



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1681

Date Filmed 6/8/84 Camera No. --- 2

Cameraman JRL

FEDERAL ELECTION COMMISSION

- All routing slips
- 12 Day Report + comment sheets
- Extra copies - designation of counsel statements
- List for docket regarding Respondents' addresses

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

Maybeth Tarant

date

6/5/84

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Pennsylvania Power and Light Company
PP&L People for Good Government
and James P. Kierzkowski, Treasurer

MUR 1681

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 31, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1681:

1. Find no reason to believe that the Pennsylvania Power and Light Company, PP&L People for Good Government and James Kierzkowski, as treasurer, have violated 2 U.S.C. § 441b(b).
2. Close the file.
3. Approve the letters as attached to the First General Counsel's Report dated May 29, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

May 31, 1984

Date

Jody C. Hanson
for Marjorie W. Emmons
Secretary of the Commission

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

5-29-84, 9:59
5-29-84, 4:00

84040460158



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1984

Joseph E. Fogarty, Assistant Corporate Counsel
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, Pennsylvania 18101

RE: MUR 1681
Pennsylvania Power & Light Company
PP&L Good Government Program
James P. Kierzkowski, Treasurer

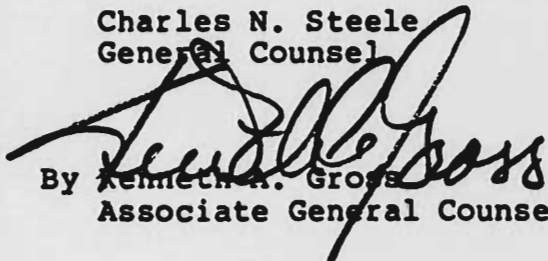
Dear Mr. Fogarty:

On April 26, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 31, 1984, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

84040460139



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1984

Stephen C. Richman, Esquire
Markowitz and Richman
1100 North American Building
121 South Broad Street
Philadelphia, Pennsylvania 19107

Re: MUR 1681
Complaint filed on behalf of Local 1600,
International Brotherhood of Electrical
Workers, AFL-CIO

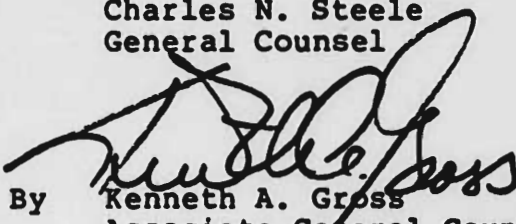
Dear Mr. Richman:

The Federal Election Commission has reviewed the allegations of your client's complaint dated April 19, 1984, and determined that on the basis of the information provided in the complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your client's attention which they believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

84040460160

SENSITIVE

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT 29 A 9: 59

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 5/29/84
10:00

MUR # 1681
DATE COMPLAINT RECEIVED
BY OGC April 20, 1984
DATE OF NOTIFICATION TO
RESPONDENTS April 26, 1984
STAFF MEMBERS M. Tarrant
L. Lerner

COMPLAINANT'S NAME: Local 1600, International
Brotherhood of Electrical Workers, AFL-CIO
RESPONDENTS' NAMES: Pennsylvania Power and Light Company
PP&L People for Good Government
and James P. Kierzkowski, Treasurer
RELEVANT STATUTE: 2 U.S.C. §§ 441b(b)(4) and (6)
11 C.F.R. § 114.5
INTERNAL REPORTS CHECKED: None
FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Complainant has alleged that the Pennsylvania Power and Light Company and its newly formed separate segregated fund, the PP&L People for Good Government ("PP&LPGG"), and its treasurer have violated 2 U.S.C. § 441b(b) by soliciting contributions to PP&LPGG from persons other than its stockholders and their families and its executive or administrative personnel and their families and by failing to make a payroll deduction method of soliciting voluntary contributions available to Local 1600's separate segregated fund. The PP&LPGG was offering a payroll deduction plan.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441b(b)(4)(A)(i), a corporation, or a separate segregated fund established by a corporation, is

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prohibited from soliciting contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families. Under 2 U.S.C. § 441b(b) (6), any corporation that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions must make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation.

On May 10, 1984, this office received a response from counsel representing the Pennsylvania Power and Light Company, PP&LPGG and its treasurer, John P. Kierzkowski. See Attachment 1. According to respondents' counsel, PP&LPGG has not engaged in any activity which relates to federal elections and, therefore, PP&LPGG does not come under the jurisdiction of the Federal Election Campaign of 1971, as amended ("the Act"). According to PP&LPGG's Articles of Association and Bylaws (see Attachment 1), the PP&LPGG is empowered "to expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania."

A check of the Commission's records shows that the PP&LPGG has not registered as a political committee with the Commission.

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Absent any evidence to the contrary, it must be assumed that the PP&LPGG is not engaged in activity relating to federal elections and, thus, it does not come under the jurisdiction of the Act. Accordingly, the General Counsel recommends that the Commission find no reason to believe that the respondents have violated the Act.

RECOMMENDATIONS

1. Find no reason to believe that the Pennsylvania Power and Light Company, PP&L People for Good Government and James Kierzkowski, as treasurer, have violated 2 U.S.C. § 441b(b).
2. Close the file.
3. Approve the attached letters.

Charles N. Steele
General Counsel

Date

May 25, 1984

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Response dated May 7, 1984.
2. Proposed letters.

84040460163



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph E. Fogarty, Assistant Corporate Counsel
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, Pennsylvania 18101

RE: MUR 1681
Pennsylvania Power & Light Company
PP&L Good Government Program
James P. Kierzkowski, Treasurer

Dear Mr. Fogarty:

On April 26, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May , 1984, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

MT 6/1/84

84040460164



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stephen C. Richman, Esquire
Markowitz and Richman
1100 North American Building
121 South Broad Street
Philadelphia, Pennsylvania 19107

Re: MUR 1681
Complaint filed on behalf of Local 1600,
International Brotherhood of Electrical
Workers, AFL-CIO

Dear Mr. Richman:

The Federal Election Commission has reviewed the allegations of your client's complaint dated April 19, 1984, and determined that on the basis of the information provided in the complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your client's attention which they believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

MT
6/1/84

84040460165



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: May 29, 1984
SUBJECT: MUR 1681 - First General Counsel's Report

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

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

84040460166

SENSITIVE

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT 29 A 9: 59

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 5/29/84
10:00

MUR # 1681
DATE COMPLAINT RECEIVED
BY OGC April 20, 1984
DATE OF NOTIFICATION TO
RESPONDENTS April 26, 1984
STAFF MEMBERS M. Tarrant
L. Lerner

