



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1981

Date Filmed 9/20/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slips & cards

Conciliation correspondence

Conciliation report

RAD cover memo (thresholds)

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

George Deming

date

9/14/85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

United Association of Journeymen
and Apprentices of Plumbing
and Pipefitting Independent Local
322 Committee for Political Education
Joseph A. Reed, as treasurer

MUR 1981

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 7, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1981:

1. Accept the conciliation agreement with the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education and Joseph A. Reed, as treasurer, attached to the General Counsel's Report signed August 2, 1985.
2. Approve the letter attached to the General Counsel's Report signed August 2, 1985.
3. Close the file.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

8-7-85

Date _____

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1985

Amy C. Goldstein, Esquire
Tomar, Parks, Selizer, Simonoff
and Adourian
41 South Haddon Avenue
Haddonfield, New Jersey 08033

RE: MUR 1981
United Association of
Journeyman and
Apprentices of Plumbing and
Pipefitting Independent Local
322 Committee for Political
Education and Joseph A. Reed,
as treasurer

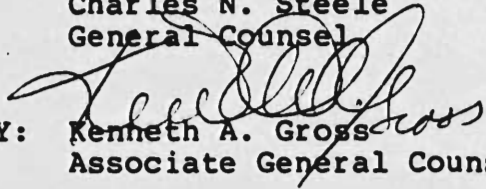
Dear Ms. Goldstein:

On August 7, 1985, the Commission accepted the conciliation agreement by your clients, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040552342

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Association of Journeymen) MUR 1981
and Apprentices of Plumbing and)
Pipefitting Independent Local)
322 Committee for Political)
Education and Joseph A. Reed,)
as treasurer)

CONCILIATION AGREEMENT

8 5 0 4 0 5 2 3 4 5
This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education and Joseph A. Reed, as treasurer, ("UA Local 322 COPE" or "Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file the 1983 Mid-Year, 1983 Year End, 1984 April Quarterly, 1984 July Quarterly, and 1984 October Quarterly reports in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent UA Local 322 COPE is a political committee within the meaning of 2 U.S.C. § 431(4)(B).
2. Respondent Joseph A. Reed is the treasurer of UA Local 322 COPE.
3. Respondents' 1983 Mid-Year report was required to be filed on July 31, 1983. Respondents failed to file the 1983 Mid-Year report.
4. Respondents' 1983 Year End report was required to be filed on January 31, 1984. Respondents failed to file the 1983 Year End report.
5. Respondents' 1984 April Quarterly report was required to be filed on April 15, 1984. Respondents failed to file the 1984 April Quarterly report.
6. Respondents' 1984 July Quarterly report was required to be filed on July 15, 1984. Respondents failed to file the 1984 July Quarterly report.
7. Respondents' 1984 October Quarterly report was required to be filed on October 15, 1984. Respondents failed to file the 1984 October Quarterly report.
8. 2 U.S.C. § 434(a)(4)(i) provides that all political committees other than the authorized committee of a candidate shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held,

35040552344

which shall be no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

9. 2 U.S.C. § 434(a)(4)(iv) provides that all political committees other than the authorized committee of a candidate shall file in any other calendar year, a report covering the January 1-June 30 period, no later than July 31 and a July 1-December 31 report, no later than January 31 of the following calendar year.

V. Respondents violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file the 1983 Mid-Year, 1983 Year End, 1984 April Quarterly, 1984 July Quarterly, and 1984 October Quarterly reports.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of ^{One} ~~Two~~ Thousand Five Hundred Dollars (¹\$5,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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

Amy C. Galt

85040552345

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

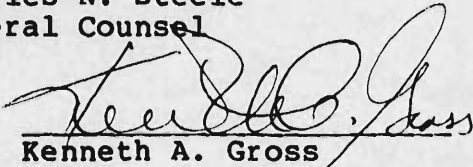
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

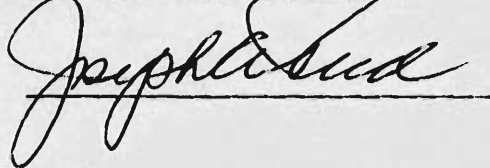
BY:


Kenneth A. Gross
Associate General Counsel

Date

August 14, 1985

FOR THE RESPONDENTS:



Date

7-18-85

35040552346

GCC# 8168

MEMORANDUM

TO: Retha Dixon
FROM: JOAN HARRIS

TO: JOAN HARRIS
FROM: Retha Dixon

CHECK NO. 1021 (a copy of which is attached) RELATING

TO MUR 1981 AND NAME Local Union # 322

WAS RECEIVED ON July 30, 1985. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

☐ BUDGET CLEARING ACCOUNT (#95F3875.16)
☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)

SIGNATURE Retha L. Dixon OTHER _____ DATE 8-2-85

1021

LOCAL UNION NO. 322
POLITICAL ACTION COMMITTEE

July 24, 1985 ⁵⁵⁻³⁹⁹¹⁰₃₁₂

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 1,500.⁰⁰/₁₀₀

Fifteen Hundred

DOLLARS

MIDLANTIC

Midlantic National Bank/South
Serving Southern New Jersey

FOR RE: MUR 1981

James C. Smith
Joseph A. Smith

⑈001021⑈ ⑆031203999⑆

801 433 4⑈

CC # 8168 RECEIVED AT THE REC.

LAW OFFICES
TOMAR, PARKS, SELIGER, SIMONOFF & ADOURIAN
A PROFESSIONAL CORPORATION
41 SOUTH HADDON AVENUE
HADDONFIELD, NEW JERSEY 08033

85 JUL 30 P 1: 01

ALBERT K. PLONE
(1909-1972)

WILLIAM TOMAR*
DAVID SELIGER
EDWARD N. ADOURIAN, JR.
MICHAEL A. KAPLAN*
RONALD A. GRAZIANO
STEVEN K. KUDATZKY
BAYARD J. SNYDER
LOIS SEIDEN GARBER
ALAN H. SKLARSKY
CLIFFORD L. VAN SYOC
BEVERLY L. BOVE**
BRADLEY M. WILSON
GEORGE F. GEIST
HILARY B. KLEIN
ROBERT W. KEYSER
OLGA D. POMAR

MATTHEW W. PARKS
HOWARD S. SIMONOFF
ROBERT F. O'BRIEN
DAVID JACOBY
CHARLES L. WINNE
MARY L. CRANGLE
RICHARD T. FAUNTLEROY
CHARLES N. RILEY
ROBERT M. CAPUANO
BARRY M. BENNETT
MARY A. KELLY
JAMES KATZ
AMY C. GOLDSTEIN
JENS B. FOG
NANCY J. JACKSON
GEORGE J. WHITEHAIR

(609) 429-1100

July 25, 1985

ATLANTIC COUNTY OFFICE
CENTRAL SQUARE
NEW ROAD AND CENTRAL AVENUE
P. O. BOX 315
LINWOOD, NEW JERSEY 08221
(609) 653-6100

901 MARKET STREET, SUITE 1111
WILMINGTON, DELAWARE 19801
(302) 655-0500

1015 CHESTNUT STREET, SUITE 702
PHILADELPHIA, PENNSYLVANIA 19107
(215) 574-0635

IN REPLY PLEASE
REFER TO 44268

* CERTIFIED CIVIL TRIAL ATTORNEY
** MEMBER PA. & DEL. BAR ONLY

Mr. George Demougout
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

CERTIFIED MAIL P 096 450 672
RETURN RECEIPT REQUESTED

RE: MUR 1981
United Association of Journeymen and
Apprentices of Plumbing and Pipefitting
Independent Local 322 Committee for
Political Education and Joseph A. Reed,
as treasurer

5 JUL 30 P 2: 12

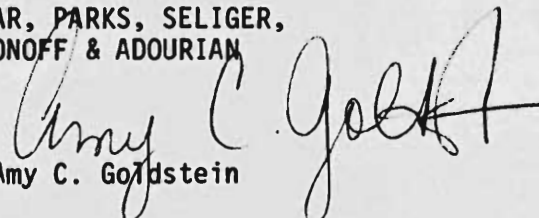
Dear Mr. Demougout:

Pursuant to our agreement, enclosed herewith please find Local
Union 322's check in the amount of \$1,500.00.

Thank you for your cooperation in this matter.

