

FEDERAL ELECTION COMMISSION

THIS IS THE BEGINNING OF MUR # 2584

DATE FILMED 6/3/88 CAMERA NO. 2

CAMERAMAN 6.4.U.

UNITED STATES OF AMERICA BEFORE THE FEDERAL ELECTION COMMISSION WASHINGTON, D.C.

Ray O. Brooks, Jr. 1020 Suzanne Avenue Knoxville, Tennessee 37920

Complainant,

v.

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Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; Amalgamated Clothing and Textile Workers Union Political Action Committee; Amalgamated Transit Union - COPE; Seafarers Political Activity Donation; and all the Committees' Treasurers,

Respondents.

Complaint

MUR No. 2584

I. INTRODUCTION

1. Pursuant to 2 U.S.C. § 437g(a)(1), Ray O. Brooks, Jr. brings this complaint against candidate for federal public office, Albert Gore, Jr. Friends of Albert Gore, Jr. Committee, Amalgamated Clothing and Textile Workers Union Political Action Committee, Amalgamated Transit Union - COPE, Seafarers Political Activity Donation, and all the Committees' treasurers individually and in their capacities as treasurers for making and receiving of excessive contributions in violation of 2 U.S.C.§ 441a(f) and 2 U.S.C.§ 441a(a)(2)(A).

II. PARTIES

2. Complainant is Ray O. Brooks, Jr. who resides at 1020 Suzanne Avenue, Knoxville, Tennessee 37920. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Tennessee.

Respondents are:

- a. Albert Gore, Jr., United States Senate, 393 Russell Senate Building, Washington, D.C. 20510.
- b. Jack Wright Robinson, Treasurer, Friends of Albert Gore, Jr., P.O. Box 2757, Nashville, Tennessee 37219.
- Mr. R. C. Wallace, Treasurer, ATU-COPE Account -Voluntary Fund, 5025 Wisconsin Avenue, N.W., Washington, D.C. 20016.
- d. Amalgamated Transit Union-COPE, 5025 Wisconsin Avenue, N.W., Washington, D.C. 20016.
- e. Mr. Jack Sheinkman, Treasurer, Amalgamated Clothing and Textile Workers Union, 15 Union Square, New York, New York 10003.
- f. Amalgamated Clothing and Textile Workers Union, 15 Union Square, New York, New York 10003.

- g. Mr. Frank Drozak, Chairman, Seafarers Political Activity Donation, Seafarers International Union, 5201 Auth Way, Camp Springs, Maryland 20746.
- h. Seafarers Political Action Donation, Seafarers International union, 5201 Auth Way, Camp Springs, Maryland 20746.

III. LIABILITY

- 3. Liability may be imposed upon the candidate, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee, Amalgamated Clothing and Textile Workers Union Political Action Committee, Amalgamated Transit Union-COPE, and Seafarers Political Activity Donation pursuant to 2 U.S.C. § 44la(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. § 44la(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).
- 4. Liability may be imposed on the treasurers, personally and in their capacities as treasurers pursuant to 11 C.F.R. § 104.14(d).

IV. OVERVIEW

5. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1984 federal primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1984 federal general election in which Albert Gore, Jr. was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; Amalgamated Clothing and Textile Workers Union

Political Action Committee; Amalgamated Transit Union-COPE, and Seafarers Political Activity Donation and all Committees' treasurers filed for the 1984 federal Congressional election.

6. For the 1984 federal primary election, excessive funds were contributed to Albert Gore, Jr.; Friends of Albert Gore, Jr.

Committee; by the Seafarers Political Activity Donation and all

Committee; by the Seafarers Political Activity Donation and all Committees' treasurers. For the 1984 general election, excessive funds were contributed to Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; by Amalgamated Clothing and Textile Workers Union Political Action Committee and Amalgamated Transit Union-COPE, and all the Committees' treasurers.

7. These unlawful contributions constitute a violation of the Federal Election Campaign Act, 2 U.S.C. § 441(a)(2)(A), which provides that a multicandidate political committee may not contribute more than \$5,000.00 (FIVE THOUSAND DOLLARS) to any candidate and his authorized political committee with respect to any election for federal office and § 441a(f) which prohibits a candidate from receiving illegal contributions.

V. VIOLATIONS OF THE F.E.C.A. BY FRIENDS OF ALBERT GORE, JR. COMMITTEE IN THE 1984 FEDERAL PRIMARY ELECTION

8. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly

accepted contributions for the 1984 federal primary election from Seafarers Political Activity Donation ("SPAD") in the amount of \$10,000.00 (TEN THOUSAND DOLLARS).

9. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr.

Committee and its treasurer, for the 1984 federal primary

election, accepted contributions from the SPAD in the following
amounts:

Date Received	Amount	F.E.C. Microfilm Locations
6/30/83	\$ 5,000.00	8302-005-0959
12/23/83	\$ 5,000.00	8402-003-1797
Total =	\$10,000.00	

- 10. A running total of the amount of contributions received from SPAD would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on June 30, 1983. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer were not permitted to accept any additional contributions. In violation of 2 U.S.C. § 441a(f), they accepted an additional contribution designated for the primary election and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.
- 11. Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the December 23 1983 \$5,000.00 (FIVE THOUSAND DOLLARS) contribution from SPAD. SPAD reported making the contribution on December 7, 1983 and designated it for the primary election. (See F.E.C. Microfilm #8403-294-2612.) In violation of 11 C.F.R § 104.14(d), Albert Gore,

Jr., Friends of Albert Gore, Jr. Committee and its treasurer inaccurately reported receiving the \$5,000.00 (FIVE THOUSAND DOLLARS) contribution from SPAD on December 23, 1983 and indicated that it was a contribution for the general election on their F.E.C. Form 3, Schedule "A", which was dated December 23, 1983. (See F.E.C. Microfilm #8402-003-1797). F.E.C. regulation, 11 C.F.R. § 104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained therein."

12. F.E.C. regulations, ll C.F.R. § 110.1(a)(1) and § 110.1(a)-(2)ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall by law be the designated election. The respondents also violated this regulation. See General Counsel's Report, MUR 2110 at 10 (11 C.F.R. §§ 110.1(a) and 102.9(e), "should not be construed as permission for the recipient committee to assign contributions to a particular election" or "determine election designations."). Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the second \$5,000.00 contribution in order to accept contributions from SPAD in excess of the statutory limit.

13. Based on a review of the periodic reports, Federal Election

¹The 1984 Tennessee Congressional primary election was held on August 2, 1984.

Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU") in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

14. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, accepted contributions from ACTWU in the following amounts:

Date Received	Amount	F.E.C. Microfilm Location
11/26/83	\$ 200.00	8402-003-1767
12/30/83	\$ 800.00	8402-003-1767
09/05/84	\$ 5,000.00	8402-021-1484
Total =	\$ 6,000.00	

15. A running total of the amount of contributions received from ACTWU would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$1,000.00 (ONE THOUSAND DOLLARS) on December 30, 1983. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer were only permitted to accept an additional contribution of \$4,000.00 (FOUR THOUSAND DOLLARS). In violation of 2 U.S.C. § 441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the \$200.00 (TWO HUNDRED DOLLARS) contribution of November 26, 1983 which was designated by ACTWU as a contribution for the general election. (See F.E.C. Microfilm #8303-289-4364.) In violation of 11 C.F.R. § 104.14(d), Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer reported receiving the \$200.00 (TWO HUNDRED DOLLARS) contribution from ACTWU on November 26, 1983 and indicated that it was a contribution for the primary election. The contribution was reported by Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer on their F.E.C. Form 3, Schedule "A", which was dated November 26, 1983. (See F.E.C. Microfilm #8402-003-1767.) F.E.C. regulation, 11 C.F.R. § 104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained therein."

17. F.E.C. regulations, 11 C.F.R. § 110.1(a)(1) and § 110.1(a)(2)ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall be the designated election.

The respondents also violated this regulation. Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the contribution in order to accept contributions from ACTWU in excess of the statutory limit.

18. Based on a review of the periodic reports, Federal Election

Commissions Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from Amalgamated Transit Union-COPE ("ATU-COPE") in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

19. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr.
Committee and its treasurer, for the 1984 general election,
accepted contributions from ATU-COPE in the following amounts:

Date Received	Amount	F.E.C. Microfilm Location
11/01/83 11/21/83 03/20/84 06/25/84 09/11/84	\$ 500.00 \$ 1,000.00 \$ 500.00 \$ 1,500.00 \$ 2,500.00	8402-003-1769 8402-003-1769 8402-008-1410 8402-014-1372 8402-021-1484
Total =	\$ 6,000.00	

20. A running total of the amount of contributions received from ATU-COPE would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$3,500.00 (THIRTY-FIVE HUNDRED DOLLARS) on June 25, 1984. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer were only permitted to accepted an additional contribution of \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits.

21. Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the \$500.00 (FIVE HUNDRED DOLLARS) contribution of November 1, 1983 (F.E.C. Microfilm #8303-287-2494); \$1,000.00 (ONE THOUSAND DOLLARS) contribution of November 21, 1983 (F.E.C. Microfilm #8303-289-0244); \$500.00 (FIVE HUNDRED DOLLARS) contribution of March 3, 1984 (F.E.C. Microfilm #8403-299-1009); \$1,500.00 (FIVE HUNDRED DOLLARS) contribution of June 25, 1984 (F.E.C. Microfilm #8403-317-3553), which were designated by ATU-COPE as contributions for the general election. In violation of 11 C.F.R. § 104.14(d), Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer reported receiving the \$500.00 (FIVE HUNDRED DOLLARS) on November 1, 1983 (F.E.C. Microfilm #8402-003-1769); \$1,000.00 (ONE THOUSAND DOLLARS) on November 21, 1983 (F.E.C. Microfilm #8402-003-1769); \$500.00 (FIVE HUNDRED DOLLARS) on March 20, 1984 (F.E.C. Microfilm #8402-008-1410); \$1,500.00 (FIFTEEN HUNDRED DOLLARS) on June 25, 1984 (F.E.C. Microfilm #8402-014-1372); and \$1,000.00 (ONE THOUSAND DOLLARS) on June 25, 1984 (F.E.C. Microfilm #8402-014-1372), contributions from ATU-COPE and indicated that they were contributions for the primary election. The contributions were reported by Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer on their F.E.C. Form 3, Schedule "A". F.E.C. regulation, 11 C.F.R. § 104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained therein."

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F.E.C. regulations, 11 C.F.R. § 110.1(a)(1) and § 110.1(a)-(2) ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall by law be the designated election. The respondents also violated this regulation. Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the contribution in order to accepted contributions from ATU-COPE in excess of the statutory limit.

VI. VIOLATIONS OF THE F.E.C.A. SEAFARERS POLITICAL ACTIVITY DONATION IN THE 1984 FEDERAL PRIMARY ELECTION

- Based on a review of the periodic reports, Federal Election 23. Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that SPAD knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated for the 1984 federal primary election in the amount of \$10,000.00 (TEN THOUSAND DOLLARS).
- 24. SPAD contributed to candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 primary election, in the following amounts:

Date Contributed	Amount	F.E.C. Microfilm Locations
6/29/83	\$ 5,000.00	8303-277-0050
12/07/83	\$ 5,000.00	8403-294-2612

Total = \$10,000.00

25. A running total of the amount of contributed to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer would have put SPAD on notice that it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS) on June 29, 1983. On that date, SPAD and its treasurer were not permitted to make additional contributions towards the primary election if they wished to meet the mandates of the law. In violation of 2 U.S.C. § 441a(a)(2)(A), a \$5,000.00 (FIVE THOUSAND DOLLARS) contribution was made to Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer. This amount exceeded the statutory monetary ceiling by \$5,000.00 (FIVE THOUSAND DOLLARS).

VII. VIOLATIONS OF THE F.E.C.A.

BY

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION POLITICAL ACTION COMMITTEE

IN

1984 FEDERAL GENERAL ELECTION

- 26. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that ACTWU-PAC knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated for the 1984 federal general election, in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).
- 27. ACTWU-PAC contributed to candidate Albert Gore, Jr., Friends

of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, in the following amounts:

Date Contributed	Amount	F.E.C. Microfilm Locations
11/17/83 12/30/83	\$ 200.00 \$ 800.00	8303-289-4364 8402-003-1767*
08/22/84	\$ 5,000.00	8403-329-3194
Total =	\$ 6,000,00	

*Itemized receipt; not reported by ACTWU-PAC.

28. A running total of the amount of contributions contributed to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer would have put ACTWU-PAC on notice that it contributed \$200.00 (TWO HUNDRED DOLLARS) on November 13, 1983. On that date, ACTWU-PAC and its treasurer were only permitted to make an additional contribution of \$4,800.00 (FORTY-EIGHT HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(a)(2)(A), it made additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits.

VIII. VIOLATIONS OF THE F.E.C.A.

BY

AMALGAMATED TRANSIT UNION-COPE

IN

1984 FEDERAL GENERAL ELECTION

29. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that ATU-COPE knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated

for the 1984 federal general election in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

30. ATU-COPE candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, in the following amounts:

Date Contributed	Amount	F.E.C. Microfilm Locations
10/27/83	\$ 500.00	8303-287-2494
11/15/83	\$ 1,000.00	8303-289-0244
02/28/84	\$ 500.00	8403-299-1009
05/23/84	\$ 500.00	8403-317-3550
05/25/84	\$ 1,000.00	8403-317-3553
09/05/84	\$ 2,500.00	8403-343-2254
Total =	\$ 6,000.00	

31. A running total of the amount of contributions made to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer by ATU-COPE and its treasurer would have put it on notice that they had contributed \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) on May 25, 1984. On that date, ATU-COPE and its treasurer were only permitted to make an additional contribution of \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(a)(2)(A), they made additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

IX. CONCLUSION

- 32. As documented above, Respondents have violated the spirit and letter of the Federal Election Campaign Act.
- 33. Complainant requests that an investigation into this complaint be undertaken, that Respondents be ordered to return the accepted excess contributions.

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34. Complainant also requests that civil sanctions be imposed on the Respondents as well as a fine equal to the statutory violation, i.e., \$7,000.00 for the recipient committee, \$5,000.00 for SPAD, \$1,000.00 for ACTWU-PAC, and \$1,000.00 for ATU-COPE.

Michael E. Avakian
Center on National Labor
Policy, Inc.
5211 Port Royal Rd., Suite 400

5211 Port Royal Rd., Suite 400 North Springfield, VA 22151 (703) 321-9180

Attorney for Complainant March 1, 1988 DESIGNATION OF COUNSEL

I, Ray O. Brooks, Jr., a complainant to the attached complaint, designate the attorney identified below as complainant's
attorney of record. The Federal Election Commission shall direct
all written and oral communications in connection with this matter
to my designated counsel.

February 3, 1988

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Complainant

DESIGNATED COUNSEL

Michael Ernest Avakian Center on National Labor Policy Suite 400 5211 Port Royal Road North Springfield, Virginia 22151 88040703794

VERIFICATION OF CITIZEN COMPLAINANT

County of Knox) ss.
State of Tennessee)

Pursuant to 2 U.S.C. § 437g(a)(1), I, Ray O. Brooks, Jr., being duly sworn, say that I have read the foregoing complaint and know the contents thereof, and that the same is true on information and belief. This complaint was not filed at the request or suggestion of any candidate. I am a citizen of the United States, over the age of 18 years and a registered voter of the State of Tennessee.