COMPLAINANT'S NAME: Local 1600, International
Brotherhood of Electrical Workers, AFL-CIO
RESPONDENTS' NAMES: Pennsylvania Power and Light Company
PP&L People for Good Government
and James P. Kierzkowski, Treasurer
RELEVANT STATUTE: 2 U.S.C. §§ 441b(b)(4) and (6)
11 C.F.R. § 114.5
INTERNAL REPORTS CHECKED: None
FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Complainant has alleged that the Pennsylvania Power and Light Company and its newly formed separate segregated fund, the PP&L People for Good Government ("PP&LPGG"), and its treasurer have violated 2 U.S.C. § 441b(b) by soliciting contributions to PP&LPGG from persons other than its stockholders and their families and its executive or administrative personnel and their families and by failing to make a payroll deduction method of soliciting voluntary contributions available to Local 1600's separate segregated fund. The PP&LPGG was offering a payroll deduction plan.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441b(b)(4)(A)(i), a corporation, or a separate segregated fund established by a corporation, is

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prohibited from soliciting contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families. Under 2 U.S.C. § 441b(b)(6), any corporation that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions must make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation.

On May 10, 1984, this office received a response from counsel representing the Pennsylvania Power and Light Company, PP&LPGG and its treasurer, John P. Kierzkowski. See Attachment 1. According to respondents' counsel, PP&LPGG has not engaged in any activity which relates to federal elections and, therefore, PP&LPGG does not come under the jurisdiction of the Federal Election Campaign of 1971, as amended ("the Act"). According to PP&LPGG's Articles of Association and Bylaws (see Attachment 1), the PP&LPGG is empowered "to expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania."

A check of the Commission's records shows that the PP&LPGG has not registered as a political committee with the Commission.

84040460168

Absent any evidence to the contrary, it must be assumed that the PP&LPGG is not engaged in activity relating to federal elections and, thus, it does not come under the jurisdiction of the Act. Accordingly, the General Counsel recommends that the Commission find no reason to believe that the respondents have violated the Act.

RECOMMENDATIONS

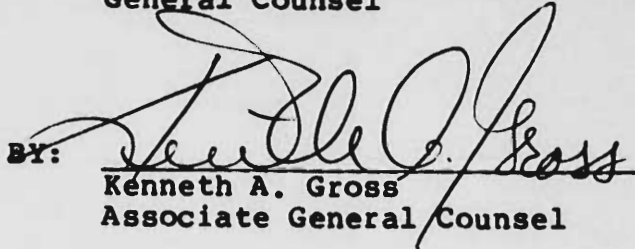
1. Find no reason to believe that the Pennsylvania Power and Light Company, PP&L People for Good Government and James Kierzkowski, as treasurer, have violated 2 U.S.C. § 441b(b).
2. Close the file.
3. Approve the attached letters.

Charles N. Steele
General Counsel

84040460169
Date

May 25, 1984

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

1. Response dated May 7, 1984.
2. Proposed letters.

600#3103

MAY 18 10:00

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Attachment 1

Joseph E. Fogarty
Asst. Corporate Counsel
215/770-4114

May 7, 1984

Federal Election Commission
Washington, DC 20463

Attn: Kenneth A. Gross, Esq.
Associate General Counsel

Re: MUR 1681

Gentlemen:

This will acknowledge receipt on April 30, 1984 of two letters over the signature of Mr. Gross addressed to Pennsylvania Power & Light Company ("PP&L") and PP&L People For Good Government ("PP&LPGG"). On behalf of the president and treasurer of each, respectively, I have been designated as counsel to respond to the complaint which accompanied your letters. Fully executed and dated statements of designation of counsel are attached.

PP&LPGG is an unincorporated association which was formally established during November, 1983. Article III B.3. specifically provides PP&LPGG is empowered "to expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania." I am attaching a copy of the Articles of Association and Bylaws which have been certified as to their authenticity and accuracy and that they have not been amended, revised or modified in anyway since their adoption.

The complaint in question cites a practice which clearly anticipates federal jurisdiction under the Federal Election Campaign Act of 1971, as amended. Activity of such a nature on the part of PP&LPGG would violate its charter; more importantly, however, no activity which would confer jurisdiction upon FEC has occurred. If required, PP&LPGG will submit copies of all documents required to be filed by it with the Secretary of the Commonwealth in which a complete accounting of its activities has been placed on the public record. These filings will conclusively demonstrate that no activity or expense has occurred relating in any way to election to Federal office.

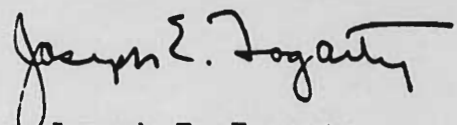
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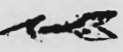
MAY 10 10:57

Accordingly, both respondents respectfully move that no action should be taken by FEC against them in response to the complaint because it cannot be demonstrated the complaint has any support either in fact or in law. Respondents maintain FEC should determine there is no reason to believe the complaint sets forth a possible violation of the Act and that its file on the matter should be closed. Respondents would appreciate receiving copies of such finding for their files.

I would appreciate if you would acknowledge receipt of this letter and its attachments in the manner provided below and return the enclosed executed copy to my attention.

Very truly yours,


Joseph E. Fogarty

cc: Ms. Marybeth Tarrant 

Receipt Acknowledged:
Federal Election Commission

By: _____
(Title)

Date: _____

JEF/jac

84040460171

I, JEAN A. SMOLICK, hereby certify:

1. That I am and at all times herein mentioned have been the qualified and acting Assistant Treasurer of PP&L People for Good Government, an unincorporated association, organized under the laws of the Commonwealth of Pennsylvania.

2. That the attached copy of the Articles of Association and Bylaws of PP&L People for Good Government is a true copy as adopted in November 1983.

3. That said Articles of Association and Bylaws have not been amended, revised or rescinded and now remain in full force and effect.

IN WITNESS WHEREOF, I have executed this certificate this 3rd day of May, 1984.

Jean A. Smolick
Jean A. Smolick

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10 49:57

Articles of Association and Bylaws
of PP&L People for Good Government

Article I-Name.

The name of this association shall be PP&L People for Good Government (PP&LPGG).

Article II-Office and Address

The principal office of PP&LPGG shall be located at Two North Ninth Street, Allentown, Pennsylvania 18101.

Article III-Form and Purpose

A. PP&LPGG shall be organized under the laws of the Commonwealth of Pennsylvania and operated as a voluntary, nonprofit, unincorporated association of individuals. It shall be politically nonpartisan in function. It shall conduct its affairs in a manner designed to protect and preserve investor-owned electric utilities and PP&L specifically.