Very truly yours,

TOMAR, PARKS, SELIGER,
SIMONOFF & ADOURIAN

By 
Amy C. Goldstein

ACG/djr

Enclosure

cc: Joseph Reed
Kenneth Gross

35040552349

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Gcc#8123
85 JUL 29 40:
..

LAW OFFICES
TOMAR, PARKS, SELIGER, SIMONOFF & ADOURIAN
A PROFESSIONAL CORPORATION
41 SOUTH HADDON AVENUE
HADDONFIELD, NEW JERSEY 08033

ALBERT K. PLONE
(1909-1972)

WILLIAM TOMAR*
DAVID SELIGER
EDWARD N. ADOURIAN, JR.
MICHAEL A. KAPLAN*
RONALD A. GRAZIANO
STEVEN K. KUDATZKY
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(609) 429-1100

July 25, 1985

ATLANTIC COUNTY OFFICE
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WILMINGTON, DELAWARE 19801
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1015 CHESTNUT STREET, SUITE 702
PHILADELPHIA, PENNSYLVANIA 19107
(215) 574-0635

* CERTIFIED CIVIL TRIAL ATTORNEY
** MEMBER PA. & DEL. BAR ONLY

Mr. George Demougeot
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

CERTIFIED MAIL P 096 450 672
RETURN RECEIPT REQUESTED

IN REPLY PLEASE
REFER TO 4768

RECEIVED
GENERAL COUNSEL
JUL 29 410:23

RE: MUR 1981
United Association of Journeymen and
Apprentices of Plumbing and Pipefitting
Independent Local 322 Committee for
Political Education and Joseph A. Reed,
as treasurer

Dear Mr. Demougeot:

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Thank you for your cooperation in this matter.

Very truly yours,

TOMAR, PARKS, SELIGER,
SIMONOFF & ADOURIAN

By

Amy C. Goldstein

ACG/djr

Enclosure

cc: Joseph Reed
Kenneth Gross

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LAW OFFICES

MAR, PARKS, SELIGER, SIMONOFF & ADOURIAN

A PROFESSIONAL CORPORATION

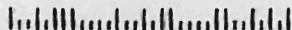
41 SOUTH HADDON AVENUE

HADDONFIELD, NEW JERSEY 08033



Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

85 JUL 29 4 9: 02



5040552351



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Amy C. Goldstein, Esquire
Tomar, Parks, Selizer, Simonoff
and Adourian
41 South Haddon Avenue
Haddonfield, New Jersey 08033

RE: MUR 1981
United Association of
Journeymen and
Apprentices of Plumbing and
Pipefitting Independent Local
322 Committee for Political
Education and Joseph A. Reed,
as treasurer

Dear Ms. Goldstein:

On , 1985, the Commission accepted the conciliation agreement by your clients, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

8504052352

BCC #7410
RECEIVED AT THE FEC

LAW OFFICES
TOMAR, PARKS, SELIGER, SIMONOFF & ADOURIAN
A PROFESSIONAL CORPORATION
41 SOUTH HADDON AVENUE
HADDONFIELD, NEW JERSEY 08033

85 MAY 8 All: 53

ALBERT K. PLONE
(1908-1972)

WILLIAM TOMAR*
DAVID SELIGER
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MICHAEL A. KAPLAN*
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MARY A. KELLY
JAMES KATZ
AMY C. GOLDSTEIN
JENS S. FOG
NANCY J. JACKSON
GEORGE J. WHITEHAIR

(609) 429-1100

May 1, 1985

ATLANTIC COUNTY OFFICE
CENTRAL SQUARE
NEW ROAD AND CENTRAL AVENUE
P. O. BOX 315
LINWOOD, NEW JERSEY 08221
(609) 683-6100

901 MARKET STREET, SUITE 1111
WILMINGTON, DELAWARE 19801
(302) 685-0500
1015 CHESTNUT STREET, SUITE 702
PHILADELPHIA, PENNSYLVANIA 19107
(215) 574-0635

IN REPLY PLEASE
REFER TO

101328.0001

* CERTIFIED CIVIL TRIAL ATTORNEY
** MEMBER PA. & DEL. BAR ONLY

Mr. George Demougeot
Federal Election Commission
1325 K. Street NW
Washington, D.C. 20515

RE: UNITED ASSOCIATION OF JOURNEYMEN AND
APPRENTICES OF PLUMBING & PIPEFITTING
INDEPENDENT LOCAL 322
COMMITTEE FOR POLITICAL ACTION
MUR 1981

Dear Mr. Demougeot:

Enclosed herewith please find the Authorization executed
by my client permitting you to discuss the above-captioned matter
directly with me. I would also appreciate your forwarding all
relevant documents to my attention at my office.