Pay O. Brooks Jr.

ore me this 3 day of Formany

Subscribed and sworn to before me this 3 day of formany

Michael R. Sharp

My Commission Expires: 3/21/89



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

March 8, 1988

Mr. Michael Ernest Avakian Center On National Labor Folicy Suite 400 5211 Port Royal Road North Springfield, VA 22151

RE: MUR 2584

Dear Mr. Avakian:

This letter acknowledges receipt of your client's complaint, received on March 1, 1938, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by Senator Albert Gore, Jr., Friends Of Albert Gore, Jr. and William P. Puryear as treasurer, the Amalgamated Transit Union- COPE Account Voluntary Fund and Raymond C. Wallace as treasurer, the Amalgamated Transit Union- COPE and Raymond C. Wallace as treasurer, the Amalgamated Clothing & Textile Workers Union, the Seafarers Political Action Donation and Marianne Rogers as treasurer, and the Amalgamated Clothing and Textile Workers Union- Political Action Committee and Charles Sallee as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the Seneral Counsel. Such information must be sworn to in the same number as the original complaint. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble General Counsel

By:

Lois G. Lerner

Associate General Counsel

Enclosure Procedures

cc: Mr. Ray O. Brooks, Jr.

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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

March 8, 1988

Charles Sallee, Treasurer
Amalgamated Clothing and Textile
Workers Union- Political
Action Committee
15 Union Square
New York, NY 10003

RE: MUR 2584

Amalgamated Clothing and Textile Workers

Union- Political Action Committee Charles Sallee, as

Treasurer

Dear Mr. Sallee:

The Federal Election Commission received a complaint which alleges that the Amalgamated Clothing and Textile Workers Union-Political Action Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Amalgamated Clothing and Textile Workers Union- Political Action Committee in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel By: Associate General Counsel Enclosures 1. Complaint 2. Procedures 3. Designation of Counsel Statement 3 0 ~ 0 4 C 8 ∞



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Marianne Rogers, Treasurer Seafarers Political Activity Donation 5201 Auth Way Camp Springs, MD 20746

Seafarers Political
Activity Donation
Marianne Rogers, as
Treasurer

Dear Ms. Rogers:

The Federal Election Commission received a complaint which alleges that the Seafarers Political Activity Donation and you, as treasurer, may have violated the Federal Election Campaign 4ct of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Seefarers Political Activity Donation in this matter. Slease 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. Your response, which should be addressed to the General Counsel's Diffice, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel Lois G. Lerner
Associate General Counsel By: Enclosures 1. Complaint I. Procedures 3. Designation of Counsel Statement m 0 4 C 8 9

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Amalgamated Clothing and Textile Workers Union 15 Union Square New York, NY 10003

> RE: MUR 2584

> > Amalgamated Clothing and Textile Workers

Union

Gentlemen:

The Federal Election Commission received a complaint which alleges that the Amalgamated Clothing and Textile Workers Union may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Amalgamated Clothing and Textile Workers Union in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel Lois G. By: Lerner Associate General Counsel Enclosures 1. Complaint 0 2. Procedures J. Designation of Counsel Statement 0 3 0 0 T 0 8 00



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

March 8, 1988

Raymond C. Wallace, Treasurer Amalgamated Transit Union- COPE 5025 Wisconsin Avenue, NW Washington, DC 20016

RE: MUR 2584

Amalgamated Transit

Union- COPE

Robert C. Wallace, as

Treasurer

Dear Mr. Wallace:

The Federal Election Commission received a complaint which alleges that the Amalgamated Transit Union- COPE and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Amalgamated Transit Union- COPE in this matter. 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 bath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel Lois G./Lerner By: Associate General Counsel 3 Enclosures 1. Complaint 0 2. Procedures 3. Designation of Counsel Statement 0 3 0 ~ 0 4 C 00 α



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

March 8, 1988

Senator Albert Gore, Jr. United States Senate Washington, DC 20510

RE: MUR 2584

Senator Albert Gore,

Jr.

Dear Senator Gore:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

William P. Puryear, Treasurer Friends Of Albert Gore, Jr. 10th Floor Third National Bank Building Nashville, TN 37219

RE: MUR 2584
Friends Of Albert
Gore, Jr.
William P. Puryear, as
Treasurer

Dear Mr. Puryear:

The Federal Election Commission received a complaint which alleges that Friends Of Albert Gore, Jr. and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and Friends Of Albert Gore, Jr. in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel By: Associate General Counsel Enclosures 1. Complaint 2. Procedures 3. Designation of Counsel Statement 00 3 0 0 C 0 8



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Raymond C. Wallace, Treasurer Amalgamated Transit Union- COPE Account Voluntary Fund 5025 Wisconsin Avenue, NW Washington, DC 20016

RE: MUR 2584

Amalgamated Transit

Union- COPE Account

Voluntary Fund

Robert C. Wallace, as

Treasurer

Dear Mr. Wallace:

The Federal Election Commission received a complaint which alleges that the Amalgamated Transit Union- COPE Account Voluntary Fund and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR COE4. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Amalgamated Transit Union— COPE in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints. Sincerely, Lawrence M. Noble General Counsel By: Associate General Counsel 0 Enclosures 1. Complaint 0 2. Procedures 3. Designation of Counsel Statement œ 3 0 0 4 0 00 0





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AMALGAMATED TRANSIT UNION 88 MAR 22 PM 12: 39

5025 WISCONSIN AVE., N.W. WASHINGTON, D.C. 20016-4139 (202) 537-1645

March 18, 1988

Sandra Robinson, Esq. General Counsel's Office Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

RE: F.E.C. MUR 2584

Amalgamated Transit Union - COPE Raymond C. Wallace, Treasurer

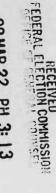
Dear Ms. Robinson:

This letter constitutes the response of the Amalgamated Transit Union - Committee on Political Education, (ATU-COPE) and Raymond C. Wallace, individually and in his capacity as Treasurer of ATU-COPE, (herein "Respondents") to your letter dated March 8, 1988, stating that the Commission has received a complaint alleging that the respondents may have violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The complaint, F.E.C. MUR 2584, alleges that the Respondent political committee and its Treasurer violated Section 441(a)(2)(A) of the Act by making contributions to the "Friends of Albert J. Gore, Jr.", Committee for the 1984 Federal General Election in the amount of \$6,000.00 exceeding the \$5,000.00 per election limitation in the Act by \$1,000.00.

We submit, as demonstrated herein, that respondents contributions to the Friends of Albert J. Gore, Jr., committee ("Committee") did not exceed the \$5,000.00 contribution per election limitation of the Act.

As referenced in the complaint, in 1983, and 1984, Respondents distributed five (5) separate contributions to the Committee. A \$500.00 contribution was distributed on October 27, 1983 and reported by the Committee on November 1, 1983. A second \$1,000.00 contribution was distributed on November 15, 1983, and reported by the Committee on November 21, 1983. A third contribution for \$500.00 was distributed on February 28, 1984, and reported by the Committee on March 20, 1984. A forth contribution for \$1,500.00 was distributed on May 23, 1984 and reported by the Committee on June 25, 1984. Finally, a \$2,500.00 contribution was distributed on September 5, 1984, and reported by the Committee on September 11, 1984. Copies





of Respondents' original monthly F.E.C. reports listing these campaign contributions are attached hereto as Exhibits A-E. Included in each exhibit are copies of the cancelled checks returned by the Committee.

Pursuant to Respondents' regular operating procedures, each of these campaign contributions was accompanied by a standard ATU-COPE cover letter, referencing the enclosed check. Neither the cover letters nor the checks designated the contributions for either the primary or general elections. A copy of the ATU-COPE cover letter used at that time is attached hereto as Exhibit F. Copies of the actual letters sent with the individual contributions were not kept in our files.

The Tennessee primary in 1984, was held on August 2, 1984. The two 1983 contributions and all but the September 5, 1984 contributions were distributed to the Committee prior to the primary and intended as primary campaign contributions. However, through an inadvertent error in our bookkeeping, which has since been corrected, our F.E.C. reports covering those periods incorrectly reported all of the contributions as targeted for the general election. Therefore, rather than recording \$3,500.00 for the primary election campaign and the last \$2,500.00 check for the general election, our records inadvertently show \$6,000.00 in contributions ear-marked for the general election.

Clearly, it was our intent not to exceed the limits prescribed by the Act. Rather, Respondents contributions were timed to provide \$3,500.00 for the primary election and a final \$2,500.00 for the general election. Attached hereto as Exhibit G are copies of our amended F.E.C. reports for the periods in questions, which accurately designate the contributions to the appropriate election campaign. The original documents of the amended reports are simultaneously being filed with the F.E.C.

At no time did Respondents herein knowingly or intentionally undertake campaign contributions in excess of the Act's legal limitations.

As your investigation will establish, although Respondents F.E.C. reports for the contributions in question incorrectly reported all of the contributions as being for the 1984 general election, those same contributions were correctly Further, as Respondents' standard reported by Committee. cover letters, then in use, and checks did not designate the specific election for which the contributions were being forwarded, the provisions of 11 C.F.R. Section 110.2 (b)(2)ii provide that contributions not designated in writing for a specific election received by the Committee prior to the primary be credited for the primary and not the general election. (For your reference, in 1983 and 1984 the language

Sections noted above was set forth in 11 C.F.R. 110.1(a)(2)ii(A).)In light of the above, we respectfully request that no further action be taken by the Commission, that the complaint be dismissed and the file closed on these instant matters. Sincerely yours, Robert A. Molofoly Robert A. Molofsky Counsel for Respondents Raymond C. Wallace Individually and as Treasurer of the Amalgamated Transit Union Committee on Political œ Education. M /rfm Enclosures cc: Jim La Sala International President Amalgamated Transit Union Raymond C. Wallace 00 International Secretary-Treasurer Amalgamated Transit Union 00 Don Simon, Esq. Sonosky, Chambers and Sache Suite 1000 1250 Eye Street, N.W. Washington, D.C. 20005

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584	
NAME OF COURSEL:	Robert A. Molofsky
ADDRESS:	Amalgamated Transit Union
	5025 Wisconsin Avenue, N.W.
	Washington, D.C. 20016
TELEPHONE:	(202) 537-1645
The above-name	ed individual is hereby designated as my
counsel and is auth	orized to receive any notifications and other
communications from	the Commission and to act on my behalf before
the Commission.	
march 18, 1988	R.C. Wallace
Date	Signature
RESPONDENT'S NAME:	Raymond C. Wallace
ADDRESS:	Treasurer, ATU-COPE Amalgamated Transit Union
ADDRESS:	
	5025 Wisconsin Avenue, N.W.
	Washington, D.C. 20016
HOME PHOME:	
BUSINESS PHONE:	(202) 537-1645

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Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

- Office of the International Secretary-Treasurer

November 17, 1983

4	Federal Election	on Commission
	1325 K Street,	N.W.
-	Washington, DC	20463

Gentlemen:

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- Enclosed please find the October report for the Amalgamated Transit Union COPE.
- Also enclosed are amended reports for January through September of 1983.
- Trusting this meets with your satisfaction, I remain

Sincerely,

R.C. Wallace

International Secretary-Treasurer/COPE Director

:ngl

Enclosure

ror a Political L	nttee Other	Than an Authorized	Commit
	(Summa	ry Page)	

ALIGN AREA		ALIGN AREA			
1.Name of Committee (In Full)	4. TYPE OF REPORT (Check appropris	te boxes)			
ANALGANAMED MOANGEM INITON - CORP	(a) April 15 Quarterly Report	October 15 Quarterly Repo			
AMALGAMATED TRANSIT UNION - COPE	July 15 Quarterly Report	January 31 Year End Repo			
Address (Number and Street)	July 31 Mid Year Report (Non-Election Year Only)				
5025 Wisconsin Avenue, N.W.	Monthly Report for 10/1	/83 - 10/31/83			
	Twelfth day report preceding (Type of Signion)				
City, State and ZIP Code					
Washington, DC 20015	election on				
Check here if address is different than previously reported.		Thirtieth day report following the General Election			
A FEC Identification Number C00032995	onin the	State of			
This committee qualified as a multicandidate committee during this Reporting Period on	(b) Is this Report an Amendment?				
	YES X N	0			
SUMMARY S. Covering Period 10/1/83 through 10/31	L/83 COLUMN A	COLUMN B Calendar Year-to-Date			
6.(a) Cash on hand January 1, 19 83		\$ 43,479.18			
(b) Cash on Hand at Beginning of Reporting Period					
(c) Total Receipts (from Line 18)	s 12,488.59	s 123,580.50			
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and	s 146,769.6	s 167,059.68			
7. Total Disbursements (from Line 28)	s 8,436.00	s 28,726.00			
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line	8(d)) s 138,333.6	s 138,333.68			
9. Debts and Obligations Owed TO The Committee	s NONE				
(Itemize all on Schedule C or Schedule D)					
10. Debts and Obligations Owed 8Y the Committee					
certify that I have examined this Report and to the best of my knowledge and belie t is true, correct and complete.					
	For further in	formation contact:			
R.C. Wallace	Federa	Election Commission			
Type or Print Name of Treesurer	Toll Fr	ee 800-424-9530			
// .2 . 1	Local 2	02-523-4068			
N/ / 1 1 12					
K. C. Waller	11/17/83				
SIGNATURE OF TREASURER Date	11/17/83				

FEC FORM 3X (3/80)

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

Name of Committee (in Full)

AMALGAMATED	TRANSIT	UNION	- COPE

AMALGAMATED TRANSIT UNION	- COPE		
A. Full Name, Mailing Address and ZP Code Lowry for U.S. Senate Thomas D. Wimmer, Treasurer	Purpose of Disbursement Election	Dete (month, day, year)	Amount of Each Disbursement This Period
P.O. Box 4246 Seattle, WA 98104	Disbursement for: Primery (General Other (specify):	10/27/83	\$ 1,000.00
8. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. P.O. Box 3000	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Nashville, TN 37219	Disbursement for: © Primery & General © Other (specify):	10/27/83	\$ 500.00
C. Full Name, Mailing Address and ZIP Code Kostmayer for Congress P.O. Box 1351	Purpose of Disbursement Re-election	Dete (month, day, year)	Amount of Each Disbursement This Period
Ooylestown, PA 18901	Disbursement for: Primery Reneral Other (specify):	10/27/83	\$ 500.00
b. Full Name, Mailing Address and ZIP Code Kaptur for Congress Committee Deborah Auger	Purpose of Disbursament Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
7040 Knighthood Lane Columbia, MD 21045	Disbursement for: Primary &General Other (specify):	10/27/83	\$ 250.00
È. Full Name, Mailing Address and ZIP Code Committee to Reelect LaFalce P.O. Box 2884	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, DC 20013	Disbursement for: Primary ©General Other (specify):	10/27/83	\$ 250.00
F. Full Name, Mailing Address and ZIP Code People for Mrazek P.O. Box 303	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Centerport, NY 11721	Disbursement for: Primary **General Other (specify):	10/27/83	\$ 500.00
G. Full Name, Mailing Address and ZIP Code Rinaldo for Congress Committee Watergate South	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
700 New Hampshire Ave., N.W. Washington, DC 20037	Disbursement for: Primary &General Other (specify):	10/27/83	\$ 250.00
H. Full Name, Mailing Address and ZIP Code Hughes for Congress 59 G Street, S.W.	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, DC 20024	Disbursement for: Primary &General Other (specify):	10/27/83	\$ 250.00
1. Full Name, Mailing Address and ZIP Code Friends of Senator Carl Levin 420 C Street, N.E.	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursament This Period
Washington, DC 20002	Disbursement for: Primary 3 General Disbursement for: Primary 3 General Disbursement for: Primary 3 General	10/27/73	\$ 500.00
SUBTOTAL of Disbursements This Page (optional)			4,000.00