B. In order to achieve these purposes, PP&LPGG is empowered:

1. To accept voluntary contributions from any lawful contributor,
2. To solicit contributions from the employees of Pennsylvania Power & Light Company,
3. To expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania,
4. To make contributions, within the limits provided by law, to other state political committees, and
5. To do such other things as may be appropriate or necessary to achieve the overall purposes of PP&LPGG.

Article IV-Membership

Individuals who make contributions to PP&LPGG shall be deemed to be members of PP&LPGG for the year in which the contribution is made.

Article V-Steering Committee

A. The Steering Committee shall be comprised of a Chairman, Vice Chairman, Treasurer and Assistant Treasurer, all to be appointed by the Chief Executive Officer of Pennsylvania Power & Light Company. No individual may hold two offices on the Committee simultaneously.

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B. The Committee shall have complete responsibility for the administration and activities of PP&LPGG.

C. In the event a vacancy occurs on the Committee by reason of death, resignation or otherwise, the appointment to fill such vacancy shall be made by the Chief Executive Officer of Pennsylvania Power & Light Company.

D. The members of the Committee shall perform such duties as are routinely and customarily performed by Committee members including the chairing of meetings, preservation of records, custody of funds and the like, as well as all other duties which are now or hereafter may be imposed by law.

E. The Chairman of the Steering Committee may appoint such subcommittees and assign to them such responsibilities as the Chairman deems necessary and appropriate.

Article VI-Allocations Subcommittee

A. The Chairman of the Steering Committee shall immediately appoint an Allocations Subcommittee whose membership shall be comprised of at least two individuals, in addition to the Chairman of the Steering Committee.

B. The Allocations Subcommittee shall have the right to authorize the disbursement of funds in furtherance of the purposes of PP&LPGG.

Article VII-Meetings

A. An annual meeting of the Steering Committee shall be held at such time and place as the Chairman of the Steering Committee may determine.

B. Special meetings of the Steering Committee, or any of its subcommittees, may be called at any time by the Chairman of the Steering Committee. In lieu of formal meetings, any such special meetings may be held by means of a conference telephone call.

C. A majority of the members of the Steering Committee, or any of its subcommittees, shall constitute a quorum and action may be taken by the vote of a majority of the members present.

Article VIII-Contributions

A. PP&LPGG may solicit contributions from employees of Pennsylvania Power & Light Company.

B. PP&LPGG shall be empowered to accept unsolicited contributions from any source permitted by law including other Pennsylvania Power & Light Company employees and shareholders, and political committees.

C. No contribution shall be accepted and no disbursement or expenditure shall be made by or on behalf of PP&LPGG by the Allocations Subcommittee at a time when there is a vacancy in the office of the Chairman or the Treasurer and Assistant Treasurer of the Steering Committee.

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D. No solicitation of employees by PP&LPGG shall be undertaken except in accordance with the following principles:

1. No supervisor shall solicit contributions from a subordinate,
2. All employees who are solicited will be informed of their rights to refuse to contribute without concern for reprisals of any sort,
3. All information concerning the contributions of individuals shall be kept confidential except to the extent disclosure is required by law.

Article IX-Segregation of Funds

All contributions to PP&LPGG shall be maintained by PP&LPGG in one or more separate bank accounts and all disbursements or expenditures on behalf of PP&LPGG in support of any candidate or political committee shall be made from such accounts and from no other source.

Article X-Amendments

These Bylaws may be amended at any annual or special meeting of the Steering Committee.

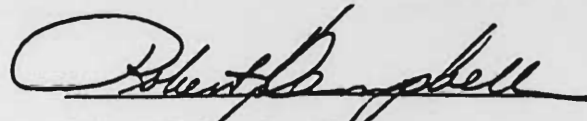
Article XI-Indemnification

All members of the Steering Committee and any properly appointed subcommittee shall be indemnified by Pennsylvania Power & Light Company from any liability of any nature whatsoever arising out of or in any way connected with their activities and performance hereunder if at the time such performances and activities by such individuals were perceived by Pennsylvania Power & Light Company to be proper and in the best interests of PP&LPGG.

Article XII-Dissolution

PP&LPGG may be dissolved by the Steering Committee. In such event, any monies in hand or held on account of PP&LPGG shall be properly disbursed by the Steering Committee in any manner permitted by law.

These Articles of Association and Bylaws have been executed and adopted this 9th day of November, 1983.



Chief Executive Officer
Pennsylvania Power & Light Company

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6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

⑦
Attachment 2

**Joseph E. Fogarty, Assistant Corporate Counsel
Pennsylvania Power & Light Company
Two North Ninth Street
Allentown, Pennsylvania 18101**

**RE: MUR 1681
Pennsylvania Power & Light Company
PP&L Good Government Program
James P. Kierzkowski, Treasurer**

Dear Mr. Fogarty:

On April 26, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May , 1984, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

**Charles N. Steele
General Counsel**

**By Kenneth A. Gross
Associate General Counsel**

**Enclosure
First General Counsel's Report**

84040460176



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Stephen C. Richman, Esquire
Markowitz and Richman
1100 North American Building
121 South Broad Street
Philadelphia, Pennsylvania 19107

Re: MUR 1681
Complaint filed on behalf of Local 1600,
International Brotherhood of Electrical
Workers, AFL-CIO

Dear Mr. Richman:

The Federal Election Commission has reviewed the allegations of your client's complaint dated April 19, 1984, and determined that on the basis of the information provided in the complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your client's attention which they believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

84040460177

8

PP&L

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

RECEIVED AT THE FEC

600# 3103
MAY 10 09:01

Joseph E. Fogarty
Asst. Corporate Counsel
215/770-4114

May 7, 1984

Federal Election Commission
Washington, DC 20463

Attn: Kenneth A. Gross, Esq.
Associate General Counsel

Re: MUR 1681

Gentlemen:

This will acknowledge receipt on April 30, 1984 of two letters over the signature of Mr. Gross addressed to Pennsylvania Power & Light Company ("PP&L") and PP&L People For Good Government ("PP&LPGG"). On behalf of the president and treasurer of each, respectively, I have been designated as counsel to respond to the complaint which accompanied your letters. Fully executed and dated statements of designation of counsel are attached.

PP&LPGG is an unincorporated association which was formally established during November, 1983. Article III B.3. specifically provides PP&LPGG is empowered "to expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania." I am attaching a copy of the Articles of Association and Bylaws which have been certified as to their authenticity and accuracy and that they have not been amended, revised or modified in anyway since their adoption.

