



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 243

Date Filmed 6/26/79 Camera No. --- 2

Cameraman J. A. Q.

79040134793

INTERIM INVESTIGATORY REPORT

MUR 243

May 12, 1977

Summary of action to date:

- 79040134794
- August 31, 1976 Senator Goldwater submitted remarks to the Congressional Record, naming six labor/political organizations which had "given or directed" more than \$5,000 to the Carter campaign. The matter was referred to the General Counsel's office by Commissioner Aikens.
- October 8, 1976 David Spiegel referred this matter to Al Keema.
- October 13, 1976 Reports Analysis Section forwarded the matter to the Investigation Section.
- October 29, 1976 Keith Vance forwarded his analysis to William Oldaker, through Michael Hershman and Fred Rayano.
- November 15, 1976 Matter transferred from Sherry Swirsky to Kathryn Kavanagh.
- February 8, 1976 General Counsel's report transmitted to Commission. Recommended finding of reason to believe as to ABC, CWA, ACW and Committee for Jimmy Carter. Report withdrawn prior to official Commission consideration.
- February 10, through
March 10, 1977 Additional research conducted.
- April 12, 1977 General Counsel's report transmitted to Commission.
- April 21, 1977 Commission approved staff recommendation, found reason to believe as to Labor Appreciates Carter, transmitted question of Maritime Engineers Fundraiser to Audit Section.
- April 26, 1977 Letters mailed to two addresses found for Labor Appreciates Carter, and one letter to Kentucky-United Labor for Carter-Mondale. Identical letters in each case stating Commission's finding of reason to believe and requesting information.
- April 28, 1977 K. Kavanagh received a telephone call from William Haines who identified himself as an

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attorney and treasurer of Kentucky-United Labor Committee for Carter-Mondale. He said that he did not know of an organization named Labor Appreciates Carter and that, as far as he knew, his committee was the only such organization in Kentucky. A confirming letter of this conversation arrived May 5, 1977.

April 28, 1977

K. Kavanagh received a telephone call from Darnell Devers. He said that on April 19, 1976 he and a friend had each written a check for \$500 to the Carter campaign. He said that no official committee for Carter had been formed at that time, but that the night he had written the check they were discussing forming a labor committee from Kentucky to support Carter. He said that the committee was formed at a later date and the treasurer was William S. Haines, an attorney. Mr. Devers had received one of the three letters.

May 6, 1977

K. Kavanagh received a telephone call from Eugene Land who identified himself as the legislative director for the UAW in Kentucky. He said that he had received our letter dated April 26 and addressed to Labor Appreciates Carter. He said that the person we probably wanted to reach was William Haines, treasurer of the committee.

May 9, 1977

K. Kavanagh received a telephone call from Eugene Land who stated that he had been mistaken in his earlier call: apparently there were two committees, Labor Appreciates Carter and United Labor Committee for Carter-Mondale. He said that he had requested a copy of his check to the Labor Appreciates Carter Committee, in order to identify who endorsed the contribution.

May 9, 1977

This office received a letter from Darnell Devers and dated May 4, 1977. He said that on April 19, 1977 he and two others met at the Ramada Inn in Frankfort, Kentucky. He and Mr. Floyd P. Conner each wrote a check for \$500 to the Jimmy Carter Presidential Campaign. The third person, Gene Land, UAW representative, said that he would reimburse the two individuals, presumably through UAW-V-CAP funds.

May 12, 1977

This office received a letter from Eugene Land, confirming previous telephone conversation. He states that Darnell Devers is the chairman of the Labor Appreciates Carter Committee.

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May 9, 1977

11:00 a.m.

Memorandum to be File

From Kathryn Kavanagh

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Gene Land telephoned and said that the information he gave me in our last conversation was partially inaccurate. He said that apparently there are two different committees: Labor Appreciates Carter and Kentucky-United Labor Committee for C-M. He said that he was trying to reach Darnell Deavers, Chairman of Labor Appreciates Carter, or Floyd Conners, treasurer of the committee. He learned that there were two committees after talking to Bill Haines. He said that he had requested that a copy of his check to the Committee (Apprec.) be sent to him from headquarters so that he could tell who had endorsed it. I asked him to send me a letter. He asked me what it should say. I said that he should say everything he knew about the case: that the check was being located and that he had agreed to reimburse the contribution from Darnell Deavers to CJC. (In fact, Mr. Deavers, not Mr. Land told me about the reimbursement). Mr. Land grew very confused and said that he had never said anything about a reimbursement. I said that he should send a letter with whatever he knew explained. He said he would and that he would send a copy of the check when he received it.

MUR 243

May 6, 1977

3:35 P.M.

Memorandum to the File

From: Kathryn Kavanagh

Mr. Deavers telephoned and read the contents of a letter he was mailing today in response to our inquiry.

The letter mentioned a meeting of three persons - Floyd Conners(?), Gene Land, and Mr. Deavers. Mr. Deavers and Mr. Conners agreed to give CJC (via Dale Sites) \$1,000 - \$500 apiece. Gene Land, according to Deavers, said that he didn't have the money to make a contribution at that time, but that he would reimburse Conners and Deavers an UAW-E-CAP.

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May 6, 1977

1:40 p.m.

Memorandum to the File

From Kathryn Kavanaugh

Mr. Eugene Land, of the United Auto Workers in Kentucky telephoned today. He said that he had received a letter dated April 26 from our office, addressed to Labor Appreciates Carter at 532 Olive Court. Mr. Land is the legislative director for the UAW in Kentucky.

He said that it was true that the UAW gave money to the Labor Appreciates Carter Committee. He said that he had tried to reach William Haines, an attorney, who is treasurer of this committee, and is the one that we would want to contact.

Mr. Land said that he was a participating member of the committee. But he didn't know how his address got on the reports so that we could then address the letter to him.

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: BOB COSTA *[Signature]*

FROM: ELMO ALLEN *[Signature]*

SUBJECT: RESPONSE TO QUESTIONS RAISED IN MEMO
OF May 2, 1977 (MUR 243)

The following is in response to your memo of May 2, (see attached) regarding a fundraising event sponsored presumably by maritime groups including the Political Action Committees of MEBA, Seafarers, National Maritime Union and the International Longshoremen's Association. Specifically, you ask whether we could answer three questions:

- a) Were the proceeds from the event directed specifically to Jimmy Carter or were they directed through a conduit.
- b) Were the tickets paid for by checks written to CJC, and;
- c) Where were the costs of sponsoring the events disclosed.

During our audit of the Committee for Jimmy Carter, we found that the Committee did not keep detailed records of its fundraising events, i.e., the total number of contributors per event, a listing of contributors to it, or the costs attributable to each event. Nor did it keep copies of contributor checks as they were under no obligation to do so. In addition, the Committee receipts were not identified as to whether any one contribution was the result of a specified fundraiser or mailing solicitation; thereby making it virtually impossible to identify its source.



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A similar problem exists with Committee expenditures, in that, the costs attributable to fundraising events were often accounted for and disclosed as payments to individuals and vendors for such purposes as "personal expense reimbursements" and "meetings: fundraising". Thus, any attempt to determine the cost of a fundraising event from the standpoint of an expenditure was equally as difficult.

In response to your memo, we are unable at this time to provide answers to your questions. However, it should be noted that our inability to answer your questions emphasizes the inadequacies noted in the Committee's records and disclosure reports. These inadequacies will be dealt with more extensively in the audit report soon to be released by the Audit Division.

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FEDERAL ELECTION COMMISSION

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

May 2, 1977

MEMORANDUM TO: Bob Costa MUR 243
FROM : William Oldaker *Bill*
SUBJECT : Maritime Engineer Benefit for Carter

A fundraiser for Jimmy Carter was held on June 30, 1976 and sponsored by a number of maritime groups. In their July 10, 1976 Report the Committee for Jimmy Carter (CJC) reported \$24,370.00 received from this fundraiser due to a "Sale of Tickets." The August 10, 1976 CJC Report lists \$40,180.00 received from the same. The September 10, 1976 CJC Report shows \$3,535.00 received from the event.

The Political Action Committees of MEBA, Seafarers, National Maritime Union and International Longshoremen's Association do not list transfers to CJC in connection with this fundraiser. Nor do they report the costs of sponsoring the event. Perhaps your division would be able to answer whether the proceeds from the benefit were directed specifically to Carter (i.e. were the tickets paid for by checks written to CJC)? Or, were the proceeds directed to Carter through a conduit, such as one or more of the sponsors of the fundraiser, in which case there would be a violation of 2 U.S.C. 434(b)(4). Further, where were the costs of sponsoring the event reported?



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FEDERAL ELECTION COMMISSION

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

May 2, 1977

MEMORANDUM TO: Bob Costa MUR 243
FROM : William Oldaker *Bill*
SUBJECT : Maritime Engineer Benefit for Carter

A fundraiser for Jimmy Carter was held on June 30, 1976 and sponsored by a number of maritime groups. In their July 10, 1976 Report the Committee for Jimmy Carter (CJC) reported \$24,370.00 received from this fundraiser due to a "Sale of Tickets." The August 10, 1976 CJC Report lists \$40,180.00 received from the same. The September 10, 1976 CJC Report shows \$3,535.00 received from the event.

The Political Action Committees of MEBA, Seafarers, National Maritime Union and International Longshoremen's Association do not list transfers to CJC in connection with this fundraiser. Nor do they report the costs of sponsoring the event. Perhaps your division would be able to answer whether the proceeds from the benefit were directed specifically to Carter (i.e. were the tickets paid for by checks written to CJC)? Or, were the proceeds directed to Carter through a conduit, such as one or more of the sponsors of the fundraiser, in which case there would be a violation of 2 U.S.C. 434(b)(4). Further, where were the costs of sponsoring the event reported?



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MEMORANDUM TO THE FILE

April 28, 1978

From Kathryn Kavanagh

RE. Labor Appreciates Carter Committee

Bill Haines, an attorney, called this morning at 11:05. He said that he had received a letter for the Kentucky United Labor Committee for Carter-Mondale and he didn't understand how the allegations in the letter ~~(dated/1977)~~ from the Commission affected his group. He said that he had never heard of the Labor Appreciates Carter Committee and he thought that his organization was the only activity sponsored by Labor and supporting Carter in Kentucky.

I asked him to send a notarized letter stating these facts, and that we would get back to him.

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APRIL 28, 1977

MEMORANDUM TO: The file

FROM: Kathryn Kavanagh

RE: Labor Appreciates Carter Committee

Mr. Darnell ~~xxxxxx~~ (Deavers) telephoned at 2:15 today and said that he had received a most confusing letter from the Commission, which he couldn't quite understand ~~xxxx~~ "being just a country boy".

Mr. Deavers said that on April 19, 1977 he and another individual, Floyd Conner, each wrote a check for \$500 to the "Jimmy Carter Presidential Campaign. This/ occurred, he said, before the Labor Appreciates Carter Committee was formed. He thought that the committee had been formed in late May or June. He said that they were talking about forming it on the day that the checks were written.

I asked him why the committee hadn't been filing with the Commission. He answered that he was sure that they had been filing and that I could talk to William S. Haines, an attorney, who is the secretary of the Committee.

I asked him ~~xxx~~ if the Committee was filing under the ~~xxx~~ name of Labor Appreciated Carter Committee, he replied that he was certain that it was.

He said that he thought that the Carter people could have perhaps made a mistake in their reporting of the two \$500 contributions, and recorded them as \$1,000 received from the Labor Appreciates Carter Committee.

As regards the UAW-V-CAP ~~xxxx~~ contribution, "the only thing I can vaguely remember," Mr. Deavers said was that upon signing the checks, he asked a UAW representative to match the amount. He did not recall ever receiving a \$1,000 contribution from UAW-V-CAP.

He suggested that we talk again in an hour or so because ~~xxxx~~ Mr. Haines would be there then.

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FEDERAL ELECTION COMMISSION

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

March 23, 1977

MEMORANDUM TO: Charles Steele
FROM : Kathryn Kavanagh
SUBJECT : Maritime Engineer Benefit for Carter

It is recommended that the following issue be referred to Audit:

A fundraiser for Jimmy Carter was held on June 30, 1976 and sponsored by a number of maritime groups. In their July 10, 1976 Report the Committee for Jimmy Carter (CJC) reported \$24,370.00 received from this fundraiser due to a "Sale of Tickets." The August 10, 1976 CJC Report lists \$40,180.00 received from the same. The September 10, 1976 CJC Report shows \$3,535.00 received from the event.

The Political Action Committee of MEBA, Seafarers, National Maritime Union and International Longshoremen's Association do not list transfers to CJC in connection with this fundraiser. The question is, were the proceeds from the benefit directed specifically to Carter (i.e. were the tickets paid for by checks written to CJC)? Or, were the proceeds directed to Carter through a conduit, such as one or more of the sponsors of the fundraiser, in which case there would be a violation of 2 U.S.C. §434(b)(4).



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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jimmy Carter)

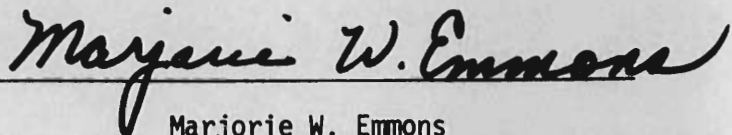
MUR 243 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 21, 1977, the Commission determined by a vote of 4-0 to take the following actions in the above-captioned matter:

1. Merge the information obtained in the Labor Appreciates Carter matter (MUR 243) with the UAW-V-CAP matter (MUR 446) as it involves the same individuals and transactions.
2. Close the file on MUR 243 (76), but defer placing this file on the public record until MUR 446 is closed by the Commission.

Voting for this determination were Commissioners Aikens, Harris, Thomson, and Tiernan. Commissioners Springer and Staebler were not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

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December 13, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 243 Team #3 Donaldson

Please have the attached General Counsel's Report on
MUR 243 distributed to the Commission and placed on the
Compliance Agenda for the Commission meeting of
December 21, 1977.

Thank you.

12-4-78
Submitting
new cert

✓

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BEFORE THE FEDERAL ELECTION COMMISSION

December 7, 1977

In the Matter of

Jimmy Carter

)

)

)

MDR 243

EXECUTIVE SESSION

DEC 21 1977

GENERAL COUNSEL'S REPORT

I. Allegations

This matter was opened on the basis of Senator Goldwater's remarks in the Congressional Record, August 31, 1976, alleging that six labor PAC's had "given or directed to" Mr. Carter amounts in excess of \$5,000. The labor unions and amounts named by the Senator are as follows:

Communication Workers of America	\$ 8,195
United Auto Workers	23,418
Marine Engineer's Beneficial Association	44,744
Retail Clerks Union (ABC)	15,100
Amalgamated Clothing Workers	5,500
Maritime Engineers	40,180

Senator Goldwater also stated that Jack Conway of American Federation of State, County, and Municipal

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Employees, and Mary Zon of AFL-CIO, were working for Mr. Carter. The Commission dismissed this allegation in the 48-hour report because there was no indication that either Mr. Conway or Ms. Zon had received union pay or benefits while they worked for Mr. Carter.

II. Evidence

A. Allegations involving the six unions named by Senator Goldwater

Examination of the reports filed by Communication Workers of America, United Auto Engineers, Marine Engineer's Beneficial Association, Retail Clerks Union (ABC), Amalgamated Clothing Workers, and Maritime Engineers uncovered no evidence which supported a finding of reason to believe with respect to these groups. On September 8, 1977, the Commission found no reason to believe that the six unions had violated the Act.

B. Other Matters

Examination of the financial statements filed by UAW-V-CAP led to the Commission's finding reason to believe on April 21, 1977, that Labor Appreciates Carter may have received more than \$1,000 but failed to register and report with the Commission. Information obtained during the investigation of this matter resulted in opening

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MUR 446 and the finding reason to believe on September 8, 1977, that UAW-V-CAP exceeded its contribution limitation by transferring \$6,000 to the Committee for Jimmy Carter; and that \$1,000 of the sum was contributed to the Carter Campaign via a conduit, Labor Appreciates Carter. On September 8, 1977, the Commission also found no reason to believe that Labor Appreciates Carter must register as a "political committee" under the Act because the evidence indicates that the \$1,000 transaction was the only financial activity undertaken by Labor Appreciates Carter.

III. Recommendations

1. Merge the information obtained in the Labor Appreciates Carter matter (MUR 243) with the UAW-V-CAP matter (MUR 446) as it involves the same individuals and transactions.

2. Close the file on MUR 243. Defer placing this file on the public record until MUR 446 is closed by the Commission.

12/12/77
Date

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

DECEMBER 9, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE EMMONS *mwe*
RE: CERTIFICATIONS ON MUR 446 and MUR (243)

Attached please find a corrected certification on
MUR 446(77) and MUR 243(76).

The previously issued certifications should be shredded.

Thanks for bringing the error to my attention.

CC: Certification File/Commission Secretary
MUR 446/MUR 243 File/ Commission Secretary

Attachment

79040134811

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
UAW-V-CAP)

MUR 446 (77)
and
MUR 243 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 16, 1977, the Commission determined by a vote of 5-0 to issue a subpoena to Dale Sights for deposition in the above-captioned matter, and reconvene the depositions of Eugene Land, Darnell Devers, and Floyd Conner if necessary.

Commissioner Thomson was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040134812

November 11, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MURs 446 and 243 Team #3 Kavanagh

Please have the attached Interim Report on MURs 446 and 243 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of November 16, 1977.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

November 9, 1977

In the Matter of

UAW-V-CAP

)
) MUR 446(77)
) and
) MUR 243(76)

INTERIM REPORT

Summary

The matters in MUR 446(77) arose as a result of information obtained during the investigation in MUR 243(76). On September 8, 1977, the Commission determined that there was reason to believe that UAW-V-CAP had exceeded its \$5,000 contribution limitation to the Carter campaign.

Reports filed with the Commission indicate that UAW-V-CAP reached its \$5,000 contribution limitation for Jimmy Carter on March 10, 1976. On May 5, 1976 UAW-V-CAP contributed \$1,000 to the Labor Appreciates Carter Committee. Deposition testimony in MUR 243(76) suggests that the \$1,000 contributed to Labor Appreciates Carter was in fact a reimbursement for a \$1,000 contribution made by Labor Appreciates Carter to the principal campaign committee for Jimmy Carter on April 19, 1976.

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It appears that UAW-V-CAP contributed \$1,000 in excess of its legal limit to Jimmy Carter in 1976 through the conduit of Labor Appreciates Carter.

Evidence

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The Commission in MUR 243 first pursued the question of whether Labor Appreciates Carter was a political committee required to register and report with the FEC. On June 13, 1977, two individuals were deposed in Frankfort, Kentucky: Darnell Devers, apparently the chairman of Labor Appreciates Carter and a member of International Association of Machinists ("IAM"); and Eugene Land, the Kentucky Legislative representative for UAW. Floyd Conner, also a member of IAM, answered questions in a sworn statement.

The testimony of the above-named individuals indicates that: on April 19, 1976, Devers, Land, Conner, and Dale Sights (the Kentucky representative for the Carter Committee) met at the Ramada Inn in Frankfort, Kentucky; at one point fundraising was discussed; Conner and Devers each gave the Carter Committee \$500 in personal funds; Land pledged \$1,000 from UAW-V-CAP but said he did not have the money to make the contribution at that time;

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because the Carter Committee needed the funds immediately, Devers said that he would make the contribution for UAW-V-CAP and Land could reimburse him later; Devers wrote a check for \$1,000 for the Jimmy Carter Presidential Campaign on an account entitled "Labor Appreciation Night" which was established in 1975 for a state political educational dinner in Kentucky; Devers testified that he crossed out "Night" and inserted "Carter" on the check and also changed the account to read Labor Appreciates Carter; at the time the check was written there was \$20 in the Labor Appreciation Night account and Devers said "a note ...was signed in order to cover the \$1,000 check"; Land requested and received a \$1,000 check from UAW-V-CAP for the Labor Appreciates Carter Committee; Land transmitted the \$1,000 check to Devers who deposited it to cover the \$1,000 check written on the Labor Appreciation Night account.

On September 8, 1977, the Commission determined that there was reason to believe Labor Appreciates Carter was a conduit for the \$1,000 contribution from UAW-V-CAP to the Committee for Jimmy Carter¹ and that the \$1,000 contribution made by UAW-V-CAP through Labor Appreciates Carter

¹Because this was the only transaction by Labor Appreciates Carter, the Commission found no reason to believe that Labor Appreciates Carter was a political committee within the meaning of §431(e) and was not required to register and report with the Commission.

appeared to place UAW's separate segregated fund over the \$5,000 contribution limitation for Jimmy Carter.

In response to the Commission's letter of notification, Eugene Land, Jay Whitman (UAW's Associate General Counsel), and Stephen Schlossberg (UAW's Director of Governmental Affairs) met with General Counsel's staff. As a result of that meeting, Eugene Land submitted an affidavit dated October 3, 1977, and stated the following: At a meeting at the Ramada Inn in Frankfort, on or about April 19, 1976, Land pledged \$1,000 to the Labor Appreciates Carter Committee, a labor coalition designed to communicate with union members about Carter; "The sense of the meeting was that, because of the shortness of time before the primary [Kentucky, May 25, 1976] the best way to achieve that purpose was to hold a dinner for the local Union leadership in Kentucky"; it was Land's intent that the \$1,000 he committed be used, through Labor Appreciates Carter, for communication with the UAW leadership at a dinner; Land requested funds from UAW and received a check for \$1,000 drawn on the UAW-V-CAP account; Land gave the check to Devers. Land further stated in his affidavit:

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"I have no personal knowledge of what Devers did with the UAW-V-CAP check. Nor do I have any personal knowledge of what disbursements or loans may have been made by LAC. I do know, however, that I never authorized anyone to transmit the UAW-V-CAP \$1,000 directly or indirectly, to the Carter campaign."

In his affidavit and at the meeting with the General Counsel's staff, Land said, in effect, that the \$1,000 from UAW-V-CAP was not a "contribution" but a communication "by a labor organization to its members" which is excluded from the definition of a "contribution" in §441b(b) (2) (A) .

Mr. Land's October 3, 1977, affidavit is clear and straightforward, but does not include statements made in his earlier deposition testimony as summarized on Attachment I. Specifically, Land and Devers stated in their depositions that Dale Sights urged them to assist the Carter campaign with contributions. In his deposition, Land said that Sights referred to the need for funds in the Pennsylvania primary:

"Mr. Sights had said to Mr. Devers and me that they [the Carter Campaign] needed some monies badly in the Pennsylvania primary that was coming up shortly and they had hoped that maybe Labor could raise some money to use up there cause they desperately

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needed money. And I made a pledge of the \$1,000 and Mr. Devers made the pledge to Mr. Sights. He would go ahead and raise the money, or find the money out of his personal account or whatever and then my \$1,000 would replace that as I recall."

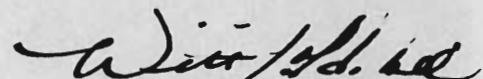
Land's affidavit does not mention Dale Sights, the Carter Committee's need for funds, or an advancement of \$1,000 to the Carter Committee by Devers. Instead, Land's affidavit states that the \$1,000 was given to Labor Appreciates Carter to communicate with UAW leadership about Carter before the Kentucky primary.

To ascertain a complete picture of the facts in this matter, we believe the following individuals should be deposed: Eugene Land, Darnell Devers, Dale Sights and Floyd Conner.

Recommendation

Subpoena Eugene Land, Darnell Devers, Dale Sights and Floyd Conner for depositions.

11/10/77
(Date)


William C. Oldaker
General Counsel

ATTACHMENT I - TESTIMONY

Deposition of Devers (June 13, 1977)	Deposition of Land (June 13, 1977)	Affidavit of Land (October 3, 1977)	Affidavit of Conner (June 30, 1977)
(1) Present at the meeting on April 19, 1976 at the Ramada in Frankfort KY were Floyd Conner, Eugene Land, Dale Sights and Darnell Devers.	(1) Present at the meeting in late April or early May at the Ramada in Frankfort, KY were Floyd Conner, Eugene Land, Dale Sights, Darnell Devers, Harold King, Charles Head, Al Shepherd and approximately 15 to 20 other people.	(1) Same as his deposition	(1) Present at the meeting on April 19, 1976 at the Ramada in Frankfort, KY were Eugene Land, Darnell Devers and Floyd Conner.
(2) At the meeting "they were discussing as to how we could raise some money for the presidential campaign in behalf of Jimmy Carter." Devers and Conner gave \$500 to Carter and Land promised \$1000 from UAW.	(2) "Mr. Sights had said to Mr. Devers and me that they [Carter campaign] needed some monies badly in the Pennsylvania primary...And I made a pledge of the \$1000..."	(2) In light of the impending Kentucky primary, Labor Appreciates Carter was formed to sponsor a labor coalition dinner to communicate with labor union members on behalf of Carter. IAM and UAW-V-CAP each pledged \$1000. "It was my intent that the money should be only used for communication through LAC with the UAW's leadership at a dinner. I did not intend this money to go, directly or indirectly to the Carter Campaign."	(2) In discussing possible fundraising for Carter, the Labor Appreciates Carter Committee was brought up. However, it was decided to give all contributions directly to the Carter campaign "in compliance with the law."

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Deposition of Devers (June 13, 1977)	Deposition of Land (June 13, 1977)	Affidavit of Land (October 3, 1977)	Affidavit of Conner (June 30, 1977)
(3) Because Land didn't have the money that he pledged, Devers wrote a check for \$1,000 on Labor Appreciation Night account - crossing out Night, inserting "Carter." When he received the UAW-V-CAP check he deposited it in the then-amended Labor Appreciates Carter account.	(3) Because Land didn't have the money he pledged, Devers "would go ahead and raise the money, or find the money out of his personal account or whatever and then my \$1000 would replace that as I recall."	(3) Land pledged \$1,000 to Labor Appreciates Carter. As soon as check came through from UAW-V-CAP, he gave the check to Devers for the Labor Appreciates Carter Committee.	(3) No statement



FEDERAL ELECTION COMMISSION

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

October 26, 1977

Mr. Darnell Devers
Route 9, Deerwood Drive
Frankfort, KY 40601

MUR 243

Dear Mr. Devers:

This is in regard to your recent telephone conversation with Kathryn Kavanaugh of this office. You requested additional instructions regarding the Commission's determination that there was reason to believe that Labor Appreciates Carter had violated 2 U.S.C. §441a(a)(8).

According to the Act (and detailed in the Commission's Regulations at 11 CFR §110.6), a person acting as an intermediary for a contribution shall report the following information to the Commission and to the intended recipient: identification of the contributor; amount of the contribution; date of receipt by the conduit; intended recipient as designated by the contributor; date on which contribution was transferred to the intended recipient; whether the contribution was transferred in cash, by the contributor's check, or by the conduit's check.

You have testified that the \$1,000 contribution in April 1976 from Labor Appreciates Carter to the Committee for Jimmy Carter was written on the Labor Appreciation Night account and subsequently reimbursed by UAW-V-CAP funds. In this case, Labor Appreciates Carter would be considered to be a conduit.

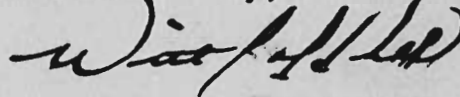


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As you were previously notified, the Commission found reason to believe that you failed to make the reports required by §441a(a)(8). In view of the facts set forth in your testimony, we would recommend that you write a letter to the Commission and a letter to the Committee for Jimmy Carter (c/o Ron Eastman, 1660 L Street N.W., Washington, DC 20036) stating the source, amount, date and the other information outlined above of the \$1,000 contribution from Labor Appreciates Carter. Copies of these two letters should be submitted to this office with your response to the Commission's letter of notification.

If you have any questions, please do not hesitate to call.

Sincerely,



William C. Oldaker
General Counsel

79040134823



FEDERAL ELECTION COMMISSION

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

October 14, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 243 (77)

Please have the attached report on MUR 243 (77)
distributed to the Commission and placed on the Compliance
Agenda for the Commission meeting of October 19, 1977.