~00000500000· No. , 1028 DOLLARS October 27 1983 (555 € 500.00 ---Friends of Albert AMERICAN SECURITY (8-3)
AND TRUBE COMPANY
AND TRUBE COMPANY
WASHINGTON D.C. 40013 ---Five Hundaged Toll AMALGAMATED TRANSIT UNION COPE ACCOUNT—VOLUNTARY FUND 5025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016 PAY TO THE ORDER OF 1-163

PROPERTY OF PERSONS AND PERSONS ASSESSMENT

- Market Name of the same

A TOTAL STREET



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

- Office of the International Secretary-Treasurer -

December 12, 1983

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

Gentlemen:

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Enclosed please find the November report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

R.C. Wallace

International Secretary-Treasurer/COPE Director

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Enclosure

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For a Political Committee Uther Th	M HI Albionzes C	Ommunicas -	The state of the s
(Summary F	Page)		
ALIGNAREA	W. S.		ALIGN AREA
1:Náme of Committee (In Full)	4. TYPE OF REPO	ORT (Check appropriate	DOXES
AMALGAMATED TRANSIT UNION - COPE		uarterly Report	October 15 Quarterly Repo
Address (Number and Street)		d Year Report (Non-Elec	
5025 Wisconsin Avenue, N.W.	Monthly R	eport for <u>11/1/83</u>	3 - 11/30/83
	Twelfth de	y report preceding	(Type of Election)
City, State and ZIP Code	election of		n the State of
Washington, DC 20016		4-11	Garage Floreign
Check here if address is different than previously reported.	Thirtieth o	ley report following the	General Election
2.FEC Identification Number C00032995	on	in the Su	ate of
	☐ Termination	on Report	
This committee qualified as a multicandidate committee during	(b) Is this Report a	n Amendment?	
this Reporting Period on(Detail		YES XX NO	
SUMMARY		COLUMN A	COLUMN B
5. Covering Period 11/1/83 through 11/30	/83	This Period	Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 83			s 43,479.18
(b) Cash on Hand at Beginning of Reporting Period		120 222 68	
			M. Tak Mey Page 1
(c) Total Receipts (from Line 18)		18,827.93	\$ 142,408.43
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and		157,161.61	s 185,887.61
Lines 6(a) and 6(c) for Column B) 7.Total Disbursements (from Line 28)	s	5,400.00	s 34,126.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line	8(d)) \$	151,761.61	s 151,761.61
9. Debts and Obligations Owed TO The Committee	s	NONE	
(Itemize all on Schedule C or Schedule D) 10. Debts and Obligations Owed BY the Committee	s	NONE	
certify that I have examined this Report and to the best of my knowledge and beli	el .		
is true, correct and complete.		For further info	rmation contact:
R.C. Wallace	Federal Election Commission		Election Commission
ype or Print Name of Tressurer			800-424-9530
IC / Adline	12/12/83	Local 20	2-523-4068
OTE: Submission of faise, erroneous, or incomplete information may subject the p	erson signing this report	to the cenatives of 2 U.S.C.	6 4370

All previous versions of FEC FORM 3 and FEC FORM 3a are absolute and should no longer be used. FEC FORM 3X (3/80) · State B

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

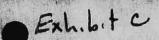
Name of Committee (in Full)

AMALGAMATED TRANSIT UNION - COPE

A. Full Name, Mailing Address and ZIP Code Tsongas for Senate Committee 420 C Street, N.W.	Purpose of Disbursement Re-election	Date (month, dey, year)	Amount of Each Disbursement This Period
Washington, DC 20001	Disbursement for: Primery QGeneral Other (specify):	11/3/83	\$ 500.00
B. Full Name, Mailing Address and ZP Code Ferraro for Congress, 1978 218 Lafayette Street	Purpose of Disbursement Re-election	Dete (month, day, year)	Amount of Each Disbursement This Period
New York, NY 10012	Disbursement for: Primary QGeneral Other (specify):	11/3/83	250.00
C. Full Name, Mailing Address and ZIP Code Torricelli for Congress 4P11 Washington Boulevard	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Axlington, VA 22201	Disbursement for: Primary General Other (specify):	11/3/83	500.00
Defuil Name, Mailing Address and ZIP Code Durbin for Congress Proc. Box 2345	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, DC 20013	Disbursement for: Primary QGeneral Other (specify):	11/3/83	250.00
En Full Name, Mailing Address and ZIP Code Committee to Reelect Joe Kolte: P.O. Box 77002	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, DC 20013	Disbursement for: Primary XXGeneral Other (specify):	11/8/83	200.00
FCFull Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. Jack Wright Robinson, Treasure:	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Re. 2 Carthage, TN 37030	Disbursement for: Primary General Other (specify):	11/15/83	1,000.00
G. Full Name, Mailing Address and ZIP Code Friends of Lane Evans P.O. Box 1222	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Rock Island, IL 61201	Disbursement for: Primary OGeneral Other (specify):	11/21/83	200.00
H. Full Name, Mailing Address and ZIP Code Friends of Neal Smith Committee 5850 N.E. 12th Avenue	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Rural Route #2 Altoona, Iowa 50009	Disbursement for: Primary ** General Other (specify):	11/21/83	250.00
I. Full Name, Mailing Address and ZIP Code Citizens for D'Amours % Robert Walsh	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
922 Elm Street Manchester, NJ 03101	Disbursement for: Primary Ceneral Other (specify):	11/21/83	1,000.00
SUBTOTAL of Disbursements This Page (optional)			\$ 4,150.00

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No. 1036	COO/100	Jahn Kowlong	• 1:054,0 = 00551; 09=86.2 74, 875"
AMALGAMATED TRANSIT UNION COPE ACCOUNT—VOLUNTARY FUND 5025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016 WASHINGTON, D.C. 20016 PAY TO THE Friends of Albert Gorer Jr.	Thousand Dollars	MI AMERICAN BECURATION FOR THE SECTION OF THE SECTI	:15500m0150:1•





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Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

- Office of the International Secretary-Treasurer -

March 9, 1984

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

Gentlemen:

Enclosed please find the February report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

International Secretary-Treasurer/COPE Director

:ngl

Enclosure

place this the committee manage a same

For a Political Committee Other Than an Authorized Committee

(Summary	Page)		ALIGN AREA
1, Name of Committee (In Full)	4 TYPE OF BE	PORT (Check appropriate	
1, Name of Committee (in Pull)	4. ITTEOP NE		
AMALGAMATED TRANSIT UNION - COPE	(a) April 15	Quarterly Report	October 15 Quarterly Report
	July 15	Quarterly Report	January 31 Year End Report
· Address (Number and Street)	July 31	Mid Year Report (Non-Ele	ction Year Only).
FOOD Winners in America W M		2/1/8	4 - 2/29/84
5025 Wisconsin Avenue, N.W.	(X) Monthly	Report for 2/1/8	4 2/23/04
	Twelfth	day report preceding	(Type of Election)
City, State and ZIP Code	design	on	in the State of
Washington, D.C. 20016			
Check here if address is different than previously reported.	Thirtiet	h day report following the	General Election
2. FEC Identification Number	on	in the St	ste of
C00032995		ation Report	A TOWN
CG. This committee qualified as a multicandidate committee during			
this Reporting Period on		t an Amendment?	
		YES X NO	· · · · · · · · · · · · · · · · · · ·
SUMMARY 2 /2 /2 /	194	COLUMN A	COLUMN B Calendar Year-to-Date
5. Covering Period 2/1/84 through 2/29	/ 64	This Period	
6.(a) Cash on hand January 1, 19 84			s 156,011.02
(b) Cash on Hand at Beginning of Reporting Period			A CONTRACTOR OF THE PARTY OF TH
			(1) 10度34月前提出的研究(1) 10 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)
(c) Total Receipts (from Line 18)		13,826.55	\$ 27,549.21
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and		174,210.23	\$ 183,560.23
Liñes 6(a) and 6(c) for Column 8) 7. Total Disbursements (from Line 28)		15,950.00	s 25,300.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Li	ne 6(d))	158,260.23	\$ 158,260.23
9. Debts and Obligations Owed TO The Committee		NONE	
(Itemize all on Schedule C or Schedule D)			
10. Debts and Obligations Owed BY the Committee		NONE	
I certify that I have examined this Report and to the best of my knowledge and bit is true, correct and complete.	digt		
			ormation contact:
R.C. Wallace Type or Print Name of Tressurer			Election Commission 800-424-9530
00 10			02-523-4068
SIGNATURE OF TREASURER	3/9/84		
	NOT THE TENT	va sa sha maratsian at a si a a	5 4220
NOTE: Submission of false, erroneous, or incomplete information may subject the	a parson signing this repo	ort to the penalties of 2 U.S.C.	9 437g.

All previous versions of FEC FORM 3 and FEC FORM 3s are obselete and should no lenger be used.

FEC FORM 3X (3/80)

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

Name of Committee (in Full)

AMALGAMATED TRANSIT UNION -	TRANSTT	INTON -	COPE
-----------------------------	---------	---------	------

A. Full Name, Majling Address and ZIP Code Annunzio for People Committee P.O. Box 15185	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, DC 20003	Disbursement for: Primery diGeneral Other (specify):	2/28/84	\$ 250.00
B. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. P.O. Box 3000	Purpose of Disbursement election	Dese (month, day, year)	Amount of Each Disbursement This Period
Nashville, TN 37219	Disbursement for: Primery QGeneral Other (specify):	2/28/84	500.00
c. Full Name, Mailing Address and ZIP Code Foglietta "84 Campaign 7.37 South 8th Street	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Philadelphia, PA 19147	Disbursement for: Primery digeneral Other (specify):	2/28/84	500.00
D. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Harold Ford	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
PPO. Box 7365 Washington, D C 20044	Disbursement for: Primery General Other (specify):	2/28/84	500.00
E. Full Name, Mailing Address and ZIP Code Jon Hunt Committee P.O. Box 25937	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Raleigh, NC 27611	Disbursement for: Primary General Other (specify):	2/28/84	1,500.00
F. Full Name, Mailing Address and ZIP Code Wyden for Congress P.O. Box 12473	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Portland, OR 97212	Disbursement for: Primary & General Other (specify):	2/28/84	250.00
G. Full Name, Mailing Address and ZIP Code Bruce A. Morrison For Congress Committee	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
P.O. Box 303 New Haven, CT 06503-0303	Disbursement for: Primary X General Other (specify):	2/28/84	500.00
H. Full Name, Mailing Address and ZIP Code Stevens: for Senate Committee 202 E Street, N.E.	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, D.C. 20002	Disbursement for: Primary General Other (specify):	2/28/84	500.00
I. Full Name, Mailing Address and ZIP Code Guarini for Congress P.O. Box J-29	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Jersey City, NJ 07306	Disbursement for: Primary Seneral Other (specify):	2/28/84	250.00
SUBTOTAL of Disbursements This Page (optional)			\$ 4,750.00

1107 DOLLARS ***00000500000** 19 84 15-55 € 500.00 2 . Feb. 28 1:0546m88551: 09-862 74 875F The Head was the His 11 11 11 001 1.1. ... PAY TO THE Friends of Alber 66 Five Hundred Dollar MERICAN SECURITY COPE ACCOUNT—VOLUNTARY FUND AMALGAMATED TRANSIT UNION AND TRUBT 5025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016 .

Exhibit D



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

- Office of the International Secretary-Treasurer

June 13, 1984

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

Gentlemen:

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Enclosed please find the May report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

R.C. Wallace

International Secretary-Treasurer/COPE Director

:ngl

Enclosure

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

Name of Committee (in Full)

AMALGAMATED TRANSIT UNION - COPE

A. Full Name, Mailing Address and ZIP Code Kaptur for Congress	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
1841 Dority Boulevard Toledo, OH 43615	Disbursement for: Primary AGeneral Other (specify):	5/07/84	\$ 500.00
B. Full Name Mailles Address and ZIP Sots ate Com. Romanelli for State Senate Com. P.O. Box 4290	Purpose of Disbursement Re-election	Date (month, day, year).	Amount of Each . Disbursement This Period
Pittsburgh, PA 15203	Disbursement for: Primary & General Other (specify):	5/22/84	200.00
C. 80H Name, Mailing Address and ZIP Code Michlovic for Legislator Com. 515 Verona Street	Purpose of Disbursement Re-election	Dete (month, day, year)	Amount of Each Disbursement This Period
North Braddock, PA 15104	Disbursement for: Primary General Other (specify):	5/22/84	200.00
D. Full Name, Mailing Address and ZIP Code Friends of Senator Carl Levin % Fearl Lipner, Treasurer	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
29201 Telegraph - Ste. 606 Southfield, MI 48034	Disbursement for: Primary General Other (specify):	5/23/84	1,500.00
E. Full Name, Mailing Address and ZIP Code Reelect Senator Pell Commmittee % Boland Berardo, Treasurer	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Providence, RI 02903	Disbursement for: Primary General Other (specify):	5/23/84	500.00
F. Full Name, Mailing Address and ZIP Code Friends of Jay Rockefeller % Russell S. Wehrle, Treasurer	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
P.O. Box 840 Charleston, WV 25323	Disbursement for: © Primary &General © Other (specify):	5/23/84	500.00
G. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. % Jack Wright Robinson	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
P.O. Box 2757 Nashville, TN 37219	Disbursement for: Primary General Other (specify):	5/23/84	500.00
H. Full Name, Mailing Address and ZIP Code Lloyd Doggett Campaign Fund 1206 San Antonio	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Austin, TX 78701	Disbursement for: Primary QGeneral Other (specify):	5/23/84	1,000.00
I. Full Name, Mailing Address and ZIP Code Stan Lundine for Congress	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
P.O. Box 2884 Washington, DC 20013	Disbursement for: Primary QGeneral Other (specify):	5/23/84	500.00
SUBTOTAL of Disbursements This Page (optional)			5,400.00

Page 4 of 5 for LINE New Page 21 (Use separate schedule(s) for each category of the Detailed Summery Page)

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

nmittee (in Full)

ATED TRANSIT UNION - COPE

e, Mailine Address and ZIP Code non in 84 Committee ox 1492	Purpose of Disbursement	Dete (month, day, year)	Amount of Each Disbursement This Period
hsburg, VA 23187	Disbursement for: Primary & General Other (specify):	5/23/84	\$ 500.00
d Daney, Treasurer ing Street gton, DE 19801	Purpose of Disbursement Re-election Disbursement for: Primary General Other (specify):	Dete (month, day, year) 5/23/84	Amount of Each Disbursement This Period 500.00
ne, Mailing Address and ZIP Code tee to elect Schwerdtfege N. Howarth, Treasurer	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ox 275 eth? IL 61028	Disbursement for: Primary Sceneral Other (specify):	5/23/84	500.00
ne, Mailing Address and ZIP Code for Congress Committee lie Welch	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Paseo, Suite C City, MO 64108	Disbursement for: Primary X ^O General Other (specify):	5/23/84	1,000.00
ne, Mailing Address and ZIP Code - 84 Relection Committee encer Jones	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Lyne NY11233	Disbursement for: Primary O'General Other (specify):	5/23/84	500.00
ne, Mailing Address and ZIP Code for Congress Committee St. Monica	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
nn, MO 63074	Disbursement for: Primary Digeneral Other (specify):	5/24/84	200.00
ne Mailing Address and ZIP Code is of Pat and Joe rk Street dence, RI 20908	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
dence, ki zoyou	Disbursement for: Primary General Other (specify):	5/24/84	50.00
me, Mailing Address and ZIP Code nds of Albert Gore, Jr. k Wright Robinson	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
Box 2757 ille, TN 37219	Disbursement for: Primary General Other (specify):	5/25/84	1,000.00
me, Mailing Address and ZIP Code ds of Les AuCoin nton W. Cook, Treasurer.	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
S.W. Fifth Avenue, #2000	Disbursement for: O Primary Oceneral	5/25/84	500.00