The complaint in question cites a practice which clearly anticipates federal jurisdiction under the Federal Election Campaign Act of 1971, as amended. Activity of such a nature on the part of PP&LPGG would violate its charter; more importantly, however, no activity which would confer jurisdiction upon FEC has occurred. If required, PP&LPGG will submit copies of all documents required to be filed by it with the Secretary of the Commonwealth in which a complete accounting of its activities has been placed on the public record. These filings will conclusively demonstrate that no activity or expense has occurred relating in any way to election to Federal office.

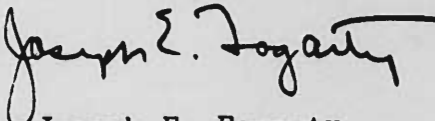
84040460178

MAY 10 09:57

Accordingly, both respondents respectfully move that no action should be taken by FEC against them in response to the complaint because it cannot be demonstrated the complaint has any support either in fact or in law. Respondents maintain FEC should determine there is no reason to believe the complaint sets forth a possible violation of the Act and that its file on the matter should be closed. Respondents would appreciate receiving copies of such finding for their files.

I would appreciate if you would acknowledge receipt of this letter and its attachments in the manner provided below and return the enclosed executed copy to my attention.

Very truly yours,


Joseph E. Fogarty

cc: Ms. Marybeth Tarrant

Receipt Acknowledged:
Federal Election Commission

By: _____
(Title)

Date: _____

JEF/jac

84040460179

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1681

NAME OF COUNSEL: Joseph E. Fogarty, Esquire

ADDRESS: Pennsylvania Power & Light Co.
Two North Ninth Street
Allentown, PA 18101

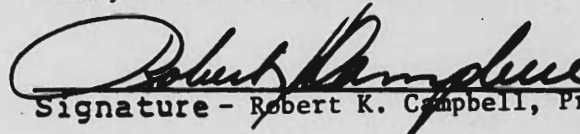
TELEPHONE: 215-770-4114

JUN 10 10:57

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Pennsylvania Power & Light Company

5/7/84
Date


Signature - Robert K. Campbell, President

RESPONDENT'S NAME: Robert K. Campbell, President

ADDRESS: Pennsylvania Power & Light Co.
Two North Ninth Street
Allentown, PA 18101

HOME PHONE: ---

BUSINESS PHONE: 215-770-5947

84040460180

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1681

NAME OF COUNSEL: Joseph E. Fogarty, Esquire

ADDRESS: Pennsylvania Power & Light Co.

Two North Ninth Street

Allentown, PA 18101

TELEPHONE: 215-770-4114

4 MAY 10 10:57

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

PP&L/People For Good Government

84040460131
Date

5/7/84

Signature - John P. Kierzkowski, Treasurer

RESPONDENT'S NAME: John P. Kierzkowski, Treasurer

ADDRESS: PP&L/People For Good Government

Two North Ninth Street

Allentown, PA 18101

HOME PHONE: ---

BUSINESS PHONE: 215-770-5839

I, JEAN A. SMOLICK, hereby certify:

1. That I am and at all times herein mentioned have been the qualified and acting Assistant Treasurer of PP&L People for Good Government, an unincorporated association, organized under the laws of the Commonwealth of Pennsylvania.

2. That the attached copy of the Articles of Association and Bylaws of PP&L People for Good Government is a true copy as adopted in November 1983.

3. That said Articles of Association and Bylaws have not been amended, revised or rescinded and now remain in full force and effect.

IN WITNESS WHEREOF, I have executed this certificate this 3rd day of May, 1984.

Jean A. Smolick
Jean A. Smolick

84040460182

MAY 10 1984

Articles of Association and Bylaws
of PP&L People for Good Government

Article I-Name

The name of this association shall be PP&L People for Good Government (PP&LPGG).

Article II-Office and Address

The principal office of PP&LPGG shall be located at Two North Ninth Street, Allentown, Pennsylvania 18101.

Article III-Form and Purpose

A. PP&LPGG shall be organized under the laws of the Commonwealth of Pennsylvania and operated as a voluntary, nonprofit, unincorporated association of individuals. It shall be politically nonpartisan in function. It shall conduct its affairs in a manner designed to protect and preserve investor-owned electric utilities and PP&L specifically.

B. In order to achieve these purposes, PP&LPGG is empowered:

1. To accept voluntary contributions from any lawful contributor,
2. To solicit contributions from the employees of Pennsylvania Power & Light Company,
3. To expend, within the limits provided by law, funds to influence the nomination and election of candidates for elective public office in the legislative branch of the government of the Commonwealth of Pennsylvania,
4. To make contributions, within the limits provided by law, to other state political committees, and
5. To do such other things as may be appropriate or necessary to achieve the overall purposes of PP&LPGG.

Article IV-Membership

Individuals who make contributions to PP&LPGG shall be deemed to be members of PP&LPGG for the year in which the contribution is made.

Article V-Steering Committee

A. The Steering Committee shall be comprised of a Chairman, Vice Chairman, Treasurer and Assistant Treasurer, all to be appointed by the Chief Executive Officer of Pennsylvania Power & Light Company. No individual may hold two offices on the Committee simultaneously.

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B. The Committee shall have complete responsibility for the administration and activities of PP&LPGG.

C. In the event a vacancy occurs on the Committee by reason of death, resignation or otherwise, the appointment to fill such vacancy shall be made by the Chief Executive Officer of Pennsylvania Power & Light Company.

D. The members of the Committee shall perform such duties as are routinely and customarily performed by Committee members including the chairing of meetings, preservation of records, custody of funds and the like, as well as all other duties which are now or hereafter may be imposed by law.

E. The Chairman of the Steering Committee may appoint such subcommittees and assign to them such responsibilities as the Chairman deems necessary and appropriate.

Article VI-Allocations Subcommittee

A. The Chairman of the Steering Committee shall immediately appoint an Allocations Subcommittee whose membership shall be comprised of at least two individuals, in addition to the Chairman of the Steering Committee.

B. The Allocations Subcommittee shall have the right to authorize the disbursement of funds in furtherance of the purposes of PP&LPGG.

Article VII-Meetings

A. An annual meeting of the Steering Committee shall be held at such time and place as the Chairman of the Steering Committee may determine.

B. Special meetings of the Steering Committee, or any of its subcommittees, may be called at any time by the Chairman of the Steering Committee. In lieu of formal meetings, any such special meetings may be held by means of a conference telephone call.

C. A majority of the members of the Steering Committee, or any of its subcommittees, shall constitute a quorum and action may be taken by the vote of a majority of the members present.