Thank you.

79040134824



BEFORE THE FEDERAL ELECTION COMMISSION

OCT 12 1977

In the Matter of
Labor for Carter

)
) MUR 243
)
)

INTERIM STATUS REPORT

October 11, 1977

Summary

On September 8, 1977 the Commission voted to find no reason to believe that (a) Senator Goldwater's remarks in the Congressional Record, August 31, 1976, referred to violations of the Act; (b) Labor Appreciates Carter is a person or organization which must register as a "political committee" under the Act; and (c) there were reporting violations associated with the June 30, 1976 Maritime Engineers fundraiser for Jimmy Carter. In addition, the Commission determined that there is reason to believe Labor Appreciates Carter, as a conduit, failed to report to the Commission (and the intended recipient) the original source and intended recipient of any contribution as required by 2 U.S.C. 441a (a) (8).

The issue of Labor Appreciates Carter as a conduit is also dealt with in MUR 446. In that matter, the Commission found reason to believe that UAW-V-CAP exceeded the \$5,000

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contribution limit by directing \$1,000 to the Jimmy Carter campaign through the Labor Appreciates Carter Committee.

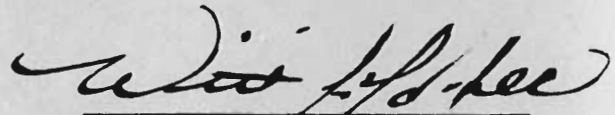
Representatives of UAW-V-CAP have met with FEC General Counsel staff and have indicated that affidavits regarding the \$1,000 to Labor Appreciates Carter Committee will be received by the Commission by October 13, 1977.

Recommendation

That the Commission postpone consideration of MUR 243 until the affidavits due in MUR 446 have been received and reviewed.

Date

10/13/77



William C. Oldaker
General Counsel

79040134826



FEDERAL ELECTION COMMISSION

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

September 13, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas Huron
Committee for Jimmy Carter
c/o White House
Washington, D.C.

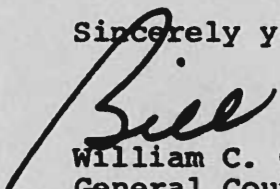
Re: MUR 243 (76)

Dear Mr. Huron:

This is to notify you that we have received your letter of August 26, 1977. On the basis of the information provided in both that letter and your first letter of July 15, 1976, we believe that the Commission's questions regarding the June 30, 1976 Maritime Engineers fundraiser have been adequately answered.

The Commission voted to find no reason to believe that the Maritime Engineers had violated the Act. We appreciate your cooperation in this matter.

Sincerely yours,


William C. Oldaker
General Counsel



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FEDERAL ELECTION COMMISSION

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

September 13, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Darnell Devers
Route 9, Deerwood Drive
Frankfort, Kentucky 40601

MUR 243 (76)

Dear Mr. Devers:

This is to notify you that the Commission found no reason to believe that Labor Appreciates Carter is a political committee that must register under the Federal Election Campaign Act of 1971, as amended (the Act). However, as an intermediary or conduit for funds from one source to a campaign, Labor Appreciates Carter is required by 2 U.S.C. §441a(a)(8)) to report the original source of the contribution and the intended recipient to the Commission and to the intended recipient. In this regard, the Commission has found reason to believe that Labor Appreciates Carter is in violation of 2 U.S.C. §441a(a)(8).

Please submit any factual or legal material which are relevant to the Commission's analysis of this matter. Your response should be submitted within ten days after your receipt of this notification. If no response is received within that period of time, the Commission will make its determination on the basis of materials already available to it.

If you have any questions, please contact Kathryn Kavanagh (202/523-4073) the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel



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MUR 243 Kavanagh

PS Form 3811, Nov. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one).		
☐ Show to whom and date delivered25¢		
☒ Show to whom, date, & address of delivery45¢		
☐ RESTRICTED DELIVERY. Show to whom and date delivered85¢		
☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery ...\$1.05 (Fees shown are in addition to postage charges and other fees).		
2. ARTICLE ADDRESSED TO: Dorrell Dovers Rt 9 Deerwood Dr Frankfort, Kentucky		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438044	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE ☐ Addressee ☒ Authorized agent		
4. DATE OF DELIVERY 9-16-77		POSTMARK SEP 16 1977 FRANKFORT, KY
5. ADDRESS (Complete only if requested) P.O. Window		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of }
LABOR FOR CARTER }

MJR 243 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 8, 1977, the Commission determined by a vote of 6-0 that

1. There is no reason to believe that Senator Goldwater's remarks refer to violation of the Federal Election Campaign Act in the above-captioned matter.
2. There is no reason to believe that Labor Appreciates Carter is a person or organization that must register as a political committee under the Federal Election Campaign Act.
3. There is no reason to believe there were reporting violations associated with the June 30, 1976 Maritime Engineers Fundraiser for Jimmy Carter.
4. There is reason to believe that Labor Appreciates Carter is a conduit required to report to the Commission and the intended recipient, the original source and intended recipient of any contribution, and therefore there is reason to believe that a violation of 2 U.S.C. Section 441a(a)(8) has been committed in this matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040134830

September 2, 1977

MEMORANDUM TO: Marge Ewons
FROM: Elissa T. Garr
SUBJECT: MUR 243 (76)

Please have the attached General Counsel's Report on
MUR 243 (76) distributed to the Commission and placed on
the Compliance Agenda for the Commission meeting of
September 8, 1977.

Thank you.

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MUR 243 (76)

GENERAL COUNSEL'S REPORT

September 1, 1977

I. Summary

This matter was initiated on the basis of Senator Goldwater's assertion that six labor organizations had "given or directed to" Jimmy Carter's presidential campaign amounts in excess of \$5,000 (Congressional Record, August 31, 1976). On April 21, 1977 the Commission approved the following recommendation:

Although we have uncovered no evidence which, in our opinion, supports a finding of reason to believe with respect to the groups named by Senator Goldwater, we recommend that this file be left open for the purpose of pursuing two issues: (1) a finding of reason to believe as to Labor Appreciates Carter for failure to register and report with the Commission as required by 2 U.S.C. §§433(a) and 434; (2) an inquiry with respect to the Maritime Engineers fundraiser to determine whether those groups were required to report the proceeds of their fundraiser for the Carter campaign.

II. Evidence

A. Labor Appreciates Carter

The Commission found reason to believe, on April 21, 1977, that Labor Appreciates Carter may have received more than \$1,000 but failed to register and report with the Commission.

As detailed in the General Counsel's Report, approved by the Commission on April 21, 1977, the Labor Appreciates Carter Committee contributed \$1,000 to Committee for Jimmy Carter (hereafter referred to as CJC) on April 26, 1976, and received \$1,000 from UAW-V-CAP on May 5, 1976. On the basis that the \$1,000 was contributed to CJC nine days before the UAW-V-CAP transfer was made, the Commission determined that there was reason to believe that Labor Appreciates Carter had received more than \$1,000 in 1976 and was, therefore, a political committee as defined in 2 U.S.C. §431(d) and subject to the filing requirements of the Act (2 U.S.C. §433 and §434).

The Commission authorized that depositions be taken in this matter. These were conducted on June 13, 1977. The testimony of Eugene Land, Darnell Devers and Floyd Conner indicated that the contribution from Labor Appreciates Carter to the CJC was a result of the following:

(1) On April 19, 1976, in response to appeals from representatives of the Carter campaign, Eugene Land of the Kentucky United Auto Workers pledged \$1,000 to the CJC.

(2) Land's cash donation would not be available to the CJC until UAW-V-CAP processed the request and forwarded the funds.

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(3) The CJC said that they needed the money immediately for their work in the Pennsylvania primary, which took place on April 27, 1976. Darnell Devers, a representative of the Kentucky Machinists Union, arranged, with Land, that he (Devers) would write a \$1,000 check on an inoperative, but not closed, "Labor Appreciation Night" checking account. [Labor Appreciation Night was a political education dinner held in late 1975.] The account, according to Devers, contained \$20.00 in 1976. Devers said he would take out a note to cover the \$1,000 until UAW-V-CAP approved the funds to reimburse him.

(4) In fact, it appears that Devers and Land followed their agreed-upon plan: Devers wrote a check for \$1,000 to the Carter campaign on April 26, 1976. The check was written on the Labor Appreciation Night account, with the word "Night" crossed out and the word "Carter" inserted (Attachment 1); Devers took out a note for \$1,000 (Attachment 2); Land requested funds from UAW-V-CAP for the contribution (Attachment 3); A check was written from UAW-V-CAP to Labor Appreciates Carter Committee on May 5, 1976 (Attachment 4); The check was deposited in the account which Devers says was changed to Labor Appreciates Carter (Attachment 5 shows the reverse of UAW-V-CAP check).

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In summary, the transaction involving the Labor Appreciates Carter Committee appears to have been a \$1,000 advance by Devers which was subsequently reimbursed by UAW-V-CAP.

B. Maritime Engineers

The second issue in this MUR centered around a total of \$68,085.00 reported received by CJC from a Maritime Engineers fundraiser held on June 30, 1976 (Attachment 6). An examination was made of all maritime-related political action committees and revealed that none of the groups had reported either incurring the sponsoring costs of the fundraiser or transferring the funds received from the sale of tickets to the CJC.

The Commission recommended on April 21, 1977 that an inquiry be conducted to determine the sponsor(s) of the fundraiser and the method by which the proceeds were transmitted to the CJC.

As a result of our examination the following information was generated:

(1) The June 30, 1976 Maritime Engineers Fundraiser was sponsored by twelve individuals associated with the maritime industry (Attachment 7).

(2) Checks, in payment of tickets to the fundraiser, were written directly to the Jimmy Carter campaign. (Attachment 8.)

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(3) The costs of the fundraiser were born by the Carter Committee (Attachment 9).

(4) The ticket proceeds, up to the \$250 per person limit, were submitted for matching funds (Attachment 7).

III. Analysis

A. Labor Appreciates Carter Committee

Regarding the possible violation of the Labor Appreciates Carter Committee, the evidence available suggests that Darnell Devers advanced a sum of \$1,000 in order that Eugene Land could make a timely contribution to the Carter campaign. It appears that there was no Labor Appreciates Carter "Committee", as such, but rather a loan extended for the UAW-V-CAP contribution. Furthermore, all available evidence indicates that this \$1,000 transaction, which was subsequently reimbursed, was the only financial activity undertaken by the Labor Appreciates Carter account. The definition of political committee (2 U.S.C. §431(d)) is a "group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000." Having not exceeded \$1,000 in contributions received or expenditures made, Labor Appreciates Carter does not qualify as a political committee, and, therefore, is not required to file and report with the Commission. As a conduit, however, the committee is required to notify both the Commission and the intended recipient of the original source and the intended recipient of the contribution (§441a(a)(8)). Labor Appreciates Carter did not so notify the Commission until contacted by the Commission during our investigation.

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- 6 -

B. Maritime Engineers Fundraiser

The Commission's inquiry regarding the June 30, 1976 Maritime Engineers fundraiser for Jimmy Carter sought to resolve two issues: (1) Who sponsored the fundraiser? (2) How were the \$68,085.00 in proceeds transferred to the CJC? Specifically, if the funds were received by the sponsor and then delivered to the CJC, there may have been a violation of 2 U.S.C. §434.

Our information indicates that the sponsors of the fundraiser were twelve individuals associated with various maritime organizations. Further, the costs of the reception were borne by the CJC and were so reported in its financial statement.

Finally, the CJC states that checks in payment for tickets to the fundraiser were written directly to the Carter campaign.

Therefore, it appears that the questioned matters regarding this fundraiser have been resolved.

IV. Recommendation

On the basis of the recommendation in the General Counsel's Report of April 21, 1977 that there was no evidence to support a finding of reason to believe with respect to the six groups named by Senator Goldwater, and on the basis

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of the information set forth herein, it is recommended that the Commission find no reason to believe that (a) Senator Goldwater's remarks refer to violations of the Act; (b) Labor Appreciates Carter is a person or organization that must register as a "political committee" under the Act; and (c) there were reporting violations associated with the June 30, 1976 Maritime Engineers Fundraiser for Jimmy Carter.

It is recommended that the Commission find reason to believe that Labor Appreciates Carter is a conduit required to report to the Commission and the intended recipient, the original source and intended recipient of any contribution.

Sincerely,

William C. Oldaker
General



Charles A. Steele
Associate General Counsel

Date

1 Sept 1977
Date

79040134838



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas Huron
Committee for Jimmy Carter
c/o White House
Washington, D.C.

Re: MUR 243 (76)

Dear Mr. Huron:

This is to notify you that we have received your letter of . On the basis of the information provided in both that letter and your first letter of July 15, 1976, we believe that the Commission's questions regarding the June 30, 1976 Maritime Engineers fundraiser have been adequately answered.

The Commission voted to find no reason to believe that the Maritime Engineers had violated the Act. We appreciate your cooperation in this matter.

Sincerely yours,

William C. Oldaker
General Counsel



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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Darnell Devers
Route 9, Deerwood Drive
Frankfort, Kentucky 40601

MUR 243 (76)

Dear Mr. Devers:

This is to notify you that the Commission found no reason to believe that Labor Appreciates Carter is a political committee that must register under the Federal Election Campaign Act of 1971, as amended (the Act). However, as an intermediary or conduit for funds from one source to a campaign, Labor Appreciates Carter is required by 2 U.S.C. §441a(a)(8)) to report the original source of the contribution and the intended recipient to the Commission and to the intended recipient. In this regard, the Commission has found reason to believe that Labor Appreciates Carter is in violation of 2 U.S.C. §441a(a)(8).

Please submit any factual or legal material which are relevant to the Commission's analysis of this matter. Your response should be submitted within ten days after your receipt of this notification. If no response is received within that period of time, the Commission will make its determination on the basis of materials already available to it.

If you have any questions, please contact Kathryn Kavanagh (202/523-4073) the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel



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ATTACHMENT 1

CARTER		33	01	103
LABOR APPRECIATION NIGHT DARNELL DEVERS				
ROUTE 9, DEERWOOD DRIVE FRANKFORT, KENTUCKY 40601				
PAY TO THE ORDER OF <u>Spring Carter & Respected Company</u> 10000				
<u>Due thousands and 100</u>				
DOLLARS				
FARMERS BANK 8 CENTRAL TRUST COMPANY FRANKFORT, KENTUCKY 40601				
FOR <u>Contribution</u>				
⑆0839⑆0061⑆ 44 0885 3⑈				
<u>Darnell Devers</u>				
⑆0000100000⑆				

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DEBIT

YOUR ACCOUNT HAS BEEN CHARGED AS FOLLOWS

FARMERS BANK & CAPITAL TRUST CO.
FRANKFORT, KENTUCKY

Danell Davis

DATE *7-19-76*

NO. *44-0885-3*

DESCRIPTION	AMOUNT
<i>Danell Davis prin</i>	<i>1 00 00</i>
<i>ib. Mck # 43755 int</i>	<i>1 00</i>
TOTAL \$	<i>1 00 1 00</i>

APPROVED BY

1:0832000611: 44 0885 311 60 000001001001



April 28, 1976

ATTACHMENT 3

To Hank Lacayo, Director, UAW National CAP Department
From Dallas Sells
Subject

Dear Hank:

Enclosed is a request for funds for the Kentucky labor coalition. This money will be basically used for the Jimmy Carter election activities with the union membership. I also understand some funds were advanced and used in Pennsylvania.

I would appreciate you presenting this request to President Woodcock per your conversation with Bill Osos and Gene Land.

With best personal wishes, I am

Fraternally yours,

Dallas Sells

Dallas Sells, Director
Region 3, UAW

DS:sm
opeiu#42
encl.

79040134843



Inter-Office Communication

April 28, 1976

ATTACHMENT 3

To Leonard Woodcock, President
From Dallas Sells
Subject

Dear Leonard:

Enclosed is a request for \$1,000 V-CAP funds for the newly formed Kentucky Labor Coalition. This coalition consists of UAW, IAM and the Transportation Workers. It also appears that a teachers group will be joining this coalition.

This coalition has endorsed Jimmy Carter for President and our Kentucky CAP Council also endorsed Carter in the Kentucky primary.

The coalition's official name is Labor Appreciates Carter Committee. The \$1,000 check should be made payable to Labor Appreciates Carter Committee and sent to Eugene Land, 532 Olive Court, Lexington, Kentucky 40503, our UAW CAP Representative in Kentucky.

Thanking you for your consideration in this matter and with best personal wishes, I am

Fraternaly yours,

Dallas Sells, Director
Region 3, UAW

DS:sm
opeiu#42

79040134844



ATTACHMENT 3

April 28, 1976

To Leonard Woodcock
From Dallas Sells
Subject UAW V-CAP Funds

Please issue a check in the amount of \$1,000.00

PAYABLE TO Labor Appreciates Carter Committee
c/o Eugene F. Land
532 Olive Court
(address of payee, including street, city, zip)
Lexington, Kentucky 40503

Drawn from Central Funds
(Central or Regional Funds)

This check represents a voluntary fund contribution for
newly formed Kentucky Labor Coalition. (See memo of 4/28/76
regarding endorsement of Jimmy Carter, etc.)

(State full purpose of contribution including candidate's
name, office seeking, district and/or state involved.)

Check to be sent to: Eugene F. Land
CAP-Legislative Representative
532 Olive Court
Lexington, Kentucky

Signature

opeiu42/dm

recopied
opeiu#1:jl

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ATTACHMENT 4

9-3 720		NO. 1998	
UAW V CAP		May 5, 1976	
8000 E. JEFFERSON DETROIT, MICHIGAN 48214		\$ 1,000.00	
PAY TO THE ORDER OF		LABOR APPRECIATES CARTER COMMITTEE	
KIRCHWAL-VAN DYKE OFFICE - 12		DOLLARS	
THE DETROIT BANK & TRUST COMPANY		-----ONE THOUSAND ONLY-----	
DETROIT, MICHIGAN		✓	
⑆0720⑈0009⑆ 0121⑈01058⑈⑈⑈		⑈0000100000⑈	

CREDITED TO THE ACCOUNT
OF THE WITHIN NAMED PAYEE

1040 02468

MAY 1975

MAY 12 75

MAY 13 75

RECEIVED
MAY 13 1975
FBI
NEW YORK

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Schedule D

January 1976
Federal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts Sales and Collections

For Line Number 15C Only of FEC Form

Page 2 of 4 for
LINE NUMBER 15C

(see instructions on back)

ATTACHMENT 60

Name of Candidate or Committee in full
COMMITTEE FOR JIMMY CARTER

Total Proceeds during the Reporting Period:

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

List of Sales and Collections by Event

Location and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
FUNDRAISER - Pt. Pleasant, New Jersey	5-23-76	\$ 412.00	\$
FUNDRAISER - Cherry Hill, New Jersey	5-26-76	1,225.00	
FUNDRAISER - Ramsey, New Jersey	5-26-76	32,342.00	
FUNDRAISER	5-28-76	1,635.00	
COCKTAIL PARTY - Morristown, New Jersey	5-23-76	440.00	
COCKTAIL PARTY	5-29-76	330.00	
RECEPTION - Atlanta, Georgia	6-26-76	51,943.00	
FUNDRAISER - Buford, Georgia	5-22-76	700.00	
BREAKFAST - Arizona	5-18-76	5.00	
FUNDRAISER - Rochester, New York	6-30-76	469.39	
FUNDRAISER - Dayton, Ohio	5-30-76	205.00	
CATTLE FOR CARTER - Georgia	6-30-76	900.00	
FUNDRAISER - Hollywood, Florida	7-07-76	3,510.00	
CHARLIE DANIELS CONCERT - Tennessee	5-17-76	31,437.06	
FUNDRAISER - Chicago, Illinois	7-01-76	2,025.00	
VICTORY PARTY - Minnesota	6-08-76	825.00	
VICTORY PARTY - PR	6-08-76	1,755.00	
FUNDRAISER - Altoona, Pennsylvania	4-19-76	358.10	
FUNDRAISER MARITIME ENG.	6-30-76	24,370.00	
Subtotal this period this page		\$ 154,396.55	\$
Total this period (last page this line number only)		\$	\$

Schedule D

January 1976
Federal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts Sales and Collections

For Line Number 15C Only of FEC Form 288

Page 3 of 4 forLINE NUMBER 15C

(see instructions on back)

ATTACHMENT 6

Name of Candidate or Committee in full
COMMITTEE FOR JIMMY CARTER

Total Proceeds during the Reporting Period:

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

List of Sales and Collections by Event

Location and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
206 Fundraiser Hollywood FL	7/7/76	\$ 20,300.00	\$
227 CT Victory Party	4/26/76	11,150.00	
228 Fundraiser, Blackstone, Chicago IL	7/1/76	147,554.90	
229 MN Victory Party	6/8/76	30.00	
230 PR Victory Party	6/8/76	355.00	
232 Maritime Engineers Fundraiser	6/30/76	40,180.00	
233 DC Fundraiser	6/30/76	115,027.00	
234 Pittsburgh Breakfast	6/30/76	48,401.69	
235 Philadelphia Luncheon	6/30/76	18,950.00	
236 Cocktail Buffet Andersonville GA	6/15/76	525.00	
237 WI Victory Party	6/8/76	30.00	
238 Boston Fundraiser	6/30/76	38,150.00	
239 NC Fundraiser	6/28/76	154,235.00	
240 Fitzgerald GA Fundraiser	6/30/76	3,852.87	
241 NYC Fundraiser	6/24/76	70,675.00	
244 Milwaukee Breakfast	6/29/76	17,675.00	
245 Dallas TX Fundraiser	7/14/76	90,369.44	
246 Miami Cocktail Party	7/7/76	74,255.00	
247 Buffalo Cocktail Party	7/1/76	2,200.00	
Subtotal this period this page		\$853,915.90	\$
Total this period (last page this line number only)		\$	\$

Schedule D

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

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

Page 2 of 2 forLINE NUMBER 15C

(see instructions on back)

ATTACHMENT 6

Name of Candidate or Committee in full

COMMITTEE FOR JIMMY CARTER

Total Proceeds during the Reporting Period:

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

List of Sales and Collections by Event

Location and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period
WDC FUNDRAISER	6/30/76	\$ 2,890.00	\$
PUERTO RICO MOVIE PREMIERE	6/20/76	1,975.00	
FUNDRAISER-HOLLYWOOD, FLORIDA	7/07/76	1,000.00	
JC FUNDRAISER-BLACKSTONE HOTEL, CHICAGO	7/01/76	10,450.00	
MARITIME ENGINEERS' FUNDRAISER	6/30/76	3,535.00	
WDC FUNDRAISER	6/30/76	5.00	
PITTSBURGH BREAKFAST	6/30/76	4,080.00	
WI VICTORY PARTY	6/08/76	82.00	
BOSTON, MA FUNDRAISER	6/22/76	1,755.00	
NC FUNDRAISER	6/28/76	11,100.00	
DALLAS FUNDRAISER	7/14/76	1,850.00	
MIAMI, FL COCKTAIL PARTY	7/07/76	50.00	
DELEGATE PARTY	6/27/76	30.00	
VA FUNDRAISER	7/06/76	2,938.50	
TN FUNDRAISER	5/18/76	44,908.00	
PORTLAND, OR LUNCHEON	5/24/76	3,278.00	
CHARLOTTE, NC VICTORY PARTY	6/08/76		3,954.90
Subtotal this period this page		▶ \$	\$
Total this period (last page this line number only)		▶ \$25,311.65	\$ 3,954.90

COMMITTEE FOR JIMMY CARROLL

July 15, 1977

ATTACHMENT 7

FEDERAL ELECTION
COMMISSION

77 JUL 20 AM 11:34

772171

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 243(76)

Dear Mr. Oldaker:

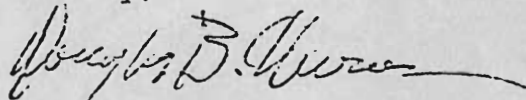
Your June 23 letter to Joanna Lambert concerning this matter was not received by our office until June 30. We trust that this letter is fully responsive to your inquiries.

Attached is a list of the names and addresses of the sponsors of the June 30, 1976 fundraiser at the Shoreham Hotel. Some of the individuals who attended sent their contributions in advance to one of the sponsors, who in turn gave them to a campaign representative at the fundraiser on the evening of June 30. Others who attended gave their checks directly to the representative at the door on June 30. Our campaign has no records distinguishing between those individuals who contributed in advance and those who contributed at the door.

Our committee submitted for matching that portion of the receipts from the fundraiser which were eligible to be matched--i.e., those funds which were adequately documented and which did not exceed \$250 for any given individual.

Please contact us if we can be of further assistance regarding this matter.

Sincerely,



DOUGLAS B. HURON

Attachment

79040134851

SPONSORS
CARTER FUNDRAISER
June 30, 1976
Shoreham Hotel

William R. Anderson
2700 Virginia Avenue, N.W.
Washington, D. C. 20037

James R. Barker
156 Pear Tree Point Road
Darien, Connecticut 06820

Leo Vladimir Berger
7 Meadow Road
Old Westbury, New York 11568

Jesse M. Calhoon
National Marine Engineers'
Beneficial Association
400 First Street, N.W.
Washington, D.C. 20001

Morris Feder
340 East 64th Street
New York, New York 10017

Paul Hall
Seafarers Political Activity
Donation
675 Fourth Avenue
Brooklyn, New York 11232

Richard W. Kurrus
American Export Lines Political
Action Committee
2000 K Street, N.W.
Washington, D.C. 20006

Captain Robert Murray
Puerto Rico Management Company
P. O. Box 1910
Elizabeth, New Jersey 07207

Joseph M. Penot
1345 Sylvia Avenue
Metairie, Louisiana 70005

Paul F. Richardson
Sea-Land Service, Inc.
P. O. Box 900
Edison, New Jersey 08817

Anthony Scotto
Brooklyn Longshoremen's PAF
343 Court Street
Brooklyn, New York 11231

William R. Steinberg
270 Madison Avenue
Room #207
New York, New York 10016

79040134852

VERNER, PFERT, BERNHARD AND McPHERSON

JAMES M. VERNER
EUGENE T. LIPPERT
BERL BERNHARD
HARRY McPHERSON
RONALD B. NATALIE
WILLIAM C. EVANS
MICHAEL J. ROBERTS
JOHN L. RICHARDSON
RONALD D. EASTMAN
MARK J. ANDREWS
HENRY GOLDBERG
FRITZ R. KAHN
STUART F. PIERSON
MICHAEL F. GOLDMAN
HOWELL E. BEGLE, JR.

SUITE 1000
1660 L STREET, N. W.
WASHINGTON, D. C. 20036

CABLE ADDRESS
VERLIP

(202) 452-7400

JOHN A. MERRIGAN
THOMAS E. ACEY, JR.
JOSEPH L. MANSON, III
ROBERT R. BRINKER
LYNDA S. MOUNTS
RUSSELL E. POMMER
JEFFREY D. KOMAROW
THOMAS J. KELLER
BARBARA DAVIS
ANN K. H. SIMON
VICTOR S. ELGORT
RICHARD L. CYS
WILLIAM C. McFADDEN

MERRITT RUHLEN
WHITNEY GILLILLAND
OF COUNSEL

August 26, 1977

Ms. Kathryn Cavanaugh
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 243 (76)

Dear Ms. Cavanaugh:

On July 15, 1977, the Committee for Jimmy Carter wrote the Commission, furnishing certain information requested with respect to the captioned matter. I understand you have requested additional information.

First, you asked whether any groups or individuals other than the Committee for Jimmy Carter made any payments to the Shoreham Hotel in Washington in connection with the fundraiser held June 30, 1976. To the best of the Committee's information, only the Committee for Jimmy Carter paid the Shoreham for expenses relating to that event.

Second, you requested the identity of the payees on the checks received in connection with the fundraiser. All of the checks which the Committee received and processed were made out to either the Committee for Jimmy Carter or the Jimmy Carter Presidential Campaign (or to similar entities, such as Carter for President). Specifically, checks were not made payable to the sponsors of the fundraiser and then turned over to the Committee.