Thank you very much.

Very truly yours,

TOMAR, PARKS, SELIGER, SIMONOFF & ADOURIAN

By: *Amy C. Goldstein/lb*
AMY C. GOLDSTEIN

ACG/lb
Enc.

cc: Joseph Reed, Treasurer

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1981

NAME OF COUNSEL: Amy C. Goldstein, Esq.

ADDRESS: c/o TPSS+R

41 So. Haddon Ave

Haddonfield NJ 08033

TELEPHONE: (609) 429-1100

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.

4/30/85
Date

Joseph A. Reed
Signature

RESPONDENT'S NAME: JOSEPH A. REED

ADDRESS: 368 BROADWAY

WESTVILLE N.J. 08090

HOME PHONE: _____

BUSINESS PHONE: 609-456-0537

85040552354

LAW OFFICES

OMAR, PARKS, SELIGER, SIMONOFF & ADOURIAN

A PROFESSIONAL CORPORATION

41 SOUTH HADDON AVENUE

HADDONFIELD, NEW JERSEY 08033



Mr. George Demougeot
Federal Election Commission
1325 K. Street NW
Washington, D.C. 20515

05 MAY 8

ALL: 8



3504055235

BEFORE THE FEDERAL ELECTION COMMISSION

M 1981
Demouglot

In the Matter of)
) RAD Referral 85NF-70
United Association of Journeyman)
and Apprentices of Plumbing and)
Pipefitting Independent Local 322)
Committee for Political Education)
Joseph A. Reed, Assistant Treasurer)
Thomas L. Kehoe, Treasurer (Deceased))

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 19, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-70:

1. Open a MUR.
2. Find reason to believe that the United Association of Journeyman and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed April 15, 1985.

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

Attest:

4-22-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 4-16-85, 12:59
Circulated on 48 hour tally basis: 4-17-85, 11:00

35040552356

BEFORE FEDERAL ELECTION COMMISSION

Demougeot

In the Matter of)
) RAD Referral 85NF-70
 United Association of Journeyman)
 and Apprentices of Plumbing and)
 Pipefitting Independent Local 322)
 Committee for Political Education)
 Joseph A. Reed, Assistant Treasurer)
 Thomas L. Kehoe, Treasurer (Deceased))

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1. Open a MUR.
2. Find reason to believe that the United Association of Journeyman and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed April 15, 1985.

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

Attest:

4-22-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
 Secretary of the Commission

Received in Office of Commission Secretary: 4-16-85, 12:59
 Circulated on 48 hour tally basis: 4-17-85, 11:00

85040552357



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1985

Joseph A. Reed, Treasurer
United Association of Journeymen and
Apprentices of Plumbing and
Pipefitting Independent Local 322-
Committee for Political Education
368 Broadway
Westville, NJ 08093

RE: MUR 1981

Dear Mr. Reed:

On April 19, 1985, the Federal Election Commission determined that there is reason to believe that the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322-Committee for Political Education and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv), provisions 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.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee and you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

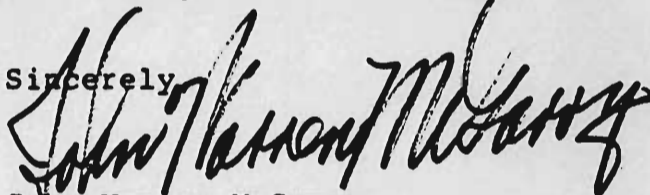
Joseph A. Reed, Treasurer
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

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 George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040552359



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FILED
FEC
COMM. SECRETARY

85 MAY 1 AIO: 49

April 24, 1985

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel

SENSITIVE

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: RAD Referral 85NF-70

On April 19, 1985 the Commission approved the recommendation that RAD Referral 85NF-70 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-70 should now become MUR 1981.