DOLLARS No. 1246 1-1-19 84 15-55 *000051 0000x \$1,500.00 NATIONAL SECRETARY-TREASURER May. 23 PAY TO THE ----Friends of Albert Gone, Jr. ---- One Thousand Five Hundred Dollars & MANÉRICAN SECURITY
AND TRUST COMPANY
WASHINGTON, D.C. 20013 MALGAMATED TRANSIT UNION OPE ACCOUNT—VOLUNTARY FUND 5025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016

Exhibit E



ted Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

Office of the International Secretary-Treasurer -

October 18, 1984

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

Gentlemen:

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Enclosed please find a copy of the September, 1984, report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

R. C. Wallace

International Secretary-Treasurer/COPE Director

amf

Enclosure

	(a) April 15	Quarterly Report	October 15 Quarterly Report
ALGAMATED TRANSIT UNION COPE July 15 Quarterly Report Jenuary 31 Year			January 31 Year End Report
Address (Number and Street)	July 31 A	Aid Year Report (Non-E	lection Year Only)
5025 Wisconsin Avenue, N. W.			4 thru 9-30-84
City, State and ZIP Code Washington, DC 20016	election		_ in the State of
Check here if address is different then previously reported.	Thirtieth	day report following th	16 General Electron
2. FEC Identification Number C00032995		in the	State of
3. This committee qualified as a multicandidate committee during this Reporting Period on (Osse)	(b) is this Report	tion Report an Amendment? YES N	0
5. Covering Period 9-1-84 through 9-30-	84	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 84		ing the second s	\$ 156,011.02
(b) Cash on Hand at Beginning of Reporting Period		170,105.68	
(ot Fotal Receipts (from Line 18)		22,183.50	\$ 177,478.16
(d)Subtotal (add Lines 6(b) and 6(c) for Column A and		192,289,18	\$ 333,489.18
7. Total Disbursements (from Line 28)		143,260.00	3 284,460.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Lin	ne 6(d)) \$	49,029.18	\$ 49,029.18
9. Debts and Obligations Owed TO The Committee (I temize all on Schedule C or Schedule D)		NONE	
10. Debts and Obligations Owed BY the Committee		NONE	
I certify that I have examined this Report and to the best of my knowledge and bel it is true, correct and complete.	lief	100	formation contact:
name de Mallaga			Election Commission
Type or Print Name of Tressurer		Toli Fi	ree 800-424-9530
SIGNA TURE OF TREASURER DON'T	october 18,	And the second s	202-523-4088
NOTE/ Submission of false, erroneous, or incomplete information may subject the	person signing this report	to the penalties of 2 U.S.C	. 9 437g.
All provious versions of FEC FORM	M 3 and FEC FORM 3a are		
		FEC F	FORM 3X (3/80)

And information in a 2 for the form, the all training to any particle sold or used by any person for the purpose of soliciting contributions or for the first and any purities of any purities contributions from such committee.

The first out Contribution much

AMALGAMATED TRANSIT UNION - COPE

A. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. Tack Wright Behinden Management	Purpose of Disbursement	Dete (month, dev, year)	Amount of Each Disbursement This Perio
Jack Wright Robinson, Treasurer 2.0. Box 2757 Vashville, TN 37219	Olsbursemens.for: © Primery RGeneral © Other (specify):	9-5-84	2,500.00
elect Senator Pell Committee Coland Berardo, Treasurer	Purpose of Disbursement Re-election	Date (month, dey, year)	Amount of Each Disbursement This Perio
Providence, RI 02903	Disbursement for: © Primery ¶General © Other (specify):	9-5-84	1,000.00
Full Name, Mailing Address and ZIP Code im Hunt Committee aylon E. Little, Treasurer	Purpose of Disbursement	Dete (month, dey, year)	Amount of Each Disbursement This Period
15 Hillsborogh Street aleigh, NC 27611	Disbursement for: © Primery General © Other (specify):	9-5-84	1,500.00
N. Full Name, Mailing Address and ZIP Code Namours for Senate Committee Obert M. Walsh, Treasurer	Purpose of Disbursement	Date (manth, day, year)	Amount of Each Disbursement This Period
087 Elm Street, Room 408 anchester, NH 03101	Disbursement for: Primary General Other (specify):	9-5-84	3,000.00
T. Full Name, Mailing Address and ZIP Code miends of Max Baucus r. R. Stephen Browning, Treasurer of Office Box 216	Purpose of Disbursement Re-election	Date (month, day, year)	Amount of Each Disbursement This Period
elena, MT 59624	Disbursement for: Primary MGeneral Other (specify):	9-5-84	1,000.00
Full Name, Mailing Address and ZIP Code inter for Senate Committee ames C. Rhoden, Treasurer	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
.O. Box 23148 ackson, MS 39225	Disbursement for: © Primary & General © Other (specify):	9-5-84	3,000.00
. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: © Primary © General © Other (specify):		
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify):		
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify):		

AMALGAMATED TRANSIT UNION
CCPE ACCOUNT—VOLUNTARY FUND
5025 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20016 No. 1326 .. -- ::: --PAYOTO THE ORDER OF 2,500.00 -Friends of Albert 0 -Two Thousand Five DOL AMERICAN SECURITY
AND TRUST COMPANY
WASHINGTON, D.G. 20013 7 0 INTERNATIONAL SECRETARY-TREASURER 5 38-20 · 1:0540#00551: 74 875m ",0000 \$ 20000",

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Amalgamated Transit Union

5025 Wisconsia Ave., N.W., Washington, D.C. 20016 202-537-1645

Office of the International Secretary-Treasurer

The Amalgamated Transit Union welcomes the opportunity to support the activities of your committee.

Enclosed please find a check for _____ and a receipt which is to be returned to my office.

With best wishes, I am

Sincerely,

R. C. Wallace

International Secretary-Treasurer and COPE Director

Enclosures

3-



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016-4139 202-537-1645

Office of the International Secretary-Treasurer

March 18, 1988

Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Sir:

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A review of our 1983 and 1984 contributions to The Friends of Albert J. Gore, Jr., campaign committee indicates that we inadvertently listed our \$500 October 27, 1983; \$1,000 November 15, 1983; \$500 February 24, 1984 and \$1,500 May 23, 1984 contributions as designated for the 1984 general elections. In fact, these contributions were for the August 2, 1984 primary election.

Accordingly, we hereby resubmit corrected copies of our Schedule B, F.E.C. reports for the months of October and November 1983, and February and May 1984. We respectfully request that your records be amended accordingly. If you should have any questions please feel free to contact my office regarding this matter.

Sincerely,

R.C. Wallace
Raymond C. Wallace

International Secretary-

Treasurer ATU-COPE

/rfm Enclosures

cc: Jack Wright Robinson, Treasurer Friends of Albert J. Gore, Jr.

P.O. Box 2757

Nashville, TN 37219

ror's Political Committee Other Than an Authorized Committee

ALIGN AREA T	y rage)	ALIGN AREA
1. Name of Committee (In Full)	4. TYPE OF REPORT (Chesk appropr	riete boxes)
AMALGAMATED TRANSIT UNION - COPE	(a) April 15 Quarterly Report	October 15 Quarterly Report January 31 Year End Report
Address (Number and Street)	July 31 Mid Year Report (Non	-Election Year Only).
5025 Wisconsin Avenue, N.W.	Monthly Report for 10/1	
City, State and ZIP Code Washington, DC 20015	Twelfth day report preceding	
Check here if address is different than previously reported.	Thirtieth day report following	the General Election
2 FEC Identification Number C00032995		e State of
This committee qualified as a multicandidate committee during this Reporting Period on	(b) Is this Report an Amendment?	NO
O SUMMARY	COLUMN A	COLUMN B
\$Covering Period 10/1/83 through 10/3	31/83 This Period	Calendar Year-to-Date
5.18) Cash on hand January 1, 19 83		s 43,479.18
(b) Cash on Hand at Beginning of Reporting Period)9
(c) Total Receipts (from Line 18)	s 12,488.5	59 s 123,580.50
O(b) Subtotal (add Lines 6(b) and 6(c) for Column A and	s 146,769.6	58 s 167,059.68
7. Tatal Disbursements (from Line 28)	s 8,436.0	28,726.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Li	ne 6(d))	s 138,333.68
9. Debts and Obligations Owed TO The Committee	s NONE	
10. Debts and Obligations Owed BY the Committee (I termize all on Schedule C or Schedule D)		
I cartify that I have examined this Report and to the best of my knowledge and be it is true, correct and complete. R.C. Wallace Type or Print Name of Treasurer SIGNATURE OF TREASURER De NOTE: Submission of false, erroneous, or incomplete information may subject the	For further Fede Toll Loca 11/17/83	information contact: rel Election Commission Free 800-424-9530 4 202-523-4068

All previous versions of FEC FORM 3 and FEC FORM 3s are consiste and should no longer be used.

FEC FORM 3X (3/80)

ITEMIZED DISBURSEMENTS

Use experent schedule(s) for each experency of the Details are innary Page

)	PAGE	OF
	FOR LIN	ENUMBER

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

purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (in Full) AMALGAMATED TRANSIT UNION - COPE A. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each Disbursement This Period day, year) Friends of Albert Gore, Jr. Re-Election P.O. Box 3000 \$500.00 Disbursement for: 3 Primary 10/27/88 General Nashville, TN 37219 Other (specify) Date (month. Amount of Each B. Full Name, Mailing Address and ZIP Code Purpose of Disbursement day, year) Disbursement This Period Primery General Disbursement for: Other (specify) Date (month, Amount of Each C. Full Name, Mailing Address and ZIP Code Purpose of Disbursement day, year) Disbursement This Period Disbursement for: General Primary Other (specify) Purpose of Disbursement Date (month, Amount of Each D. Full Name, Mailing Address and ZIP Code Disbursement This Period day, year) Disbursement for: General Primary Other (specify) Date (month, Amount of Each E. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Disbursement This Period dev. year) Disbursement for: Primery General Other (specify) Amount of Fach Date (month, F. Full Name, Mailing Address and ZIP Code Purpose of Disbursement day, year) Disbursement This Period Disbursement for: Primary General Other (specify) Date (month. Amount of Each G. Full Name, Mailing Address and ZIP Code Purpose of Disbursement day, year) Disbursement This Period Disbursement for: General Primary Other (specify) Date (month, H. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Amount of Each day, year) Disbursement This Period Disbursement for: General Primary Other (specify) I. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Disbursement This Period Disbursement for: Primary General Other (specify)

	(Summary Page)	34.	
ALIGN AREA			ALIGN AREA
1. Name of Committee (In Full)	4. TYPE OF	REPORT (City eppropriet	• poxet)
	(a) April	I 16 Querterly Report	October 15 Quertarly Repo
AMALGAMATED TRANSIT UN			January 31 Year End Repo
	4_ July	15 Quarterly Report	1 January 21 1 can First Liebe
Address (Number and Street)	July	31 Mid Year Report (Non-El	estion Year Only).
5025 Wisconsin Avenue,	N.W.	thly Report for 11/1/8	3 - 11/30/83
	Mon.	thly Report for	
	Two	ifth day report preceding	(Type of Blassica)
City, State and ZIP Code			in the State of
Washington, DC 20016		tion on	, in the otalie of
Check here if address is different than pr		tieth day report following the	General Election
2. FEC Identification Number	90 -	in the S	tate of
C00032995			
~_	THE RESERVE OF THE PARTY OF THE	mination Report	
3. This committee qualified as a multicandid this Reporting Period on	(D) IS THIS ME	port an Amendment?	
this reporting reviou on	Detail	TYES SEN NO	
SUMMAR	ly and the same of	2011001	COLUMN B
S. Covering Period 11/1/83	11/30/83	COLUMN A This Period	Calendar Year-to-Date
		THE PARTY SHOWS BELLEVILLE	
6.(a) Cash on hand January 1, 19 83			s 43,479.18
(b) Cash on Hand at Beginning of Reporting P	Octob	1 120 223 68	
(b) Cash on hand at beginning of heporting P	renige	130,333.00	Mark Control
(c) Total Receipts (from Line 18)		18,827.93	\$ 142,408.43
(d) Subtotal (add Lines 6(b) and 6(c) for Colu	umn A and		\$ 105 007 63
Lines 6(a) and 6(c) for Column 8)	gilli a sire	15/,101.01	185,887.61
7. Total Disbursements (from Line 28)		s 5,400.00	s 34,126.00
8. Cash on Hand at Close of Reporting Period (s	subtract Line 7 from Line 8(d))	\$ 161 961 61	\$ 151 761 61
3.33	ADDIOS. GITTE / TOTAL GITTE GITTE GITTE	151,761.61	151,761.63
9. Debts and Obligations Owed TO The Commi		S NONE	
(Itemize all on Schedule C or Schedule D) 10. Debts and Obligations Owed BY the Commit		s NONE	
(I temize all on Schedule C or Schedule D)		NONE	
certify that I have examined this Report and to the bett is true, correct and complete.	ast of my knowledge and belief		
		For further in	formation contact:
P.C. Wallace Type or Print Name of Tressurer		Federal	Election Commission
ype or Print Name of Tressurer		Toll Fr	ee 800-424-9530
11) 1. 11 -160	12/12/87		202-523-4068
IGNATURE OF TREASURER	12/12/83		
IATE Commission of later assessment of incomplete of			. 4224
IOTE: Submission of false, erroneous, or incomplete in	normation may subject the person signing this	report to the penalties of 2 0.3.0	. 9 43/g.
All pr	revious versions of FEC FORM 3 and FEC FORM :	Se are electrical and should no longer	be used.
		FEC F	ORM 3X (3/80)

ITEMIZED DISBURSEMENTS

Use reparese schedule(s) for each exceptory of the Detailed property Page

)	PAGE	OF
	FOR LINE	NUMBER

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

NAME OF COMMITTEE (In Full)

A. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr.	Purpose of Disbursement Election	Dete (month, day, year)	Amount of Each Disbursement This Period
Jack Wright Robins, Treasurer Rt 2 Carthage, TN 37030	Disbursement for: X Primery General Other (specify)	11/15/83	1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Oste (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primery General Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		La
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: Primary General Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primery General Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: Primery General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
1. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
TOTAL of Disbursements This Page (optional)			

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA	3(6)		ALIGN AREA
1.Name of Committee (In Full)	4. TYPE OF REPORT ICH	eck appropriate	boxes)
	(a) April 15 Quarterly	Report	October 15 Quarterly Repo
AMALGAMATED TRANSIT UNION - COPE			
	July 15 Quarterly	Report	January 31 Year End Repo
Address (Number and Street)	July 31 Mid Year I	Report (Non-Ele	gtion Year Only).
5025 Wisconsin Avenue, N.W.	Monthly Report fo	2/1/8	4 - 2/29/84
5025 Wisconsin Avenue, N.W.	Monthly Report to	w <u> </u>	
	Twelfth day repor	t preceding	(Type of Election)
City, State and ZIP Code			in the State of
Washington, D.C. 20016			
Check here if address is different then previously reported.	Thirtieth day repo	rt following the	General Election
2-SEC Identification Number	on	in the St	ste of
C00032995	Termination Repo	ort	
This committee qualified as a multicandidate committee during	(b) Is this Report an Amen	dment?	
this Reporting Period on	YES	X NO	
SUMMARY			
Sovering Period 2/1/84 through 2/29/		LUMN A	COLUMN B Calendar Year-to-Date
	DATEMAKAGE		
(a) Cash on hand January 1, 19 84			s 156,011.02
(b) Cash on Hand at Beginning of Reporting Period	s 160	,383.68	
			Concession of the Concession o
Cic) Total Receipts (from Line 18)	\$ 1:	3,826.55	\$ 27,549.21
প্রি Subtotal (add Lines 6(b) and 6(c) for Column A and		4,210.23	\$ 183,560.23
Lines 6(a) and 6(c) for Column 8) 7. Total Disbursements (from Line 28)	. 11	5,950.00	\$ 25,300.00
7. Total Dispursaments (from Line 45)		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Lin	e 6(d))	8,260.23	\$ 158,260.23
9. Debts and Obligations Owed TO The Committee	\$ 200	170	
(Itemize all on Schedule C or Schedule D)	s NOI	· ·	
0. Debts and Obligations Owed BY the Committee	s NOI	NE	
cartify that I have examined this Report and to the best of my knowledge and bel	ief		
is true, correct and complete.		For further inf	ormation contact:
R.C. Wallace			Election Commission
ype or Print Name of Tressurer			e 800-424-9530)2-523-4068
K.C. Wallow	3/9/84	Cottal 21	
IGNATURE OF TREASURER Date			
			6 437g.