If you have any further questions concerning this matter, please contact me.

Sincerely,

Ronald D. Eastman
Counsel for the Committee for
Jimmy Carter

79040134853

7-974013485475

- 1 - 11

SCHEDULE B - ITEMIZED FUNDRAISING EXPENDITURES FOR LINE 22 OF FEC FORM 3

COMMITTEE FOR JIMMY CARTER

ALGEAN FARE
539 COMMONWEALTH AVENUE
BOSTON MA 02215

BANK CHECK NUMBER	ACCTS/LK	ACCOUNT NAME	YY/MM/DU	AMOUNT
GAG 4020	1	MEETINGS-FUND-RAISING	76/07/01	\$ 5125.00

THE ALNEY'S-DEUZEL ALNEY SR.
NOBLE ROAD
PADUCAH KY 42001

BANK CHECK NUMBER	ACCTS/LK	ACCOUNT NAME	YY/MM/DU	AMOUNT
GAG 4330	1	MEETINGS-FUND-RAISING	76/07/01	\$ 150.00

X SHOREHAM AMERICANA HOTEL
2500 CALVERT STREET NW
WASHINGTON DC 20008

BANK CHECK NUMBER	ACCTS/LK	ACCOUNT NAME	YY/MM/DU	AMOUNT
UCW 748	1	MEETINGS-FUND-RAISING	76/07/06	\$ 1620.23

BAPTIST BOOK STORE
2620 AVENUE E EAST
AMINGTON TX 76011

BANK CHECK NUMBER	ACCTS/LK	ACCOUNT NAME	YY/MM/DU	AMOUNT
NYN 1193	1	MISC. FUNDRAISING EXPENSES	76/07/01	\$ 270.00

COMMITTEE FOR JIMMY CARTER

20001254

RECEIVED
VERNER, BERNHARD AND MCPHERSON
FEDERAL ELECTION COMMISSION

LAW OFFICES

SUITE 1000

1660 L STREET, N. W.

WASHINGTON, D. C. 20036

CABLE ADDRESS

VERLIP

(202) 452-7400

JOHN A. MERRIGAN
THOMAS E. ACEY, JR.
JOSEPH L. MANSON, III
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LYNDA S. MOUNTS
RUSSELL E. POMMER
JEFFREY D. KOMAROW
THOMAS J. KELLER
BARBARA DAVIS
ANN K. H. SIMON
VICTOR S. ELGORT
RICHARD L. CYS
WILLIAM C. MCFADDEN

MERRITT RUHLEN
WHITNEY GILLILLAND
OF COUNSEL

JAMES M. VERNER
EUGENE T. LIIPFERT
BERL BERNHARD
HARRY MCPHERSON
RONALD B. NATAL
WILLIAM C. EVANS
MICHAEL J. ROBERTS
JOHN L. RICHARDSON
RONALD D. EASTMAN
MARK J. ANDREWS
HENRY GOLDBERG
FRITZ R. KAHN
STUART F. PIERSON
MICHAEL F. GOLDMAN
HOWELL E. BEGLE, JR.

77 AUG 29 AM 9:00

August 26, 1977

Ms. Kathryn Cavanaugh
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

772521

Re: MUR 243 (76)

Dear Ms. Cavanaugh:

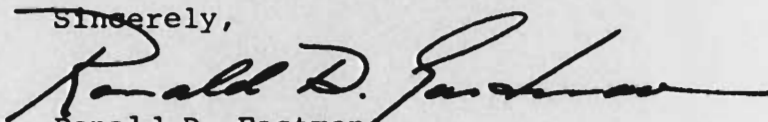
On July 15, 1977, the Committee for Jimmy Carter wrote the Commission, furnishing certain information requested with respect to the captioned matter. I understand you have requested additional information.

First, you asked whether any groups or individuals other than the Committee for Jimmy Carter made any payments to the Shoreham Hotel in Washington in connection with the fundraiser held June 30, 1976. To the best of the Committee's information, only the Committee for Jimmy Carter paid the Shoreham for expenses relating to that event.

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If you have any further questions concerning this matter, please contact me.

Sincerely,

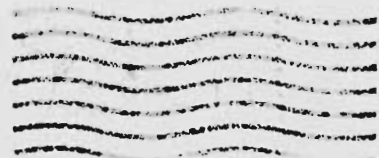


Ronald D. Eastman
Counsel for the Committee for
Jimmy Carter

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5
8
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7 9 0 4 0 1 3 8 5 6

LAW OFFICES
ERNER, LIIPFERT, BERNHARD AND MCPHERSON
SUITE 1000
1660 L STREET, N.W.
WASHINGTON D.C. 20036



Ms. Kathryn Cavanaugh
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

77 AUG 29 AM 11:15

FEDERAL ELECTION
COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 JUL 22 AM 11:17

FEDERAL ELECTION COMMISSION

RE: MDR 243 (76)

772209

A P P E A R A N C E S

Hon. David R. Spiegel
Deputy Assistant General Counsel
Federal Election Commission
1325 K Street, Northwest
Washington, D. C. 20564

Ms. Kathryn Kavanaugh
Research Assistant

JUANITA M. TOOLE

COURT REPORTER - PUBLIC STENOGRAPHER
109 SPRUCE DRIVE, FRANKFORT, KENTUCKY 40601
PHONE 1-502-227-4955

79040134857

Henlock
ERASABLE

Homlock

FEDERAL ELECTION COMMISSION

ERASABLE

RE: MUR 243 (76)

79040134858

* Pursuant to agreement of the parties hereto
the deposition of Mr. Darnell Devers and Mr. Eugene Land
was taken at the Municipal Building, Frankfort, Kentucky,
on June 13, 1977 at 1:00 P.M.

JUANITA M. TOOLE

COURT REPORTER - PUBLIC STENOGRAPHER
109 SPRUCE DRIVE, FRANKFORT, KENTUCKY 40601
PHONE 1-502-227-4955

79040134859

The witness, DARNELL DEVERS, after being duly sworn, deposes and states as follows:

DIRECT EXAMINATION

BY MR. SPIEGEL:

Q1 As a preliminary matter before we start, Mr. Devers, are you aware of the fact that you have the right to have an attorney present if you want to have one?

A To be honest with you, I was not aware until right now but I trust my government.

Q2 Okay, so we can proceed without an attorney, is that okay with you?

A Yes.

Q3 What is your home address?

A Route 9, Deerwood Drive, Frankfort, Kentucky 40601.

Q4 What is your business position?

A I am a Grand Lodge representative of the International Association of Machinists and Aerospace Workers Union.

Q5 Could you state your business address for the record?

A Route 9, Deerwood Drive; I work out of my home, but I have offices throughout the State. I have three other offices but my mailing address is Route 9.

Q6 Prior to April, 1976, have you been associated with any committees or groups which gave aid or assistance to the Carter presidential campaign?

7 9 0 4 0 1 3 4 8 6 0

A Prior to April 6?

Q7 April, 1976.

A No, not at that time, I don't think. What do you mean, in checks, gave money --

Q8 Any groups or committees?

A Not groups, I bought a couple of tickets one time to a dinner on April 14 in Louisville. That is the only recollection to anything to my first contact with the Carter people, I guess, if my memory serves me correctly.

Q9 Have you made any contributions to the Carter campaign?

A Yes.

Q10 Could you state the amounts?

A \$500 at one time and, I think, \$200 previously to that on my wife and I's personal account.

Q11 Do you have checks for those contributions with you?

A Yes. I have xerox copies of them.

OFF THE RECORD

Q12 Are these accurate copies of the checks that you gave to the Carter campaign?

A Two of them are out of my personal account, one is on **another** account, we marked out the word Night and put Carter.

Q13 I will question you about that later, I am just concerned about the first two checks.

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A Okay, the first two checks, yes, my wife and I gave to the Jimmy Carter Presidential Campaign out of our personal checking account. One of them dated 4-19-76 and one dated 4-16-76.

MR. SPIEGEL: Okay, let us enter those checks as Exhibits 1 and 2.

Q14 Did you, at any other time, have occasion to discuss contributions to the Carter campaign?

A Yes.

Q15 Approximately, what time or-times did these discussions take place?

A If my memory serves me correctly, it was the 19th of April.

Q16 Where did that meeting take place?

A Ramada Inn, Frankfort, Kentucky.

Q17 Were any other individuals present at that time?

A Yes.

Q18 State their names.

A Floyd Conner and Eugene Land.

Q19 Was anybody else present?

A Dale Sights.

Q20 What were the positions of these persons if you are aware of them?

A Floyd Conner is a business agent for the International Association of Machinists and Aerospace Workers Union.

Eugene Land is an international rep for the UAW. Dale Sights, at that time, was chairman of the Carter for President campaign in the State of Kentucky. His official title, I don't know.

Q21

What was discussed at this meeting?

A

Well, in any campaign, I think you discuss money; and they were discussing as to how we could raise some money for the presidential campaign in behalf of Jimmy Carter. And, sitting around there with a drink, I told them that out of my personal account I would write them a check for \$500; and, I turned to my friend and said it looks like you could do the same thing. So, Mr. Floyd Conner wrote them a check for \$500. And, at that time, I turned around to Mr. Land and said; you know, it looks like a representative of the Machinists Union is coming up with a \$1,000, it looks like UAW could do the same thing some way or another. To the best of my recollection, that is the way the conversation went. At that time, he said he didn't carry or have that kind of money, but if there was some way we could give it to the Democrat chairman at that time, he could reimburse. So we talked about how we could get the money to the chairman since he seemed like he needed it at that time. Somebody

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brought up the account we had used, Labor Appreciation Night, back in '75 or '76, I'm not even sure. I told them the account was still open but there was no money in it; but we could, I guess, just take it and strike out the word Labor Appreciation Night and put Carter in there; write a check on it and I would sign a note to cover it and then they could reimburse the account and I would have the note run through like a check. Everybody seemed to agree.

Q22 Was this \$1,000 that we are talking about in addition to the amount that you and Mr. Conner had said that you were giving to the campaign?

A It was in addition to the \$500 that he personally give out of his personal checking account and the \$500 that I personally give. It was not given in behalf of anybody but ourselves,

Q23 And who was this \$1,000 given on behalf of to invest in the Carter campaign?

A Well, as I said earlier, at that time, we were trying to put some kind of a committee together. This never did really materialize and it was given Labor Appreciates Carter; that's just like the check says. And there was really no committee established or nothing, no officer, nobody elected, nobody --

79040134864
Q24

I am going to show you a copy of the check that has at the top Labor Appreciation Night, the word Night crossed out with the word Carter penciled in. It is a check for \$1,000 and it is dated April 19, 1976. Is this the \$1,000 check that you are referring to? That's the third check down.

A

Yes, that's the check I am referring to that was crossed out.

Q25

And is this the check that was from this committee that you state was never formed?

A

Right, it never materialized.

MR. SPIEGEL: Let's enter that check for Labor Appreciation Night crossed out Carter as Exhibit 3.

Q26

I am going to show you a copy of a note which is marked debit, Farmers Bank and Capital Trust Company, Darnell Devers, principal - \$1,000, in trust - \$1.00. Is this note familiar to you?

A

Yes, it is where the bank ran it through this account, and took care of the note that was signed in order to cover the \$1,000 check, yes sir.

MR. SPIEGEL: Thank you. This is Exhibit 4.

OFF THE RECORD

79040134865

Q27 Did there come a time when you received money from Mr. Land as a result of that meeting?

A It is my recollection that I received a check from Mr. Land for \$1,000 which in turn I put in the account which I had had changed from Night to Carter to cover the note for a \$1,000. Yes, sir.

Q28 Now you mentioned Labor Appreciation Night. What was that?

A Labor Appreciation Night is where all the labor unions in the State of Kentucky through a coalition got together and invited the politicians, both Republicans and Democrats, to a sit-down dinner in Louisville, Kentucky. The money spent on this was provided through the sale of tickets to union members throughout the State. We spent a total of \$11,000 with which we bought 1,100 meals at \$10.00 per ticket. It was an educational function for union members throughout the State of Kentucky.

Q29 Was there any money left over as a result of that Labor Appreciation Night?

A Other than \$20.00 that I put into the account when I first opened it out of my pocket.

Q30 Do you have any receipt or check with you that would show the receipt of the \$11,000?

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A Yes. Are you talking about where I paid it or, exactly what are you talking about?

Q31 A receipt that would show the bill for the \$11,000 in payment of the \$11,000?

A Yes, I do. As a matter of fact, I have the cancelled checks. Cancelled checks and the bill.

OFF THE RECORD

Q32 Was there to your knowledge ever a political committee by the name of Labor Appreciates Carter?

A Committee, per se, no. People got together and started to formalize which never did become a reality, yes.

Q33 Were you ever an officer of any committee named Labor Appreciates Carter?

A No, sir. There was no officers.

MR. SPIEGEL: Okay, I have no further questions. Let's at this point enter for the record Exhibits 5, 6 and 7, the receipt from the Ramada Inn for Labor Appreciation Night, and the two checks and the payment referred to in previous testimony.

Q34 Are you familiar with William Haines?

A

Yes

Q35

Was he in any way connected with Labor Appreciation
Carter or any of the other --

A

No.

MR. SPIEGEL: Thank you


DARNELL DEVERS

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7 9 0 4 0 1 3 4 8 6 8

The witness, EUGENE F. LAND, after being duly sworn, deposes and states as follows;

DIRECT EXAMINATION

BY MR. SPIEGEL:

Q1 Would you spell your name for the record?

A E-u-g-e-n-e F., middle initial, Land L-a-n-d.

Q2 What is your home address?

A 532 Olive Court, Lexington, Kentucky 40503.

Q3 What is your business occupation?

A I'm international representative and my title is Legislative Cap Representative for the State of Kentucky.

Q4 For which organization?

A United Automobile Workers Union.

Q5 Do you participate in any functions involving the making of contributions or expenditures to federal candidates?

A Yes, I do.

Q6 Are you familiar with a group called Labor Appreciates Carter?

A Yes, I am.

Q7 Could you describe how you became familiar with that group?

A In very late April or early May, I was contacted by the Governor of the State saying he was going to make

endorsement for Jimmy Carter on a certain date. There had been other officials, political officials, in Kentucky who had contacted me on behalf of Senator Jackson and I was contacted by a Mr. Darnell Devers, who is a member of the Machinists Union, asking me to attend a meeting in Frankfort, Kentucky at the Ramada Inn on, I can't tell you the date, but the early part of May. There's probably a record of the date somewhere but I don't really know the date. We have a record of it occurring on April 19. Does that sound like a likely date?

Q8

A

That's possible. I don't remember the date actually.

Q9

Who was present at this meeting besides Mr. Devers?

A

Dale Sights, who was the state campaign chairman for Jimmy Carter. Harold King, who is a member of the United Automobile Workers Union. Charles Head, who is a member of the United Mine Workers Union. Mr. Al Shepherd, I believe, or Shepherd's the last name at least, from Danville, Kentucky, who is a member of the Transportation Workers Union. I think there was a Mr. Ray Grider in attendance and there was a state official of the AFL-CIO Union. There were others, I can't remember, I would say approximately 15 or 20 people in attendance.

Q10

Was there a Floyd P. Conner?

7 9 0 4 0 1 3 4 8 7 0

A There was a Floyd P. Conner in attendance.

Q11 Was this the only meeting of this type that took place in April or May to the best of your recollection?

A No. There was another meeting held I believe at the Frankfort Country Club. I'm not sure of the date or place.

Q12 Was this the only meeting held with Mr. Devers present?

A I think Mr. Devers was present, I think he was present at the other meeting, I'm quite sure he was, I know he was, in fact, I can say he was present at the Frankfort Country Club, a luncheon type meeting.

Q13 Now this first meeting, do you remember where this took place?

A Yes, at the Ramada Inn in Frankfort.

Q14 What was the substance of what was discussed at this meeting?

A Substance of the meeting was to form a committee of various unions to support Carter for President. It was a national movement by the national labor organizations to form labor coalitions in most every state, I believe; and, this was the beginning of an effort to form a labor coalition for Carter.

Q15 Is this labor coalition that you are referring to Labor Appreciates Carter?

7 9 0 4 0 1 3 4 8 7 1

A Yes, that's what it was called at that meeting.

Q16 Was it in existence at the time of that meeting?

A I guess it was just born at the time of that meeting; it became in existence.

Q17 Was the subject of contributions by any individuals at that meeting discussed?

A Yes, they were.

Q18 Do you recall if any individuals, at that time, pledged money and made contributions to the Carter campaign?

A Yes, there was a, I made a pledge of \$1,000 stating that it would take a, the way my operation was, a couple of weeks possibly to get a check. I think a number of other representatives of other unions said that they would check with their international officers or whoever they had to check with and subject to approval, would commit some money, but I don't know of any definite amount committed, but there was a commitment to try to raise some money by various other individuals.

Q19 Did the, to your recollection, did Mr. Devers and Mr. Conner make any contributions?

A Yes, to my recollection, they made a commitment to raise some money.

OFF THE RECORD

I would have to say to my honest knowledge, there was no official minutes kept of those two meetings and sent out to the participating members. At least I don't recall ever receiving any minutes, unfortunately.

Q20 At this meeting, did any conversation take place between you and Mr. Devers regarding the making of a contribution by Labor Appreciates Carter?

A Yes.

Q21 What was the substance of that conversation?

A Well, Mr. Sights had said to Mr. Devers and to me that they needed some monies badly in the Pennsylvania primary that was coming up shortly, and they had hoped that maybe labor could raise some money to use up there cause they desperately needed money. And, I had made a pledge of the \$1,000 and Mr. Devers made the pledge too. Mr. Sights, he would go ahead and raise the money, or find the money out of his personal account or whatever and then my \$1,000 would replace that as I recall. And, I think that's, I might say that the information that Mr. Sight's secretary just gave me on the phone was that their records show a \$5,000 personal check and a \$2,000 personal check for Mr. Devers.

Q22 \$5,000?

A \$500, \$500, I'm sorry, and a \$200; and, I gave my check, a \$1,000 check to Mr. Devers. Their records don't show anything about that at all.

Q23 Did there come a time after this meeting when you sent money to Mr. Devers to pay him back for this money that he had paid for out of his personal account?

A The only money that I ever gave Mr. Devers was the \$1,000 check.

Q24 And what was that check for?

A That was for the, it was earmarked for the Labor Appreciates Carter committee and I would think to be used in any manner that the committee saw fit to use. I'm not, whether it was, I have to assume it was to reimburse him on some expenses he had given personally. I didn't really earmark it that way. I just gave it to him to operate the committee.

Q25 Was it in response to any conversations you had with him at that Ramada Inn meeting?

A Yes, as I have stated, I said that I would commit a \$1,000 to the labor from the auto workers and it was hoped at that time that other people would contribute money so that I would assume we were hoping to raise something like 5,000 or so dollars. Apparently, that didn't materialize, but my commitment of \$1,000, I

did receive and present to Mr. Devers.

Q26 Was there ever any understanding between you and Mr. Devers that he would pay monies out of a personal account and you would pay him back with that \$1,000 check?

A He made that statement that he would do that. That he would, until my thousand dollars come through, that he would go ahead and advance or he would pay some personal money.

Q27 Are you familiar with the persons who are officers, who were officers, of the Labor Appreciates Carter committee?

A Yes, to my knowledge, Mr. Devers was the chairman. He asked me if I would be the treasurer and I refused saying I don't know anything about filling those forms out, I don't want to fool with them. And, he told me that he would get a member of his union from Bowling Green, Mr. Floyd Conner, to be the treasurer. I have no actual knowledge that he is the treasurer but he told me he would be.

Q28 Are you aware or do you have knowledge of any other contributions that were made by Labor Appreciates Carter?

A I have no other awareness of any other, and as I say,

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their records show, apparently there wasn't, I have no knowledge -- . To answer your question, I have no actual knowledge of any other contribution by any other labor organization.

Q29 Are you familiar with an activity or function that was called Labor Appreciation Night?

A Yes.

Q30 Did this Labor Appreciation Night come up at any point in the discussion with Mr. Devers in that April meeting at the Ramada Inn?

A Well, either that one or the one, the next meeting we had. I think it came up at that meeting at the Ramada Inn that labor would try to get the leadership of the state together for a Labor Appreciates Carter dinner or whatever.

Q31 This Labor Appreciation Night I'm referring to occurred in October or November of '75. Is that the function that you are familiar with?

A That was, yes I'm familiar with, that was Labor Appreciates Carter - Mondale, that's a different --

OFF THE RECORD

Q32 Did the subject of Labor Appreciation Night, that's the event that occurred in late 1975, did that come up at any point in discussions at this Ramada Inn meeting in April of 1976?

8

A I can't recall it come up per se. I think the conversation was around, we hold a Labor Appreciate Night or something similar to that, but I'm not sure that there was any actual discussion of that particular night that I recall.

Q33 Did the subject of any monies from that night ever come up to your knowledge?

A Not really, I can't honestly remember any monies --. I remember that there was a discussion; I remember that we owed some monies from the dinner on that Labor Appreciation Night and we helped pay it off; and, if there is any discussion come up, it was just in jest, that we're not going to do that again or something of this nature. But I don't recall any details of discussion of that.

Q34 Do you make the statements of having had a chance to refresh your memory of that off the record conference that we just had? Is that a full and accurate ---

A I'm sorry, I don't quite understand --

Q35 Is that your full and accurate recollection of the Labor, of what you remember of Labor Appreciation Night having had a chance to refresh your memory?

A I remember the Labor Appreciation Night very vividly now after refreshing my memory. But I don't remember it being discussed in detail at that meeting at the

Ramada Inn.

Q36 Are you familiar with a group called Kentucky United Labor Committee for Carter?

A Well, no. Let me preface that by saying that I'm familiar with the term, it sounds familiar, but I'm in, I'm a little bit confused on what committee or whatever that might refer to. As I recall, for the record, we had the meeting in April and we formed a Labor Appreciates Carter committee after the May 25th primary and then we formed a Labor, United Labor Supports Carter-Mondale, or words to this effect. That's pretty close to the official title.

Q37 There was another group, it was United Labor Committee?

A As far as I'm concerned Labor Appreciates Carter committee was dead and void after the May 25th primary.

Q38 So Labor Appreciates Carter committee actually pre-dates the May 25th primary?

A That's right. After that, we formed a more, better organized, all of labor, which some people, some parts of labor were for Hubert Humphrey in Kentucky, some were for Jackson, so forth. But all labor came together and the United Labor Committee for Carter - Mondale, I think that's the question you're asking me.

at a later date.

Q39 Was Labor Appreciates Carter committee formed as a result of this Ramada Inn meeting?

A Labor Appreciates Carter committee was formed at this Ramada Inn meeting.

MR. SPIEGEL: I have no further questions.

Q40 Are you aware, Mr. Land, that you have a right to have an attorney present during this deposition?

A Yes, I am.

Q41 And have you, do you consent to having waived that right?

A Yes, I do.

MR. SPIEGEL: Thank you.

EUGENE F. LAND

STATE OF KENTUCKY
COUNTY OF FRANKLIN

7 9 0 4 0 1 3 4 8 7 9
I, Juanita M. Toole, a Notary Public in and
for the state and county aforesaid, do hereby certify that the
foregoing testimony was taken by me at the time and place and
for the purpose stated in the caption; that the witnesses were
duly sworn by me before giving their testimony; that said
testimony was first taken by me in shorthand and later transcribed
on the typewriter and that the foregoing Twenty
pages of typewritten matter constitute a true and correct copy
of all testimony taken down by me in the above styled cause of
action.

I certify that the appearances are as listed on the first
page of this transcript.

Witness my hand and notarial seal this July 1, 1977.

My Commission Expires:
2-17-78

Juanita M. Toole
NOTARY PUBLIC
State of Kentucky at Large

79040134880

MUR 243

200 #1113

DARNELL OR JOANNE C. DEVERS
RT. 9, DEERWOOD DR., (502) 695-2149
FRANKFORT, KENTUCKY 40601

64 03 429

PAY TO THE
ORDER OF

1 2 4 19 76 73.61
839
500 00

Devers Exp. #1 Mr. Huber 00 DOLLARS

FARMERS BANK & CAPITAL TRUST CO.
FRANKFORT, KENTUCKY

FOR

Contribution 13 2046 7

Darnell Devers

0000050000

DARNELL OR JOANNE C. DEVERS
RT. 9, DEERWOOD DR., (502) 695-2149
FRANKFORT, KENTUCKY 40601

32 26 427

PAY TO THE
ORDER OF

4, 16 76 73.61
839
200 00

Devers Exp. #2 Mr. Huber 00 DOLLARS

FARMERS BANK & CAPITAL TRUST CO.
FRANKFORT, KENTUCKY

FOR

CONTRIBUTION 13 2046 7

Darnell Devers

0000020000

CARTER
LABOR APPRECIATION NIGHT
DARNELL DEVERS

33 01 103

ROUTE 9, DEERWOOD DRIVE
FRANKFORT, KENTUCKY 40601

PAY TO THE
ORDER OF

April 15, 76 73-61/839
1000 00
Due thousands and 100 00

Devers Exp. #3 Mr. Huber 00 DOLLARS

FARMERS BANK
& CAPITAL TRUST COMPANY
FRANKFORT, KENTUCKY 40601

FOR

Contribution 44 0885 3

Darnell Devers

0000100000

DEBIT

YOUR ACCOUNT
HAS BEEN
CHARGED
AS FOLLOWS

FARMERS BANK & CAPITAL TRUST CO.
FRANKFORT, KENTUCKY

DATE

7-19-76

NO.

44-0885-3

DESCRIPTION

AMOUNT

Devers Exp. #4 Mr. Huber 43755- prin 1000 00
int 1 00

APPROVED BY

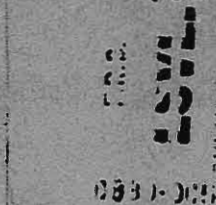
TOTAL \$

1001 00

0832 006 11 44 0885 3

60 0000100100

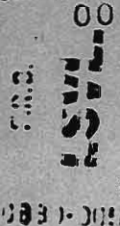
Pay the Fulton National Bank
 -19- PEACHTREE STREET OFFICE -19-
 COMMITTEE FOR JIMMY CARTER
 00 570 88



0000-0000
 BANK ATLANTA GA
 BANK ATLANTA GA

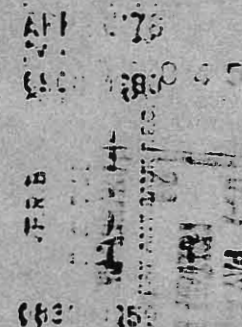
011379

Pay the Fulton National Bank
 OF ATLANTA, GA
 -19- PEACHTREE STREET OFFICE -19-
 FOR DEPOSIT ONLY
 COMMITTEE FOR JIMMY CARTER
 00 570 88



0000-0000
 BANK ATLANTA GA
 BANK ATLANTA GA

011379
 BANK ATLANTA GA



Pay the Fulton National Bank
 COMMITTEE FOR JIMMY CARTER
 00 570 88

7 9 0 4 0 1 3 4 8 8 3

PAY TO THE ORDER OF
CITIZENS FIDELITY BANK & TRUST CO
LOUISVILLE, KENTUCKY

24 043-205 0
HURSTBOURNE HOSTS, INC.
d/b/a RAMADA INN

Bookkeeper - Bank

X
PAY TO THE ORDER OF
CITIZENS FIDELITY BANK & TRUST CO
LOUISVILLE, KENTUCKY
043-205 0
HURSTBOURNE HOSTS, INC.
D.B.A. RAMADA INN

6110

AMOUNT 51.004
DATE 10-28-66
00315615-01071

0011710 07 0104073

28-10-66
21-10

088164

79040134884

Juanita M. Toole
Court Reporter
109 Spruce Drive
Frankfort, Kentucky 40601

77 AUG 3 4 30 PM

Federal Election Commission
1225 K. Street N.W.
Washington D.C. 20463

Att: Ms. Katherine Kavanaugh



79040134885



RETURN RECEIPT
REQUESTED

CERTIFIED
No. 458439
MAIL

JUANITA M. TOOLE
COURT REPORTER - PUBLIC STENOGRAPHER
109 SPRUCE DRIVE FRANKFORT, KENTUCKY 40601

To

Hon. David R. Spiegel
Deputy Assistant General Counsel
Federal Election Commission
1325 K Street, Northwest
Washington, D. C. 20564

PENGAD, BAYONNE, N. J. 07003

11:11 AM JUL 22 1977

FEDERAL ELECTION
COMMISSION

6CC 944

COMMITTEE FOR JIMMY CARTER

July 15, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 243(76)

Dear Mr. Oldaker:

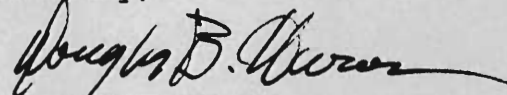
Your June 23 letter to Joanna Lambert concerning this matter was not received by our office until June 30. We trust that this letter is fully responsive to your inquiries.