Article VIII-Contributions

A. PP&LPGG may solicit contributions from employees of Pennsylvania Power & Light Company.

B. PP&LPGG shall be empowered to accept unsolicited contributions from any source permitted by law including other Pennsylvania Power & Light Company employees and shareholders, and political committees.

C. No contribution shall be accepted and no disbursement or expenditure shall be made by or on behalf of PP&LPGG by the Allocations Subcommittee at a time when there is a vacancy in the office of the Chairman or the Treasurer and Assistant Treasurer of the Steering Committee.

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D. No solicitation of employees by PP&LPGG shall be undertaken except in accordance with the following principles:

1. No supervisor shall solicit contributions from a subordinate,
2. All employees who are solicited will be informed of their rights to refuse to contribute without concern for reprisals of any sort,
3. All information concerning the contributions of individuals shall be kept confidential except to the extent disclosure is required by law.

Article IX-Segregation of Funds

All contributions to PP&LPGG shall be maintained by PP&LPGG in one or more separate bank accounts and all disbursements or expenditures on behalf of PP&LPGG in support of any candidate or political committee shall be made from such accounts and from no other source.

Article X-Amendments

These Bylaws may be amended at any annual or special meeting of the Steering Committee.

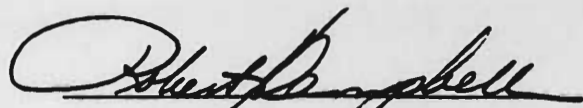
Article XI-Indemnification

All members of the Steering Committee and any properly appointed subcommittee shall be indemnified by Pennsylvania Power & Light Company from any liability of any nature whatsoever arising out of or in any way connected with their activities and performance hereunder if at the time such performances and activities by such individuals were perceived by Pennsylvania Power & Light Company to be proper and in the best interests of PP&LPGG.

Article XII-Dissolution

PP&LPGG may be dissolved by the Steering Committee. In such event, any monies in hand or held on account of PP&LPGG shall be properly disbursed by the Steering Committee in any manner permitted by law.

These Articles of Association and Bylaws have been executed and adopted this 9th day of November, 1983.



Chief Executive Officer
Pennsylvania Power & Light Company

8404046018

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101

First Class Mail

Federal Election Commission
Washington, DC 20463

Attn: Kenneth A. Gross, Esq.
Associate General Counsel



4040460186



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Pennsylvania Power & Light
People for Good Government
Two N. Ninth Street
Allentown, PA 18101

Re: MUR 1681

Dear Sir or Madam:

This letter is to notify you that on April 20, 1984 the Federal Election Commission received a complaint which alleges that your committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1681. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

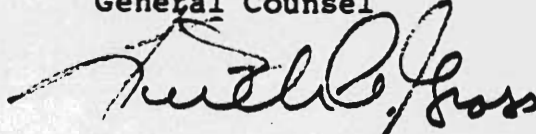
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040460137

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

MUR 1601

1. The following service is requested (check one): ☐ Return to sender and this delivery ☒ Return to sender, date, and address of delivery ☐ Registered mail (the recipient's signature is required as evidence in the return mailing)	
2. ARTICLE NUMBER: <u>Treasurer</u> <u>P.P. 1 L People For Good Gov't</u> <u>S. N. 98 St</u> <u>ALLENTOWN, PA 18101</u>	
3. TYPE OF SERVICE: ☐ Registered ☐ Insured ☐ Registered and Insured	4. ARTICLE NUMBER: <u>943450</u>
5. I have examined the article described above. SIGNATURE: <u>A. Rodriguez</u> DATE OF DELIVERY: <u>4-30-84</u>	
6. ADDRESSEE'S ADDRESS (only if registered)	
7. UNABLE TO DELIVER BECAUSE:	8. THE OFFICE'S REPLY:

4/26/84

84040460188



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert K. Campbell, President
Pennsylvania Power & Light
Two N. Ninth Street
Allentown, PA 18101

Re: MUR 1681

Dear Mr. Campbell:

This letter is to notify you that on April 20, 1984 the Federal Election Commission received a complaint which alleges that your corporation may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1681. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your corporation in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

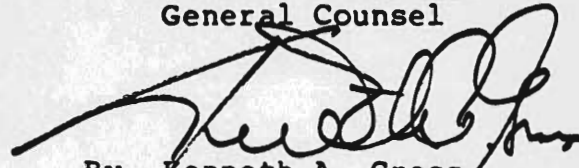
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040460189

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

84040460190

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

MAIL 11/21 10:00AM

1. The following service is requested (check one):

☐ Show to whom and date delivered

☒ Show to whom, date, and address of delivery

2. ☐ RESTRICTED DELIVERY (The addressee's delivery is charged to delivery to the addressee's use.)

TOTAL \$

3. ARTICLE ADDRESSED TO: Robt. K. Campbell, Jr.
PA Police & Light Co.
D N 95 St
Allentown, PA 18101

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED

☒ CERTIFIED ☐ COD

☐ EXPRESS MAIL

ARTICLE NUMBER: 943449

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE:  ☐ Addressee ☐ Authorized Agent

6. DATE OF DELIVERY: 4/26/84

7. ADDRESSER'S ADDRESS (and if required):

7. UNABLE TO DELIVER BECAUSE:

4/26/84



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 24, 1984

Stephen C. Richman, Esquire
MARKOWITZ & RICHMAN
1100 North American Building
121 South Broad Street
Philadelphia, PA 19107

Dear Mr. Richman:

This letter is to acknowledge receipt of the complaint of your client, Local 1600, International Brotherhood of Electrical Workers, AFL-CIO, which we received on April 20, 1984, against Pennsylvania Power & Light Company, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your client's complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Cheryl Thomas at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

cc: Robert R. Finger

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84040460192

PS Form 3811, July 1982

MUR 1681 Tarrant

- **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☐ Show to whom and date delivered

☒ Show to whom, date, and address of delivery

2. ☐ RESTRICTED DELIVERY

(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: Stephen C Richman
Markowitz & Richman
1100 N. Am. Bldg
101 S. Broad St
Philadelphia PA 19107

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED

☒ CERTIFIED ☐ COD

☐ EXPRESS MAIL

ARTICLE NUMBER

942442

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

Donna J. Richman

5. DATE OF DELIVERY

4-27-84

POSTMARK!