FEC FORM 3X (3/80)

TEMIZED DISBURSEMENTS

for each category of the Detailed Summary Page

FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)

AMALGAMATED TRANSIT UNION - COPE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dete (month, day, year)	Amount of Each Disbursament This Perio
Friends of Albert Gore, Jr.	Election	G, ,,	
P.O. Box 3000		02/28/84	\$500.00
Nashville, eN 37219	Other (specify)		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursament	Oece (month, day, year)	Amount of Each Disbursament This Perio
	Disbursament for: Primary General Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disburssment	Date (month, day, year)	Amount of Each Disbursement This Perio
V	Disbursement for: Primary General Other (specify)		
Q, Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dete (month, day, year)	Amount of Each Disbursament This Perio
	Disbursement for: Primary General Other (specify)		
E. Full Name, Mailing Address and ZIP Godo	Purpose of Distursement	Dete (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement .	Date (month, day, year)	Amount of Esch Disbursement This Perio
	Disbursement for: Primary General Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: Primary General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursament	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
1. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: Primary General Other (specify)		
OTAL of Disbursements This Page (optional)			
AL This Period (last page this line number only)			

TEMIZED DISBURSEMENTS

TOTAL This Period (last page this line number only)

for each assessory of the Detailed Summery Page

FOR LINE NUMBER

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

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (menth,	Amount of Each
Friends of Albert Gore, Jr.		dey, year)	Disbursement This Period
c/o Jack Wright Robinson	Re-election Disbursement for: Primary General	5/23/84	1,500.00
P.O. Box 2757 Nashville, TN 37219	Other (specify)	3/23/04	1,300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursament	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (menth, day, year)	Amount of Each Disbursement This Period
	Disbursament for: Primery General Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dete (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General		
2	Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Oisbursement for: Primary General Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Oisbursement for: Primary General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursament This Period
	Oisbursement for: Primary General Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Oisbursement for: Primary General		

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S.P.A.D.

Seafarers Political Activity Donation

GCC#8853

RECEIVED ...
RECEIVED ...
RECEIVED ...
MAIL ROOM

88 HAR 23 AM 10: 45

5201 Auth Way, Camp Springs, Maryland 20746

301-899-0675

March 15, 1988

Lois G. Lerner, Esq. Associate General Counsel Federal Election Commission Washington, DC 20463

RE: MUR 2584

Seafarers Political Activity Donation Marianne Rogers, as Treasurer

Dear Ms. Lerner:

Please accept this letter as a formal Statement of Positions on behalf of the Seafarers Political Activity Donation (SPAD) is the above-captioned matter.

The charging party, Ray O. Brooks, Jr. has alleged that SPAT has violated the Federal Election Campaign Act of 1971 by making excessive donations to the primary election of Albert Gore, Jr. As Treasurer of SPAD, I will demonstrate that the contributions received by Gore were lawful and within the statutory limitations and that there is no basis for this complaint.

On June 29, 1983, SPAD made a donation in the amount of \$5,000 payable to the "Friends of Albert Gore, Jr." The cover letter dated June 30, 1983 enclosed with the check sent to the Friends of Albert Gore, Jr. indicated that check #3149 represented a contribution to Gore's "1984 Primary Election" Campaign. (See SPAD exhibit A attached.)

Subsequently, on December 7, 1983, SPAD made a donation in the amount of \$5,000 payable to "Albert Gore, Jr. for Congress Committee." The cover letter attached indicated that check #3541 represented a contribution to Gore's "1984 General Election Campaign for Congress". (See SPAD exhibit B attached.)

Both these contributions were legal and within the lawful parameters established by the Act. The Federal Election Campaign Act of 1971 permits contributions up to the amount of \$5,000 to any candidate "with respect to any election for

LEDLAVI ELECTION COMPILE

Lois G. Lerner, Esq. March 15, 1988 Page 2 Federal office..." Under the applicable regulations, a primary election and a general election are considered to be separate "elections" for purposes of the contribution limitation. On July 18, 1983 SPAD filed its monthly FEC Form 3X with the Commission. On Schedule B (page 11 of 14) item A, SPAD indicated that it made a \$5,000 donation to the "Friends of Albert Gore, Jr." on June 29, 1983. The disbursement box indicated that this donation was intended for the '84 primary. (See SPAD exhibit C.) On January 30, 1984 SPAD filed another monthly FEC Form 3X report with the Commission. On Schedule B (page 49 of 57) item I, SPAD indicated that it made a \$5,000 donation to "Albert Gore œ for Congress Committee" on December 7. 1983. The disbursement box for the primary was indicated. (See SPAD exhibit D.) 0 The notation that the December 7, 1983 donation was for Gore's primary election was a clerical error and SPAD filed an Amended Form 3X report with the Commission. 0 4 That amended report was filed by Thomas J. Bovo, Assistant Treasurer on October 9, 1984. On that report (question 4(b)) 0 SPAD indicated that this was an amended report. The October report corrected the error that was made on the previous report filed on January 30, 1984. On the corrected page 49 (of 57) 8 item I, the donation to Albert Gore, Jr. for Congress Committee 00 was modified to show that the disbursement, was made in fact for the '84 general election. (See SPAD exhibit E.) The evidence submitted demonstrates that at the time SPAD made the donations that it intended to make a \$5,000 donation to Gore's primary election on June 29, 1983 and a \$5,000 donation to Gore's general election on December 7, 1983. Although SPAD made a clerical error on its reporting form in January 1984, this error was subsequently corrected by SPAD by its filing of an Amended FEC Form 3X on October 9, 1984. I am confident that the above explanation should be sufficient to establish that SPAD did not make any contributions to Gore during 1983 that exceeded the legal limitations. The enclosed documentation speaks for itself.

Lois G. Lerner, Esq. March 15, 1988 Page 3 As a result, this complaint should be dismissed and no adverse action should be taken against SPAD or any of its representatives. Please do not hesitate to contact me if can provide you with my additional information. 4 Sincerely, œ Marianne Rogers 3 0 -Marianne Rogers 0 Treasurer 4 MAR/AFF: ald 0 cc: Sandra Robinson, Esq. 0 Attachments - EXHIBITS A thru E 00

EXHIBIT A

S.P.A.D.

Seafarers Political Activity Donation

5201 Auth Way, Camp Springs, Maryland 20746

301-899-0675

June 30, 1983.

My /

Friends of Albert Gore, Jr.

Dear Congressman Gore:

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SPAD is a political committee established and administered by the Seafarers International Union of North America, Atlantic, Gulf, Lakes and Inland Waters District (SIU-A&G), as provided by the Federal Elections Campaign Act as amended (Act). The SIU-A&G is chartered by and affiliated with the Seafarers International Union of North America, AFL-CIO, (SIUNA).

It is our pleasure to enclose Check #3149 in the amount of \$5,000.00 as a contribution to your 1984 Primary Election Campaign.

With best regards, I am, ...

Sincerely,

	Frank Drozak, Chairman	- up	Licker	6
3149	SEAFARERS POLITICAL ACTIVITY DONATION	OR PAYMENT	CHECK IS DELIVERED F	1HIS C
C	S.P.A.D. 675 FOURTH AVE. BROOKLYN, N.Y. 11232	AMOUNT	PARTICULANS	DATE
19_83				
\$ 5,000.00**	TO THE ORDER OF Friends of Albert Core Jr.			
Doll	The model of the Control Control			
· Mayor	CHEMICAL BARK			
/ · Av	NEW YORK NY TOURS TO	ECEIPT NECESSARY	PLEASE RETURN NO F	CC)MMICT

1:0210001281: 020110154531

88040703850

EXHIBIT B

S.P.A.D.

Seafarers Political Activity Donation

5201 Auth Way, Camp Springs,	Maryland	20746	301-899-0675
------------------------------	----------	-------	--------------

December 7, 1983

1 em

Albert Gore, Jr. for Congress Committee

Dear Congres, sman Gore:

SPAD is a political committee established and administered by the Seafarers International Union of North America, Atlantic, Gulf Lakes, and Inland Waters District (SIU-A&G), as provided by the Federal Election Campaign Act as amended (Act). The SIU-A&G is chartered by and affiliated with the Seafarers International Union of North America, AFL-CIO (SIUNA).

It is our pleasure to enclose Check #3541 in the amount of \$5,000,00 representing a contribution to your 1984 General Election Campaign for Gongress.

With best wishes, I am

Sincerely.

De interest.

Terry June 12/7/83

Frank Drozak, Chairman

DATE	PARTICULAS	· AMOUN	
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SEAFARERS POLITICAL ACTIVITY DONATION
S.P.A.D.
675 FOURTH AVE.
BROOKLYN, N.Y. 11232

December 7 19 83

TO THE ORDER OF Albert Gore Jr. for Congress Committee \$ 5,000.00**

The sum of 5.000 dol's Cocts

DOLLAI

3541

CHEMICALBANK

1411 BROADWAY NEW YORK NY 10018 The land

G311

"003541" ":02100012B" 020"015453"

88040703852

EXHIBIT C

For a Political distinct Other Than an Authorized Committee

RECEIVED FEDERALELECTION COMMISSION

Summary #	AUG! ARS 60
1 Name of Committee (In Fu)	4 TYPE OF REPORT (Check appropriate boxes) HAR 23 AN IO
Seafarers Political Activity Donation	(a) April 15 Guarterly Report October 15 Quarterly Report
	July 15 Quarterly Report January 31 Year End Report
Address (Number and Street)	July 21 Mid Year Report (Non Election Year Only)
5201 Auth Way	Monthly Report for June 1983
City, State and ZIP Code	Twelfth day report preceding (Type of Election)
Camp Springs, Maryland 20746	election on in the State of
Check here if address is different than previously reported.	Thirtieth day report following the General Election
2 FEC Identification Number	on in the State of
C 0000 4325	Termination Report
7. This committee qualified as a multicandidate committee during	(b) is this Report an Amendment?
this Reporting Period on	YES NO
SUMMARY	
5 Covering Period June 1 through June 30,	COLUMN A COLUMN B 1983 This Period Calendar Year-to-Date
	1 (A)
6.(a) Cash on hand January 1, 19.83	\$ 501,071.10
(b) Cash on Hand at Beginning of Reporting Period	825,834.90
(c. Total Receibts (from Line 18)	
	66,065.50 436,615.46
(a) Subtotal (add Lines 6(b) and 6(b) for Column A and , Lines 6(a) and 6(c) for Column B:	891,920.80 ^{\$} 1,020,486.50
Tiple Dipursyminal from Line 28	24,550.00 ^{\$} 153,115.70
3 Dash on mand at Crose of Reporting Period (suptract Line 7 from Line)	867,370.80 S 867,370.80
U.S. tip Do. sur for Gives TO The Committee (Itemize all on Schedule Clar Schedule D)	<u> </u>
. Debts and Objections Owed Bir the Committee	
Hitemize 3 i on Stredule Clor Schedule D I have nave examined this neport and to the pest of my knowledge and to the	-0-
"Le correct and commeté	For further information contact
John Fair Thomasium	Figure Communication
Joint Fay Treasurer	*r* 5 % 424 95.10
GNATURE OF TBLASURER/	/18/13
11. Submission tase, graneous or incomplete information may value if the go	in the penalties of 2 July.
Att previous versions of FEC FORM 3	and FEC FORM Jack a minurate and should no ronger be used
	68U CX (3.80)

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	-

Name of Lumm the tin ful.. hapon Covenne the Pene Seufarers Political Activity Donation - June 30, 1983 From June 1 COLUMN 8 COLUMN A Calendar Year-To-Date Total This Period I. RECEIPTS 11 CONTRIBUTIONS tother than loans? FROM: 66,085,90 438.615.40 11(a) (Memo Entry Uniternized 5 63, 289.90 -0--0-11(b) (b) Political Party Committees -0-4 11(c) 66,085.90 438,615.40 11(4) idi TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . -0-4 12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES . . . 12 11-11-11-11 5 -0-13 ALL LOANS RECEIVED 13 V ... V 7.32--C-_ 14. LOAN REPAYMENTS RECEIVED 14 -0--0-15 15. OFFSETS TO-OPERATING EXPENDITURES (Retunds, Repates, etc.) -0--0-16 : TREFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES ----AND OTHER POLITICAL COMMITTEES YOTHER RECEIPTS : Dividends, Interest etc.)....... 4 -0-17 and e the month 438,615.40 1 18 TAL RECEIPTS (And 11(d), 12, 13, 14, 15, 16 and 17) . 66,085.90 \$ 00 pm ---in Medaria THE DET OF STANDING II. DISBURSEMENTS 959.EO PERATING EXPENDITURES 19 2 · Aire -0--0-20 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES 0 93.956.10 24,550.00 21 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND 7 no - 1 CONTRACTOR OF THE PARTY OF OTHER POLITICAL COMMITTEES -0-22 -0-INDEPENDENT EXPENDITURES (use Schedule E) *************** -0-23 -0-22 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. . . . (2 U.S.C. § 441 aid)) (Use Schedule F) -0-24 200 OAN REPAYMENTS MADE........ -0--0--0-25 Committee Service Letter 26. REFUNDS OF CONTRIBUTIONS TO 4 1900 -0-26(a) (a) Individuals/Persons Other Than Political Committees. -0--0--0-26(b) -0-26(c) -0-(c) Other Political Committees. -0--0-25(4) (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) white the state of 58,200.00 -0-27 27.5. 6. 153,115.70 28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) 24,550.00 28 -----III NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES 66.085.90 438,615...) 29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) -0-30 TOTAL CONTRIBUTION REFUNDS from Line 2016 -0-30 66,085.90 438.01 31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) -0-350. 19 32 32. TOTAL OPERATING EXPENDITURES from Line 13 1 33 -0-33. OF FULTS TO OPERATING EXPENDITURES from Line 15 -0-950.00 134 24 NET OPERATING EXPENDITURES PLANTED Line 31 from Line 31:

TEMIZED DISBURSEMENTS

Page 11 of 12 for
LINE NUMBER 21
IUse separate schedulets) for each
category of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial burdoses, other than using the name and address of any political committee to solicit contributions from such committee. Name of Committee in Full 7)216.1NAC Seafarers Political Activity Donation Purpose or Dispursement Albert Date Imonth. A. Full Name, Mailing Address and ZIP Code Amount of Esch Friends of Albert Core Jr. Dispursement This Period Gore Jr.-Sen-Tenn day, year! Route 2 YTD-5,000,00 Carthage, Tenn 37030 6/29/83 5,000,00 Disbursement for EPrimary EGeneral X2 Other ispecifyl 184 Primary B. Full Name, Mailing Address and ZIP Cade Cate imonth Amount or Each Purpose of C spursement Dispursement This Period day, vear! Dispursement for EPrimary Eigeneral Ciner Haggiry. C. Full Name, Maning Address and ZIP Code Amount of Each Date imonin. Purpose or Discursement day, years Dispursement This Period n Dispursement for: Sprimary Sceneral 3 Other (specify) Amount of Esch D. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Date (month. Dispursement This Period day, year! Dispursement for EPrimary = General 2 Other (specify): Amount of Each E. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Date imonth. Disbursement This Period day, year! Disbursement for: SPrimary SGeneral T Cother (specify) F. Full Name, Mariing Address and ZIP Code Purpose of Disbursement Date Imonth. Amount of Each day, year! Dispursement This Period 9 Disbursement for . Primary - General œ Ciner ispecity) G. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Date imports. Amount of Each Dispursement This Period day, year! Dispursement for Eprimary EGeneral 3 Ciner ispecity) H. Full Name, Mairing Address and ZIP Code Date imonth Amount of Each Purpose of Dispursement Dispursement This Period day, year! Dispursement for: Sprimary Sceneral 3 Other Ispecity! 1. Full Name Mailing Address and ZIP Code Care imonth Amount or Each Purpose of Enguinement Dispursement This Period "34 Y#311

Dispursement for Primary Teneral

I Timer Loedings

SUBTOTAL of Cishursements This Page (autional)

TOTAL This resign last base in sine number onivi

EXHIBIT D

OF RECEIPTS AND DISBURSEMENTS For a Political

ittee Other Than an Authorized Committee

FEDERAL ELECTION COMMISSION

(Summary Page) ALIGN AREA ALIGN AREA 4. TYPE OF REPORT (Check appropriate 188-MAR 23 AM ID: 45 1. Name of Committee IIn Full October 15 Quarterly Report April 15 Quarterly Report Seafarers Political Activity Donation July 15 Quarterly Report January 31 Year End Report July 31 Mid Year Report (Non-Election Year Only) Address (Number and Street) Monthly Report for <u>December 1983</u> 5201 Auth Way Twelfth day report preceding _ IType of Election City, State and ZIP Code in the State of _ Camp Springs, Maryland 20746 Thirtieth day report following the General Election Check here if address is different than previously reported 2. FEC Identification Number _ in the State of _ C 0000 4325 Termination Report This committee qualified as a multicandidate committee during (b) is this Report an Amengment? t Ahis Reporting Period on _ KX NO YES SUMMARY COLUMN B COLUMN A 5. Covering Period December 1 through December 31, 1983 Calendar Year-to-Date This Period THE PARTY OF THE P 6.(a) Cash on hand January 1, 19 83 N.S. 581,871.10 844,940.40 79,980.70 s 1,426,811.50 Lines 6(a) and 6(c) for Column B) 632,812.77 351,393.56 7 (Tal Disbursements (from Line 28) 793,998.73 8. Sh on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) 793,998.73 -0-21 Il temize all on Schedule C o. Schedule D) 10. Debts and Obligations Owed BY the Committee the start and as -0litemize all on Schedule C or Schedule Di I certify that I have examined to a Report and to the best of my knowledge and belief it is true correct and complete Federal Election Commission John Fay, Treasurer in. Free 800 424 9: 30 .sc. 207 : 23 4065 in the period of the manufacture of the person significant for report to the personal effort of the Carlo. All previous versions of FEC FURNI 3 and FEC FORM 3e are obsolete and show ding romon be used FEC FORM 3% 13 80.

TOTAL RECEIPTS TOTA	Name of Commission for Funts	Report Covering the Portet		100	1
Total This Period Culmeds Viv. 19 11 CONTINUUTIONS tother than board PROM. 19, 980.70 844, 940. 11161 12 CONTINUUTIONS tother than formitted Cognitives. 19, 980.70 844, 940. 11161 13 ALL LOANS RECEIVED	Seafarers Political Activity Donation	From December 1	To Decem!	1	
11 CONTINUUTIONS (other than loand FROM 19, 980.70 844, 940. 1144 114				-1#	7
11 CONTRIBUTIONS (alber than loand FROM: 79, 980.70	L RECEIPTS	THE ASSESSMENT OF THE PARTY OF			
(Memb Entry Unitemized \$ 71, 486, 20) -00- 116 (b) Political Party Committees	:1.CONTRIBUTIONS (other than loans) FROM:			: 4	
(ii) Political Prize Committees (ic) Other Political Committee		79,980.70		-30	11(0)
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3. OFFSETS TO OPERATING EXPENDITURES from Line 15	32. TOTAL OPERATING EXPENDITURES from Line 19	2,093.56	9,366.6	1	32
NA NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	<u> </u>	-0-	•		
	34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		9.366.6		



ITEMIZED DISBURSEMENTS



Page 49 of 57 for LINE NUMBER 21 (Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code Quillen for Congress Committee 214 Cumberland St./P.O.Box 68	Purpose of Disbursement James Quillen-HR-1-Tn YTD-5,000.00	Date (month, day, year)	Amount of Each Disbursement This Period
Kingsport, TN 37662	Disbursement for: APrimary General Other (specify):	12/20/83	2,500.00 -
B. Full Name, Mailing Address and ZIP Code Re-elect Lloyd to Congress P.O.Box 1568	Purpose of Disbursement Marylin Lloyd-HR-3-TN YTD-1,000.00 Disbursement for: RPrimary General	Date (month, day, year)	Amount of Each Disbursement This Period
Chattanooga, TN 37401	Other (specify):		
C. Full Name, Mailing Address and ZIP Code Citizens to Elect Don Sundquist to Congress	Purpose of Disbursement Donald Sundquist-HR-7-TN YTD-500.00	Date (month, day, year)	Amount of Each Disbursement This Period
12th Floor Union Planters Bank Bldg Memphis, TN 38103	Disbursement for: KPrimary General Other (specify):	12/1/83	500.00
D. Full Name, Mailing Address and ZIP Code . Friends of Ed Jones	Purpose of Disbursement Ed Jones HR-8-TN YTD-500.00	Date (month, day, year)	Amount of Each Disbursement This Period
P.O.Box 173 Yorkville, TN 38389	Disbursement for: XPrimary General Other (specify):	12/1/83	500.00
E. Full Name, Mailing Address and ZIP Code John J. Duncan Campaign	Purpose of Disbursement John J. Duncan-HR-2-TN YTD-1,000,00	Date (month, day, year)	Amount of Each Disbursement This Period
5403 East Sunset Rd. Knoxville, TN 37914	Disbursement for: MPrimary General Other (specify):	12/1/83	1,000.00
F. Full Name, Mailing Address and ZIP Code Re-elect Harold Ford Committee	Purpose of Disbursement Harold Ford-HR-9-TN YTD-1,000.00	Date (month, day, year)	Amount of Each Disbursement This Period
Suite 1810 Sterick Bldg. Memphis, TN 38103	Disbursement for: APrimary General Other (specify):	12/1/83	1,000.00
G. Full Name, Mailing Address and ZIP Code Jim Cooper for Congress Committee	Purpose of Disbursement James Cooper-HR-4-TN YTD-500.00	Date (month, day, year)	Amount of Each Disbursement This Period
P.O.Box 684 Shelbyville, TN 37160	Disbursement for: 《Primary General Other (specify):	12/1/83	500.00
H. Full Name, Mailing Address and ZIP Code Re-elect Congressman Boner B. O. Boyr 60685	Purpose of Disbursement William Boner-4R-5-TN YTD-1,000.00	Date (month, day, year)	Amount of Each Disbursement This Period
P.O.Box 60685 Nashville, TN 37206	Disbursement for: ÖPrimary General O Other (specify):	12/1/83	1,000.00
I. Full Name, Mailing Address and ZIP Code Albert Gore Jr. for Congress Comm. P.O.Box 335	Purpose of Disbursement Albert Gore JrHR-6-TN YTD-5,000.00	Date (month, day, year)	Amount of Each Disbursement This Pariod
Smithville, TN 37166	Disbursement for: RPrimary D General Other (specify):	12/7/33	5,000.00 .
SUBTOTAL of Disbursements This Page (optional? TOTAL This Period (last page this line number only)	De Harrie E. L.		

EXHIBIT E

1.Name of Committee (In Full)		PORT (Check appropri	MAII. ROOM
Seatarene Dolitical Activity Donation	(a) April 15 (Quarterly Report	Octo88:MAR-23, PAN-10: 46
Seafarers Political Activity Donation	July 15 Q	luarterly Report	January 31 Year End Report
Address (Number and Street)	July 31 M	lid Year Report (Non	Election Year Only)
5201 Auth Way	Monthly I	Report for Decem	nber 1983
City, State and ZIP Code	Twelfth d	lay report preceding _	(Type of Election)
Camp Springs, MD 20746	election o	n	in the State of
Check here if address is different than previously reported.	Thirtieth	day report following	the General Election
.FEC Identification Number	on	in the	State of
C 0000 4325	П-		
This committee qualified as a multicandidate committee during this Reporting Period on	(b) Is this Report a		
(Dete)		YES	NO
SUMMARY Covering Period December 1 through December :	31, 1983	COLUMN A This Period	COLUMN B
7			
(a) Cash on hand January 1, 19 83			\$ 581,871.10
Nb) Cash on Hand at Beginning of Reporting Period	s	1,065,411.59	
Total Receipts (from Line 18)	s	79,980.70	s 844,940.40
Subtotal (add Lines 6(b) and 6(c) for Column A and	s	1,145,392.29	s 1,426,811.50
Lines 6(a) and 6(c) for Column 8) Total Disbursements (from Line 28)	s	351,393.56	s 632,812.77
Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6	6(d)) s	793,998.73	s 793,998.73
Debts and Obligations Owed TO The Committee	s	-0-	
(Itemize all on Schedule C or Schedule D) Debts and Obligations Owed BY the Committee	s	-0-	
tify that I have examined this Report and to the best of my knowledge and belief true, correct and complete			
			el Election Commission
Thomas J. Bovo. Asst. Treasurer			ree 800 424 9530
AB- 10	19/84	Local	707-573-4068
Date E. Submission of laise erroneous, or incumplete information may subject the pers	son signing this report to	the penalties of 2 U S C	: 44379
All provious various of FEC FORM 3 o	and FEC FORM 3a are obs	iolete and should no tonge	r be used.
		1220	2004 20 (2000)
		I FECT	FORM 3X (3/80)

For a Political mmittee Other Than an Authorized Commis



Name of Committee (in Full)	Report Covering the Period		
Seafarers Political Activity Donation	From December 1	To Decemi	1
	COLUMN A Total This Period	COLUMI Calendar Year	-: (4
I. RECEIPTS	THE ASSESSMENT OF THE		**
11. CONTRIBUTIONS (other than loans) FROM:		with the same	
(a) Individuals/Persons Other Than Political Committees	79,980.70	844,940	116
(Memo Entry Unitermized \$ 71.486.20)	A CONTRACT OF THE PARTY OF THE		100
(b) Political Party Committees	-0-	-0-	11(
(c) Other Political Committees	-0-	-0-	116
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) .	79,980.70	844,940.	11(
	SERVICE PROPERTY.	0	. 192
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-U-		12
	A PROPERTY OF THE PARTY OF THE	-0-	
13. ALL LOANS RECEIVED	THE MEMORIAL PROPERTY OF THE P	CONTRACTOR OF THE PARTY OF THE	13
	-0-	-0-	14
14 LOAN REPAYMENTS RECEIVED		The state of the s	
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	2	-0-	15
The state of the line except force theirnes, necess, etc.)		The state of the s	
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES		-0-	16
AND OTHER POLITICAL COMMITTEES	THE REAL PROPERTY.	ALC: THE	
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
	はいる。		1.300
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	79,980.70	1 844,940.40	18
	to the second of the second	where and the	
II. DISBURSEMENTS		9,866.67	13043
19. OPERATING EXPENDITURES	2,093.56	9,000.0	19
TO TO MESTERS TO ASSULATED OTHER SACTO COMMITTEES		-0-	20
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	HERMINE STATE OF THE STATE OF T	ESTENSION STANSON	
21 ONTRIBUTIONS TO FEDERAL CANDIDATES AND	> 349,300.00	549,246.10	21
OTHER POLITICAL COMMITTEES	ELLAND COMPENSATION		1
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
	设施产生的	LA CONTRACTOR OF THE PARTY OF T	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES	-0-	-0-	23
CCI 2 U.S.C. 5 441 a(d)) (Use Schedule F)	CHE THE THE THE	新兴·北京	
24 LOAN REPAYMENTS MADE	-0-	-0-	24
α		\$ 700 × 37 5037 -	· /- 44
25. LOANS MADE	-0-	-0-	25
	A CONTRACTOR OF THE PROPERTY O	THE REPORT OF THE PARTY OF THE	- 10
26. REFUNDS OF CONTRIBUTIONS TO	-0-	-0-	-
(a) Individuals/Persons Other Than Political Committees		-0-	26 (a
(b) Political Party Committees	-0-	-0-	2610
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		-0-	26(d
-			
27 OTHER DISBURSEMENTS	-0-	3,700.00	27 ,
	an his contract of	- 4	
CS TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27).	351,393.56	632,812.77	28
	A STATE OF THE PARTY OF THE PAR	- imite men	
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES	767-7-167	G. E LANGEL	
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	_	344,940.4	. 29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)	70 000 73	-0-	30
11 NET CONTRIBUTION 1 ther than loans) (Subtract Line 30 from Line 29)		814,940.4	- 31
	Prida America de la Trans.	No activity	344
32 TOTAL OPERATING EXPENDITURES from Line 19		9,360.0	32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15	2 002 55	-0-	33
4 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	2,093.56	(t, (nn.))	14

ITEMIZED DISBURSEMENTS

Page 49 of 57 for LINE NUMBER 21 (Use separate scheduloid) for each category of the Detailed

Disbursement This Period

5,000.00 -

day, year)

12/7/83

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. Name of Committee (in Full) Seafarers Political Activity Donation Date (month. Amount of Each A. Full Name, Mailing Address and ZIP Code Purpose of Disbursement James Disbursement This Period dey, year) Quillen-HR-1-Tn Quillen for Congress Committee YTD-5,000.00 214 Cumberland St./P.O.Box 68 2,500.00 -12/20/83 Disbursement for: KPrimery D General Kingsport, TN 37662 O Other (specify): Amount of Each Purpose of Disbursement Marylin Date (month, B. Full Name, Mailing Address and ZIP Code Disbursement This Period day, year) Lloyd-HR-3-TN Re-elect Lloyd to Congress YTD-1,000.00 P.O.Box 1568 1,000.00 / Disbursement for: KPrimery O General 12/7/83 Chattanooga, TN 37401 O Other (specify): Amount of Each Date Lononth, Purpose of Disbursement Donald C. Full Name, Mailing Address and ZIP Code Sundquist-HR-7-TN dev. year) Disbursement This Period Citizens to Elect Don Sundquist YTD-500.00 to Congress 500.00 / P 12th Floor Union Planters Bank Bldg Disbursement for: KPrimery General 12/1/83 Memphis, TN 38103 O Other (specify): Purpose of Disbursement Ed Jones Amount of Each Date (month, D. Full Name, Mailing Address and ZIP Code . Disbursement This Period day, year) HR-8-TN Friends of Ed Jones YTD-500.00 P.O.Box 173 500.00 -Disbursement for: (Primery DGeneral 12/1/83 Yorkville, TN 38389 O Other (specify): Purpose of Disbursement John J. Date (month, Amount of Each DE. Full Name, Mailing Address and 71P Code Disbursement This Period Duncan-HR-2-TN day, year) John J. Durkan Campaign YTD-1,000.00 5403 East Sunset Rd. 1,000.00 -12/1/83 Disbursement for: Aprimery O General Pknoxville, TN 37914 O Other (specify): Purpose of Disbursement Harold Amount of Each F. Full Name, Mailing Address and ZIP Code Date Imonth. Ford-HR-9-TN Disbursement This Period day, year) Re-elect Harold Ford Committee YTD-1,000.00 Suite 1810 Sterick Bldg. 1,000.00 ′ Disbursement for: &Primary O General 12/1/83 Memphis, TN 38103 Other (specify): Purpose of Disbursement James Amount of Each Date (month G. Full Name, Mailing Address and ZIP Code Cooper-HR-4-TN Disbursement This Period day, year) . Jim Cooper for Congress Committee YTD-500.00 P.O.Box 684 Disburgement for: & Primary O General 12/1/83 500.00 -Shelbyville, TN 37160 O Other (specify): Amount of Each Purpose of Disbursement William Date Imonth. H, Full Name, Mailing Address and ZIP Code Disbursement This Period Boner-4R-5-TN dev. year) Re-elect Congressman Boner YTD-1,000.00 P.O.Box 60685 1,000.00 / 12/1/83 Disburgement for: Eprimary O General Nashville, TN 37206 O Other (specify): Amount of Each Purpose of Disbursement Albert I, Full Name, Mailing Address and ZIP Code Date (month,

Gore Jr.-SEN-TN

Disbursement for:

YTD-5,000.00

O Other (specify): '84 General

Primary & General

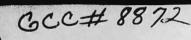
SUBTOTAL of Disbursements This Page (optional?