Attached is a list of the names and addresses of the sponsors of the June 30, 1976 fundraiser at the Shoreham Hotel. Some of the individuals who attended sent their contributions in advance to one of the sponsors, who in turn gave them to a campaign representative at the fundraiser on the evening of June 30. Others who attended gave their checks directly to the representative at the door on June 30. Our campaign has no records distinguishing between those individuals who contributed in advance and those who contributed at the door.

Our committee submitted for matching that portion of the receipts from the fundraiser which were eligible to be matched--i.e., those funds which were adequately documented and which did not exceed \$250 for any given individual.

Please contact us if we can be of further assistance regarding this matter.

Sincerely,



DOUGLAS B. HURON

Attachment

79040134886

SPONSORS
CARTER FUNDRAISER
June 30, 1976
Shoreham Hotel

William R. Anderson
2700 Virginia Avenue, N.W.
Washington, D. C. 20037

James R. Barker
156 Pear Tree Point Road
Darien, Connecticut 06820

Leo Vladimir Berger
7 Meadow Road
Old Westbury, New York 11568

Jesse M. Calhoon
National Marine Engineers'
Beneficial Association
400 First Street, N.W.
Washington, D.C. 20001

Morris Feder
340 East 64th Street
New York, New York 10017

Paul Hall
Seafarers Political Activity
Donation
675 Fourth Avenue
Brooklyn, New York 11232

Richard W. Kurrus
American Export Lines Political
Action Committee
2000 K Street, N.W.
Washington, D.C. 20006

Captain Robert Murray
Puerto Rico Management Company
P. O. Box 1910
Elizabeth, New Jersey 07207

Joseph M. Penot
1345 Sylvia Avenue
Metairie, Louisiana 70005

Paul F. Richardson
Sea-Land Service, Inc.
P. O. Box 900
Edison, New Jersey 08817

Anthony Scotto
Brooklyn Longshoremen's PAF
343 Court Street
Brooklyn, New York 11231

William R. Steinberg
270 Madison Avenue
Room #207
New York, New York 10016

79040134887

COMMITTEE FOR JIMMY CARTER

July 15, 1977

RECEIVED
FEDERAL ELECTION
COMMISSION

77 JUL 20 AM 11:34

772171

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 243(76)

Dear Mr. Oldaker:

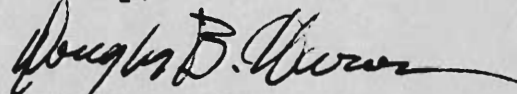
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Our committee submitted for matching that portion of the receipts from the fundraiser which were eligible to be matched--i.e., those funds which were adequately documented and which did not exceed \$250 for any given individual.

Please contact us if we can be of further assistance regarding this matter.

Sincerely,



DOUGLAS B. HURON

Attachment

79040134888

SPONSORS
CARTER FUNDRAISER
June 30, 1976
Shoreham Hotel

William R. Anderson
2700 Virginia Avenue, N.W.
Washington, D. C. 20037

James R. Barker
156 Pear Tree Point Road
Darien, Connecticut 06820

Leo Vladimir Berger
7 Meadow Road
Old Westbury, New York 11568

Jesse M. Calhoon
National Marine Engineers'
Beneficial Association
400 First Street, N.W.
Washington, D.C. 20001

Morris Feder
340 East 64th Street
New York, New York 10017

Paul Hall
Seafarers Political Activity
Donation
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Captain Robert Murray
Puerto Rico Management Company
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1345 Sylvia Avenue
Metairie, Louisiana 70005

Paul F. Richardson
Sea-Land Service, Inc.
P. O. Box 900
Edison, New Jersey 08817

Anthony Scotto
Brooklyn Longshoremen's PAF
343 Court Street
Brooklyn, New York 11231

William R. Steinberg
270 Madison Avenue
Room #207
New York, New York 10016

79040134889

772038

RECEIVED
FEDERAL ELECTION
COMMISSION
77 JUL 9 1977

ANSWERS TO INTERROGATORIES TO: FEDERAL ELECTION COMMISSION
FROM: FLOYD CONNER
DATE: June 30, 1977

Comes Floyd Conner, Directing Business Representative for District 53, International Association of Machinists and Aero-Space Workers, and for his Answers to the Interrogatories propounded to him and after first being duly sworn, states as follows:

1. Yes, I attended the meeting in the Ramada Inn in Frankfort, Kentucky on April 19, 1976.

a. Yes, Eugene Land and Darnell Devers were also present.

b. This was a meeting to discuss possible fund raising on behalf of the Jimmy Carter For President Campaign Committee. Yes, the Labor Appreciates Carter Committee was discussed. The nature of the discussion was that we would not use the Labor Appreciates Carter Committee, but that we would allow the Carter Campaign Committee itself to receive all funds in compliance with the law.

c. See above.

d. Dale Sites, Henderson, Kentucky.

2. To my understanding, I was not an officer or member of the Labor Appreciates Carter Committee. I did attend the meeting, but that was the extent of my participation.

3. To my knowledge, there were no expenditures or contributions made by the Labor Appreciates Carter Committee on behalf of the candidacy of any individual seeking Federal office.

4. No, I did not contribute to the Labor Appreciates Carter Committee.

5. Yes, I did make a personal contribution to the Jimmy Carter Committee. I enclose herein a photostatic copy of my check in the amount of \$500.00.

7 9 0 4 0 1 3 4 8 9 1

This 30th day of June, 1977.

Floyd Conner
FLOYD CONNER
Directing Business Representative
IAM & AW, District 53

SUBSCRIBED AND SWORN to before me by Floyd Conner on this
the 30th day of June, 1977 in Bowling Green, Warren County, Kentucky.

Julie Litter
NOTARY PUBLIC, Ky. State-at-Large
My Commission Expires: 12/15/79

7 9 0 4 0 1 3 4 8 9 2

FLOYD CORNER
R. R. 1
Alvaton, Ky. 42122

765

4-19-1976 73-77/839
Pay to the order of Jimmy Carter Pres. Campaign \$ 500.00
Five hundred Dollars no/100 Dollars



Bowling Bank &
Green Trust Co.
BOWLING GREEN, KENTUCKY

Memo

Floyd Corner

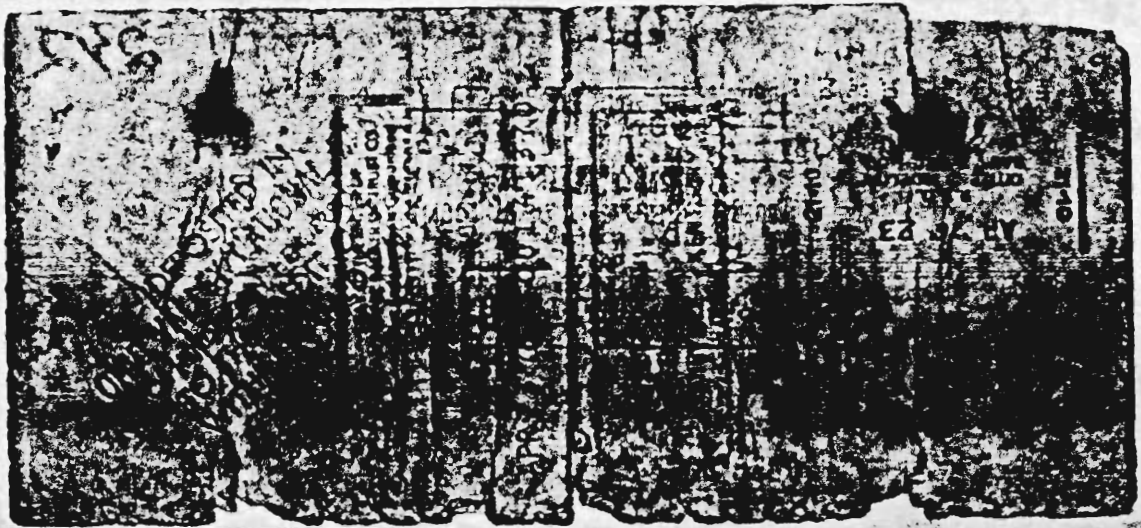
⑆0839⑉0077⑆ 113 828 6⑈

⑈0000050000⑈

APR 23 1976

⑈20038421⑈

7 9 0 4 0 1 3 4 8 9 3



79040134894

JEFFREY R. O'GRODY, P.S.C.

ATTORNEY AT LAW

408 EAST 10TH ST.

BOWLING GREEN, KENTUCKY 42101

FEDERAL ELECTION
COMMISSION

17 JUL 7 AM 10:20

FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

24 JUN 1977

Floyd Conner
Directing Business Representative
P.O. Box 1221
Bowling Green, Kentucky 42101

Re: MUR 243 (76)

Dear Mr. Conner:

I am sending this letter as a follow-up to your conversation with me on June 8, 1977, in which you indicated you would be willing to file an affidavit regarding your involvement with Labor Appreciates Carter, a committee whose political activities are under investigation in the above-numbered matter.

The committee is reported to have contributed \$1,000 to the Committee for Jimmy Carter on April 26, 1976, and received \$1,000 from UAW-V-CAP on May 5, 1976. It therefore appears that the Labor Appreciates Carter Committee received more than \$1,000 in the course of the 1976 election, and was required to file a Statement of Organization with the Federal Election Commission (2 U.S.C. §433). Further, 2 U.S.C. §434 states that each political committee "shall file with the Commission reports of receipts and expenditures." The Commission has received no such financial statements from the Labor Appreciates Carter Committee.

Since you were not available to attend an interview on June 13, 1977, we would now appreciate it if you would submit the answers to the following questions in a sworn statement:

1. Did you attend a meeting at the Ramada Inn in Frankfort, Kentucky, on April 19, 1976? If so, please advise us of the following: (a) Were Eugene Land and Darnell Devers also present? Please also indicate any other individuals whom you recall were in attendance. (b) What was the purpose of this meeting?



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
L. R. ... COUNSEL

79040134895

In particular, was the Labor Appreciates Carter Committee discussed and if so, what was the nature of the discussion? (c) At this meeting was there any discussion between you and Mr. Land and Mr. Devers or any other persons regarding contributions to the Jimmy Carter Campaign for President? If so, please relate the nature of that discussion. (d) What other individuals (names and addresses, if available) were in attendance?

2. Were you an officer or member of the Labor Appreciates Carter Committee?

3. To the best of your knowledge, what was the nature and extent of expenditures or contributions made by the Labor Appreciates Carter Committee on behalf of the candidacy of any individual seeking Federal office?

4. Did you contribute to the Labor Appreciates Carter Committee? If so, when and what amount? Please supply relevant documentation, such as cancelled checks.

5. Did you, personally, make any contributions to the Jimmy Carter campaign? If so, please state the amount and the date of the contribution. Please supply relevant documentation, such as cancelled checks.

We appreciate your cooperation in this matter. If you have any questions, please contact Kathryn Kavanagh at 202/523-4073 or David Spiegel at 202/523-4038.

Sincerely yours,

[Handwritten signature]
Counsel

Counsel

7 9 0 4 0 1 3 4 8 9 6

FL-2243

PS Form 3824, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).
☐ Show to whom and date delivered..... 15¢
☒ Show to whom, date, & address of delivery..... 30¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 55¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ASSIGNED TO:
Floyd P. Conner
P.O. Box 1221
Bowling Green, Kentucky 42101

3. ARTICLE DESCRIPTION:
REGISTERED NO. 983454 INSURED NO.

4. I have received the article described above.
SIGNATURE *Floyd Conner* P. Add. *12* Authorized agent

5. DATE OF DELIVERY 6-27-77

6. ADDRESS (Complete only if not on label)
7. ADDRESS (Complete only if not on label)

8. UNABLE TO DELIVER REASON:
CLERK'S INITIALS *140*

9. POSTMARK 27 17 US10



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 23, 1977

Mrs. Joannah Lambert
Committee for Jimmy Carter
1795 Peachtree Rd., N.E., Rm. 206
Atlanta, Georgia 30309

MUR 243 (76)

Dear Mrs. Lambert:

In the course of our investigation of this matter, it has come to our attention that the Committee for Jimmy Carter was the recipient of \$68,085.00 from a Maritime Engineers Fundraiser, held on June 30, 1976. (This total is derived from our aggregating separate amounts, all listed as received from the same fundraiser, appearing on your July 10, August 10, and September 10, 1976 Reports).

We would appreciate your providing us with the names and addresses of each of the sponsors. Also, please indicate whether the proceeds from the events were transferred as a whole by the sponsors or were transferred by the individual ticket purchasers. If the latter, were the funds which were received as ticket payments, submitted for matching funds?

In order that the Commission may soon resolve this matter, please submit your answers to these questions within ten days from receipt of this letter. If you have any questions, please call Kathryn Kavanagh (202-523-4073), the staff member assigned to this issue.

Sincerely yours,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134897

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 243 Karanagh

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

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

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY. 0
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Joannah Lambert
Comm. for Jimmy Carter
Atlanta, Georgia

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	243430	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 6-27-76 POSTMARK 11:11 AM JUN 27 1976

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 8, 1977

Darnell Devers
Route 9 Deerwood Drive
Frankfort, Ky. 40601

Re: MUR 243 (76)

Dear Mr. Devers:

Pursuant to your conversation with Ms. Kathryn Kavanagh of our staff, we confirm that the interview date in this matter which was originally scheduled for June 9, 1977 has been changed to Monday, June 13, 1977 at 12:00 a.m. at the City Hall in Frankfort, Kentucky, in Paul Royster's office.

Since it may be necessary at that time to take your deposition, we enclose herewith a copy of a subpoena. Please note that the subpoena contains a request that you produce certain documents. Please bring these at the time we speak to you.

Sincerely,

David R. Spiegel

David R. Spiegel
Deputy Asst. General Counsel

66 MUR 243

SENDER: Complete this form and return to sender.	
1. The following service is requested (check one):	
☐ Show to whom and date delivered.	15c
☒ Show to whom, date, & address of delivery.	30c
☐ RESTRICTED DELIVERY.	
☐ Show to whom and date delivered.	65c
☐ RESTRICTED DELIVERY.	
☐ Show to whom, date, and address of delivery.	85c
2. ARTICLE ADDRESSED TO: Darnell Devers Route 9, Deerwood Drive Frankfort, Ky. 40601	
3. ARTICLE DESCRIPTION: REGISTERED NO. 943322	INSURED NO.
I have received the article described above.	
SIGNATURE ☒ Addressee ☐ Authorized agent	DATE OF DELIVERY JUN 13 1977
2. ADDRESS (Complete only if requested) 1220 High St	
3. UNABLE TO DELIVER BECAUSE: CARRIER UNAVAILABLE	

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 8, 1977

Eugene Land
532 Olive Court
Lexington, Kentucky 40503

Re: MUR 243 (76)

Dear Mr. Land:

This is to confirm that you will be interviewed by representatives of the Federal Election Commission on June 13, 1977 at 1:00 p.m. at the City Hall in Frankfort, Kentucky, in Paul Royster's office.

As I indicated to you in our phone conversation on this date, it may be necessary to take your deposition when we speak to you on June 13, 1977. Accordingly, I enclose a copy of a Commission subpoena with this letter. As you will note, the subpoena contains a request that you produce certain documents. Please bring these at the time we speak to you.

If you have any questions please contact me at 202/523-4038 or Kathryn Kavanagh (203-523-4073).

Sincerely,

David R. Spiegel

David R. Spiegel
Dep. Asst. General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134900



INTERNATIONAL ASSOCIATION OF MACHINISTS
and AEROSPACE WORKERS

'77 JUN 9 AM 10:45
District 56
FEDERAL ELECTION COMMISSION

Affiliated Locals 664, 2264 & 2406

June 6, 1977

C. L. Cutliff Building
102 31-W North, Room 113
Bowling Green, Kentucky 42101

Floyd Conner,
Directing Business Representative
Phone 843-3461

Hon. William Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

Please be advised that a previous engagement will not allow me to attend an interview with Kathryn Kavanagh or any staff member of the commission on June 13, 1977.

If you have any questions please contact the undersigned (502-843-3461).

Sincerely yours,

Floyd Conner

Floyd Conner
Directing Business Representative
P.O. Box 1221
Bowling Green, Ky. 42101

cc: Kathryn Kavanagh ✓

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134901

7 9 0 4 0 1 3 4 9 0 2



INTERNATIONAL ASSOCIATION
OF MACHINISTS
AND AEROSPACE WORKERS
Local Lodge 664
P. O. Box 1221
Bowling Green, Ky. 42101

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

FEDERAL ELECTION
COMMISSION

JUN 9 11 10:20



6-3-77

3 JUN 1977

Darnell Devers
Route 9 Deerwood Drive
Frankfort, Kentucky 40601

Re: MUR 243 (76)

Dear Mr. Devers:

This is to confirm that you will be interviewed by representatives of the Federal Election Commission on June 9, 1977 at 12:00 at the City Hall in Frankfort, Kentucky in Paul Royster's office.

If you have any questions please contact Kathryn Kavanagh (202-523-4073), the staff member assigned to this matter.

Sincerely yours

William C. Oldaker
General Counsel

10 Form 3811, Rev. 10/76

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

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

☐ Show to whom and date delivered..... 15¢

☐ Show to whom, date, & address of delivery.. 35¢

☒ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Darnell Devers
Route #9 Deerwood Dr.
Frankfort, Kentucky 40601

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

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
6/6/76

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
JUN 11 1977

CLERK'S INITIALS

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

3 JUN 1977

Floyd P. Conner
Box 1221
Bowling Green, Kentucky
42101

MUR 243

Dear Mr. Conner:

This is to confirm that you will be interviewed by representatives of the Federal Election Commission on June 9, June 9, 1977, at 11:00 at the City Hall in Frankfort, Kentucky in Paul Royster's office.

If you have any questions please contact Kathryn Kavanagh (202-523-4073) the staff member assigned to this matter.

Sincerely yours,



William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79049134904

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Labor Appreciates Carter Committee)

MUR 243 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 1, 1977, the Commission determined by a vote of 4-0 to issue subpoenas to the following named persons in the above-captioned matter: Darnell Devers of Frankfort, Kentucky; Eugene Land of Lexington, Kentucky; and Floyd P. Conner.

Voting for this determination were Commissioners Aikens, Harris, Thomson, and Tiernan; Commissioners Springer and Staebler were not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134905

6-1-77
Emmons

MUR 243 FACT SHEET

Haynes - The Kentucky United Labor Committee for Carter-Mondale "has no knowledge or affiliation with the entity referred to as "Labor Appreciates Carter Committee".

Land - He received our letter at his home address in Lexington.
- UAW-V-CAP wrote a check for \$1,000 on May 5, 1976 to Labor Appreciates Carter Committee.
- Enclosed photocopy of the check revealed that it was endorsed "CERTIFIED TO THE ACCOUNT OF THE WITHIN NAMED PAYEE".
- He stated that the chairman of the LACC is Darnell Devers, Frankfort, Kentucky (same street address as reported on the CJC statements on file with the Commission.
- Intra-UAW correspondence, enclosed by Land, indicated that the \$1,000 transfer was approved through channels and intended for a Kentucky labor coalition, including UAW-IAM, and a teachers' group.

Devers - He received our letter at his home address in Frankfort.
- He, and Floyd P. Conner (also of IAM) met with Eugene Land of UAW on April 19, 1976 and discussed organizing an effort on behalf of Carter.
- He and Conner wrote checks for \$500 apiece to the Carter campaign.
- He suggested that Eugene Land match the \$1,000.
- Land replied that he didn't have the funds, that perhaps UAW-V-CAP would provide the sum, and that, in the meantime, if Devers would write a check for \$1,000, Land would reimburse him.
- Devers wrote a check for \$1,000 on an old account for "Labor Appreciation Night". He crossed out "Night" and inserted "Carter". There was never additional money given to Carter under this amended account.

FEC - Our records reveal that \$1,000 was received by the CJC from "Labor App Night" on April 26, 1976.
- \$500 was received from Darnell Devers on April 22, 1976.
- \$200 was received from Darnell Devers on April 26, 1976.
- There was no record in the CJC reports of a contribution by Floyd P. Conner.

79040134906

BEFORE THE FEDERAL ELECTION COMMISSION

May 26, 1977

In the Matter of)
) MUR 243 (76)
Labor Appreciates Carter Committee)

Request for Authorization for Deposition

As indicated in our General Counsel's report of April 12, 1977, an examination of Commission documents revealed that Citizens for Jimmy Carter (CJC) received \$1,000 on April 26, 1976 from "Labor App Carter" and that UAW-V-CAP contributed \$1,000 to "Labor Appreciates Carter Committee" nine days later, on May 5, 1976. It appeared that Labor Appreciates Carter Committee (LACC) may have received more than the \$1,000 reporting requirement threshold and, therefore, was required to file with the Commission. On April 21, 1977, the Commission found reason to believe that the Labor Appreciates Carter Committee had violated 2 U.S.C. §433 and 434.

Notification of the Commission finding was mailed to three addresses: the LACC in Frankfort, Kentucky (address reported by CJC), the LACC in Lexington, Kentucky (address reported by UAW-V-CAP), and the Kentucky United Labor Committee for Carter-Mondale in Louisville (an unauthorized committee on file with the Commission). Responses were received from each address: from a Darnell Devers, from a Eugene Land, and from a William Haynes. The responses were to a large extent contradictory and left unresolved a certain significant number of factual and legal issues, which can be summarized as follows;

1. It is unclear whether a group called Labor Appreciates Carter ever existed. Eugene Land's response encloses a copy of UAW-V-CAP's check for \$1,000 to the LACC. The endorsement on the check reads "CREDITED TO THE ACCOUNT OF THE WITHIN NAMED PAYEE. Land states further that Devers was the LACC Chairman.

On the other hand, the response from Devers indicates that the "Labor App Carter" entry on the CJC reports was a result of his writing a \$ 1,000 check on a 1975 account set up for a Labor Appreciation Night. Devers contends he replaced the word "Night" with the word "Carter.

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

79040134907

The Haynes reply indicates that he knows only of a group called Kentucky United Labor Committee, which is registered with the Commission and of which he is treasurer.

2. Devers states in his letter that he, Eugene Land and Floyd P. Conner met on April 19, 1976. They discussed organizing an effort on Carter's behalf. At that meeting, Devers writes, he and Conner (both Machinist Union representatives) each wrote checks for \$500 to the Carter Campaign. Devers' contribution is reported-in by CJC, but there is no record of a Conner contribution. Devers contends further that at the April 19 meeting he arranged, with Land, that he (Devers) would give \$1,000 to Carter and later would be reimbursed by UAW-V-CAP. Land's response makes no mention of the meeting or of the alleged reimbursement. The Devers account suggests that UAW-V-CAP and Devers may have violated 2 U.S.C. §441f (contributions in the name of another).

In light of the controverted information in the three letters, we recommend that the Commission authorize depositions of Devers, Land and Conner. We also recommend that the Commission seek disclosure of the Labor Appreciation Night check, written to Carter on April 19, 1976, and any other withdrawals on the account in 1976; any records of contributions or expenditures by Labor Appreciates Carter Committee, and the check allegedly written by Conner for \$500.

79040134908
Date

5/27/77

William C. Oldaker
General Counsel

BY:


Charles N. Steele
Associate General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: Darnell Devers
Route 9, Deerwood Dr.
Frankfort, Kentucky

At the instance of the Federal Election Commission pursuant
to §437d of Title 2 of the United States Code, you are hereby
subpoenaed to appear for deposition with regard to political
contributions by Labor Appreciates Carter Committee. Notice is
hereby given that the deposition is to be taken at

and at any and all adjournments there-
of.

You are hereby subpoenaed to appear for this deposition
and pursuant to §437d of Title 2, United States Code, to pro-
duce at the time of the deposition:

(a) Contemporaneous memoranda, including telephone logs,
and any other records under your control regarding phone calls or
other oral communication with persons associated with Labor
Appreciates Carter Committee or Kentucky United Committee for Carter-
Mondale;

(b) All bank statements, deposits and withdrawal slips,
and checks for the Labor Appreciation Night account for the years
1975 and 1976;

(c) All bank statements, deposit and withdrawal slips,
and checks for the Labor Appreciates Carter account for 1976;

(d) Records of all contributions made by you or your
authorized representatives to the Jimmy Carter Campaign, or any of
his authorized representative or committees, or any committee
making expenditures on his behalf;

79040134909

Whereas, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day of
 , 1977.

Thomas E. Harris
Chairman

ATTEST

Secretary to the Commission

79040134910

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to
Produce Books, Records, and other Relevant Documents

To: Eugene Land
532 Olive Court
Lexington, Kentucky 40503

At the instance of the Federal Election Commission pursuant
to §437d of Title 2 of the United States Code, you are hereby
subpoenaed to appear for deposition with regard to political
contributions by Labor Appreciates Carter Committee. Notice is
hereby given that the deposition is to be taken at
and at any and all adjournments
thereof.

You are hereby subpoenaed to appear for this deposition
and pursuant to §437d of Title 2, United States Code, to pro-
duce at the time of the deposition:

(a) All correspondence, memoranda, or other relevant
documents from or to you under your control which pertain to any
contribution made by you or by persons authorized by you on
behalf of Jimmy Carter's Presidential candidacy;

(b) Contemporaneous memoranda, including telephone
logs, and any other records under your control regarding phone
calls or other oral communication with persons associated with
Labor Appreciates Carter Committee, Kentucky United Committee
for Carter-Mondale;

(c) All checks drawn on any account, written to the
Labor Appreciates Carter Committee during 1976;

79040134911

Whereas, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day
of , 1977.

Thomas E. Harris
Chairman

ATTEST

Secretary to the Commission

79040134912

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records, and other Relevant Documents

To: Floyd P. Conner

At the instance of the Federal Election Commission pursuant to §437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to political contributions by Labor Appreciates Carter Committee. Notice is hereby given that the deposition is to be taken at

and at any and all adjournments thereof.

You are hereby subpoenaed to appear for this deposition and pursuant to §437d of Title 2, United States Code, to produce at the time of the deposition:

(a) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communications with persons associated with Labor Appreciates Carter Committee, Kentucky United Committee for Carter-Mondale;

(b) Records of all contributions made by you or your authorized representative to the Jimmy Carter Campaign, or any of his authorized representatives or committees, or any committee making expenditures on his behalf;

(c) All checks drawn on any personal account to the Carter campaign or to the Labor Appreciates Carter Committee;

79040134913

Whereas, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of , 1977.

Thomas E. Harris
Chairman

ATTEST

Secretary to the Commission

79040134914



PRINTED IN U.S.A.