(Only for use on business days)

6. ADDRESSEE'S ADDRESS (Only if requested)

PHILADELPHIA, PA
APR 27 1984

7. UNABLE TO DELIVER BECAUSE:

PHILADELPHIA, PA
APR 27 1984

RETURN RECEIPT

• GPO: 1982-75-000

4/24/84

LAW OFFICES
MARKOWITZ & RICHMAN
1100 NORTH AMERICAN BUILDING
121 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19107

RECEIVED AT THE FED
604 2212
84 APR 20 All: 44
mur 1681

RICHARD H. MARKOWITZ
STEPHEN C. RICHMAN
PAULA R. MARKOWITZ
ROBERT C. COHEN
ANDREW L. MARKOWITZ
QUINTES D. TAGLIOLI
WILLIAM T. JOSEM
ALAN L. PHILLIPS
MARK B. SEGAL

(215) 875-3100
DIRECT DIAL:
875-3114

April 19, 1984

NEW YORK OFFICE
RICHARD H. MARKOWITZ
950 THIRD AVE.
NEW YORK, N.Y. 10022
(212) 752-6761

ALLENTOWN OFFICE
512 HAMILTON STREET
ALLENTOWN, PA. 18101
(215) 820-9531

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

4-1600-27

Attention: General Counsel

RE: Pennsylvania Power & Light Company

Dear Sir or Madam:

Please be advised that the undersigned represents Local 1600, International Brotherhood of Electrical Workers, AFL-CIO.

Enclosed herein please find an original and three copies of a notarized Complaint with exhibits which I am filing herein on behalf of Local 1600. The enclosed Complaint has been signed by Robert R. Finger, President of the Local Union and duly notarized. I would appreciate it if you would communicate with the undersigned, as well as Robert R. Finger, President, Local 1600, International Brotherhood of Electrical Workers, AFL-CIO, Box 470, Trexlertown, PA 18087, on behalf of the Local Union during your processing of this Complaint.

Thank you for your cooperation.

Very truly yours,

Stephen C. Richman
STEPHEN C. RICHMAN

SCR:ssp
cc: Robert Finger

84040460193

APR 20 P 2: 45

COMPLAINT AGAINST PENNSYLVANIA POWER & LIGHT COMPANY

The foregoing is a Complaint filed on behalf of Local 1600, International Brotherhood of Electrical Workers, AFL-CIO, against Pennsylvania Power & Light Company for violations of the Federal Election Campaign Act and Federal Election Commission Regulations.

By letter dated November 4, 1983, James M. Klinedinst, Director - Union Relations of the Company notified the Local Union that the Company was establishing the PP&L People for Good Government program. Attached hereto and marked as Exhibit 1 is the letter from Klinedinst dated November 4, 1983. Also attached hereto and marked as Exhibit 2 is a copy of the pamphlet distributed by the Company describing the PP&L People for Good Government program.

The program is communicated to all employees of the Company by posting throughout the Company facilities. Attached hereto and marked as Exhibit 3 is a copy of that posting. Attached hereto and marked as Exhibit 4 is a notice that was distributed to all employees of the Company describing the PP&L People for Good Government program. This notice was distributed to employees on or about November 10, 1983.

This program is available to all employees of the Company and is not restricted to stockholders and executive or administrative personnel. To the best of the Union's knowledge, all hourly employees of the Company, including those represented

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for collective bargaining purposes by the Local Union received notices advising of the commencement of the PP&L People for Good Government program and were eligible to participate in this program. As indicated by the program, solicitation of the employees, including the hourly employees was for a payroll deduction program and was not limited to two solicitations per year.

Because the Company chose to establish this program and solicit contributions through a payroll deduction plan, the Local Union by the letter dated February 1, 1984, requested the Company to provide a payroll deduction for the Local Union's committee on political education. Attached hereto and marked as Exhibit 5 is the letter of February 1, 1984.

By letter dated March 19, 1984, the Company advised the Local Union of its decision not to provide payroll deduction for the Local 1600 Committee on Political Education. Attached hereto and marked as Exhibit 6 is a copy of the letter of March 19, 1984.

I have read all of the foregoing and hereby certify that it is true and correct to the best of my knowledge, information and belief.

Robert R. Finger
ROBERT FINGER

SWORN TO AND SUBSCRIBED BEFORE

ME THIS 19th DAY OF

April, 1984.

NOTARY PUBLIC

Anita F. Stark
ANITA F. STARK
Notary Public, Phila., Phila. Co.
My Commission Expires Sept. 17, 1984

PP&L

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215/770-5151

R. - Action
B
M
REC'D. NOV 7 '83

November 4, 1983

Mr. Robert R. Finger
President-Financial Secretary
IBEW Local 1600
P.O. Box 470
Trexlerstown, Pa. 18087

Dear Mr. Finger:

Attached for your advance notification is information relative to the establishment of the PP&L People for Good Government Program which shall be communicated to all employees on Thursday, November 10, 1983.

Sincerely,

James M. Klinedinst
James M. Klinedinst
Director-Union Relations

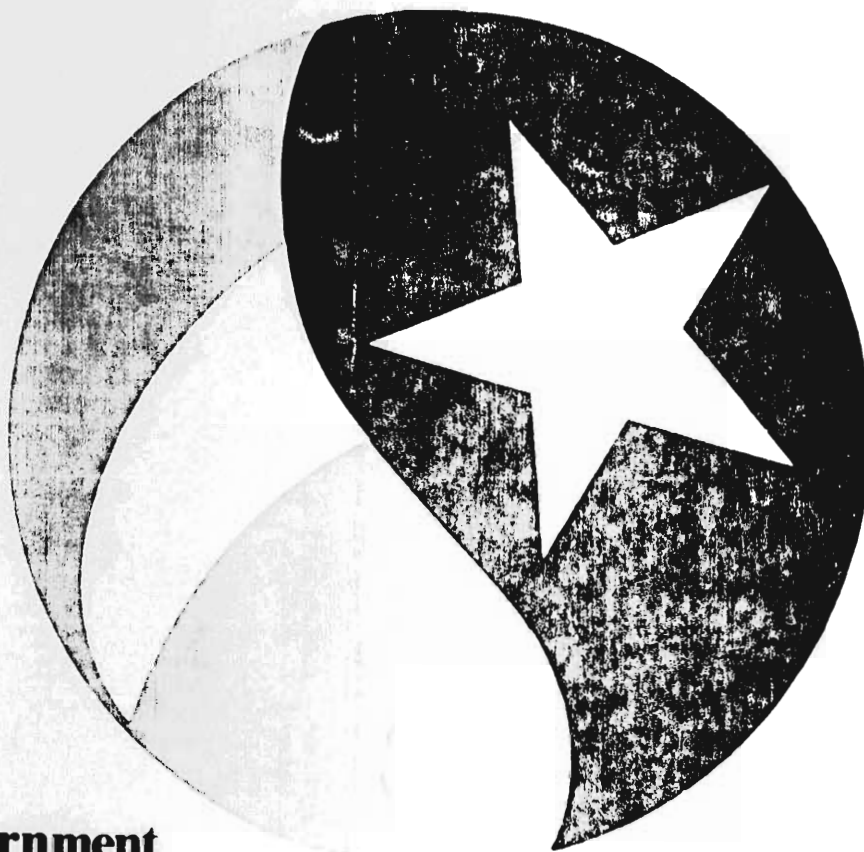
Attachment

EXHIBIT "1"

cc - [unclear] 10/9/83
[unclear] @

84040460196

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**Good Government
doesn't just happen;
good People
make it happen.**

"Our political system is responsive to those actively engaged in the process. Through membership in PP&L People for Good Government, we now have an opportunity to join together to support those who will promote and preserve a healthy investor-owned utility industry."