Attachment
Copy of Certification

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
United Association of Journeyman) RAD Referral 85NF-70
and Apprentices of Plumbing and)
Pipefitting Independent Local 322)
Committee for Political Education)
Joseph A. Reed, Assistant Treasurer)
Thomas L. Kehoe, Treasurer (Deceased))

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I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 19, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-70:

1. Open a MUR.
2. Find reason to believe that the United Association of Journeyman and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed April 15, 1985.

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

Attest:

4-22-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 4-16-85, 12:59
Circulated on 48 hour tally basis: 4-17-85, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: April 16, 1985
SUBJECT: RAD 85NF-70: 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) []

SENSITIVE

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

100 16 012: 50

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4/16/85-1:00

RAD #85NF-70
STAFF MEMBER
Demougeot

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

RESPONDENT'S NAME: United Association of Journeymen and
Apprentices of Plumbing and
Pipefitting Independent Local 322
Committee for Political Education
Joseph A. Reed, Assistant Treasurer*/
Thomas L. Kehoe, Treasurer (Deceased)

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(iv)

INTERNAL REPORTS
CHECKED: Committee Reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

Based on information obtained in the normal course of its
supervisory duties under the Federal Election Campaign Act of
1971, as amended (the "Act"), the Report Analysis Division
("RAD") referred this matter to the Office of General Counsel on
March 6, 1985.

SUMMARY OF ALLEGATIONS

The United Association of Journeymen and Apprentices of
Plumbing and Pipefitting Independent Local 322 Committee for
Political Education ("UA Local 322 COPE") failed to file the 1983
Mid-Year, 1983 Year End, 1984 April Quarterly, 1984 July

*/ UA Local 322 COPE has not amended their Statement of
Organization to disclose a new treasurer.

8 5 0 4 0 5 5 2 3 6 3

Quarterly, and 1984 October Quarterly Reports of Receipts and Disbursements.

UA 322 COPE was sent the respective Prior Notices.**/

On December 5, 1984, UA Local 322 COPE filed a 1984 30 Day Post-General Election Report covering June 1, 1982 to November 26, 1984.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(i) provides that all political committees other than the authorized committee of a candidate shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be no later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(iv) provides that the above mentioned committees shall file in any other calendar year, a report covering the January 1-June 30 period, no later than July 31 and a July 1-December 31 report, no later than January 31 of the following calendar year.

In view of the fact that UA Local 322 COPE has continually failed to file its reports, the Office of General Counsel recommends that the Commission find reason to believe that the United Association of Journeymen and Apprentices of Plumbing and

**/ UA Local 322 COPE did not receive a Prior Notice for the 1983 Mid-Year Report because the committee did not register until December 9, 1983.

Pipefitting Independent Local 322-Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322-Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).
3. Approve the attached letter and factual and legal analysis.

April 15, 1985
Date

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

- I. RAD Referral
- II. Proposed General Counsel's Factual and Legal Analysis
- III. Proposed letter

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 6 March 1985

ANALYST: J. Hunter Bryan

I. COMMITTEE: United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education (C00173419)
Joseph A. Reed, Assistant Treasurer*/
Thomas Kehoe, Treasurer (Deceased)
(December 9, 1983-November 21, 1984)
368 Broadway
Westville, NJ 08093

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) and (iv)
11 CFR 104.5(c)(1)(i)(A)
11 CFR 104.5(c)(2)(i)(A) and (B)

III. BACKGROUND:

Failure to Timely File Reports

The United Association of Journeymen and Apprentices of Plumbing and Pipefitting Local 322 Committee for Political Education ("UA Local 322 COPE") failed to file the 1983 Mid-Year, 1983 Year End, 1984 April Quarterly, 1984 July Quarterly, and 1984 October Quarterly Reports of Receipts and Disbursements by Election Day, November 6, 1984.

UA 322 COPE was sent the respective Prior Notices**/ (Attachments 2 - 5).

On December 5, 1984, UA Local 322 COPE filed a 1984 30 Day Post-General Election Report covering June 1, 1982 to November 26, 1984 (Attachment 6).

*/ UA Local 322 COPE has not amended their Statement of Organization to disclose a new treasurer.

**/ UA Local 322 COPE did not receive a Prior Notice for the 1983 Mid-Year Report because the committee did not register until December 9, 1983.