• UAW •

FEDERAL ELECTION
COMMISSION

FILE COPY

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA-UAW

DALLAS SELLS, DIRECTOR
REGION 3, UAW

REGIONAL OFFICE
1701 W. 18TH STREET
INDIANAPOLIS, INDIANA 46202

SUB REGIONAL OFFICE
1925 LINCOLN WAY EAST
MISHAWAKA, INDIANA 48544

TELEPHONE:

REGIONAL OFFICE 317 634-7884
SUB REGIONAL OFFICE 319 259-8487

May 11, 1977

Ms. Kathryn Kavanagh, Staff Member
Federal Election Commission
525 K Street, N. W.
Washington, D. C. 20463

Dear Ms. Kavanaugh:

As promised in my letter to you dated May 9th, I am enclosing a copy of our UAW V-CAP Check Number 1998, dated May 5, 1976 in the amount of \$1,000.00 made payable to Labor Appreciates Carter Committee. We have also enclosed a copy of the back of the check for your information.

If I can be of further help to you, please advise.

Sincerely yours,

Eugene F. Land

Eugene F. Land *Per J.L.*
CAP-Legislative Representative
Region 3, UAW

EFL:jl
opeiu#494aficio
Enclosure

In Reply: 532 Olive Court
Lexington, Kentucky 40503

cc: Dallas Sells, Director
Jay Whitman, Legal Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134915

79040134916

9-9 720	
UAW V CAP	
8000 E. JEFFERSON	
DETROIT, MICHIGAN 48214	
NO.	1998
PAY TO THE ORDER OF	LABOR APPRECIATES CANTER COMMITTEE
May 5, 1976	\$ 1,000.00
-----ONE THOUSAND ONLY-----	DOLLARS
	
KERCHEVAL-VAN DYKE OFFICE - 12	
THE DETROIT BANK & TRUST COMPANY	
DETROIT, MICHIGAN	
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CREDITED TO THE ACCOUNT
OF THE WITHIN NAMED PAYEE

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UNITED AUTOMOBILE - AEROSPACE - AGRICULTURAL IMPLEMENT WORKERS
AMERICA (UAW)

DALLAS SELLS, DIRECTOR
REGION NO. 3, UAW
1701 W. 18TH ST.
INDIANAPOLIS, INDIANA 46202

FEDERAL ELECTION
COMMISSION

'77 MAY 13 PM 1:44

Ms. Kathryn Kavanagh, Staff Member
Federal Election Commission
525 K Street, N. W.
Washington, D. C. 20464



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• UAW •

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA-UAW

DALLAS SELLS, DIRECTOR
REGION 3, UAW

LEONARD WOODCOCK..... PRESIDENT
DAN HARRY..... SECRETARY-TREASURER
RECEIVED
FEDERAL ELECTION
COMMISSION

77 MAY 12 AM 10:43

REGIONAL OFFICE
1701 W. 16TH STREET
INDIANAPOLIS, INDIANA 46202

SUB REGIONAL OFFICE
1929 LINCOLN WAY EAST
MISHAWAKA, INDIANA 46544

TELEPHONE:

REGIONAL OFFICE 317 634-7884
SUB REGIONAL OFFICE 219 289-8487

May 9, 1977

Ms. Kathryn Kavanagh, Staff Member
Federal Election Commission
525 K Street, N. W.
Washington, D. C. 20463

Dear Ms. Kavanagh:

This is relative to our telephone conversation of 5/6/77 regarding a communication to Labor Appreciates Carter Committee and addressed to 532 Olive Court, Lexington, Kentucky 40503, from a Mr. William Oldaker, General Counsel, stating that said committee has not filed a statement of organization with the commission and the commission had not received a financial report from the Labor Appreciates Carter Committee.

As per your request I am stating in writing that I was not an officer of the Labor Appreciates Carter Committee and I have no records of the committee and I am not the person responsible for filing such statements. However, 532 Olive Court, Lexington, Kentucky 40503 is my home address.

As I stated to you on the telephone, I do not know why the communication was sent to me. The Chairman of the Labor Appreciates Carter Committee was Darnell Devers, a member of the IAM, and his address is Route #9, Deerwood Drive, Frankfort, Kentucky 40601, telephone 502-695-2149.

I have tried to reach Mr. Devers and was unable to do so by telephone. I suggest that he be contacted as to who the Treasurer of said committee was and why such a report had not been made.

My organization did contribute \$1,000.00 from our V-CAP (Voluntary Contributions Fund) and I gave the check to Mr. Devers. I have requested my office in Detroit to send me a photostat copy of the check and I will

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

19040134918

Ms. Kathryn Kavanagh
May 9, 1977
Page Two

forward you a copy just as soon as it is received.

If I can be of further assistance to you in this matter, please feel free to call upon me.

Sincerely yours,

Eugene F. Land
Eugene F. Land,
CAP-Legislative Representative
Region 3, UAW

EFL:jl
opeiu#494afl-cio
Enclosures

cc: Dallas Sells, Director
Jay Whitman, Legal Counsel

Subscribed and sworn to before me a Notary Public this 10
day of MAY, 1977 by _____
of Commonwealth of Kentucky.

James H. Smitson
Notary Public
My Commission Expires Sept. 5, 1980



79040134919

EUGENE F. LAND
532 OLIVE CT, LEXINGTON, KY, 40503



DALLAS SELLS, DIRECTOR
REGION NO. 3, UAW
170 W 18TH ST.
INDIANAPOLIS, INDIANA 46202

FEDERAL ELECTION COMMISSION
MAY 12 AM 10:21



Ms. Kathryn Kavanagh, Staff Member
Federal Election Commission
525 K Street, N. W.
Washington, D. C. 20463

7 9 0 4 0 1 3 4 9 2 1

FEDERAL ELECTION
COMMISSION

6cc #406

MUR 243

'77 K. 9 AM 10:45 Route 9, Deerwood Dr.
Frankfort, Ky. 40601

May 4, 1977

Mr. William Oldaker
General Counsel
Federal Election Committee
325 "K" Street, NW
Washington, D. C. 20463

Dear Sir:

I am in receipt of your letter dated April 26, 1977, which I received on April 28. After reviewing the content of your letter and thinking back on what transpired, I will try to explain it this way:

Two other gentlemen and I met on April 19, 1976 at the Ramada Inn in Frankfort, Kentucky, and were talking about putting together some type of organization in behalf of the now-elected President of the United States. While discussing the situation the subject of money came up and how we could raise some money and I told my friend who was with me that I would put up \$500.00 of my personal money if he would match it and he agreed that he would also put up \$500.00. The checks that my friend and I gave were paid to the order of the Jimmy Carter Presidential Campaign. As your records will show, one check was given by me and the other was contributed by Mr. Floyd P. Conner. Both Mr. Conner and I are representatives of the Machinists Union. The third person in the party was Mr. Gene Land, which represents the UAW.

I turned to Mr. Land, and said, "Since Floyd and I have put up \$1,000.00 for the Campaign, it looks like you UAW people could do the same." He said, "Well, I don't have that kind of money but I could possibly get the CAP Committee to put it up." I said, "Well, how do we go about doing it?" Mr. Land said, "Why don't you write them a check and get your banker to take care of it, and I will reimburse you."

The check was written April 19, 1976, made payable to Jimmy Carter Presidential Campaign. It was an old check on an old account which I had used in Labor Appreciation Night (in 1975) and I changed the word, "Night" to "Carter". At the time of the contribution in question, no committee had been formed by labor people in Kentucky in support of Jimmy Carter for President. There was never any additional money given to the President's campaign under the heading of "Labor Appreciation-Carter."

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

-2-

It was and still is my understanding that as long as the contributions are no more than \$1,000.00, there is no need to report.

To better help you in your investigation, there was a "Kentucky United Labor Committee for Carter-Mondale" formed in the State of Kentucky later, to help promote the President's campaign. To my knowledge, there was no money per se contributed by that committee to the President's campaign. There was some activity generated in behalf of the President in the form of a banquet, pamphlets and buttons distribution.

If additional information is needed to clear up this matter, feel free to contact me.

Sincerely yours,

Darnell Devers

Darnell Devers

444-376
NRN

HAYNES, MOBLEY & ZOELLER

ATTORNEYS AT LAW
614 KENTUCKY HOME LIFE BUILDING
LOUISVILLE, KENTUCKY 40202
(502) 582-4616

RECEIVED
FEDERAL ELECTION
COMMISSION

77 MAY 5 AM 10:32

WILLIAM S. HAYNES
JOSEPH V. MOBLEY
CHESTER F. ZOELLER, JR.
MICHAEL J. O'CONNELL
BRETT BUTLER
ROBERT H. SALVERS

May 2, 1977

OF COUNSEL
JAMES A. HUBBS
KENNETH E. HOLLIS

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

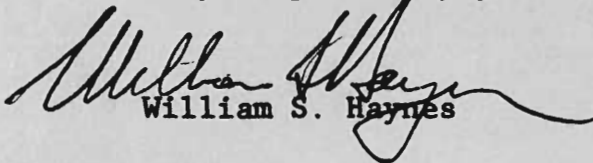
Dear Ms. Kavanagh:

As per our conversation of April 29, 1977, I am writing this letter to inform you that Kentucky United Labor Committee for Carter-Mondale has no knowledge or affiliation with the entity referred to as "Labor Appreciates Carter Committee". A review of the records will indicate that the Kentucky United Labor Committee for Carter-Mondale was organized in September 1976 and accepted no contributions or made any expenditures prior to that date. You will also find in reviewing the file for Kentucky United Labor Committee for Carter-Mondale that our statement of organization was properly filed with the Federal Election Commission.

If you have any questions please feel free to contact me in this matter.

I remain,

Very respectfully yours,


William S. Haynes

WSHet

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134923

7904034924

HAYNES, MOBLEY & ZOELLER

ATTORNEYS AT LAW

614 KENTUCKY HOME LIFE BUILDING

LOUISVILLE, KENTUCKY 40202

FEDERAL ELECTION
COMMISSION

'77 MAY 5 AM 10:25



USA 13c



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



April 28, 1976

To Hank Lacayo, Director, UAW National CAP Department
From Dallas Sells
Subject

Dear Hank:

Enclosed is a request for funds for the Kentucky labor coalition. This money will be basically used for the Jimmy Carter election activities with the union membership. I also understand some funds were advanced and used in Pennsylvania.

I would appreciate you presenting this request to President Woodcock per your conversation with Bill Osos and Gene Land.

With best personal wishes, I am

Fraternally yours,

Dallas Sells, Director
Region 3, UAW

DS:sm
opeiu#42
encl.

79040134925



Inter-Office Communication

April 28, 1976

To Leonard Woodcock, President
From Dallas Sells
Subject

Dear Leonard:

Enclosed is a request for \$1,000 V-CAP funds for the newly formed Kentucky Labor Coalition. This coalition consists of UAW, IAM and the Transportation Workers. It also appears that a teachers group will be joining this coalition.

This coalition has endorsed Jimmy Carter for President and our Kentucky CAP Council also endorsed Carter in the Kentucky primary.

The coalition's official name is Labor Appreciates Carter Committee. The \$1,000 check should be made payable to Labor Appreciates Carter Committee and sent to Eugene Land, 532 Olive Court, Lexington, Kentucky 40503, our UAW CAP Representative in Kentucky.

Thanking you for your consideration in this matter and with best personal wishes, I am

Fraternaly yours,

Dallas Sells, Director
Region 3, UAW

DS:sm
opeiu#42

79040134926



Inter-Office Communication

April 28, 1976

To Leonard Woodcock
From Dallas Sells
Subject UAW V-CAP Funds

Please issue a check in the amount of \$1,000.00

PAYABLE TO Labor Appreciates Carter Committee
c/o Eugene F. Land
532 Olive Court
(address of payee, including street, city, zip)
Lexington, Kentucky 40503

Drawn from Central Funds
(Central or Regional Funds)

This check represents a voluntary fund contribution for
newly formed Kentucky Labor Coalition. (See memo of 4/28/76
regarding endorsement of Jimmy Carter, etc.)

(State full purpose of contribution including candidate's
name, office seeking, district and/or state involved.)

Check to be sent to: Eugene F. Land
CAP-Legislative Representative
532 Olive Court
Lexington, Kentucky

Signature

opeiu42/dm

recopied
opeiu#1:jl

79040134927

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

26 APR 1977

Labor Appreciates Carter Committee
532 Olive Court
Lexington, Kentucky 40503

Dear Sir:

This is to notify you that the Federal Election Commission in the course of carrying out its normal supervisory responsibilities, has detected certain irregularities which give reason to believe that there has been a violation of the Federal Election Campaign Act of 1971, as amended (the Act).

2 U.S.C. §433 states that "each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization." Financial statements filed with the Commission reveal that your organization contributed \$1,000 to the Committee for Jimmy Carter on April 26, 1976, and received \$1,000 from UAW-V-CAP on May 5, 1976. It appears, therefore, that the Labor Appreciates Carter Committee was required to file a Statement of Organization with the Commission.

Further, 2 U.S.C. §434 states that each political committee "shall file with the Commission reports of receipts and expenditures." The Commission has received no such financial statements from the Labor Appreciates Carter Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/523-4073), the staff member assigned to this case.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134928

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William Oldaker
General Counsel

Enclosures

0134929

U.S. MAIL, INC. 1974

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6C

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

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

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Labor Appreciates Carter Comm.
532 Olive Court
Lexington, Kentucky 40503

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	458250	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4-22-77

DATE OF DELIVERY

532 Olive Ct.

ADDRESS (Complete only if requested)

532 Olive Ct.

4. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

507-109-0-205-456

Vanagh:CAW 4/25/77

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

26 APR 1977

Kentucky United Labor Committee for
Carter-Mondale
614 Kentucky Home Life Building
Louisville, Kentucky

Dear Sir:

This is to notify you that the Federal Election Commission, in the course of carrying out its normal supervisory responsibilities, has detected certain irregularities which give reason to believe that there has been a violation of the Federal Election Campaign Act of 1971, as amended (the Act).

2 U.S.C. §433 states that "each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization." Financial statements filed with the Commission reveal that your organization contributed \$1,000 to the Committee for Jimmy Carter on April 26, 1976 and received \$1,000 from UNAW-V-CAP on May 5, 1976. It appears, therefore, that the Labor Appreciates Carter Committee was required to file a Statement of Organization with the Commission.

Further, 2 U.S.C. §434 states that each political committee "shall file with the Commission reports of receipts and expenditures." The Commission has received no such financial statements from the Labor Appreciates Carter Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/523-4073), the staff member assigned to this case.

OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

79040134930

This matter will remain confidential in accordance with 2 U.S.C. Section 4379 unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

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

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

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3. ARTICLE ADDRESSED TO:
Kentucky United Labor Comm.
for Carter-Mondale
514 Kentucky Home Life Bldg.
Louisville, Kentucky

4. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438349	

(Always obtain signature of addressee or agent)

I have received the article described above:

SIGNATURE: *Pat Bowler* ☒ Addressee ☐ Authorized agent

5. DATE OF DELIVERY: 4-28-77

6. ADDRESS: (Complete only if requested)
614 KY HOME LIFE BLDG
LOUISVILLE, KY 40202

7. UNABLE TO DELIVER BECAUSE:
LOU, KY 40202

8. POSTMARK: APR 28 1977

9. INITIALS:

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

26 APR 1977

Labor Appreciates Carter Committee
Route 9 Deerwood Drive
Frankfurt, Kentucky 40601

Dear Sir:

This is to notify you that the Federal Election Commission, in the course of carrying out its normal supervisory responsibilities, has detected certain irregularities which give reason to believe that there has been a violation of the Federal Election Campaign Act of 1971, as amended (the Act).

2 U.S.C. 5433 states that "each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization." Financial statements filed with the Commission reveal that your organization contributed \$1,000 to the Committee for Jimmy Carter on April 26, 1976 and received \$1,000 from UAW-V-CAP on May 5, 1976. It appears, therefore, that the Labor Appreciates Carter Committee was required to file a Statement of Organization with the Commission.

Further, 2 U.S.C. 5434 states that each political committee "shall file with the Commission reports of receipts and expenditures." The Commission has received no such financial statements from the Labor Appreciates Carter Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kananagh (telephone no. 202/523-4073), the staff member assigned to this matter.

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PS Form 3811, Rev. 7-74
3
6
RETURN RECEIVED REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
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Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Labor Appreciates Carter Comm.
Route 9 Deerwood Drive
Frankfurt, Kentucky 40601

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

438351

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. *Mr. Darrell Lister*

DATE OF DELIVERY
APR 28 1977



5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William Oldaker
General Counsel

Enclosures

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KKKavanagh: caw: 4/22/77

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Labor for Carter)

MUR 243 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 21, 1977, the Commission determined by a vote of 6-0 that the file be left open on the above-captioned matter for the purpose of pursuing two issues:

- 1) A finding of reason to believe that Labor Appreciates Carter had failed to register and report with the Commission as required by 2 U.S.C. §§433a and 434; and
- 2) An inquiry with respect to the Maritime Engineers fundraiser to determine whether those groups were required to report the proceeds of their fundraiser for the Carter Campaign.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

April 7, 1977

In the Matter of
Labor for Carter

)
) MUR 243 (76)
)

GENERAL COUNSEL'S REPORT

I. Allegations

This MUR was generated internally on the basis of Senator Goldwater's remarks in the Congressional Record, August 31, 1976, in which he alleged that six labor PACs had "given or directed to" Mr. Carter amounts in excess of \$5,000 (see Attachment I). The labor unions and amounts named by the Senator are as follows:

Communications Workers of America	\$8,195
United Auto Workers	23,418
Marine Engineers Beneficial Assn.	44,744
Retail Clerks Union (ABC)	15,100
Amalgamated Clothing Workers	5,500
Maritime Engineers	40,180

Senator Goldwater also stated that Jack Conway of American Federation of State, County and Municipal Employees, and Mary Zon of AFL-CIO, were working for Mr. Carter. The Commission dismissed this allegation in the 48-hour report because there was no indication that either Mr. Conway or Ms. Zon had received union pay or benefits while they worked for Mr. Carter.

II. Evidence

Examination of the reports filed by the political action committees of these unions and the Committee for Jimmy Carter revealed the following:

Communication Workers of America - the aggregate amount transferred by CWA-COPE and CWA Districts #1, 3, 4, 5, and 9 Political Action Committees to the Federal Election Campaign

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was \$8,325. The Committee for Jimmy Carter's financial statement for October reveals that a total of \$3,825 was refunded to CWA Districts #1, 3, 4, 5, and 9 Political Action Committees; therefore, the net contribution from CWA-COPE and CWA District PACs to CJC in the 1976 Presidential election was \$4,500.

United Auto Workers - According to the financial statements filed by UAW-V-CAP, the committee transferred to the Carter campaign \$5,000. In addition, the UAW-V-CAP made a \$1,000 transfer to the Labor Appreciates Carter Committee, an organization which is not registered with the Commission. Independent expenditures made by the committee on behalf of Carter totalled \$19,832.23; the aggregate amount expended by UAW-V-CAP on the Carter candidacy was \$25,832.23.

Marine Engineers Beneficial Association - MEBA Political Action Fund reported transferring \$5,000 to the Carter campaign on May 10, 1976. Senator Goldwater's statement referred to \$44,744, "including fundraiser". The CJC August 10, 1976 Report lists \$40,180.00 received from "Sale of Tickets" for a Maritime Engineers Fundraiser. It appears that this receipt from "sale of tickets" could be the remaining portion of the total mentioned by Senator Goldwater.

Retail Clerks Union (ABC) - ABC-DRCIA (A Department of Retail Clerks International Association) reported transferring to the 1976 Carter campaign a total of \$5,000. ABC-Retail Food Clerks Union 1500 reported making a \$5,000 contribution to Carter. Further, CJC's reports show \$500 received from ABC-Local 400 and \$100 received from ABC-Local 888. The Committee for Jimmy Carter financial statement for October 1976, reported that the money received from ABC-RFCU Local 1500, ABC-Local 400 and ABC-Local 888 had been refunded; therefore, the net amount contributed by the Active Ballot Clubs to the Carter campaign was \$5,000.

Amalgamated Clothing Workers - Amalgamated Political Education Committee transferred \$500 to Carter on March 9, 1976 and \$4,500 on April 21, 1976. These were the only contributions made to Carter, according to the reports filed by the political action committees connected with

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ACW. In addition, \$4,508.52 in independent expenditures were made by APEC on behalf of the Carter candidacy.

Maritime Engineers - As mentioned in Marine Engineers Beneficial Association, above, the CJC reported \$40,180 "received from Sale of Tickets" for a Maritime Engineers Fundraiser.

III. Analysis

It should be noted that Senator Goldwater did not file a formal complaint with the Commission nor did his remarks in the Congressional Record ever state that there had been a violation of the Federal Election Campaign Act. In fact, he charged that "this year the labor bosses are taking full advantage of the loopholes", referring to 441b(b)(2)(A). Thus, it is not at all clear that the information he provided was intended to set forth a basis for showing violations of the Federal Election Campaign Laws. In any event, our examination of the pertinent records in this matter reveals no evidence at the present time (subject to the caveat involving MEBA) that any of the parties named by Senator Goldwater actually violated the campaign laws:

Communication Workers of America - The refunds by the Committee for Jimmy Carter to the CWA Districts #1, 3, 4, 5, and 9 Political Action Committees brought the net amount contributed by CWA PAC affiliates to \$4500, an amount within the limits set forth in §441a(a)(2)(a).

UAW-V-CAP - Given the factual circumstances involved, it does not appear that the \$6,000 aggregate contribution by UAW-V-CAP to the Carter Campaign involves a violation of the limitation in §441a(a)(1)(c).

In construing the limitations of 2 U.S.C. §441a(a), the Commission has stated that contributions to a single candidate committee would be considered as part of the donor's overall limitation to the candidate the committee was supporting. (See §110.1(h) of the proposed regulations, as interpreted in A.O. 1976-20 and the Commission Policy Statement of October 1, 1976). Thus, if this interpretation were applicable here, the \$1,000 contribution by UAW-V-CAP to Labor Appreciates Carter would have to be aggregated with the group's other contributions to the Carter campaign

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\$5,000) and would therefore create a violation of 2 U.S.C. § 441a(a)(1)(c). In point of fact, however, the \$1,000 contribution -- and for that matter all of the UAW-V-CAP contributions -- occurred before the effective date of the 1976 Campaign Law amendments and the Commission's proposed regulations. Thus, it would not have been unreasonable for UAW-V-CAP, on the basis of the statutes in existence at the time of its contributions, to have assumed that the \$1,000 contribution to Labor Appreciates Carter would not be aggregated with its prior contributions of \$5,000 to Carter.

It should be noted, however, that there are no Commission reporting records for Labor Appreciates Carter. If this is a group that received contributions or made expenditures in excess of \$1,000-- which appears likely-- they would be obliged to return and report with the Commission. See 2 U.S.C. §§433a, 434.

Maritime Engineers Beneficial Association: MEBA Political Action Fund appears not to have exceeded the \$5,000 multi-candidate committee contribution limitation, making only the one transfer of \$5,000 to CJC. The additional amount referred to by Senator Goldwater seems to be the \$40,180.00 received by Carter as a result of a Maritime Engineers Fundraiser, of which MEBA was one sponsor.

The funds which Carter received from this fundraising event are reported-in by CJC, but are not reported as transferred-out by MEBA-PAF. This is legitimate provided that the purchasers of tickets wrote their checks or directed their payments specifically to Carter and not to the sponsors to transfer to Carter. If the tickets were sold by MEBA-PAF, and the other sponsors, and then the receipts were directed to the CJC, there would be a violation of 2 U.S.C. §434(b)(4) by the sponsors of the fundraiser. A memorandum referring this question to Compliance Review is attached.

Retail Clerks Union (ABC) - CJC's refunds to certain Active Ballot Clubs in October, 1976 reduced their aggregate contribution of \$10,600 to \$5,000, an amount allowable under §441a(a)(2)(a).

Amalgamated Clothing Workers - Amalgamated Political Education Committee, the sole organization connected with ACW which contributed to CJC, transferred a total of \$5,000 to Carter's campaign. The Record Article's reference to \$5,500 directed to Carter, most likely incorporated a portion of the \$4,508.52 in independent

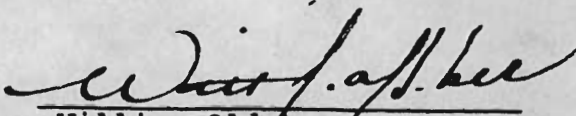
expenditures which APEC made on Carter's behalf.

Maritime Engineers - There is a possibility, as explained in MEBA, above, that the proceeds from this fundraiser were directed to CJC through a conduit, in which case there may be a violation of §434.

IV. Recommendation

Although we have uncovered no evidence which, in our opinion, supports a finding of reason to believe with respect to the groups named by Senator Goldwater, we recommend that this file be left open for the purpose of pursuing two issues: (1) a finding of reason to believe as to Labor Appreciates Carter for failure to register and report with the Commission as required by 2 U.S.C. §§433a and 434; (2) an inquiry with respect to the Maritime Engineers fundraiser to determine whether ~~those~~ groups were required to report the proceeds of their fundraiser for the Carter Campaign.

4/12/77
Date


William Oldaker
General Counsel

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or to other candidates for the U.S. Senate in the 1976 election:

Organized labor contributions

Maryland:
 *J. Glenn Beall, Jr. (R)..... 17,900
 Paul Sarbanes (D)..... 71,598

Texas:
 *Lloyd M. Bentsen (D)..... 86,750
 Alan Steelman (R)..... 0

Tennessee:
 *William E. Brock (R)..... 0
 James Esser (D)..... 21,900

New York:
 *James L. Buckley (R)..... 0
 Peter Feyer (R)..... 23,178
 Daniel Moynihan (D)..... 18,500
 Paul O'Dwyer (D)..... 500
 Robert Abrams (D)..... 300
 Bella Abzug (D)..... 19,420

North Dakota:
 *Quentin Burdick (D)..... 25,500
 Robert Stroup (R)..... 0

Virginia:
 *Harry Byrd, Jr. (I)..... 0
 Elmo Zumwalt (D)..... 45,580

West Virginia:
 *Robert Byrd (D)..... 79,300

Nevada:
 *Howard Cannon (D)..... 44,500
 David Towell (R)..... 0

Florida:
 *Lawton Chiles (D)..... 0
 John Grady (R)..... 0
 Walter Sims (R)..... 0
 Helen Hansel (R)..... 0

Arizona:
 *Paul Fannin (R)..... retiring
 Sam Steiger (R)..... 0
 John Conlan (R)..... 0
 Dennis DeConcini..... 4,100

Hawaii:
 *Hiram Fong (R)..... retiring
 William Quinn (R)..... 0
 Spark Matsunaga (D)..... 26,650
 Patay Mink (D)..... 2,400

Michigan:
 *Philip Hart (D)..... retiring
 Donald Riegle (D)..... 4,700
 James O'Hara (D)..... 103,278
 Marvin Esch (R)..... 300

Indiana:
 *Vance Hartke (D)..... 101,775
 Richard Lugar (R)..... 0

Nebraska:
 *Roman Hruska (R)..... retiring
 Edward Zorinsky (D)..... 4,300
 John McCollister (R)..... 0

Minnesota:
 *Hubert Humphrey (D)..... 95,178
 Gerald Brakke (R)..... 0

Washington:
 *Henry Jackson (D)..... 168,477
 George Brown (R)..... 0
 Henry Nelson (R)..... 0

Massachusetts:
 *Edward Kennedy (D)..... 55,550
 Mike Robertson (R)..... 0

Wyoming:
 *Gale McGee (D)..... 41,794
 Malcolm Wallop (R)..... 0

Montana:
 *Mike Mansfield (D)..... retiring
 John Melcher (D)..... 21,650
 Stanley Burger (R)..... 0

New Mexico:
 *Joseph Montoya (D)..... 41,200
 Harrison Schmitt (R)..... 0

Utah:
 *Frank Moss (D)..... 58,475
 Jack Carlson (R)..... 0
 Orrin Hatch (R)..... 0

Maine:
 *Edmund Muskie (D)..... 27,863
 Robert Moks (R)..... 0

Rhode Island:
 *John Pastore (D)..... retiring
 Philip Noel (D)..... 300
 John Chafee (R)..... 0

Wisconsin:
 *William Proxmire (D)..... 0
 Stanley York (R)..... 0

Delaware:
 *William Roth (R)..... 0
 Thomas Maloney (D)..... 19,850

Pennsylvania:
 *Hugh Scott (R)..... retiring
 John Helms (R)..... 1,500
 William Green (D)..... 64,075
 Jeanette Reidman (D)..... 10,465

Vermont:
 *Robert Stafford (R)..... 7,850
 Tom Salmon (D)..... 3,000

Mississippi:
 *John C. Stennis (D)..... 0

Missouri:
 *Stuart Symington (D)..... retiring
 Warren Hearnes (D)..... 1,350
 Jerry Litton (D)..... 800
 James Symington (D)..... 47,600
 John Danforth (R)..... 0

Ohio:
 *Robert Taft, Jr. (R)..... 3,700
 Howard Metzenbaum (D)..... 52,743
 Paines Stanton (D)..... 30,969

California:
 *John Tunney (D)..... 118,583
 Tom Hayden (D)..... 1,000
 S. I. Hayakawa (R)..... 0

New Jersey:
 *Harrison Williams (D)..... 115,750
 David Norcross (R)..... 0

Total..... 1,042,195

*Incumbent.
 *Includes aborted Presidential campaign.
 *Primary not held yet.
 *O'Hara lost primary to Riegle; Reidman lost to Green; Stanton lost to Metzenbaum; Hayden lost to Tunney.
 *Includes Presidential campaign contributions.
 *Primary on Sept. 15th.
 *Cong. Litton died; Hearnes nominated by Central Committee.