P.O.Box 335

Smithville, 1N 37166

Albert Gore Jr. for Congress Comm.

TOTAL This Period (lest page this line number only)





AFL-CIO, CLC

15 UNION SQUARE . NEW YORK, N.Y. 10003-3377 (212) 242-0700

NOISSILLIO

EXPRESS MAIL B 04606536W March 23, 1988

Sandra Robinson, Esq. Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Re: MUR 2584

Amalgamated Clothing and Textile Workers Union Political Action Committee and Friends of Albert Gore, Jr.

Dear Ms. Robinson:

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Enclosed please find a designation of counsel designating myself and Arthur M. Goldberg as Counsel for Respondent Amalgamated Clothing and Textile Workers Union Political Action Committee in the above captioned case.

The complaint in this matter was received by the Union on March 14, 1988, and a response is due in Washington on March 29, 1988. Respondent ACTWU-PAC hereby requests an extension of two weeks in which to file its response to the complaint. This extension of time is necessary because in order to fully respond to the complaint, we must search files located in both Washington, D.C. and New York City. In addition, I have had extensive and unexpected out of time travel which has prevented me from reviewing the documents in the New York office. The two week extension of time would extend the deadline to April 12, 1988.

Thank you for your consideration in this matter.

Very truly yours,

cc: Charles Sallee

Arthur M. Goldberg Jean Grumet

Liz Smith

Assistant General Counsel

VICE PRESIDENT

JOHN ALLERUZZO NOE: BEASLEY KILMER CABAN ED CLARK

ANTHONY COSTANZA JEAN-MARC COUTURE OLGA DIAZ JAMES DILLON HENRY DROPKIN BRUCE DUNTON

GARRY FERRARIS JOHN FOX JOSEPH HUIGHE JAMES A JOHNSON RICHARD MacFADYEN CHESTER MAKOSK

JOYCE D MILLER MURRAY MORENO DANIEL MYERS FRANK NICHOLAS, JR BRUCE BAYNOR

THOMAS -. LEON SPITZER CECIL TOPP JIM WALPALE'.

STATEMENT OF DESIGNATION OF COUNSEL

MAME OF CO ADDRESS:	15 Union 8	Square Goldberg and Jean Grumet	
	New York,	NY 10003	
TELEPHONE:	212-	-242-0700	
The a	bove-named i	ndividual is hereby designated as my	
		ndividual is hereby designated as my zed to receive any notifications and ot	her
counsel as	d is authori		
counsel as	d is authori	zed to receive any notifications and ot	
counsel ar	d is authori	zed to receive any notifications and ot	

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Charles Sallee RESPONDENT'S NAME:

15 Union Square ADDRESS:

New York, NY 10003

212-420-6086

HOME PHOME:

212-242-0700 BUSINESS PHONE:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 28, 1988

Jean Grumet, Esquire
Amalgamated Clothing &
Textile Workers Union
15 Union Square
New York, N.Y. 10003-3377

RE: MUR 2584

Amalgamated Clothing & Textile Workers Union - Political Action Committee and Charles

Sallee, as treasurer

Dear Ms. Grumet:

9

This is in response to your letter dated March 23, 1988, which we received on March 24, 1988, requesting an extension until April 12, 1988, to respond to the complaint in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on April 12, 1988.

If you have any questions, please contact Sandra H. Robinson the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel

GCC#8915

FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES

88 HAR 28 AH 10: 13

SONOSKY, CHAMBERS & SACHSE

SUITE 1000

1250 EYE STREET, N.W. WASHINGTON, D.C. 20005 (202) 682-0240

ANCHORAGE OFFICE SUITE 700 900 WEST FIFTH AVENUE ANCHORAGE, ALASKA 99501

(907) 258-6377 TELECOPIER (907) 272-8332

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
WILLIAM R. PERRY
LLOYD BENTON MILLER®
DONALD J. SIMON
DOUGLAS B. L. ENDRESON®
MARY V. BARMEY
LOUISE LYNCH
ANNE D. NOTO
JILL A. DE LA HUNT®®

OF COUNSEL LOFTUS E. BECKER, JR.

ROGER W. DUBROCK

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C.

March 25, 1988

*RESIDENT PARTNER, ANCHORAGE OFFICE **ADMITTED IN WISCONSIN **ADMITTED IN ALASKA

Sandra Robinson, Esq.
Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2584

Dear Ms. Robinson:

I enclose for filing in the above-captioned MUR a response to the complaint on behalf of Senator Albert Gore, Jr., the Friends of Albert Gore, Jr. Committee and the Committee treasurers. I also enclose the appropriate designations of counsel.

Sincerely,

Donald J. Simon

DJS/cmt Enclosure Copy to:

Todd Campbell, Esq.
Jack Wright Robinson
William Puryear
Fred Martin
John M. Quinn, Esq.

88 MAR 28 PM 2: 44

STATEMENT OF DESIGNATION OF COUNSEL

Donald J. Simon
Sonosky, Chambers & Sachse
Suite 1000
1200 Eye Street, N.W.
Washington, D.C. 20005.

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

3/24/88

Date
Signature

RESPONDENT'S NAME: Albert Gore, Jr.

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ADDRESS: 1725 Jefferson Davis Hwy. #602

P.O. Box 15800

Arlington, Va. 22215

HOME PHONE: 703/521-5521

BUSINESS PHONE: 703/979-1988

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584	
NAME OF COURSEL:	Donald Simon
ADDRESS:	Sonosky, Chambers & Fachse
	Suite 1000, 1250 I St. NW
	Washington, DC 20005
TELEPHONE:	(202) 682-0240

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

RESPONDENT'S NAME:

Friends of Albert Gore, Jr.

ADDRESS:

c/o William Puryear & Co.

10th Floor

Third National Bank Building

Nashville, TN 37219

HOME PHONE:

(615) 259-9038

BUSINESS PHONE:

(615) 259-9038

STATEMENT OF DESIGNATION OF COUNSELL

MUR 2584	
NAME OF COURSEL:	Donald J. Simon
ADDERSS:	Sonosky, Chambers & Sachas
	Suize 1000
	1200 Eye Street, M.W.
TRLEPECKE:	Washington, D.C. 20005.

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

3/24/88	Alle Wight Column
Date	Sigpature

ADDRESS:

TACK TRIGHT KOBIASON

ADDRESS:

TIO LYNVEROOK ROAD

NASHVILLE, TH. 3725

ECHE PECKE:

(615) 241-1245

BUSINESS PROME:

(675) 244-4944

BEFORE THE FEDERAL ELECTION COMMISSION In re: MUR 2584 0 3 RESPONSE TO COMPLAINT ON BEHALF OF RESPONDENTS SENATOR ALBERT GORE, JR., FRIENDS OF ALBERT GORE, JR. COMMITTEE AND ITS TREASURER 0 Donald J. Simon SONOSKY, CHAMBERS & SACHSE 0 1250 Eye Street, N.W. 8 Suite 1000 20005 Washington, D.C. (202) 682-0240 Counsel for Senator Albert Gore, Jr., Friends of Albert Gore Jr. Committee and its Treasurer Of Counsel: Todd Campbell Post Office Box 15800 Arlington, Virginia 22215 March 28, 1988

BEFORE THE FEDERAL ELECTION COMMISSION

In re: MUR 2584

V.

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RESPONSE TO COMPLAINT
ON BEHALF OF RESPONDENTS SENATOR ALBERT GORE, JR.,
FRIENDS OF ALBERT GORE, JR. COMMITTEE AND ITS TREASURER

On March 1, 1988, Ray O. Brooks, Jr. filed a complaint against Senator Albert Gore Jr., and the Friends of Albert Gore, Jr. Committee, his 1984 authorized Senate campaign committee.

The complaint alleges that Senator Gore and his campaign committee accepted contributions from three union political committees during the 1984 campaign in excess of the contribution limit in 2 U.S.C. §441(a)(2).1/

Respondents received notification of this complaint on March 11. This response is filed to demonstrate that the allegations made in the complaint against Senator Gore and the Committee are frivolous and should be dismissed.²/

^{1/} Although the complaint nowhere so states, identical allegations were made by letter to Senator Gore dated February 2, 1988 from the Executive Director of the Center on National Labor Policy, who issued a press release on the allegations and disseminated his letter to the press.

^{2/} In addition to Senator Gore and the Committee, the complaint, in its listing of parties in Paragraph 2, names Jack Wright Robinson, the Committee's former treasurer, as a respondent. The Commission did not serve the complaint on

Introduction

The complaint alleges that three union political committees made contributions in excess of the \$5,000 limit per election to either Senator Gore's 1984 primary, or his 1984 general election campaign. 3/ Under the law, each committee could contribute \$5,000 to a candidate such as Senator Gore "with respect to any election for Federal office..." 11 C.F.R. \$110.2(a)(1) (1984). It is clear that the primary election and the general election are considered separate "elections" for purposes of applying the \$5,000 per election contribution limit. See e.g., 11 C.F.R. \$\$100.2, 110.1(a)(2). Thus each contributor committee at issue here could contribute \$5,000 to Senator Gore's 1984 primary campaign, and another \$5,000 to his 1984 general

Mr. Robinson, but instead served it on William P. Puryear, the Committee's current treasurer.

Indeed, the complaint's listing of parties is confused and inconsistent. Although the complaint lists the Committee as a respondent in its cover caption, it fails to list the Committee in its statement of parties. See Paragraph 2. And although Mr. Robinson, the Committee's former treasurer, is listed as a respondent, nowhere is the Committee's current treasurer so listed, although he was served with the complaint by the Commission.

In order to dispel any confusion, this response is filed on behalf of Senator Gore, his 1984 Senate campaign committee, and both its former and current treasurers. All appropriate designations of counsel have been submitted.

3/ Complainant does not contest that each of the contributor union committees qualified as a "multicandidate political committee," 11 C.F.R. 100.5(e)(3), and is therefore subject to the \$5,000 limit. election campaign, for an aggregate permissible contribution of \$10,000. 2 U.S.C. §441(a)(2). In no instance cited by complainant did the Gore Committee receive more than the aggregate \$10,000 it could accept from any one multicandidate committee for both the primary and general elections. Rather, complainant alleges that the committees contributed more than the \$5,000 limit to either the Committee's primary or its general election account.

In fact, the allegations are demonstrably false. The charges are based either on a misreading of the relevant public disclosure reports, or on the fact that the contributor committees, in some instances, misreported on their public disclosure reports the proper designation for the contribution. And even in some of those cases, the union committee has long since amended its reports and corrected that error, but the correction was unnoticed -- or ignored -- by complainant. In all cases, however, the Gore Committee properly received -- and properly reported -- the contributions at issue here. The Committee can demonstrate on the face of its public disclosure reports that it received no excess contribution. The complaint against Senator Gore, the Gore Committee and its treasurers should accordingly be dismissed without further action.

We address each allegation in turn.

1. Seafarer's Political Activity Donation

The complaint alleges that the Gore Committee received a contribution of \$5,000 from the Seafarer's Political Activity Donation (SPAD) on June 30, 1983 designated for the 1984 primary election, and another \$5,000 contribution on December 23, 1983 also designated for the primary election. Accordingly, the complainant concludes that the Gore Committee received and accepted from SPAD a total contribution of \$10,000 for the primary election, obviously in excess of the \$5,000 limit. See Complaint at ¶¶ 8-12.

In fact, the June 30 contribution of \$5,000 was made by SPAD to the primary campaign, and the December 23 contribution was made to the general election campaign. Both contributions were proper and within the permissible limit.

Exhibit A is a copy of the transmittal letter and check for the June 30 contribution. The letter specifically designates the contribution as being "to your 1984 Primary Election Campaign." Exhibit B is a copy of the Committee's public disclosure report for the relevant period, showing the contribution reported as made to its primary account.

Exhibit C is a copy of the transmittal letter and check for the December 23 contribution. The letter specifically

designates the contribution as being "to your 1984 General Election Campaign for Congress." Exhibit D is a copy of the Committee's public disclosure report for the relevant period, showing this contribution reported as made to its general election account.

This demonstration is sufficient to show that the Gore Committee did not receive any excess contribution from SPAD.

Both the June contribution to the primary account and the December contribution to the general election account were within the permissible \$5,000 limit. Both were designated to the Committee properly and both were reported by the Gore Committee properly.

Complainant's confusion on this matter may arise from the fact that SPAD, on its disclosure report filed on January 30, 1984, initially reported the December contribution as designated to the <u>primary</u> election. <u>See</u> Exhibit D attached to letter of March 15, 1988 from Marianne Rogers, SPAD Treasurer, to Lois Lerner, Esq. As SPAD now states, this was simply a clerical error. However, SPAD subsequently filed an amended report on October 9, 1984, correcting that clerical error and reporting the December contribution as designated for the general election.

<u>See</u> Exhibit E to Rogers letter.

Whatever reporting error SPAD may have made, the Gore Committee committed no wrong either in the acceptance or the reporting of these contributions. The charge on this matter against the Committee should clearly be dismissed.

2. ACTWU

The complaint alleges that the Gore Committee received from the Amalgamated Clothing and Textile Workers Union Political Action Committee (ACTWU) a contribution of \$200 on November 26, 1983 for its primary account, another contribution of \$800 on December 30, 1983 for its primary account, and a third contribution of \$5,000 on September 9, 1984, also for its primary account. Accordingly, complainant alleges that the Committee received a total contribution of \$6,000 to its primary account, in excess of the \$5,000 limit. See Complaint ¶¶ 13-17.

In fact, the first two contributions listed above were made to the primary account, and the \$5,000 contribution was made to the general election account. All contributions were proper and reported by the Gore Committee properly.