Attachment I
(2)

35040552366

UNITED ASSOCIATION OF JOURNEYMEN AND
APPRENTICES OF PLUMBING AND
PIPEFITTING INDEPENDENT LOCAL 322
COMMITTEE FOR POLITICAL EDUCATION
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

IV. OTHER PENDING MATTERS INITIATED BY RAD:

On February 22, 1985, a Non-Filer Notice was mailed to
UA Local 322 COPE for failure to file the 1984 Year End
Report. This matter may be referred at a later date.

85040552367

Attachment I
(3)

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 5MAR85
PAGE

Attachment I
(4)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED CONNECTED ORGANIZATION: PLUMBING & PIPEFITTING INDUSTRY				NON-PARTY NON-QUALIFIED ID #C00173419		
1983	STATEMENT OF ORGANIZATION			9DEC83	3	83FEC/288/4787
1984	POST-GENERAL	193,942	12,828	1JUN82 -26NOV84	7	84FEC/353/0138
	NOTICE OF FAILURE TO FILE			27NOV84 -31DEC84	1	85FEC/366/4691
1985	MISCELLANEOUS NOTICE FROM FEC			17JAN85	1	85FEC/360/1952
	MISCELLANEOUS REPORT			31JAN85 TO FEC	2	85FEC/363/0079
	TOTAL	193,942	0	12,828	0	14 TOTAL PAGES

All reports have been reviewed.

Cash-on-Hand as of 11/26/84: \$181,114

Debts and Obligations owed by the Committee: \$0

Debts and Obligations owed to the Committee: \$0

Attachment #1

8 5 0 4 0 5 5 2 3 6 8



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

Attachment #2

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Furthermore, failure to file in a timely fashion is a serious violation and an offending committee is subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted and committees filing such documents will be required to refile.

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 1984.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications
202/523-4068 or 800/424-9530

Attachment I
(5)

A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with an election, which have not previously been disclosed, must file a pre-election report for that election. (Although some committees may not be required to file pre-election reports, all committees, are required to file a post-general election report.)

FOR INFORMATION CALL: Office of Public Communications
800/424-9530 or 202/523-4068

35040552370

Attachment I

⑥



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1984

APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by April 15, 1984. (See below)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,* through March 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than April 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed in 1984, and prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b) Activity which occurred prior to 1984 should be reported separately.

A R E M I N D E R F O R Q U A R T E R L F I L E R S

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election which have not previously been reported must file a pre-election report.

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Attachment I

8



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,* through June 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

Attachment I
⑨

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A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election, which have not previously been reported, must file a pre-election report.

FOR INFORMATION CALL: Office of Public Communications
800/424-9530 or 202/523-4068

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Attachment I
(10)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 21, 1984

OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by October 15, 1984. (See Monthly Filers below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through September 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,* through September 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by October 20, 1984, and disclose all financial activity of their committee from September 1 through September 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

Attachment I
(11)

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Attachment I

12

For a Complete Guide to the Form See the Instructions
For a Complete Guide to the Form See the Instructions

RECEIVED AT THE FEC

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Summary Page

NAME AREA

1. Name of Committee (Do Not
United Assn. Journeymen & Apprentices
of Plumbing & Pipefitting Industry
Local 322 Committee For Political
Education

Address (Number and Street)

300 Broadway

City, State and ZIP Code

Westville, N.J. 08093

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C-00173419

3. ☐ This committee qualified as a national or state committee during
this reporting period on affiliated with international
committee-(International) and state

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelve day report preceding _____

election on _____ in the State of _____

☒ Thirteen day report following the General Election

on Nov. 6, 1984 in the State of New Jersey

☐ Termination Report

Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period June 1, 1982 (Start) through November 26, 1984

6. (a) Cash on hand January 1, 19 _____

(b) Cash on Hand at Beginning of Reporting Period _____

(c) Total Receipts (from Line 1B) _____

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(b) and 6(c) for Column B)

7. Total Disbursements (from Line 2B) _____

8. Cash on Hand at Close of Reporting Period (Subtract Line 7 from Line 6(d)) _____

9. Debts and Obligations Owed TO The Committee _____

(Transmit all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee _____

(Transmit all on Schedule C or Schedule D)