Now, there is a very interesting fact here. Note that nearly all labor contributions have gone to Democrat candidates. The respective totals are \$1,587,767 given to the Democrats compared with only \$54,428 contributed to Republicans. The Republican share of union largess is a barely visible 3 percent.

But the list of union contributions does not end here. In addition to spending for individual candidates, organized labor also funds the major Democrat campaign committees. The Democrat Congressional Dinner Committee received \$88,500 in 1975 from big labor, and has so far this year received another \$127,500 from labor, all for use in the 1976 elections.

The Democratic National Committee has also enjoyed the favor of union money. To date, this Democrat group has received \$266,289 during 1975-76 from big labor. Among the contributions are \$50,000 from the Machinists; \$15,000 from the Transportation Workers; \$10,000 from the Communication Workers; \$50,000 from the United Auto Workers; \$25,000 from the National Education Association and \$18,000 from the Ameri-

can Federation of State, County and Municipal Employees.

Then there is the Democratic Senatorial Campaign Committee. It alone has received \$91,550 during 1975-76 from union coffers. The AFL-CIO COPE gave \$25,000 of this total in 1976.

But the list is not complete yet. The Democratic Study Group here on the Hill now gets its share of substantial funding from the labor bosses. In 1976 alone, and the final figures are not yet in, this so-called independent group has received \$15,100 in union contributions.

In addition to all of the above political gifts, various other national Democrat organizations have received an extra \$35,700 from labor.

And yet the roll of union contributions still does not end. Additionally, the United Auto Workers have made their own crash contributions to several other union political action committees, including \$22,500 to the Labor Coalition for "computerization of delegate files and contingency fund." The United Auto Workers also gave \$25,000 to the 1976 Democratic Campaign Committee of Detroit, Mich., for what was called simply Federal elections.

Moreover, there are the big labor contributions to candidates for the House of Representatives. Although the figures are changing every day, it is certain that unions have already poured in excess of \$1.5 million to House candidates, even though those campaigns are just getting started.

In all, the total political cash contributions made by big labor to Presidential and congressional campaigns this early in the election year is at least \$4,235,000. Of this amount, a scant portion—no more than 2 or 3 percent—has been given to Republican organizations or candidates.

Mr. President, when the official and final totals are in after the 1976 elections, I will report back to this body the full amounts of cash spent by organized labor to elect candidates of their choosing.

The sheer volume of big labor cash contributions revealed above is astounding. It is just the tip of an iceberg, however. You have not seen anything yet. Now let us take a look at the other part of labor's muscle—the part which the labor lobbyists carefully protected from their reform efforts—the indirect, so-called in kind contributions. These indirect efforts rely on that old nemesis of privacy—the computer.

Mr. President, the American public must understand the full dimensions of big labor's efforts to dominate the election; and nothing better illustrates the truth than the unchallenged fact that organized labor has developed, and plans to use to the greatest extent ever, its vast computer system to get Jimmy Carter and its own choice of Senate and House candidates elected. You can be certain Mr. Carter knows he needs the computer's help to register voters, canvas

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August 31, 1976

CONGRESSIONAL RECORD—SENATE

S 15063

year, after a brief period of disunity, organized labor is again in the ring and slugging for the national Democrat ticket—and labor's well developed muscle is being felt from coast to coast.

Over the last few years, big labor's bosses have taken great pains to protect and expand their political powers—and are now aiming for a Republican knockout in 1976, a virtual end of the two-party system.

It is rare that the political efforts of organized labor are exposed to the glare of publicity in the public media. The American people have little opportunity to learn of the massive, calculated plan to grab hold of the national political system which is the clear aim of big labor. This is unfortunate because democracy depends upon an informed electorate—aware of the influences upon their attention and of ultimate designs to capture power in the Nation. For make no mistake about it, there is an all-out campaign by organized labor to become the new rulers of the American political system.

Mr. President, it is in order to bring a little light to the monumental reach of union political ambitions in the 1976 elections that I take to the floor today. It is difficult to know where to begin, but let us start our survey with the recent Democrat National Convention where great pressure was brought to bear upon delegates and events by the AFL-CIO's Committee on Political Education, COPE, and the Labor Coalition Clearinghouse.

The efforts of these groups were bolstered by the large numbers of delegates—over one-fifth of the entire convention—who were active union members or officers. This is more than in any previous convention.

Organized labor spent over a half million dollars electing these delegates, financing their travel and convention expenses and in some cases, even providing them pay for missed days of work.

It is no secret that the Democrat Presidential nominee, Jimmy Carter, and his advisers, are continuing to work closely with a number of big labor officials. Among numerous labor ties with Mr. Carter that can be documented from public reports are the following:

Leonard Woodcock, president of the United Auto Workers, is active in the Carter campaign, and, in fact, has been touted as a potential Secretary of Labor or HEW, should Mr. Carter win.

Jack Conway, another old United Auto Workers hand and former president of the self-styled "nonpartisan" lobby group, Common Cause, is taking a leave of absence from the American Federation of State, County, and Municipal Employees to work for Mr. Carter.

Mary Zon, assistant director of AFL-CIO's COPE will go directly to Atlanta to coordinate labor's efforts with the Carter campaign.

But the labor bosses' most important sources of power and influence are their

direct and indirect contributions to the Democrat Presidential and selected congressional campaigns.

Interestingly, organized labor provided strong and vocal support for the new Federal Campaign Act, which imposes disclosure requirements and campaign spending limitations. The new election statute was intended to eliminate campaign financing abuses and bring campaign contributions and spending out into the open. It is based on the theory that the public has a right to know the source of a candidate's support.

Labor's support for the reform effort stopped at their own doorstep. Lobbyists for organized labor worked long and hard to exempt their own indirect political activities from the bill's provisions. And they apparently succeeded. As a result, we can only estimate the full extent of big labor's efforts behind the scenes on behalf of a Presidential or congressional candidate.

Organized labor can do anything and everything within their power, including the use of union dues, to elect candidates of their persuasion so long as their activities are restricted to their own members. The sole exception prohibits direct cash contributions from union treasuries.

The New York Times of January 18, 1976, quotes the AFL-CIO's interpretation of the new election law as allowing unions:

To use treasury funds, derived from member's dues, to communicate with their members and their families on political issues and candidates; To use union treasury funds in non-partisan registration and get-out-the-vote campaigns; To contribute treasury money and union manpower to the national Committee on Political Education or to state or local central body political education committees to be used to communicate with or register union members and their families; To use Treasury funds to solicit voluntary contributions for a political fund and for the establishment and administration of such a fund; To use treasury funds to pay union personnel doing political work as long as they work under union direction and control, and are engaged in political activity aimed at union members and their families.

Thus while the labor "reformers" were pushing stringent requirements for all others, they seem to have been more than generous in protecting and allowing their own particular activities and contribution. And this year the labor bosses are taking full advantage of the loopholes they have created for themselves. In the interest of an informed electorate, I believe the American public should know what pressure organized labor has already exerted so far this year, and what is planned for the remainder of the campaign. The public must be aware of what influences are shaping the election.

First, direct-cash contributions. The law says unions themselves may not make cash contributions. So all the unions do is set up political action committees, which may make cash contributions under the law.

Since normal union dues may not be

used, the political action committees are funded through what are on the surface "voluntary contributions" from union members. In fact, these voluntary contributions are not necessarily what an objective person might label "voluntary." Often, by use of a checkoff system, the contribution to a union political committee is automatically deducted from a worker's paycheck unless he goes on record and makes a formal objection. In other cases, the shop steward gives the workers a checkoff card providing for such a payroll deduction and its automatic forwarding to the unions. Now, I would ask, who is going to say no to his shop steward, especially when he can be singled out?

As of now, over 230 such voluntary funded political action committees have been established and registered with the Federal Election Commission.

Where are the huge amounts of voluntary contributions received by these committees being spent by the labor bosses?

Well, let us look first at Mr. Carter. Since he became the obvious Democratic Presidential candidate, large amounts have been poured into his campaign chests. These contributions have, of course, been matched with public funds.

Individual union PAC's which have so far given or directed to Mr. Carter amounts of \$5,000 or more are as follows:

Communications Workers of	
America	\$8,195
United Auto Workers	23,418
United Transportation Union	5,000
American Federation of State, County and Municipal Employees	5,000
Marine Engineers Beneficial Association MEBA (includes fundraiser)	44,744
Amalgamated Clothing Workers	5,500
Retail Clerks Union (ABC)	15,100
Machinists NPPL	5,000
Engineers Political Education Committee	5,000
Seafarers SPAD	5,000
Hotel and Restaurant Employees and Bartenders International Union	5,000
Carpenters LIO	5,000
Railway Clerks Political League	5,000
Laborers Political League	5,000
Oil, Chemical and Atomic Workers	5,000
United Rubber Works	5,000
Transport Workers Union	5,000
Building and Construction Trades Department	5,000
Coal Miners Union	5,000
Maritime Engineers (fundraiser)	40,180
Total	207,137

The total of big labor cash contributions to Mr. Carter in gifts of all amounts is \$259,444.55, this early in the campaign.

Senate candidates are also feeling the labor bosses' power of the purse. As of now—and remember, these figures will grow substantially as we approach November—the following contributions have been made by organized labor to incumbent Members seeking reelection

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precincts by foot and phone, get crowds to rallies and try to get out the vote on election day.

An article in U.S. News & World Report of July 26, 1976 entitled, "Will Unions Deliver the Vote for Carter?" tells the story. Part of the article deals with the AFL-CIO computer:

In 1968 C.O.P.E. could "blitz" the country with tens of millions of pamphlets favorable to Humphrey. But at that time there existed no single source of names of all union members in a city or state, their addresses and voter-registration status. Each of the unions affiliated with the AFL-CIO jealously guarded such data, fearful that rival unions could misuse the information if it were made available.

Today, stored inside a computer at the AFL-CIO's offices in downtown Washington are the names of more than 14 million members of unions belonging to the Federation—plus their addresses, phone numbers, party registration, if any, and the ward, precinct and Congressional district in which they live.

From the bank of political data in the months ahead will come millions of address labels for mailing political brochures or reminders to register and vote. Telephone canvassers will be supplied with computer lists of unregistered union members in wards, cities and counties. Door-to-door canvassers will have lists of union members arranged even by the side of the street on which they live.

Frankly, Mr. President, the article left me a little in awe at the potential of this "Big Brother" machine—which the labor bosses possess, and have now put at the disposal of Jimmy Carter—for controlling and manipulating the political behavior of union members and their families.

This million dollar computer, which is housed in the new AFL-CIO Data Processing Center in Washington, is working around the clock in preparation for the fall campaign.

The computer has an interesting background. It stems from an action taken by COPE in 1964 at the time of my candidacy for President. As part of labor's efforts for Lyndon Johnson that year, unions in New Jersey produced a list of 400,000 union members. After the election, that list, compiled and maintained by hand, was still around. By 1965 COPE spotted the potential of computerization and decided to launch a pilot computer project.

In addition to New Jersey, Pennsylvania was chosen for the pilot. In 1966 the program was extended to Maryland, Virginia, Ohio, Colorado, California, and Texas. As the 1968 election approached there were 3.2 million names in the computer. In 1968 COPE made the data processing effort a year-round project. It is my understanding that the COPE computer now has lists from about 45 States ready to roll in use for this year's election.

Mr. President, the COPE computer is truly awesome. In sorting information it can read 350,000 numbers per second. In 1 hour it can turn out 30,000 3 by 5 cards, 75,000 mailing labels or 68,000 lines on a precinct listing. The computer can also send out specialized mailings from stored information about individuals. In the near future, in large city areas where

both registration lists and the telephone company subscribers are on magnetic tape, the computer will be able to pass the COPE file of union members against those lists and electronically capture, in the same computer, the information on members and their telephone numbers—all without lifting a human hand. I do not know about others, but that scares the heck out of me.

Mr. President, this so-called in kind or soft money contribution by organized labor to their favored candidates is truly disturbing when you think of the dollar value and the enormous influence that labor will be able to put into this year's elections. In 1974, the AFL-CIO reported that 110,000 volunteers contributed millions of hours to COPE programs—register and vote campaigns, telephone banks, staffing, polling, canvassing, checking registration, distributing materials and just getting-out-their-vote. How you can put a true price tag on the value of the Big Brother computer, I do not know; but it is estimated that in 1976 organized labor will contribute by direct and indirect payments, and by in kind and volunteer time, between \$40- and \$60 million, for this, their most important election.

Mr. President, what do these disclosures of giant union intervention into this year's elections mean to the average American citizen and his or her way of life? Well, we can learn a lot by comparing what has happened in a democracy where big labor has already taken over. Last spring, Mr. Robert Moss, editor of the London Economist, "Foreign Report," commented on the trade unions in Great Britain. I call the attention of my colleagues to Mr. Moss' observations regarding the impact of concentrated union power on their political and economic system. He stated:

[L]et me give you a little image of how I think that the kind of trade union power that has grown up in Britain could help to bring about the final destruction of our economy, and even the overthrow of our parliamentary democracy. That will sound a little exaggerated to you as I stand here before you, but I live with that, and my friends here tonight from England live with that day by day, and it is something that we do not take lightly for one moment.

Now our trade unions are not just bargaining over wages or trying to get more men into their ranks, they are trying to dictate the whole shape of economic and social policy in Britain. More than that, they're trying to build themselves into our political process.

For example, our Trade Union Congress [similar to the AFL-CIO] has proposed that non-elected trade union delegates should sit on every local council in Britain. Our local councils—municipal councils—are elected on the principle of one man, one vote. Now we have a proposal from the TUC that they should contain non-elected union officials who will have full voting rights. That is a direct attack, if it ever becomes law, on our constitutional system. It gives you one measure of how far the challenge is going, and what is TUC policy today in our country is often enough the policy of the Labor Party and the Labor government tomorrow.

That recommendation has been accepted by the local government committee of our Labor Party. It has gone to the executive of the party, and I don't know, it could become a bill, and then legislation in the not too distant future.

That gives you one little index. Next, I'll give you another little index. We had a new budget announced in Britain not long ago, and our Chancellor of the Exchequer stood up, and in his budget speech he made it openly plain to everyone that the key element in his policy, wage restraint, would not be government policy until it had been signed, sealed, and delivered by our TUC, our Trade Union Congress.

He made that open. Now again, in our view, these are unconstitutional acts, because under our original Bill of Rights of the 17th century, power in Britain is vested in the people as represented in the Parliament, and in the throne. Apparently not. Apparently the TUC in Britain has become the non-elected upper house, our real Senate, since the House of Lords doesn't count for much in terms of real power today. Our TUC appears to be taking its place.

So the aims of our trade union officers have become very ambitious indeed. They long ago stopped being just concerned with how much more they could screw out of the bosses, or what sort of cars they drove in. These are very subsidiary questions to them today. The real question involves power and the whole future of our form of society.

Now, Britain is on the pretty rocky road to ruin, for the moment, economically. I've already mentioned the size of our deficit. Our deficit runs to 12,000-million pounds a year, which is a lot of money for an impoverished little group of islands off the northwestern coast of Europe. We can't afford it. The TUC's pressure forces our government to continue to overspend on this colossal scale, to continue to promote nationalization programs, particularly with the private firms, and to generally waste the taxpayer's and rate payer's money in whatever new ways they find from day to day.

Now, I'm not altogether certain that in the not too distant future we won't see a situation emerge where there will be a new phase in the economic crisis in Britain where our long-patient foreign friends will get fed up with us and stop lending us money unless we set our economic house in order. And I'm not certain that at some point we won't have to face a fairly shattering kind of decision, a decision as to whether we go on further into the kind of socialism our trade union bosses want, further towards total state regulation of our economy, nationalization of our banks (which is another thing that the TUC is calling for) and so on—a communist kind of economy with high import controls, fixed exchange rates, and all the rest of it—or whether we go in a radically different direction by trying to restore sanity, by trying to cut excessive public spending, by trying to provide new incentives for people to make their own business decisions, and the rest of it.

But I do know one thing: we will have to face that decision. And I know another thing, any government that faces that decision will not be allowed to make up its mind without a fairly devastating confrontation with our trade union movement, if it wants to go back towards curbing abusive union power, towards developing economic power back to the private sector, and towards cutting excessive public spending.

In other words, what I'm saying to you here in a foreign land is that I see no way out of our crisis in Britain without widespread strikes, and I'm not confident, as I stand here before you tonight, that those strikes will be contained, or at any rate I'm not confident as I stand here at this moment that the elements in our society who are now convinced that the abuse of trade union power is one of our key problems, are organized to do anything about it.

Well, I didn't want to speak for too long. I think without exaggerating the picture that I may be beginning to give you some measure of where a society can go when it allows one

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pressure group—in this case, trade unions—to acquire and to practice monopoly power. That is where we are going.

Mr. President, we would do well to ponder what is happening in Britain because of the power of big labor bosses. The American people should be alert that we do not let them buy that kind of power here. The result would be the utter transformation of American society into an alien order where centralization, social planning, individual regimentation, redistribution of income and wealth, and the final collapse of the private enterprise-profit motive system are the legacy of our inattention now.

ENDPIECE

Mr. HOLLINGS. Mr. President, Mr. Ed Ward of Spartanburg, S.C., recently called my attention to an article in a South Carolina publication which I wish to share with my colleagues in the Senate today.

The article is in the form of an editorial commentary in Sandlapper magazine by the editor, Mr. Bob W. Rowland, and it pertains to our Bicentennial celebration this year. The editorial goes to the very heart, I think, of what the Bicentennial is all about, telling, as it does, of the greatness and strength of the American character through 200 years of our grand experiment in democratic government.

I commend Mr. Rowland's thoughts to the Senate and ask unanimous consent that his commentary be printed in the RECORD.

There being no objection, the commentary was ordered to be printed in the RECORD, as follows:

ENDPIECE

Shakespeare said it first (although one usually hears it misquoted as "It's an ill wind that blows no good") about 200 years before the founding of this nation of ours and 400 years before our celebration of independence.

It's a fairly appropriate comment to apply to the Bicentennial craze in which we find ourselves. Because, just in case you haven't noticed, just about everybody who can is cashing in (or trying to cash in) on the 200th anniversary of the founding of our nation. On every side we are being besieged with Bicentennial items, ranging from planters to prints and from plates to toilet seats and even coffins.

But perhaps before we go too far in decrying this trend we should look at the positive aspects of the Bicentennial fever we are experiencing.

One of the really wonderful, and at the same time amazing, things about this country is its dichotomy, its sense of mixture, of separateness and at the same time togetherness. For America is made up of many parts, of people of different cultural origins and folkways, of diverse religions and beliefs and mores, of different traditions and speech. It's a part of this nation which other nations still do not understand, sometimes sneer at; but they are constantly amazed at how it works.

We don't have a queen or a king or a dictator who is given to us whether we like them or not. People of other nations are amazed that every four years our nation divides up into fragments supporting the candidate of their choice for president, and basing that support on what their candidate says or looks like or the part of the country he comes from or his record of achievements or what he says

he is going to do or what he has done. Americans talk and argue and try to influence one another to vote for their candidate and it goes on for months and months. Then comes the big day when people have a chance to go to the polls and vote for the candidate of their choice. Of course, some don't go to the polls at all, don't exercise their right to vote for some personal or private reason and again, that's a wonderful prerogative to have.

And then after the count is in and someone wins, Americans come back together. Everybody can't be a winner but generally no matter how disappointed Americans may be that their man didn't win, once we have a winner, Americans tend to come back together and say in effect, "Well, heck, I didn't vote for him, but he's our president now." And in general he receives the respect we accord our leader. This does not mean, of course, that when the leader does something which displeases the losers they don't say, "Well, I told you my candidate would be better" but they accept it in fairly good grace.

But the past decade has been a different time for America, a time when our nation has been in the agonies of divisiveness. We are divided up into more fragments than possibly ever before due to forces such as the Korean War, the Civil Rights movement, Welfare Rights, the Vietnam War; the Peace movement, the Hippie/Drug culture; Desegregation, Discrimination; Inflation, Unemployment; the assassinations of John Kennedy, Robert Kennedy and Martin Luther King; the attempted assassination of George Wallace; Watergate, and the resignation under fire of a vice-president and a president, leaving a nation with a leader who, for the first time in our history, was not elected.

And so we have been during the past decade more divided, more tormented, less united, than probably at any time in the history of our nation.

To me it seems both ironic and fortunate that at this time in our development we come to the Bicentennial of our nation. Although as a people and a nation no matter how much we may tire of hearing the word "Bicentennial" over and over again and no matter how much we may deplore some of the crass commercialism which may develop out of it, the Bicentennial does afford us a sorely needed chance to reflect, a chance to consider the agonies of our birth—to remember people who pledged their lives, their fortunes and their sacred honors to bring it about. We now have a chance to re-appraise the growth and development of America as a nation. In short, take a focus, in which all of us can say, "This is where we came from, this is where we've been, this is what we have done." With all the mistakes and problems and errors which we committed and caused during the past 200 years we have built something which nobody in 1776 would have given a chance in hell of developing, succeeding and lasting. We may not be perfect, but we did it, and by jove if we had it to go through over again we would.

REVENUE SHARING AND THE SO-CALLED ANTIDISCRIMINATION PROVISION

Mr. BUCKLEY. Mr. President, simply stated, revenue sharing is recycled fiscal assistance, with strings attached. I shall call attention to some of the strings that appear in the House version lest they be offered on the floor of this Chamber.

The House-passed bill, H.R. 13367, contains several objectionable features that should be forcefully opposed, the most noticeable of which is the expanded so-called nondiscrimination provision which has been expanded to include religion, age, and handicapped status. This provision would, in all likelihood,

subject State and local government to the kind of quotas in the form of goals and timetables that are presently upsetting unions, businesses, and many local school districts. It is to the effects of this amendment that I wish to address the following remarks.

These additions may appear to many to be overdue and even laudatory, but their adoption and subsequent enforcement will make for ludicrous public policy and discredit the entire program.

Underlying the inclusion of these additional categories is the misguided social engineering assumption that confuses a homogenized society with an open one. It is the assumption that every inhibition and every activity should represent a multiethnic, cross-cultural-economic-religious-sexual microcosm of the Nation in large. In other words, every group situation must have its representative share of ethnic and religious minorities, atheists, the elderly, women, preadolescents, teenagers, homosexuals, the crippled, blind, impoverished, and so forth, or else run the risk of being branded racist, chauvinist, sexist, or worse.

Revenue sharing is the kind of congressionally created income redistribution program that encourages fiscal dependency and bureaucratic meddling. Although it came into existence as a well-intended emergency relief instrument, it is rapidly being transformed into an institution with its own constituency. If H.R. 13367 is adopted in its current form, it will also have an expanding bureaucracy, cumbersome reporting, and enforcement procedures and so forth. It is a shortcut route to what ought to be a long-term approach to intergovernmental reform. It should be gradually phased out over a period of a few years and replaced by a vastly improved and more equitable Federal tax structure that would insure each State a greater share of its own self-generated revenue.

What concerns me much more, however, is that if the Senate adopts the House's expanded nondiscrimination provision, we will have succeeded in pushing existing civil rights legislation to an illogical extreme, thereby making it irrational and virtually unenforceable. As written, the amended provision provides the Office of Revenue Sharing with the authority to automatically suspend funds to local communities if, in the opinion of the Federal Government, antidiscrimination complaints are not satisfactorily resolved within 90 days. This is patently absurd.

Increasingly, federally sponsored social policy seems more and more prepared to ignore the fact that there are differences of degree as well as differences of kind. For example, men and women, children and the elderly, the physically abled and disabled clearly represent differences of kind. Each category requires special or "preferential" treatment in a host of areas to accommodate the unique needs of its condition, from day care centers to senior citizens' residences. With the amended language no preferential treatment can be made for the newly identified categories, without discriminating. In the light of the

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Jimmy Carter

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MUR 243

GENERAL COUNSEL'S REPORT

I. Summary

This MUR was generated internally on the basis of Senator Goldwater's remarks in the Congressional Record, August 21, 1976, in which he alleged that Jack Conway of American Federation of State, County and Municipal Employees, and Mary Zon of AFL-CIO, are working for Mr. Carter. This allegation was dismissed in the 48-hour report because there was no indication that either Mr. Conway or Ms. Zon had received union pay or benefits while they worked for Mr. Carter.

The Record Article also contained allegations that the following six labor PAC's have "given or directed to" Mr. Carter amounts in excess of \$5,000: Communication Workers of America (CWA), United Auto Workers (UAW), Marine Engineers Benefit Association (MEBA), Amalgamated Clothing Workers (ACW), Retail Clerks Union (ABC) and Maritime Engineers (NMUPLOW). A decision regarding this allegation was postponed pending further analysis of the reports of the various labor groups named by Mr. Goldwater and the reports of the Committee for Jimmy Carter. That analysis was made in separate memoranda supplied by Keith Vance on October 29, 1976, and Kurt Burkhardt December 22, 1976.

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II. Evidence

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Senator Goldwater named the six above-mentioned union PACs which, according to his figures, had given or directed to Mr. Carter's campaign amounts in excess of \$5,000. Information obtained through the investigation division's examination of these six groups revealed that the figures in the Congressional Record article included independent expenditures and transfers of funds raised through joint fundraising efforts. Excluding independent expenditures and fundraiser transfers from the totals eliminates UAW, MEBA, and Maritime Engineers from the list of those groups which contributed in excess of \$5,000 to the Carter campaign. (For example, UAW directed \$24,832.93 to the Carter campaign, \$19,832.93 of which was reported as independent expenditures, leaving \$5,000 in transfers to CJC. MEBA directed \$11,182.41 to the Carter Campaign, \$6,182.41 of which was reported as expenditures for communications to its members or the press, leaving \$5,000 in transfers to CJC. Maritime Engineers directed \$68,085 to the Carter campaign; the total amount of which was reported as transfers from fundraising efforts.)

Questions remain regarding Retail Clerk's Union (ABC), CWA, ACW, and NMUPLOW:

A. The Committee for Jimmy Carter (CJC) reports \$10,600 received from ABC affiliates in the period of May 7,

1976 through July 25, 1976 (Attachment A). ABC reports that \$2,200.00 was transmitted prior to May 11, 1976, the date the anti-proliferation clause became effective; a total of \$8,400.00 was contributed after May 11, 1976.