Robert K. Campbell

PP&L People for Good Government:
A Political Action Committee

10 83

**PP&L
for Good Government**

EXHIBIT "2"



What is PP&L People for Good Government?

A. PP&L People for Good Government is an independent, voluntary, non-partisan political action committee established in accordance with state and federal election law. These laws permit corporations, trade associations, and other interest groups to establish committees and to solicit voluntary contributions from those committees for support of political candidates.



Why is my participation in PP&L People for Good Government important?

A. In politics, strength lies in numbers. This is especially true when trying to gain the ear of legislators who are keenly aware of the importance of being responsive to voters who elect them to office.

PP&L People for Good Government offers an opportunity for you to join with other PP&L people on issues affecting you, as an individual, and the electric utility industry as a whole.

O



Can't PP&L contribute to political candidates and committees?

A. No, election laws prohibit corporations from contributing corporate funds to candidates for political office. However, the federal government encourages individual participation in the political process through favorable tax treatment of contributions. In addition, laws permit companies to facilitate voluntary, individual political contributions through programs called political action committees.



How many political action committees are in Pennsylvania?

A. Currently in Pennsylvania, there are more than 450 political action committees. Each of the major utilities in Pennsylvania has a state political action committee.



What is the purpose of PP&L People for Good Government?

A. The purpose is to:

- help elect responsible candidates to state office
- promote sound governmental policies that further a healthy investor-owned electric utility industry
- encourage active interest and participation in the political process by PP&L people



Who can participate?

A. Anyone who supports the purpose of PP&L People for Good Government.



Is participation voluntary?

A. Absolutely. Participation in PP&L People for Good Government is strictly on a voluntary basis.



Who are the members?

A. Those individuals who are current contributors.



How does it operate?

A. PP&L People for Good Government is directed by the steering committee officers operating under the association bylaws. The steering committee (which is appointed by the chief executive officer) consists of chairman, vice chairman, treasurer, and assistant treasurer, and is responsible for administrative activities — primarily preserving and filing records and writing annual reports. An allocations committee, appointed by the chairman of the steering committee, is responsible for making campaign contribution decisions after considering the recommendations of the association's members. If the association is dissolved, any money in hand or on account at that time will be returned to members or disbursed to candidates according to law.



Who will serve on the Allocations Committee?

A. Representatives from the five major departments of the company: Division Operations, Financial, Human Resources & Development, Nuclear, and System Planning & Engineering.



How will contributions to PP&L People for Good Government be spent?

A. Contributions to PP&L People for Good Government will be given to candidates for state legislative offices, reflecting the decisions of the allocations committee who consider recommendations of the association's members and based on such factors as:

- position on issues of concern to PP&L
- leadership qualities

- election chances
- availability of and need for funds

As part of the decision-making process, the allocations committee will consider the suggestions of association members. Suggestion forms are available from the Public Affairs Department and Allocations Committee members.



How will I know which candidates PP&L People for Good Government supports?

A. All PP&L People for Good Government members will receive an annual report listing the amount of money received and specific contributions made. Prior to elections, information will be sent to members about the candidates the Association supports. PP&L People for Good Government intends to support candidates for legislative office as soon as sufficient funds are accumulated.



Besides financial participation, what other kinds of political participation will be promoted by my membership?

A. Members will be provided with information on how to effectively participate in the political process and information on legislative and political issues affecting PP&L interests.



How can I contribute?

A. Contributions may be made by check or through payroll deduction, with a minimum of 50¢ per pay period.



How much should I contribute?

A. Any contribution will be greatly appreciated. Since political contributions up to a certain level qualify for partial federal income tax credit, you may wish to consider that when making your decision.



How does the federal income tax credit work?

A. You may take a yearly federal tax credit of up to one-half your contribution to a maximum credit of \$100 if filing jointly (\$50 for a separate return). For a married contributor, therefore, a \$200 yearly contribution qualifies you for a \$100 tax credit, to be subtracted from your tax owed.



Suppose I have other questions?

A. Contact the Public Affairs Department ext. 5529 with any questions concerning PP&L People for Good Government or other legislative matters.



How do I join?

A. Fill out a PP&L People for Good Government Wage Deduction Authorization Form found in this brochure. Detach the form and return it to Payroll Administration, TW-13. Please make checks payable to PP&L People for Good Government.

PP&L People for Good Government

PP&L Form 3480 (9-83)
PENNSYLVANIA POWER & LIGHT COMPANY

WAGE DEDUCTION AUTHORIZATION
PP&L PEOPLE FOR GOOD GOVERNMENT

☐ New
☐ Change
☐ Cancel

Employee Name _____

(Please print or type)

Employee Number _____

Payroll # _____

YES, I am pleased to join PP&L People for Good Government and help elect responsible candidates to public office.
Select A, B, C or D:

- A I hereby authorize PP&L to withhold from my base salary per pay period (Circle one of the following): \$ _____ \$2, \$1, \$.50
- B I hereby authorize PP&L to withhold from my base salary per pay period: _____ % (percent)
- C I hereby authorize the one time deduction from my base salary of \$ _____
- D My lump sum contribution to PP&LPGG is \$ _____ (Please make check payable to PP&L People for Good Government and attach).

I am voluntarily making this contribution and understand I have the right to refuse to contribute without reprisal. This authorization supersedes any previous authorization and is to remain in effect until changed or cancelled by me in writing. Please return this form and check, if appropriate, to Payroll Administration, TW-13.

Date _____

Signature _____

FOR PAYROLL SECTION USE ONLY

EMPLOYEE NO	P/R	TR CODE	DED CODE	AMOUNT
		8 2		
EMPLOYEE NO	P/R	TR CODE	DATA CODE	PERCENT
		9 0	1 2 3 0	





What is PP&L People for Good Government?