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 800-426-6900

Local 202-455-4225

Name or Print Name of Treasurer (Last, First, Middle)

Joseph J. ...
Signature of Treasurer (Last, First, Middle)

Signature

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 editions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

Attachment I
(13)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Form 2, FPC FORM 3X)**

Attachment 6, Page 3 of 7

Report Covering the Period
From June 1, 1982 to Nov. 26, 1984

	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	184,217.95	184,217.95	11(a)
(Include Every Unitemized \$ <u>184,217.95</u>)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	184,217.95	184,217.95	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	9,725.01	9,725.01	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	193,942.96	193,942.96	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	5.00	5.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	7,350.00	7,350.00	21
22. INDEPENDENT EXPENDITURES (Use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS	5,473.76	5,473.76	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	12,828.76	12,828.76	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	184,217.95	184,217.95	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	184,217.95	184,217.95	31
32. TOTAL OPERATING EXPENDITURES from Line 19	5.00	5.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	5.00	5.00	34

Attachment I
14

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SCHEDULE B

ITEMIZED DISBURSEMENTS
(Contributions to Federal Candidates
and Other Political Committees)

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

Attachment 6, Page 4 of 7

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)

**United Ass'n Journeymen & Apprentices of Plumbing & Pipefitters Industry
Local 322 Committee For Political Education C-00173419**

A. Full Name, Mailing Address and ZIP Code Hughes For Congress Committee 2307 New Road Northfield, NJ 08225	Purpose of Disbursement Contribution to William Hughes, House Candidate	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 1,000.00
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):		
B. Full Name, Mailing Address and ZIP Code James Smith For Congress Committee Burlington County Democrat Hdqtrs. 78 High Street Mt. Holly, N.J. 08060	Purpose of Disbursement Contribution to John Smith, House Candidate	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 1,000.00
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code James A. Florio Campaign Fund One Colby Ave. Stratford, NJ 08084	Purpose of Disbursement Contribution to James A. Florio, House Candidate	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 1,000.00
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code Same as Above (Florio)	Purpose of Disbursement Same as Above	Date (month, day, year) 10/30/84	Amount of Each Disbursement This Period 4,000.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code AGL-CIO CLU COPE 211 South 6th St. Camden, NJ 08102	Purpose of Disbursement Tickets for COPE Brunch	Date (month, day, year) 10/25/84	Amount of Each Disbursement This Period 350.00
	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)			7,350.00
TOTAL This Period (last page this line number only)			7,350.00

Attachment I
(15)

85040553379

SCHEDULE B

Attachment 6, Page 5 of

ITEMIZED DISBURSEMENTS

(Other Disbursements)

Page 1 of 2 for
LINE NUMBER 27

(Use separate schedules 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)
United Assoc'n Journeymen and Apprentices of Plumbers & Pipefitting Industries
Local 322 Committee For Political Education G-00173419

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution to Non-Federal Candidate	Date (month, day, year)	Amount of Each Disbursement This Period
Joseph Wilkins 24 Fremas Ave. Pleasantville, NJ 08232	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	10/24/84	500.00
B. Full Name, Mailing Address and ZIP Code Francis McDevitt 440 Freund Ave. Gibbstown, NJ 08027	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 400.00
C. Full Name, Mailing Address and ZIP Code George P. Miller, Jr. 6 Ridgewood Rd. Gibbsboro, NJ 08026	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 500.00
D. Full Name, Mailing Address and ZIP Code August, Elias & Graziano Campaign Treasurer, Robert Preller 19 Conestoga Lane Rancocas Woods, Mt. Holly, NJ 08060	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Joseph Roberts 7 Robert Messick 41 Grove Ave. Haddonfield, NJ 08033	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 400.00
F. Full Name, Mailing Address and ZIP Code Joseph Carroll 7 Robert Messick 41 Grove Ave. Haddonfield, NJ 08033	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/24/84	Amount of Each Disbursement This Period 400.00
G. Full Name, Mailing Address and ZIP Code Vincent Tarantino & James Bathurst Joseph DiLolite, Chairman Monroe Township Executive Committee 611 A Trenton Ave. Williamstown, NJ 08094	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 10/25/84	Amount of Each Disbursement This Period 250.00
H. Full Name, Mailing Address and ZIP Code George Scharer P. O. Box 129 Landisville, NJ 08326	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 11/02/84	Amount of Each Disbursement This Period 400.00
I. Full Name, Mailing Address and ZIP Code John Marer 7 James P. Barry 80 N. Maple St. Woodbury, NJ 08096	Purpose of Disbursement Contribution to Non-Federal Candidate Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 11/02/84	Amount of Each Disbursement This Period 300.00
SUBTOTAL of Disbursements This Page (optional)			3,650.00
TOTAL This Period (last page this line number only)			