B. CWA reports reveal that transfers to Jimmy Carter from various affiliated CWA PAC's totalled \$7,950 from November 15, 1975 through May 6, 1976 (See Attachment E). There were no transfers after May 11, 1976. Of the \$7,950, the CJC disclosed only \$3,950 in receipts from CWA.

C. ACW affiliates reported transferring \$5,250 to the Carter Campaign (See Attachment C). Only \$250 of the transactions took place after the May 11, 1976 anti-proliferation amendment. However, the \$250 transfer from American Textile for Good Government, an affiliate of ACW, was not reported as received by CJC.

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D. Investigation of Maritime Engineers revealed that NMUPLOW made expenditures on behalf of the Carter campaign totalling \$4,677.02. The sixteen expenditures were reported by NMUPLOW on line 22a for loans, loan repayments, and contributions refunds (see Attachment D). CJC's statements reveal only two of the sixteen transactions reported by NMUPLOW: \$250.00 received on June 5, 1976 and \$300.00 received on June 20, 1976.

III. Analysis

There appears to be reason to believe that each of the labor groups outlined in parts A through D of the evidence section as well as the CJC may have violated certain sections of the Federal Election Campaign Act: Our conclusions can be summarized as follows:

A. ABC

1) The contributions from ABC affiliates appear to have been in connection with a single election and there is reason to believe that they exceed the \$5,000 limitation of 2 U.S.C. §441a(a)(C) by \$5,600.

B. CWA

1) The contributions from CWA and affiliates also appear to be in connection with a single election and also appear to have exceeded the \$5,000 limitation, set forth in §441a(a)(c), by \$2,950.

2) The Carter Campaign may have failed to report certain contributions received, in violation of §434.

C. ACW

The Carter Campaign may have failed to report a \$250 contribution received, in violation of §434.

D. NMUPLOW

Of the \$4,977.02 which NMUPLOW reported expending on behalf of the Carter campaign, only \$550.00 was reported as received by the Committee for Jimmy Carter. According to the NMUPLOW reports, the funds expended were typically reimbursements or advancements to individuals campaigning for Carter or costs incurred in connection with Carter rallies.

The reports gave no indication that the expenditures were independent: the reports were not made on Schedule E and they were not accompanied by a notarized certification as required under §109.2 and §109.3 of the Commission's proposed regulations. Therefore, the expenditures, within the meaning of §431(e)(4), appear to be in-kind contributions and would be subject to reporting requirements under §109.1(c) of the Commission's proposed regulations. In

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failing to report fourteen of the sixteen contributions,
the Committee for Jimmy Carter may be in violation of
§434 of the Act.

IV. Recommendation

Find reason to believe as to Respondents ABA, CWA,
ACE, and Committee for Jimmy Carter.



William Oldaker
General Counsel

Date:

2/8/77

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FEDERAL ELECTION COMMISSION
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After a brief period of disunity, the labor is again in the ring and for the national Democrat ticket—and labor's well developed muscle is being felt from coast to coast.

Over the last few years, big labor's bosses have taken great pains to protect and expand their political powers—and are now aiming for a Republican knock-out in 1976, a virtual end of the two-party system.

It is true that the political efforts of organized labor are exposed to the glare of publicity in the public media. The American people have little opportunity to learn of the massive, calculated plan to grab hold of the national political system which is the clear aim of big labor. This is unfortunate because democracy depends upon an informed electorate—aware of the influences upon their attention and of ultimate designs to capture power in the Nation. For make no mistake about it, there is an all-out campaign by organized labor to become the new rulers of the American political system.

Mr. President, it is in order to bring a little light to the monumental reach of union political ambitions in the 1976 elections that I take to the floor today. It is difficult to know where to begin, but let us start our survey with the recent Democrat National Convention where great pressure was brought to bear upon delegates and events by the AFL-CIO's Committee on Political Education, COPE, and the Labor Coalition Clearinghouse.

The efforts of these groups were bolstered by the large numbers of delegates—over one-fifth of the entire convention—who were active union members or officers. This is more than in any previous convention.

Organized labor spent over a half million dollars electing these delegates, financing their travel and convention expenses and in some cases, even providing them pay for missed days of work.

It is no secret that the Democrat Presidential nominee, Jimmy Carter, and his advisers, are continuing to work closely with a number of big labor officials. Among numerous labor ties with Mr. Carter that can be documented from public reports are the following:

Leonard Woodcock, president of the United Auto Workers, is active in the Carter campaign, and, in fact, has been touted as a potential Secretary of Labor or HEW, should Mr. Carter win.

Jack Conway, another old United Auto Workers hand and former president of the AFL-CIO, is taking a leave of absence from the American Federation of State, County, and Municipal Employees to work for Mr. Carter.

Mary Zen, assistant director of AFL-CIO's COPE will go directly to Atlanta to coordinate labor's efforts with the Carter campaign. *on or off payroll?*

But the labor bosses' most important sources of power and influence are their

direct and indirect contributions to the Democrat Presidential and selected congressional campaigns.

Interestingly, organized labor provided strong and vocal support for the new Federal Campaign Act, which imposes disclosure requirements and campaign spending limitations. The new election statute was intended to eliminate campaign financing abuses and bring campaign contributions and spending out into the open. It is based on the theory that the public has a right to know the source of a candidate's support.

Labor's support for the reform effort stopped at their own doorstep. Lobbyists for organized labor worked long and hard to exempt their own indirect political activities from the bill's provisions. And they apparently succeeded. As a result, we can only estimate the full extent of big labor's efforts behind the scenes on behalf of a Presidential or congressional candidate.

Organized labor can do anything and everything within their power, including the use of their funds to elect candidates of their party—as long as their activities are restricted to their own members. The sole exception prohibits direct cash contributions from union treasuries.

The New York Times of January 18, 1976, quotes the AFL-CIO's interpretation of the new election law as allowing unions:

To use treasury funds, derived from member's dues, to communicate with their members and their families on political issues and candidates. To use union treasury funds in non-partisan registration and get-out-the-vote campaigns. To contribute treasury money and union dues power to the national Committee on Political Education or to state or local central body political education committees to be used to communicate with or register union members and their families. To use Treasury funds to solicit voluntary contributions for a political fund and for the establishment and administration of such a fund. To use treasury funds to pay union personnel for political work as long as they work under union direction and control, and are engaged in political activity aimed at union members and their families.

Thus while the labor "reformers" were pushing stringent requirements for all others, they seem to have been more than generous in protecting and allowing their own particular activities and contribution. And this year the labor bosses are taking full advantage of the loopholes they have created for themselves. In the interest of an informed electorate, I believe the American public should know what pressure organized labor has already exerted so far this year, and what is planned for the remainder of the campaign. The public must be aware of what influences are shaping the election.

First, direct-cash contributions. The law says unions themselves may not make cash contributions. So all the unions do is set up political action committees, which may make cash contributions under the law.

Since normal union dues may not be

used, the political action committees are funded through what are on the surface "voluntary contributions" from union members. In fact, these voluntary contributions are not necessarily what an objective person might label "voluntary." Often, by use of a checkoff system, the contribution to a union political committee is automatically deducted from a worker's paycheck unless he goes on record and makes a formal objection. In other cases, the shop steward gives the workers a checkoff card providing for such a payroll deduction and its automatic forwarding to the unions. Now, I would ask, who is going to say no to his shop steward especially when he can be singled out?

As of now, over 230 such voluntary funded political action committees have been established and registered with the Federal Election Commission.

Where are the huge amounts of voluntary contributions received by these committees being spent by the labor bosses?

Well, let us look first at Mr. Carter. Since he became the obvious Democratic Presidential candidate, large amounts have been poured into his campaign chests. These contributions have, of course, been matched with public funds.

Individual union PAC's which have so far given or directed to Mr. Carter amounts of \$5,000 or more are as follows:

Communications Workers of America	\$8,195
United Auto Workers	23,418
United Transportation Union	5,000
American Federation of State, County and Municipal Employees	5,000
Marine Engineers Beneficial Association MEBA (includes fundraiser)	44,744
Amalgamated Clothing Workers	5,500
Retail Clerks Union (ABC)	15,100
Mechanics NEPL	5,000
Engineers Political Education Committee	5,000
Seafarers SPAD	5,000
Hotel and Restaurant Employees and Bartenders International Union	5,000
Carpenters LIO	5,000
Railway Clerks Political League	5,000
Laborers Political League	5,000
Oil, Chemical and Atomic Workers	5,000
United Rubber Workers	5,000
Transport Workers Union	5,000
Building and Construction Trades Department	5,000
Coal Miners Union	5,000
Maritime Engineers (fundraiser)	40,180
Total	207,137

The total of big labor cash contributions to Mr. Carter in gifts of all amounts is \$269,444.55, this early in the campaign.

Senate candidates are also feeling the labor bosses' power of the purse. As of now—and remember, these figures will grow substantially as we approach November—the following contributions have been made by organized labor to incumbent Members seeking reelection

*Again money
are about the
contribution
figures.*

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ATTACHMENT A

RECEIPTS FROM ABC AS REPORTED BY CJC

ABC	May 7, 1976	\$ 200.00
Retail Food, 1500 Clerks Local-ABC	June 5, 1976	5,000.00
ABC	June 23, 1976	2,800.00
ABC-local 400	July 5, 1976	500.00
ABC-local 888	July 24, 1976	100.00
ABC	July 25, 1976	<u>2,000.00</u>
PRE	May 11, 1976	200.00
POST	MAY 11, 1976	10,400.00
TOTAL		\$10,600.00

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ATTACHMENT B

TRANSFERS TO JIMMY CARTER CAMPAIGN REPORTED BY CWA

CWA-COPE	November 14, 1975	\$1,000.00
CWA-COPE	February 9, 1976	4,000.00
CWA District #9 PAC	April 23, 1976	500.00
CWA District #5 PAC	April 28, 1976	1,000.00
CWA District #9 PAC	April 30, 1976	125.00
CWA District #4 PAC	April 30, 1976	1,000.00
CWA District #9 PAC	May 6, 1976	125.00
CWA District #3 PAC	June 3, 1976	200.00
	TOTAL	<u>\$7950.00</u>

RECEIPTS FROM CWA AS REPORTED BY CJC

CWA District #9 PAC	May 15, 1976	\$ 500.00
CWA District #9 PAC	May 15, 1976	125.00
CWA District #1 PAC	May 16, 1976	1,000.00
CWA District #9 PAC	May 22, 1976	500.00
CWA District #9 PAC	May 22, 1976	125.00
CWA District #9 PAC	May 23, 1976	500.00
CWA District #5 PAC	June 6, 1976	1,000.00
CWA District #3 PAC	June 7, 1976	200.00
	TOTAL	<u>\$ 3,950.00</u>

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ATTACHMENT C

EXPENDITURES TO CARTER CAMPAIGN REPORTED BY ACW

Amalgamated Political Education Committee (APEC)	March 9, 1976	\$ 500.00
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APEC	April 21, 1976	4,500.00
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American Textile for Good Government		250.00
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PRE	May 11, 1976	5,000.00
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POST	May 11, 1976	250.00
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TOTAL		\$5,250.00
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ATTACHMENT D

EXPENDITURES RELATING TO CARTER CAMPAIGN REPORTED BY NUMUPLow

DATE	Amount	TO	Description
April 26, 1976	\$120.00	Mrs. Catherine Peterson	Signs for Carter for Pres.
April 26, 1976	300.00	Hugo Durand, Coordinator for Charter in 20th Dist. Corpus Christie, Texas	Money for TV time.
April 27, 1976	300.00	Charles Mills, Patrolman NMU	Monies to be used for J. Carter Campaign in Houston
April 29, 1976	375.00	Louis Parise, Business Agent NMU	Expenses incurred in Carter Campaign in PA
May 7, 1976	30.70	Louis Luci, Business Agent	Expenses incurred at Carter Rally, Gary, Indiana
May 11, 1976	1,000.00	Thomas Martinez, NMU	Expenses incurred in Carter campaign in Maryland primary
May 29, 1976	20.70	same	same
May 11, 1976	250.00	Jimmy Carter Presidential Campaign Committee -Calif.	Dinner in Carter's Honor
May 24, 1976	300.00	Jimmy Carter for Pres. c/o Jerry White, New Jersey	Office space for So. Jersey area N.J. Carter Primary
May 24, 1976	200.00	Elwood Hampton, NMU	Monies to be utilized for Gloucester & Salem City area- N.J. Carter Primary
May 25, 1976	500.00	Andrew Rich, NMU	Advance of Monies to be accounted for Carter-N.J. Carter Primary
May 28, 1976	200.00	Elwood Hampton, NMU	Advance of Monies to be accounted for Carter N.J. primary

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<u>DATE</u>	<u>AMOUNT</u>	<u>TO</u>	<u>DESCRIPTION</u>
June 3, 1976	450.00	Andrew Rich, NMU	Monies advanced and accounted for in connection with Carter Primary Campaign
June 3, 1976	550.00	Elwood Hampton, NMU	Same as above
June 25, 1976	300.00	New York Campaign for Carter	function
June 30, 1976	81.25	NMU Upgrading & Retraining Plan	Plan Reimbursement for expenses incurred in Carter Prim. Campaign
TOTAL	<u>\$4,977.02</u>		



FEDERAL ELECTION COMMISSION

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

Mr. R. J. Lipshutz
Committee for Jimmy Carter
1795 Peachtree Street
Atlanta, Georgia 30309

Dear Mr. Lipshutz:

This is to notify you that certain irregularities, concerning your organization, have come to the attention of the Federal Election Commission. The Commission has reason to believe that the matters outlined below may be violations of the Federal Election Campaign Act of 1971, as amended.

First, financial reports filed with the Commission by the political action committees of the Retail Clerks' Union (Active Ballot Clubs) state that your committee received, from ABC, \$10,600 during the period May 7, 1976 through July 25, 1976. \$8,400 of this amount was contributed after May 11, 1976, the effective date of the 1976 Amendments to the FECA. Under 2 U.S.C. §441a(a)(C) a multicandidate committee is subject to a \$5,000 contribution limitation per candidate. The Act states further that "no candidate or political committee shall knowingly accept any contribution. . . in violation of the provisions of this section" (§441a(f)).

Second, Communication Workers of America Political Action Committee reported transferring to your committee a total of \$7,950 from November 15, 1975 through May 6, 1976. Our examination of CJC's reports revealed only \$3,950 listed as received from CWA. Accordingly, there is reason to believe that you may have failed to comply with the reporting requirements of §434.

Third, American Textile for Good Government, a political action committee affiliated with Amalgamated Political Education Committee (APEC), contributed \$250 to the Carter campaign on June 28, 1976. Our examination of CJC's reports has failed to locate a record of this transaction. It is required under 2 U.S.C. §434(b)(4) that any receipt of funds transferred from a political committee be reported to the Commission.



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Fourth, and finally, the National Maritime Union Political and Legislative Organization on Watch (NMUPLOW) reported making a total of \$4,977.02 in expenditures on behalf of the Carter campaign. The CJC reports reveal only two transfers-in from NMUPLOW: \$250.00 June 5, 1976 and \$300.00 on June 20, 1976. The remaining \$4,427.02 involves fourteen expenditures for the Carter presidential effort. Under §431(e)(4) "contribution" is defined as "a gift, subscription, loan, advance, or deposit of money or anything of value made for the purpose of influencing the nomination for election, or election, of any person to federal office or for the purpose of influencing the results of a primary held for a political party." Since NMUPLOW made no effort to designate these expenses as independent expenditures, the monies could be considered in-kind contributions to CJC. The Commission's proposed regulations requires that all in-kind contributions in excess of \$100 be reported by the candidate or committee in receipt of such benefits (see §104.3).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit, under oath, any factual or legal materials which you believe are relevant to the Commission analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134958



FEDERAL ELECTION COMMISSION

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

January , 1977

W. R. Shockley
American Textile Industry
Good Government Committee
Suite 1001, 1150 17th St. N.W.
Washington, D.C. 20036

Dear Mr. Shockley :

It has come to the attention of the Commission that the affiliated political action committees of the Amalgamated Clothing Workers may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that Amalgamated Political Education Committee and American Textile for Good Government contributed \$5,250 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
APEC	Committee for Jimmy Carter	3-9-76	\$ 500.00
APEC	Committee for Jimmy Carter	4-21-76	4,500.00
ATGG	Jimmy Carter Presidential Campaign	6-28-76	250.00
TOTAL			\$ 5,250.00

2 U.S.C. §441a(a)(C) limits the amount which a multi-candidate committee may contribute to one candidate to \$5,000 per election. It appears that ACW may have exceeded this amount by \$250.

Under the Act, you have an opportunity to demonstrate



that no action should be taken against you. Please submit, under oath, any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134960



FEDERAL ELECTION COMMISSION

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

January , 1977

Mr. Jacob Sheinkman
Amalgamated Political Education
Committee
15 Union Square
New York New York 10003

Dear Mr. Sheinkman:

It has come to the attention of the Commission that the affiliated political action committees of the Amalgamated Clothing Workers may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that Amalgamated Political Education Committee and American Textile for Good Government contributed \$5,250 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
APEC	Committee for Jimmy Carter	3-9-76	\$ 500.00
APEC	Committee for Jimmy Carter	4-21-76	4,500.00
ATGG	Jimmy Carter Presidential Campaign	6-28-76	250.00
TOTAL			\$ 5,250.00

2 U.S.C. §441a(a)(C) limits the amount which a multi-candidate committee may contribute to one candidate to \$5,000 per election. It appears that ACW may have exceeded this amount by \$250.

Under the Act, you have an opportunity to demonstrate



that no action should be taken against you. Please submit, under oath, any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

January , 1977

Mr. Avelino B. Montes, Treasurer
CWA District #9
2310 Mason Street
San Francisco, California 94133

Dear Mr. Montes:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



2 U.S.C. §441a(a) (C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

January , 1977

Ms. Gwendolyn R. Martin
CWA District #5 PAC
790 Busse Road
Elk Grove Village, Illinois 60007

Dear Ms. Martin:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



2 U.S.C. §441a(a) (C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

January , 1977

Ms. Barbara Easterling
CWA #4 PAC
20525 Center Ridge Rd Room 515
Cleveland, Ohio 44116

Dear Ms. Easterling:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



2 U.S.C. §441a(a)(C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134968



FEDERAL ELECTION COMMISSION

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

January , 1977

Louis B. Knecht, Treasurer
CWA-COPE
1925 K. Street N.W.
Washington, D.C. 20006

Dear Mr. Knecht:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



79040134969

2 U.S.C. §441a(a)(C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134970



FEDERAL ELECTION COMMISSION

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

January , 1977

Ms. Jan Pierce
CWA District #1 PAC
85 Worth Street
New York, New York 10013

Dear Ms. Pierce:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



79040134971

2 U.S.C. §441a(a) (C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

January , 1977

Mr. Michael I. Handley
CWA District #3PAC
40 Pryor Street S.W. 3rd Floor
Atlanta, Georgia 30303

Dear Mr. Handley:

It has come to the attention of the Federal Election Commission that the Communication Workers of America may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that CWA and affiliates, contributed \$7,950 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
CWA-COPE	Jimmy Carter for President	11-14-75	\$1,000.00
CWA-COPE	Jimmy Carter for President	2-9-76	4,000.00
CWA #9PAC	Jimmy Carter for President Committee	4-23-76	500.00
CWA #5PAC	Jimmy Carter Presidential Campaign	4-28-76	1,000.00
CWA #9PAC	Jimmy Carter for President	4-30-76	125.00
CWA #4PAC	Carter Campaign	4-30-76	1,000.00
CWA #9PAC	Carter for President	5-6-76	125.00
CWA #3PAC	Jimmy Carter Presidential Campaign	6-3-76	200.00
TOTAL			\$7,950.00



2 U.S.C. §441a(a) (C) limits that amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$2,950.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you notify the Commission in writing you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134974



FEDERAL ELECTION COMMISSION

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

January , 1977

Arthur Wolfson
Active Ballot Club Retail Food
Clerks Union Local 1500
221-10 Jamaica Avenue
Queens Village, New York 11428

Dear Mr. Wolfson:

It has come to the attention of the Federal Election Commission that the Active Ballot Club of the Retail Clerks Union may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that ABC, and affiliates, contributed \$10,600 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
ABC	Jimmy Carter Presidential Campaign	5-4-76	\$ 200.00
ABC	Jimmy Carter Campaign Committee	5-5-76	2,000.00
Retail Food Clerk's Union 1500 ABC	New York Citizens for Jimmy Carter	5-24-76	5,000.00
ABC	Jimmy Carter Presidential Campaign	6-14-76	2,800.00
ABC local 400	Committee for Carter (reported on CJC statements)	7-5-76	500.00
ABC local 888	Committee for Carter (reported on CJC statements)	7-24-76	100.00
TOTAL			\$10,600.00



79040134975

2 U.S.C. §441a(a)(C) limits the amount which a multicandidate committee may contribute to one candidate to \$5,000 per election. It appears that ABC may have exceeded this amount by \$5,600.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/382-3153), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter please have such counsel notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

79040134976



FEDERAL ELECTION COMMISSION

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

January , 1977

Peter J. Hall
Active Ballot Club
1775 K Street N.W.
Washington, D.C. 20006

Dear Mr. Hall:

It has come to the attention of the Federal Election Commission that the Active Ballot Club of the Retail Clerks Union may have violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission has reason to believe that ABC, and affiliates, contributed \$10,600 to the Carter campaign. Reports filed with the Commission reveal the following:

From	To	Date	Amount
ABC	Jimmy Carter Presidential Campaign	5-4-76	\$ 200.00
ABC	Jimmy Carter Campaign Committee	5-5-76	2,000.00
Retail Food Clerk's Union 1500 ABC	New York Citizens for Jimmy Carter	5-24-76	5,000.00
ABC	Jimmy Carter Presidential Campaign	6-14-76	2,800.00
ABC local 400	Committee for Carter (reported on CJC statements)	7-5-76	500.00
ABC local 888	Committee for Carter (reported on CJC statements)	7-24-76	100.00

TOTAL

\$10,600.00



December 8, 1976

MEMORANDUM TO: Keith A. Vance
FROM: Kathryn Kavanagh
THRU: David R. Spiegel
RE: MUR 243 (76)

Your report of October 29, 1976 enabled us to narrow the focus of MUR 243. However, certain matters still require further investigation. Specifically, we would like the following:

1. Dates, purposes, and amounts of all contributions to Carter, reported by Retail Clerks Union (ABC), Communication Workers of America (CWA), Amalgamated Clothing Workers (ACW) and National Maritime Union Political and Legislative Organization on Watch (NMUPLOW).

2. Dates, amounts and purposes, were available of all transactions from the above-mentioned committees, reported and received by Carter.

3. I would appreciate it if you would supply this information by Wednesday, December 15, 1976. Please arrange the information in a brief format, using tables to illustrate any complex factual problem.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION

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

CC # 921
MUR 243

November 2, 1976

MEMORANDUM TO: David R. Spiegel
THROUGH: Al Keema *AK*
FROM: Nancy Davis *ND*
SUBJECT: MUR 243 (76)

The attached memorandum by Keith Vance is in response to your memo of October 8, 1976. I informed Sherry Swirsky on October 11, 1976, that the Investigation Section would conduct all research necessary for MUR 243 due to the fact they were currently researching several of the committees in question.

Should you need further information please contact Nancy Davis at X3484. A response as to what action OGC will take on this matter would be appreciated.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION

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

See work file
for attachments

October 29, 1976

MEMORANDUM

TO: Bill Oldaker

THROUGH: Michael Herschman *MH*
Fred Rayano *FR*

FROM: Keith A. Vance *KAV*

SUBJECT: MUR 243(76)

On October 13, 1976, the Reports Analysis Section Liaison forwarded to the Investigation Section an October 8, 1976, request from the Office of General Counsel for in-depth research relative to allegations that certain union PACs made contributions to the Carter campaign in excess of the limitations set forth in 2 U.S.C. Section 441a(a) (see Attachment #1).

In addition to researching the six (6) union PACs specifically listed in OGC's October 8, 1976 Memorandum, we conducted research on all affiliated committees determined in accordance with Section 110.3 of the Commission's proposed Regulations dated August 25, 1976.

Pursuant to Section 433 of Title 2 of the United States Code, the Committee for Jimmy Carter (CJC), 1795 Peachtree Street, N.E., Atlanta, Georgia, 30309, registered on January 31, 1975, with the U.S. General Accounting Office as the Honorable Jimmy Carter's principal campaign committee for the primary period. Although CJC is the principal campaign committee, many of the contributions from multicandidate committees are to the "Jimmy Carter Presidential Campaign", a designation which appears on CJC's letterhead (see Attachment #1a). On July 19, 1976, the Commission received notification from Mr. Carter that pursuant to Section 9002(1) of Title 26 of the United States Code, he authorized the 1976 Democratic Presidential Campaign Committee, Inc. (1976 DPCC), 1175 Peachtree Street, N.E., Atlanta, Georgia, 30361, to serve as the principal campaign committee during the forthcoming general election campaign. Statements of Organization filed by the aforementioned Committees do not show any connected or affiliated organizations. Furthermore, Mr. Carter's principal campaign committees (PCC) have established



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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N. Iowa Farmers for Carter--Mondale

B. CWA District #2, PAC

- C. CWA District #3, PAC
- D. CWA District #4, PAC
- E. CWA District #5, PAC
- F. CWA District #6, PAC
- G. CWA District #7, PAC
- H. CWA District #8, PAC
- I. CWA District #9, PAC
- J. CWA District #10, PAC
- K. CWA District #11, PAC
- L. CWA District #12, PAC
- M. CWA-COPE

On November 14, 1975, CWA-COPE made a transfer of \$1,000.00 to the Jimmy Carter for President Committee (JCPC), P.O. Box 1976, Washington, D.C., designated as a "contribution" (see Attachment #2). On February 9, 1976, CWA-COPE made a \$4,000.00 transfer to JCPC at the same P.O. Box, designated a "campaign contribution" (see Attachment #2a).

On April 23, 1976, CWA District #9, PAC, made a transfer to JCPC, 15 Sansome Street, San Francisco, California, in the amount of \$500.00, designated as an expenditure for "Primary" (see Attachment #3).

On April 28, 1976, CWA District #5, PAC, made a transfer in the amount of \$1,000.00 to the JCPC, 921 East 86th Street, Suite 107, Indianapolis, Indiana (see Attachment #4).

On April 30, 1976, CWA District #9, PAC, made two transfers of \$125.00 each, designated as expenditures for "Primary" to JCPC, 15 Sansome Street, San Francisco, California (see Attachment #3), and another transfer in the amount of \$375.00 to the "Carter Dinner Committee", located at 1 California Street, San Francisco, California (see Attachment #2).

The Carter Dinner Committee has not been identified in the Committee for Jimmy Carter's (CJC) registration or amendments as an affiliated organization. A review of the registered political committees did not disclose any political committee named "Carter Dinner Committee." If CJC and the Carter Dinner Committee are affiliated, CJC has not amended its registration forms, as required by 2 U.S.C. Section 433(c). In addition, CJC may be in violation of 2 U.S.C. Section 433(b) (2), which requires a political committee to list the name, address and relationship of affiliated or connected organizations on its Statement of Organization.

In addition, on April 30, 1976, CWA District #4, PAC, made a transfer designated as "Voluntary Contribution" to the "Carter Campaign" (see Attachment #5) in the amount of \$1,000.00.

On May 6, 1976, CWA District #9, PAC, made a transfer of \$125.00, designated as an expenditure for "Primary" to JCPC, 15 Sansome Street, San Francisco, California (see Attachment #3).

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On June 3, 1976, CWA District #3, PAC, made an expenditure in the amount of \$200.00 to the Jimmy Carter Presidential Campaign, P.O. Box 1976, Atlanta, Georgia, designated as "20 tickets--'Victory Party'" (see Attachment #6).

