subsequent transfer out to a non-voluntary account. I advised him that the Commission, as a matter of policy, notifies a committee in such situations and advises that further legal steps may be taken. Mr. Cronin asked if any response should be submitted and I advised him that for the Public Record, he could submit a letter disclosing the receipt of the notice and our subsequent phone conversation.

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OIL, CHEMICAL and ATOMIC WORKERS INTERNATIONAL UNION, AFL-CIO



Political and Legislative League

P.O. Box 2812
Denver, Colorado 80201-9964
Phone (303) 893-0811

ROBERT F. GOSS, Chairman
MICHAEL RICIGLIANO, Secretary-Treasurer

Affiliated with COPE, AFL-CIO

November 12, 1982

Edward Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

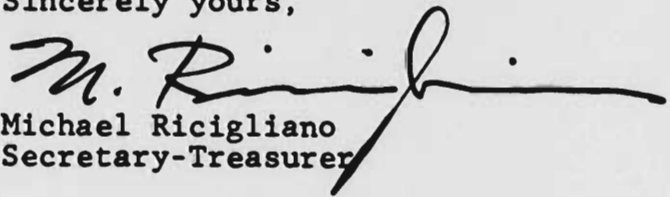
RE: Oil, Chemical and Atomic
Workers International Union
Political and Legislative
League Fund I.D. No. C00030635

Dear Mr. Ryan:

This will confirm Associate General Counsel
James J. Cronin's telephone conversation with you this
date, to the effect that your letter dated November 5,
1982, is in the nature of an information notice and
does not require any additional information or response
from OCAWIU - PLL FUND.

If we can be of further assistance, please
advise.

Sincerely yours,


Michael Ricigliano
Secretary-Treasurer

MR:gz

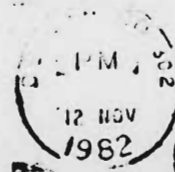
Oil, Chemical and Atomic Workers
International Union



AFTER FIVE DAYS RETURN TO:

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