Attachment I
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SCHEDULE B

Attachment #6, Page 6 of 6
ITEMIZED DISBURSEMENTS

Page 2 of 2
LINE NUMBER 27
(Use separate schedules for each category of the Data on Summary Page)

(Other Disbursements-Continued)

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)			
United Assoc'n Journeymen and Apprentices of Plumbers & Pipefitting Industries Local 322 Committee For Political Education FBC #C-00173419			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tomar, Parks, Seliger, Simonoff & Adourian 41 S. Haddon Ave. Haddonfield, NJ 08033	Legal Services	10/30/84	850.00
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
N. G. Slater Corp. 220 W. 19th Street New York, N.Y. 10011	Election Buttons	10/29/84	407.76
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Progressive Printing Co. 811 Longwood Ave. Cherry Hill, NJ 08034	Envelopes and Printing flyers (restricted class mailing)	10/30/84	566.00
	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)			1,823.76
TOTAL This Period (last page this line number only)			5,473.76

Attachment I
(17)

R 4 0 3 3 1 3 0 1 4 4



Attachment #6,
Page 7 of 7

**TOMAR, PARKS, SELIGER,
SIMONOFF & ADOURIAN**
A PROFESSIONAL CORPORATION
41 SOUTH HADDON AVENUE
HADDONFIELD, NEW JERSEY 08033

To

Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20515

FIRST CLASS MAIL

Attachment I
18

CERTIFIED
P 533 752 064
VA

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT'S NAME: United Association of Journeymen and
Apprentices of Plumbing and
Pipefitting Independent Local 322
Committee for Political Education
Joseph A. Reed, Assistant Treasurer
Thomas L. Kehoe, Treasurer (Deceased)

SUMMARY OF ALLEGATIONS

The United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322 Committee for Political Education ("UA Local 322 COPE") failed to file the 1983 Mid-Year, 1983 Year End, 1984 April Quarterly, 1984 July Quarterly, and 1984 October Quarterly Reports of Receipts and Disbursements.

UA 322 COPE was sent the respective Prior Notices.* /

On December 5, 1984, UA Local 322 COPE filed a 1984 30 Day Post-General Election Report covering June 1, 1982 to November 26, 1984.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(i) provides that all political committees other than the authorized committee of a candidate shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be no

* / UA Local 322 COPE did not receive a Prior Notice for the 1983 Mid-Year Report because the committee did not register until December 9, 1983.

Attachment II
(19)

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later than the 15th day after the last day of each calendar quarter, except that the report for the final calendar quarter of the year shall be filed on January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(iv) provides that the above mentioned committees shall file in any other calendar year, a report covering the January 1-June 30 period, no later than July 31 and a July 1-December 31 report, no later than January 31 of the following calendar year.

In view of the fact that UA Local 322 COPE has continually failed to file its reports, the Office of General Counsel recommends that the Commission find reason to believe that the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322-Committee for Political Education and Joseph A. Reed, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv).

Attachment II
20

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph A. Reed, Treasurer
United Association of Journeymen and
Apprentices of Plumbing and
Pipefitting Independent Local 322-
Committee for Political Education
368 Broadway
Westville, NJ 08093

RE: MUR

Dear Mr. Reed:

On , 1985, the Federal Election Commission determined that there is reason to believe that the United Association of Journeymen and Apprentices of Plumbing and Pipefitting Independent Local 322-Committee for Political Education and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 434(a)(4)(A)(iv), provisions 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.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee and you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

Attachment III
(21)

Joseph A. Reed, Treasurer
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

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 George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

Attachment III
(22)

3 5 0 4 0 5 5 2 3 8 6

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1981

Date Filmed 9/20/85 Camera No. --- 2

Cameraman AS