In retrospect, our review disclosed that CWA made total expenditures of \$8,325.00 on behalf of Jimmy Carter from November 14, 1975, through June 3, 1976, which may be in violation of the contribution limits specified in 2 U.S.C. Section 441a(a) (2) (A). (4)

Our review revealed that CJC disclosed only a total of \$4,250.00 as contributions from CWA. CJC's reports showed the following transfers-in:

CWA District #9, PAC	5/15/76	\$ 500.00
CWA District #9, PAC	5/15/76	125.00
CWA District #1, PAC	5/16/76	1,000.00
CWA District #9, PAC	5/22/76	500.00
CWA District #9, PAC	5/22/76	125.00
CWA District #9, PAC	5/23/76	500.00
CWA District #5, PAC	6/06/76	1,000.00

TOTAL \$4,250.00

2. United Auto Workers (UAW)

Records show that this organization is officially recognized as the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America--UAW.

- A. UAW-V-CAP
- B. Committee for Good Government (CGG)

On November 20, 1975, UAW-V-CAP made expenditures to the Jimmy Carter Presidential Campaign, P.O. Box 1976, Atlanta, Georgia, in the amounts of \$400.00, designated as "4 tickets fund raiser, Atlanta, Georgia," (see Attachment #7), and \$300.00, designated as "12 ticket fund raiser, Dec. 2 in Florida" (see Attachment #8).

On January 15, 1976, UAW-V-CAP made a transfer of \$500.00 to Jimmy Carter for President at 407 South Dearborn Street, Chicago, Illinois (see Attachment #9).

On January 19, 1976, UAW-V-CAP made two transfers of \$1,000.00 each, both to the Jimmy Carter Presidential Campaign at P.O. Box 1976, Atlanta, Georgia (see Attachment #10).

On February 12, 1976, UAW-V-CAP made a transfer of \$250.00 to Jimmy Carter for President, 407 South Dearborn Street, Chicago, Illinois, 60605 (see Attachment #11).

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On February 23, 1976, UAW-V-CAP made two transfers, of \$1,000.00 and \$300.00, to the Jimmy Carter Presidential Campaign, P.O. Box 1976, Atlanta, Georgia, designated as expenditures for "Candidate for President" (see Attachment #12).

Again, on ~~May~~^{MARCH} 10, 1976, UAW-V-CAP made a transfer of \$250.00 to the Jimmy Carter Presidential Campaign at 407 South Dearborn Street, Room 500, Chicago, Illinois (see Attachment #13).

On May 5, 1976, UAW-V-CAP made a transfer of \$1,000.00 to the "Labor Appreciates Carter Committee, 532 Olive Court, Lexington, Kentucky, 40503." The expenditure was designated for a "Newly formed Kentucky Labor Coalition" (see Attachment #14).

Labor Appreciates Carter Committee has not been identified in UAW-V-CAP's registration or amendments as an affiliated organization. A review of the registered political committees did not disclose any political committee entitled "Labor Appreciates Carter Committee." If UAW-V-CAP and Labor Appreciates Carter Committee are affiliated, UAW-V-CAP has not amended its registration forms, as required by 2 U.S.C. Sections 433(c) and 433(b) (2).

If not affiliated, the Labor Appreciates Carter Committee has not filed a Statement of Organization as required by 2 U.S.C. Section 433(a) and Section 434 which requires that reports be filed with the Commission. Depending on the circumstances, there may be violations of other Sections of 2 U.S.C.

On May 17, 1976, UAW-V-CAP made expenditures in the amounts of \$1,512.00 and \$908.50, both designated as "Independent Expenditures Radio spots on behalf of Carter (unauthorized)" (see Attachment #15).

On June 2, 1976, UAW-V-CAP made a "Radio time for J. Carter--Independent expenditure" in the amount of \$6,066.00 (see Attachment #20).

On June 3, 1976, the Committee for Good Government made numerous expenditures totalling \$3,549.00 on behalf of Carter. These expenditures were each designated as "Independent Expenditure Work on Primary Election for Carter" (see Attachments #16 through #18).

On June 7, 1976, UAW-V-CAP made an expenditure in the amount of \$142.54, designated as "(Independent Expenditure) Hrs. editing, tape, cassettes on behalf of J. Carter" (see Attachment #19).

On June 17, 1976, UAW-V-CAP made an "Independent Expenditure" in the amount of \$65.36. This expenditure was designated the same way as the June 7, 1976, expenditure noted above (see Attachment #19).

On June 21, 1976, UAW-V-CAP made two expenditures designated as "Independent Expenditures;" one in the amount of \$4,860.18 for "Printing of Cir-

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culars on behalf of J. Carter," and the second in the amount of \$2,889.85 for "Bumper stickers & freight on behalf of Jimmy Carter" (see Attachment #19).

On June 30, 1976, \$160.50 was returned from the expenditure made on June 2, 1976, by UAW-V-CAP, reducing the actual expenditure on that date to \$5,905.50 (see Attachment #20).

In retrospect, the committees of UAW transferred a total of \$4,000.00 to Jimmy Carter's primary Presidential campaign, and made total expenditures designated as "independent expenditures" in the amount of \$19,832.93. In addition, UAW made expenditures totalling \$1,000.00 to the "Labor Appreciates Carter Committee," an unauthorized and unregistered organization.

3. Marine Engineers Beneficial Association (MEBA)

- A. MEBA-Political Action Fund (MEBA-PAF)
- B. Professional Air Traffic Controllers Organization (PATCO-PAC)
- C. MEBA Retirees Group Fund (MEBA-RGF)

A review of reports filed by MEBA-PAF disclosed the following:

On May 10, 1976, MEBA-PAF made a transfer designated as "Contribution to Political Committee" in the amount of \$5,000.00, to the Jimmy Carter Presidential Campaign, P.O. Box 1976, Atlanta, Georgia (see Attachment #21).

On May 27, 1976, MEBA-PAF made an expenditure in the amount of \$767.00, for "Campaign Buttons & Bumper strips Re: Jimmy Carter" (see Attachment #22).

On June 4, 1976, MEBA-PAF made an expenditure in the amount of \$1,750.53, designated as "Printing of Receipt Books Re: Jimmy Carter" (see Attachment #23).

On July 27, 1976, MEBA-PAF made an expenditure in the amount of \$1,160.25, for "Photographic Service Re: Jimmy Carter Reception Washington, D.C.--6/30/76" (see Attachment #24).

On July 30, 1976, MEBA-PAF made three expenditures on behalf of Jimmy Carter; \$1,062.79 for "Public Relations Costs Re: Wire & News Releases--MEBA Announcement of Support for Jimmy Carter's Candidacy"; \$590.00 for "Printing of Letter Re: Endorsement of J. Carter--Mailed to Membership of National MEBA"; and \$570.00 for "Service Bureau Costs Re: Envelopes, Supplies Programming, etc.--Letter mailed to Membership of National MEBA--Endorsement of Jimmy Carter Candidacy" (see Attachment #24).

Again on July 30, 1976, MEBA-PAF made an expenditure designated as "Postage--Letter Mailed to Membership of National MEBA Re: Endorsement of Jimmy Carter's Candidacy," in the amount of \$281.84 (see Attachment #25).

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In summarization, MEBA-PAF made transfers totalling \$5,000.00 to CJC, and made expenditures, not designated as independent, on behalf of Jimmy Carter in the amount of \$6,181.62.

CJC's reports disclose a transfer-in from MEBA-PAF on May 13, 1976, in the amount of \$5,000.00.

A review of reports filed by CJC revealed the \$5,000.00 transfer from MEBA-PAF (see Attachment #26), and the following contributions from various individuals clearly associated with MEBA:

<u>CJC REPORT</u>	<u>DATE</u>	<u>CONTRIBUTOR</u>	<u>AMOUNT</u>
7/10/76	6/04/76	Mr. Clayton E. Defries (See Attachments #27 and #28)	\$1,000.00
7/10/76	6/16/76	Mr. William M. Fast	\$ 115.00
7/10/76	6/25/76	Mr. William M. Fast	\$ 15.00
7/10/76	6/21/76	Mr. William M. Fast (See Attachment #28)	\$1,000.00
7/10/76	6/04/76	Ms. Marguerite E. Bryan (See Attachment #29)	\$ 250.00
7/10/76	6/21/76	Mr. Irving A. Lamy (See Attachment #30)	\$1,000.00
7/10/76	6/04/76	Mr. Ben J. Man (See Attachment #31)	\$ 250.00

In total, individuals associated with MEBA made contributions to CJC in the amount of \$3,630.00. Section 6 of this Memorandum will detail other contributors by "Marine Engineers."

The review of MEBA-PAF's reports and records reflects the fact that it has never submitted Schedule D's, indicating it has no receipts from events. Furthermore, MEBA-PAF's reports disclose a minimum of itemized contributions. The majority of its contributions are categorized in the unitemized section of its reports.

4. Amalgamated Clothing Workers (ACW)

- A. American Textile for Good Government (ATGG)
- B. Amalgamated Political Education Committee (APEC)
- C. Clothing Workers Political Committee for Eastern Pennsylvania (CWPCEP)
- D. Menswear Public Affairs Committee (MPAC)

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A review of ACW records discloses the following:

On March 9, 1976, APEC made an expenditure designated as "Contribution" in the amount of \$500.00, to CJC (see Attachment #32).

On April 21, 1976, APEC made a transfer out to CJC in the amount of \$4,500.00, designated as "Contribution" (see Attachment #33).

On June 28, 1976, ATGG made a transfer out in the amount of \$250.00 to the "Jimmy Carter Presidential Campaign Committee, 2000 P Street, N.W., Washington, D.C., 20036," designated as "Contribution" (see Attachment #34).

Thus, ACW made transfers out to CJC in the total amount of \$5,250.00, which may exceed the contribution limits specified in 2 U.S.C. Section 441a (a) (2) (A). (9)

However, CJC's reports show two transfer-in transactions from ABC; one from APEC on March 17, 1976, in the amount of \$500.00, and the second from APEC on May 1, 1976, in the amount of \$4,500.00. ACW (9)

5. Retail Clerks Union (ABC)

- A. Active Ballot Club, A Department of Retail Clerks International Association (ABC-DRCIA)
- B. Active Ballot Club of Retail Clerks International Association 648
- C. Active Ballot Club Local 692
- D. Retail Store Employees Union Local 88 Active Ballot Club 1 General Fund
- E. Active Ballot Club Retail Food Clerk Union Local 1500 (ABC-RFCU 1500)
- F. Retail Store Employees Union Local 428 AFL-CIO Active Ballot Club
- G. Active Ballot Club Sponsored by RICA Local 400
- H. Active Ballot Club Council #6
- I. Retail Store Employees' Union Active Ballot Club
- J. Retail Food Clerks Local 1500 Active N.Y. Ballot Club
- K. Retail Store Employees Union Local 1262 Active Ballot Club

Our review of the Retail Clerk Union's (ABC) reports revealed the following:

On May 4, 1976, ABC-DRCIA made an expenditure in the amount of \$200.00, to the Jimmy Carter Presidential Campaign Committee, 2550 West Grand Boulevard, Detroit, Michigan, designated as a "Contribution" (see Attachment #35).

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A. Seafarers International Union of North America, AFL-CIO
B. National Maritime Union of America
C. International Longshoremen's Association, AFL-CIO

The CJC July 10, 1976 Report shows \$24,370.00 received from a June 30, 1976 "Fundraiser Maritime Eng." due to a "Sale of Tickets:"

The CJC August 10, 1976 Report shows receipts of \$40,180.00 from a "Sale of Tickets" for a "Maritime Engineers Fundraiser" on June 30, 1976.

Again, the September 10, 1976 CJC Report shows receipts of \$3,535.00 received from a "Sale of Tickets" from a "Maritime Engineers Fundraiser" on June 30, 1976.

Receipts from such "Sale of Tickets" are not easily traceable to itemized contributions disclosed on CJC's reports because CJC has neglected to adhere to the requirements specified in 2 U.S.C. Section 434(b) (2).

A. Seafarers International Union of North America

(1) Seafarers Political Activities Donation (SPAD)

(a) Marine Cooks and Stewards Voluntary Political Defense and Education Fund (MC&SVPF)

(b) Marine Firemen's Union Political Action Fund (MFUPAF)

Review of records shows:

On June 4, 1976, SPAD made a transfer of \$5,000.00 to the Jimmy Carter Presidential Campaign Committee, P.O. Box 1976, Atlanta, Georgia (see Attachment #38).

Our review of SPAD's records did not reveal any contribution violations to Mr. Carter.

CJC's reports disclosed a transfer-in from SPAD on June 9, 1976, in the amount of \$5,000.00.

B. National Maritime Union of America (NMU)

(1) NMU Political & Legislative Organization On Watch (NMUPLow)

Our review revealed that:

On April 26, 1976, NMUPLow made an expenditure to Mrs. Catherine Peterson of Corpus Christi, Texas, in the amount of \$120.00, designated as "Signs for Carter for President" (see Attachment #39).

On April 27, 1976, NMUPLow made an expenditure to Mr. Charles Mills of the National Maritime Union of America in the amount of \$300.00, designated as "Monies to be used for Jimmy Carter Campaign in Houston area" (see Attachment #40).

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On April 29, 1976, NMUPLow made an expenditure in the amount of \$375.00 to Mr. Louis Parise, Business Agent, National Maritime Union of America. This expenditure was designated as "Expenses incurred in Carter for President campaign in Pa." (see Attachment #40).

On May 7, 1976, NMUPLow made a \$30.70 expenditure to Mr. Louis Lucci, Business Agent, National Maritime Union of America, designated as "Expenses incurred at Jimmie Carter Rally in Gary, Ind." (see Attachment #41).

On May 11, 1976, NMUPLow made a \$1,000.00 expenditure to Mr. Thomas Martinez, Assistant to the President, National Maritime Union of America, designated as "Expenses incurred in Jimmy Carter's campaign in Maryland Primary" (see Attachment #41).

Again, on May 11, 1976, NMUPLow made an expenditure to Jimmy Carter Presidential Campaign in the amount of \$250.00, designated as "Dinner in Carter's honor" (see Attachment #41).

On May 24, 1976, NMUPLow made an expenditure in the amount of \$300.00 to Jimmy Carter for President. NMUPLow designated the expenditure as "Office space for So. Jersey area--NJ Carter Primary" (see Attachment #41). Also, on May 24, 1976, NMUPLow made a \$200.00 expenditure designated as "Monies to be utilized for Gloucester & Salem County area--N.J. Carter Primary Campaign" (see Attachment #41).

On May 25, 1976, NMUPLow made an expenditure for "Advance of monies to be accounted for for Carter--N.J. Carter Primary" to Mr. Andrew Rich of the National Maritime Union of America in the amount of \$500.00 (see Attachment #42).

On May 28, 1976, NMUPLow made another expenditure to Mr. Elwood Hampton, Regional Representative of the National Maritime Union of America in the amount of \$200.00 for "Advance of monies to be accounted for--for Carter New Jersey primary" (see Attachment #42).

On May 29, 1976, NMUPLow made an expenditure of \$20.07 for "Expenses incurred in Jimmy Carter's campaign in Maryland Primary" (see Attachment #41).

Further review of NMUPLow's reports revealed that on June 3, 1976, NMUPLow made two expenditures designated as "Monies advanced and accounted for in connection with Carter Primary Campaign"; one in the amount of \$450.00, and the second in the amount of \$550.00 (see Attachment #43).

On June 25, 1976, NMUPLow made a \$300.00 expenditure for a "function" to New York Campaign for Carter (see Attachment #44). CJC's July 10, 1976 report discloses the receipt of the \$300.00 on June 20, 1976.

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On June 30, 1976, NMUPLow made an expenditure in the amount of \$81.25 to the NMU Upgrading & Retraining Plan designated as "Plan reimbursement for expenses incurred in Carter Primary Campaign" (see Attachment #44).

NMUPLow's October 10, 1976 report discloses a \$259.20 expenditure on August 4, 1976 to the Consolidated Sign Co., 142 W. 24th Street, New York, NY for "oilcloth signs used to inform membership of union's support of Dem. candidates for Pres. and Vice Pres." (see Attachment #45).

In summation, NMUPLow made expenditures on behalf of Jimmy Carter in the total amount of \$4,677.02, and \$259.20 was designated for the Democratic candidates. (13)

A review of CJC's reports discloses only the following transfers-in from NMUPLow:

June 5, 1976	\$250.00
June 20, 1976	\$300.00

4977.02
550
4427.02

C. International Longshoremen's Association, AFL-CIO

- (1) Brooklyn Longshoremen's Political Action and Education Fund (BLPAEF)

Review of reports revealed that BLPAEF made a transfer of \$2,500.00 to the Jimmy Carter Presidential Campaign Committee on June 8, 1976, designated as a "Donation" (see Attachment #46). This transfer was reported properly by CJC.

7. Recap of Net Figures Transferred to Carter from the Union PACs in Question

(1) Communication Workers of America	\$ 8,325.00
(2) United Auto Workers	4,000.00
(a) Independent Expenditures	19,832.93
(b) Labor Appreciates Carter Committee	1,000.00
(3) Marine Engineers Beneficial Association (MEBA)	5,000.00
(a) Other Expenditures	6,181.62
(b) Individuals of MEBA	3,630.00
(4) Amalgamated Clothing Workers	5,250.00
(5) Retail Clerks Union (ABC)	10,000.00
(6) Maritime Engineers	78,021.22

TOTAL \$141,240.77

cc: Al Keema

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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~~September 29, 1976~~

10-8-76

MEMORANDUM TO: Al Keema
FROM: David R. Spiegel
RE: MUR 243 (76)

The Office of General Counsel is investigating allegations that certain Union PACS have made contributions to the Carter campaign in excess of the limitations set forth in §441a(a). These Union PACS are as follows:

- (1) Communications Workers of America,
- (2) United Auto Workers,
- (3) Marine Engineers Beneficial Association (MEBA),
- (4) Amalgamated Clothing Workers,
- (5) Retail Clerks Union (ABC),
- (6) Maritime Engineers.

The amounts allegedly contributed by each PAC are set forth in the enclosure.

A cursory examination of the files did not reveal a Maritime Engineers PAC. It is possible that this group is affiliated with MEBA and that their contributions are therefore commingled. In addition, the Amalgamated Clothing Workers PAC has been administratively terminated and its records, apparently are not in the files.

If you need any additional information, please contact Sherry Swirsky at 382-1406.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

October 8, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS
RE: MUR 243 (76)

The above mentioned MUR was transmitted to the Commission
on October 7, 1976 at 2:30 p.m.

As of 2:40 p.m. on October 8, 1976, no objection had
been received on this MUR.

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DATE AND TIME OF TRANSMITTAL: 10-7-76

NO. MUR 243 (76)

REC'D: _____

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Generated Internally

Respondent's Name: Carter; Jack Conway; Mary Zon: CWA, UAW, MEBA, Amalgamated Clothing Workers, Retail Clerks Union (ABC) and Maritime Engineers.

Relevant Statute: 2 U.S.C. §434(b); 2 U.S.C. §§441a(a)(2)(A) and 441a(a)(5);
2 U.S.C. §441b.

Internal Reports Checked: Registration Statements for the following PACs:

Federal Agencies Checked: CWA, UAW, MEBA, and Retail Clerks Union (ABC)
none

SUMMARY OF ALLEGATION

I. The Congressional Record for August 31, 1976 (Senator Goldwater) indicated that Jack Conway, on leave of absence from the American Federation of State, County and Municipal Employees, and Mary Zon, of AFL-CIO's COPE, are working for Mr. Carter.

II. The same source indicates that the following PACs have "given or directed to Mr. Carter" amounts in excess of \$5,000: CWA, UAW, MEBA, Amalgamated (see continuation sheet)

PRELIMINARY LEGAL ANALYSIS

I. There is no indication that Jack Conway or Mary Zon have remained on union payrolls or that their union employers are paying their fringe benefits while they are working for Mr. Carter. In light of the insufficiency of the information, there is no reason to believe that a violation of 2 U.S.C. §§434(b) and 441b have occurred.

(Continuation Sheet)

RECOMMENDATION

Leave file open pending further analysis

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Date of Next Commission Review: _____

SUMMARY OF ALLEGATION

(CONTINUATION SHEET)

Clothing Workers, Retail Clerks Union (ABC) and Maritime Engineers.

PRELIMINARY LEGAL ANALYSIS

(CONTINUATION SHEET)

II. A cursory examination of the files indicates that at least four of the individual union PACs, CWA, UAW, MEBA and Retail Clerks Union (ABC), are in fact each multicandidate groups which appear to consist of affiliates. Some of these PACs designate only the international union, and not another PAC, as an affiliate. It is unclear, however, whether the amounts specified in the Congressional Record were actually given to Mr. Carter or whether some of the funds constituted independent expenditures.

Further in-house research is necessary to verify the allegations in the Congressional Record that these groups have violated 2 U.S.C. §§441a(a)(2)(A) and 441a(a)(5). We have referred this matter to the Office of Compliance and Disclosure. If further research substantiated the allegations, we will proceed with this matter.

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FEDERAL ELECTION COMMISSION

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

Dear

This is to notify you that the Federal Election Commission, in the course of carrying out its normal supervisory responsibilities, has detected certain irregularities which give reason to believe that there has been a violation of the Federal Election Campaign Act of 1971, as amended (the Act).

2 U.S.C. §433 states that "each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization." Financial statements filed with the Commission reveal that your organization contributed \$1,000 to the Committee for Jimmy Carter on April 26, 1976 and received \$1,000 from UAW-V-CAP on May 5, 1976. It appears, therefore, that the Labor Appreciate Carter Committee was required to file a Statement of Organization with the Commission.

Further, 2 U.S.C. §434 states that each political committee "shall file with the Commission reports of receipts and expenditures." The Commission has received no such financial statements from the Labor Appreciates Carter Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Kathryn Kavanagh (telephone no. 202/523-4073, the staff member assigned to this case.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL COUNSEL

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This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William Oldaker
General Counsel

Enclosures

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OFFICIAL FILE COPY

After a brief period of disunity, organized labor is again in the ring and the drive for a national Democrat ticket—and labor's well developed muscle is being felt from coast to coast.

Over the last few years, big labor's bosses have taken great pains to protect and expand their political powers—and are now aiming for a Republican knock-out in 1976, a virtual end of the two-party system.

It is rare that the political efforts of organized labor are exposed to the glare of publicity in the public media. The American people have little opportunity to learn of the massive, calculated plan to grab hold of the national political system which is the clear aim of big labor. This is unfortunate because democracy depends upon an informed electorate—aware of the influences upon their attention and of ultimate designs to capture power in the Nation. For make no mistake about it, there is an all-out campaign by organized labor to become the new rulers of the American political system.

Mr. President, it is in order to bring a little light to the monumental reach of union political ambitions in the 1976 elections that I take to the floor today. It is difficult to know where to begin, but let us start our survey with the recent Democrat National Convention where great pressure was brought to bear upon delegates and events by the AFL-CIO's Committee on Political Education, COPE, and the Labor Coalition Clearinghouse.

The efforts of these groups were bolstered by the large numbers of delegates—over one-fifth of the entire convention—who were active union members or officers. This is more than in any previous convention.

Organized labor spent over a half million dollars electing these delegates, financing their travel and convention expenses and in some cases, even providing them pay for missed days of work.

It is no secret that the Democrat Presidential nominee, Jimmy Carter, and his advisers, are continuing to work closely with a number of big labor officials. Among numerous labor ties with Mr. Carter that can be documented from public reports are the following:

Leonard Woodcock, president of the United Auto Workers, is active in the Carter campaign, and, in fact, has been touted as a potential Secretary of Labor or HEW, should Mr. Carter win.

Jack Conway, another old United Auto Workers hand and former president of the "re-elected" "honest" Jack Ruby Common Cause, is taking a leave of absence from the American Federation of State, County, and Municipal Employees to work for Mr. Carter.

Mary Zen, assistant director of AFL-CIO's COPE will go directly to Atlanta to coordinate labor's efforts with the Carter campaign, on or off payroll.

But the labor bosses' most important sources of power and influence are their

direct and indirect contributions to the Democrat Presidential and selected congressional campaigns.

Interestingly, organized labor provided strong and vocal support for the new Federal Campaign Act, which imposes disclosure requirements and campaign spending limitations. The new election statute was intended to eliminate campaign financing abuses and bring campaign contributions and spending out into the open. It is based on the theory that the public has a right to know the source of a candidate's support.

Labor's support for the reform effort stopped at their own doorstep. Lobbyists for organized labor worked long and hard to exempt their own indirect political activities from the bill's provisions. And they apparently succeeded. As a result, we can only estimate the full extent of big labor's effort behind the scenes on behalf of a Presidential or congressional candidate.

Organized labor can do anything and everything within their power, including the use of union dues, to elect candidates of their person, so long as their activities are restricted to their own members. The sole exception prohibits direct cash contributions from union treasuries.

The New York Times of January 18, 1976, quotes the AFL-CIO's interpretation of the new election law as allowing unions:

To use treasury funds, derived from members' dues, to communicate with their members and their families on political issues and candidates; To use union treasury funds in non-partisan registration and get-out-the-vote campaigns; To contribute treasury money and union manpower to the national Committee on Political Education or to state or local central body political education committees to be used to communicate with or register union members and their families; To use Treasury funds to solicit voluntary contributions for a political fund and for the establishment and administration of such a fund; To use treasury funds to pay union personnel doing political work as long as they work under union direction and control, and are engaged in political activity aimed at union members and their families.

Thus while the labor "reformers" were pushing stringent requirements for all others, they seem to have been more than generous in protecting and allowing their own particular activities and contribution. And this year the labor bosses are taking full advantage of the loopholes they have created for themselves. In the interest of an informed electorate, I believe the American public should know what pressure organized labor has already exerted so far this year, and what is planned for the remainder of the campaign. The public must be aware of what influences are shaping the election.

First, direct-cash contributions. The law says unions themselves may not make cash contributions. So all the unions do is set up political action committees, which may make cash contributions under the law.

Since normal union dues may not be

used, the political action committees are funded through what are on the surface "voluntary contributions" from union members. In fact, these voluntary contributions are not necessarily what an objective person might label "voluntary." Often, by use of a checkoff system, the contribution to a union political committee is automatically deducted from a worker's paycheck unless he goes on record and makes a formal objection. In other cases, the shop steward gives the workers a checkoff card providing for such a payroll deduction and its automatic forwarding to the unions. Now, I would ask, who is going to say no to his shop steward, especially when he can be singled out?

As of now, over 230 such voluntary funded political action committees have been established and registered with the Federal Election Commission.

Where are the huge amounts of voluntary contributions received by these committees being spent by the labor bosses?

Well, let us look first at Mr. Carter. Since he became the obvious Democratic Presidential candidate, large amounts have been poured into his campaign chests. These contributions have, of course, been matched with public funds.

Individual union PAC's which have so far given or directed to Mr. Carter amounts of \$5,000 or more are as follows:

Communications Workers of America	\$2,195
United Auto Workers	21,418
United Transportation Union	5,000
American Federation of State, County and Municipal Employees	5,000
Marine Engineers Beneficial Association (includes fundraiser)	44,744
Amalgamated Clothing Workers	5,500
Retail Clerks Union (ABC)	18,100
Nightshifts NSPL	5,000
Engineers Political Education Committee	5,000
Seafarers SPAD	5,000
Hotel and Restaurant Employees and Bartenders International Union	5,000
Carpenters LIO	5,000
Railway Clerks Political League	5,000
Laborers Political League	5,000
Oil, Chemical and Atomic Workers	5,000
United Rubber Workers	5,000
Transport Workers Union	5,000
Building and Construction Trades Department	5,000
Coal Miners Union	5,000
Maritime Engineers (fundraiser)	50,180
Total	267,137

The total of big labor cash contributions to Mr. Carter in gifts of all amounts is \$269,444.55, this early in the campaign.

Senate candidates are also feeling the labor bosses' power of the purse. As of now—and remember, these figures will grow substantially as we approach November—the following contributions have been made by organized labor to incumbent Members seeking reelection

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Agree, many are about the antipolitical official.



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