A. PP&L People for Good Government is an independent, voluntary, non-partisan political action committee established in accordance with state and federal election law. These laws permit corporations, trade associations, and other interest groups to establish committees and to solicit voluntary contributions from those committees for support of political candidates.



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A. In politics, strength lies in numbers. This is especially true when trying to gain the ear of legislators who are keenly aware of the importance of being responsive to voters who elect them to office.

PP&L People for Good Government offers an opportunity for you to join with other PP&L people on issues affecting you, as an individual, and the electric utility industry as a whole.



Can't PP&L contribute to political candidates and committees?

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- help elect responsible candidates to state office
- promote sound governmental policies that further a healthy investor-owned electric utility industry
- encourage active interest and participation in the political process by PP&L people



Who can participate?

A. Anyone who supports the purpose of PP&L People for Good Government.



Is participation voluntary?

A. Absolutely. Participation in PP&L People for Good Government is strictly on a voluntary basis.



Who are the members?

A. Those individuals who are current contributors.

PEOPLE

PP&L

8 4 0 4 0 4 6 0 2 0

PP&L People for Good Government Formed

Robert K. Campbell formally announced the establishment of PP&L People for Good Government, a political action committee to promote sound governmental policies that impact the electric utility industry.

PP&L joins over 180 businesses and all the major utilities in Pennsylvania in having a political action committee.

"Government activities have a growing impact on all operations of PP&L," says Campbell. "However, one of the positive attributes of our system of government is the fact that each of us has an opportunity to be heard before decisions affecting us are made.

"By establishing PP&L People for Good Government," he says, "we can actively promote responsible government, participate in the political process, and express our collective support for those who share our views."

Membership information will be mailed to all employees Thursday (11/10). If you have any questions about PP&L People for Good Government or would like additional payroll deduction forms, please call the Public Affairs Department, ext. 5593.

Post on "SYSTEM NEWS" Section
11/9/83

Please Remove Nov. 21

EXHIBIT "3"

PP&L People for Good Government

TWO NORTH NINTH STREET • ALLENTOWN, PA 18101 • 215-770-5593

November 10, 1983

TO ALL EMPLOYEES:

Have you ever considered what effect an elected Public Utility Commission (PUC) would have on you as an employee? OR have you thought about the effect on the company of a law taking plants out of rate base if they are not operating for 60 days? These issues and others are currently before the legislators in Pennsylvania and seriously threaten the health and well being of the utility industry.

Have you ever wondered if there was a way for you to become more actively involved in the political process to help legislators understand how their actions may adversely affect you?

PP&L People for Good Government may be your answer.

PP&L People for Good Government -- a non-partisan, voluntary political action committee, authorized and governed by election law -- is organized for members to work on political campaigns and to make voluntary political contributions to those candidates who support issues of concern to the electric utility industry.

The political climate in Pennsylvania has changed towards the electric utility industry. Legislators are more likely to respond to those constituents who support them and keep them informed of what issues are important to them. Many groups are taking a more active role in utilities' rate increase requests by testifying at public hearings, providing monetary support to their legislators, and writing letters about issues that concern them.

PP&L People for Good Government provides a way for us to collectively make our views known as well. Actively supporting candidates is one of the best ways to make government decision makers aware of legislation which may seriously injure our company.

I hope you will consider joining PP&L People for Good Government. Please take the time to read the attached brochure. Now, more than ever, we need to support responsible people in public office. A payroll deduction form is included in the brochure for your use.

Remember, up to a certain level of contribution, you are entitled to a Federal income tax credit.

Thank you for your support. Please return all responses to Payroll Administration, TW-13. If you have any questions, please call Public Affairs, extension 5593.



Linda Curry Bartholomew

Attachment

EXHIBIT "4"

84040460203

LOCAL UNION NO. 1600

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

540 GRANGE ROAD • P.O. BOX 470 • ALLENTOWN, PA 18107 • PHONE: (215) 395-8167 395-0168 305-8169

OFFICERS:

ROBERT R. FINGER
PRESIDENT—FINANCIAL SECRETARY
HOME PHONE (717) 394-9890
BRUCE WEHR
VICE PRESIDENT
SUSAN M. BELLMORE
RECORDING SECRETARY
RAYMOND BAKER, JR.
TREASURER

BUSINESS REPS:

PAUL EDWARDS
HOME PHONE (717) 393-1424
MARIE A. PELUSO
HOME PHONE (215) 253-7910
WILLIAM SCHMITT
HOME PHONE (717) 455-8998
BRENT SNYDER
HOME PHONE (717) 464-3026

February 1, 1984

Mr. James Klinedinst
Director-Union Relations
Pennsylvania Power & Light Co.
Two North Ninth Street
Allentown, PA 18101

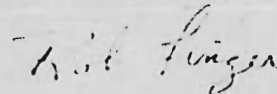
Dear Mr. Klinedinst:

Recently the Company established a "Good Government" program and encouraged employee voluntary payroll deductible contributions. The Good Government committee would use these funds for a variety of subjects, including contributions to political candidates.

Please consider this letter the Union's request to the Company to provide payroll deduction for Local 1600's Committee on Political Education. Please notify the Payroll Department as soon as possible.

Your written response will be appreciated.

Sincerely,



Robert R. Finger
President-Financial
Secretary
I.B.E.W. Local 1600

RRF/ak

EXHIBIT "5"

84040460204

PP&L

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215/770-6101

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W4

REC'D. MAR 21 '84

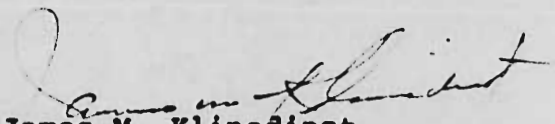
March 19, 1984

Mr. Robert Finger
President-Financial Secretary
I.B.E.W. Local 1600
P. O. Box 470
Trexlerstown, Pennsylvania 18087

Dear Mr. Finger:

In response to your request dated February 1, 1984,
we will not provide payroll deduction for the Local 1600
Committee on Political Education. Payroll deduction is a
negotiable item which should be discussed when the contract is
open for negotiations.

Very truly yours,


James M. Klinedinst
Director-Union Relations

cc: Mr. R. S. Gombos

EXHIBIT "6"

8404046020

PC
KST CLA
KST CLA
TZ & RICHMAN
AMERICAN BUILDING
11 BROAD STREET
PHIA, PA 19107

8 4 0 4 0 4 6 0 2 0 6



FIRST CLASS MAIL

Federal Election Commission
General Counsel
1325 K Street, N.W.
Washington, DC 20463

file in
1681



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1681

Date Filmed 6/8/84 Camera No. --- 2

Cameraman JRL