At the time these contributions were made, the Commission's regulations provided that for any contribution not designated in writing by the contributor for a particular election, the contribution was to be designated "for a primary

election...if made on or before the date of the election...," and "for a general election if made after the date of the primary election." 11 C.F.R. §§110.2(a)(1); 110.1(2)(ii)(A),(B) (1984).

None of the contributions made by ACTWU to the Gore
Committee were designated. Under the rule, therefore, the date
of the contribution determined the proper designation.

The 1984 Tennessee Senatorial primary was held on August 2, 1984. Any undesignated contributions made to the Gore campaign prior to that date would be automatically designated to the primary campaign; contributions after that date would be designated to the general election.

Exhibit E is a copy of the November 17, 1983 contribution check for \$200 and transmittal letter. It shows the contribution to be undesignated. Accordingly, since the contribution was made prior to the primary election, it was designated to the primary. The same is true for the \$800 contribution made on December 19, 1983. See Exhibit F.4/

Although the complainant did not raise the issue, the ACTWU made three additional contributions to the Gore Committee prior to the primary election, one for \$1,000 on June 24, 1983, one for \$500 on June 24, 1983 and a third for \$100 on April 6, 1984. The total of these five contributions made to the primary account was \$2,600.

The Committee properly reported these contributions as made to the primary election account. See Exhibit G.

On August 22, 1984, the ACTWU made an undesignated contribution in the amount of \$5,000 to the Committee. Since this contribution was made after the primary election, it was, under the Commission's regulations, to be automatically attributed to the general election. The Committee so reported it. See Exhibit H.

Accordingly, it is clear that the Committee properly received and reported a total of \$2,600 from the ACTWU to its primary account, including the two contributions totaling \$1,000 cited by the complainant, and also properly received and reported a contribution for \$5,000 to its general election account. In both instances, the contributions were within the applicable \$5,000 contribution limit.

The complainant indicates that the ACTWU may have misreported some of the contributions made to the primary election as instead being designated to the general election. 5/

It is our understanding that the \$800 contribution of December 19, 1983 was properly reported by the ACTWU as a primary contribution, but the \$200 contribution was mistakenly reported as made for the general election. It is our further understanding this misreporting was due to a clerical error by the ACTWU, and was corrected by the ACTWU by the filing of an amended disclosure report on February 12, 1988.

If the contributor committee so misreported its contribution, the fault, if any, lies with the contributor committee, not with the recipient Gore Committee. The Gore Committee, based on its receipt of various undesignated contributions, and the regulations governing the designation of such contributions, properly attributed the contributions to the primary election, up to August 2, 1984, and to the general election thereafter. In no way was the Gore Committee responsible for the disclosure reports filed by the union committee. If the contributor committee subsequently erred in the designation it put on its public disclosure report, that reporting error cannot convert an otherwise lawful contribution into an unlawful one. If a contribution was made to the Gore Committee's primary account, was deposited into the Committee's primary account, was reported by the Committee as a contribution to its primary account, then the fact that the contributor inadvertently listed the contribution as made for the general election reflects only a reporting mistake by the contributor -- not, as complainant suggests, the receipt of an illegal contribution by the Gore Committee. The remedy is simply for the contributor committee to amend its report to properly reflect the contribution made. 6/

^{6/} This is not to say that a contributor committee could not, if it so wished, designate a contribution made prior to the primary to be for the general election rather than for the primary. Certainly it could do so under the Commission rules in effect at the time by making its designation express at the time of the contribution. See 11 C.F.R. §110.1(a)(2)(i) (1984). However, where a contribution is undesignated at the time of making, a subsequent misreporting of the contribution by the contributor does not

Accordingly, the Gore Committee properly received and properly reported all contributions from the ACTWU. The charge on this matter against the Committee should clearly be dismissed.

3. Amalgamated Transit Union

The complaint alleges that the Gore Committee received five contributions from the Amalgamated Transit Union (ATU), totaling \$6,000, and that all of the contributions were designated for the primary election. Therefore, the complainant concludes, the Gore Committee accepted contributions to its primary account in excess of the permissible \$5,000 limit. Complaint, ¶¶ 18-22.

In fact, as with the contributions from the ACTWU, the contributions received by the Gore Committee from the ATU were undesignated. The Committee thus applied the rule that an undesignated contribution is to be attributed to the primary if received prior to the primary election, and to the general election if received after the primary election. 11 C.F.R. \$110.1(a)(2) (1984).

work a retroactive redesignation of it. Otherwise, the recipient committee would be unable to know how to designate the contribution, how to report it, and how to apply the contribution limits. Surely the law cannot be applied in a manner to put a recipient committee at a continuing risk of potential violation of the contribution limits through no fault of its own.

By check dated October 27, 1983, the Gore Committee received a \$500 contribution from the ATU. Since the check and its accompanying transmittal letter indicated no designation, see Exhibit I, and since the contribution was received prior to the primary election, the Committee treated the contribution as one designated to the primary. It was reported by the Committee as a contribution to the primary account. See Exhibit J.

By check dated November 15, 1983, the Committee received a \$1,000 contribution from the ATU, again undesignated.

See Exhibit K. Again, since this was received primary to the August, 1984 primary, the Committee treated the contribution as one made to its primary account, and so reported it. See Exhibit J.

By check dated February 28, 1984, the Committee received another \$500 -- undesignated -- contribution from the ATU. See Exhibit L. Since this was received prior to the primary, the Committee designated the contribution to its primary account, and so reported that designation. See Exhibit M.

Finally, by check dated May 23, 1984, the Committee received a \$1,500 contribution, also undesignated. See Exhibit N. Since this was prior to the primary, the Committee treated

the contribution as made to its primary account, and so reported it. See Exhibit O.

These four checks -- all made to the primary election -- totalled \$3,500, well within the \$5,000 contribution limit.

By check dated September 5, 1984 -- after the primary election -- the Committee received an undesignated contribution of \$2,500. See Exhibit P. Since this was received after the primary, the Commission's regulations required the Committee to treat the contribution as made to its general election account, and apply it against a separate \$5,000 contribution limit available to the ATU. The Committee did so, and reported the contribution as made to its general election account. See Exhibit Q. This was the only contribution made by the ATU to the Committee's general election fund, and thus within the \$5,000 contribution limit available to the ATU.

It is our understanding that the ATU misreported the first four contributions as designated to the Committee's general election account, rather than its primary account, thus creating an impression, from the ATU's public disclosure reports, that the contribution limit to the general election had been exceeded. As noted above, the error -- if any -- lay solely in the contributor committee's reporting of these contributions, not in the Gore Committee's acceptance or reporting of them. Thus, at worst,

the problem which complainant points to here is only one of a technical misreporting by the contributor committee, a problem which can -- and should -- be simply remedied by the filing of the appropriate amended reports. 7/

In any event, no violation whatsoever has been committed by the Gore Committee. From the Committee's point of view, the undesignated contributions made and received prior to the primary election were properly designated to the primary and so reported. As such, they were within the ATU's primary election contribution limit. However the ATU may have reported, or misreported, those contributions, it creates no wrongdoing on the part of the Gore Committee.

Conclusion

The complaint fails to state even a hint of wrongdoing by Senator Gore, the Friends of Albert Gore, Jr. Committee, or its treasurers. As amply documented above, the Committee properly received, properly accounted for and properly reported every single contribution at issue here. Whatever technical reporting mistakes may have been made by some of the contributor

^{7/} It is our understanding that the ATU has filed, or is in the process of filing, amended reports showing the first four contributions as properly attributable to the primary election.

committees, those faults should not be visited upon the Gore Committee, which handled these contributions properly. Accordingly, the complaint as against Senator Gore, the Gore Committee and its treasurers should be dismissed without further action. Respectfully submitted, 10 Donald J. Simon SONOSKY, CHAMBERS & SACHSE 0 1250 Eye Street, N.W. 00 Suite 1000 Washington, D.C. 20005 M (202) 682-0240 0 Of counsel: Todd Campbell, Esq. 0 Post Office Box 15800 Arlington, Virginia 22215 7 0 00 00 -14EXHIBIT A

S.P.A.D.

Seafarers Political Activity Donation

5201 Auth Way, Camp Springs, Maryland 20746

301-899-0675

June 30, 1983

Dun)

Friends of Albert Gore, Jr.

Dear Congressman Gore:

SPAD is a political committee established and administered by the Seafarers International Union of North America, Atlantic, Gulf, Lakes and Inland Waters District (SIU-A&G), as provided by the Federal Elections Campaign Act as amended (Act). The SIU-A&G is chartered by and affiliated with the Seafarers International Union of North America, AFL-CIO, (SIUNA).

It is our pleasure to enclose Check #3149 in the amount of \$5,000.00 as a contribution to your 1984 Primary Election Campaign.

With best regards, I am,

Sincerely,

7.0154534

31	SEAFARERS POLITICAL ACTIVITY DONATION	FOR PAYMENT	MECK IS DELIVERED I	THIS
	S.P.A.D. 675 FOURTH AVE. BROOKLYN, N.Y. 11232	AMOUNT	PARTICULARS	DATE
29 19 83	June 2			
\$ 5,000	TO THE Friends of Albert Gore Jr.			
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EXHIBIT B

22-Jul-83 FRIENDS OF ALBERT GUDE, JR. COMPAIGN CONNITTEE Page - 19
FFC LINF 11(C) - FOLTTICAL ACTION CONNITTEE

JANUARY 1 THRU JUNE 30, 1983

PAC NAME CATE ELECTION S THIS PERIOD

Pan Am Political Action Committee 06-22-83 FRIMARY \$ 500.00

Attention: Mr. Rill Evans
Pan Am Corporation
1660 L Street, N.W., Suite 901
Washington, DC 20036

ACCRICATE TTD: \$ 500.00

Public Ownership of Electric Resources PAC PERSARY \$ 250.00 06-22-83

FowerPAC 2301 M Street, N. W. 3rd Floor, DC 20037

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AGGREGATE TTD: \$ 250.00

Responsible Citizens Political League 05-24-83 PRIMARY \$ 500.00 06-22-83 PRIMARY \$ 1,000.00

Protherhood of Railway & Airline Clerks
3 Pesearch Flace
Rockville, MD 20850

AGGREGATE YTC: \$ 1,500.00

Pockwell International Corporation 06-30-83 PRIMARY \$ 500.00

Good Government Committee Attn: Hr. M. L. Haddox, Treasurer 600 Grant Street Fittsburgh, PA 15219

AGGREGATE YTE: 5 500.00

Pafarers Folitical Activity Constion 06-30-93 (FRIMARY) \$ 5,000.00

Attention: Mr. Frank Drozak, Chairman Seafarers International Union 5201 Auth Way Camp Springs, MD 20'46

AGGREGATE YTD: S 5,000.00

EXHIBIT C

S.P.A.D.

Seafarers Political Activity Donation

5201 Auth Way, Camp Springs, Maryland 20746 301-899-0675

December 7, 1983

Jen

Albert Gore, Jr. for Congress Committee

Dear Congres; sman Gore:

SPAD is a political committee established and administered by the Seafarers International Union of North America, Atlantic, Gulf Lakes, and Inland Waters District (SIU-A&G), as provided by the Federal Election Campaign Act as amended (Act). The SIU-A&G is chartered by and affiliated with the Seafarers International Union of North America, AFL-CIO (SIUNA).

It is our pleasure to enclose Check #3541 in the amount of \$5,000,00 representing a contribution to your 1984 General Election Campaign for Gongress.

With best wishes, I am

Sincerely,

Tany June 12/7/83

Frank Drozak, Chairman Descrit.

DATE	PARTICULARS	AMOUNT

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SEAFARERS POLITICAL ACTIVITY DONATION
S.P.A.D.
675 FOURTH AVE.

BROOKLYN, N.Y. 11232

3541

December 7 19 83

DAY TO THE ORDER OF Albert Gore Jr. for Congress Committee \$ 5,000.00**

The sum of 5.000 dol's O Octs

DOLLARS

CHEMICALBANK

1411 BROADWAY NEW YORK, N.Y. 10018 20 lungle My

Auth. Sig

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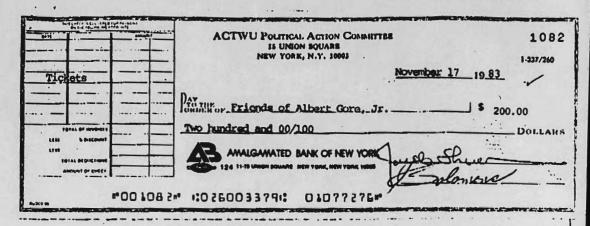
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EXHIBIT E

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IEL No.16158240113

Feb.17.88 16:28P.01



AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION

MURRAY H. FINLEY

JACOB SHEINKMAN

SCOTT HOYMAN Executive Vice President

815 SIXTEENTH ST., N.W. . WASHINGTON, D.C. 20006 (202) 628-0214

ELIZABETH M. SMITH, Director Legislative and Political Education Department

November 7, 1983

Friends of Albert Gore, Jr. P. O. Box 3000 Nashville, Tennessee 37219

Dear Friends:

Enclosed is our check for \$200.00 to cover the cost of tickets to the reception for Congressman Gore which was held in Knoxville on November 5. Our manager, Mrs. Geneva Sneed, and three others attended the reception.

mede 1900

This contribution is made possible by the voluntary contributions of our members in Tennessee.

MF/JS:jav Enclosure: \$200.00 check

cc: Geneva Sneed



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EXHIBIT F

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION AFL-CIO, CLC 815 SIXTEENTH ST., N.W. . WASHINGTON, D.C. 20006 (202) 628-0214 0 ELIZABETH M. SMITH, Director Legislative and Political Education Department Honorable Albert Gore, Jr. 1131 Longworth House Office Building Washington, D.C. 20515 Dear Congressman Gore: campaign for election to the Senate. 8

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NEUMANOHAYES@DIXON

Contribution

TEL No.16158240113 Feb.17.88 15:44P.02 1092 ACTWU POLITICAL ACTION COMMITTER IS UNION SQUARE NEW YORK, N.Y. 10003 1-337/240 Dec. 13 83 AN THE Friends of Albert Gore, Jr. 1 \$ 800.00 Eight hundred & 00/100 ----- Dollates

AWALGAWATED BANK OF NEW YORK D 124 11-15 UNION SQUARE MEN YORK, NEW YORK 14000

01077276**

MURRAY H. FINLEY President

SOL STETIN Senior Executive JACOB SHEINKMAN Secretary-Treasurer SCOTT HOYMAN Executive Vice President

December 19, 1983

Enclosed is our contribution in the amount of \$800.00 to your

This contribution is made possible by the voluntary donations of members of the Amalgamated Clothing and Textile Workers Union.

Best wishes to you. I am looking forward to working with you and your staff during the second session of the 98th Congress.

Sincerely,

DEC 27 1983

Elizabeth M. Smith Legislative & Political

Director

EMS: Jav

Enclosure

EXHIBIT G

27-Jan-14 FRIFED OF ALBERT CORF, JR. CARPAIGE COPRITTEE PAGE - 1 FEC LINE 11C - PACS AND OTHER POLITICAL COMMITTEE PECFIPSE JULY 1 THRU DECEMBER 31, 1983

PAC SARE DATE ELECTION S THIS PERIOD 24th Congressional District 12-30-F3 PRIMARY \$ 2,000.00

of California PAC 360 South Kenzore Avenue Yc. 306 les Angeles, CA 90020

ACCREGATE YTT: \$ 2,000.00

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!GGFEGATE YTT: \$ 3,150.00

Attn: Fr. Willist Wynn, Fresident

United Food & Comercial Workers Int'l. Union 1775 & Otreet, '. W. hantington, DC 20006

AGGREGATE ATT: 410,000.00

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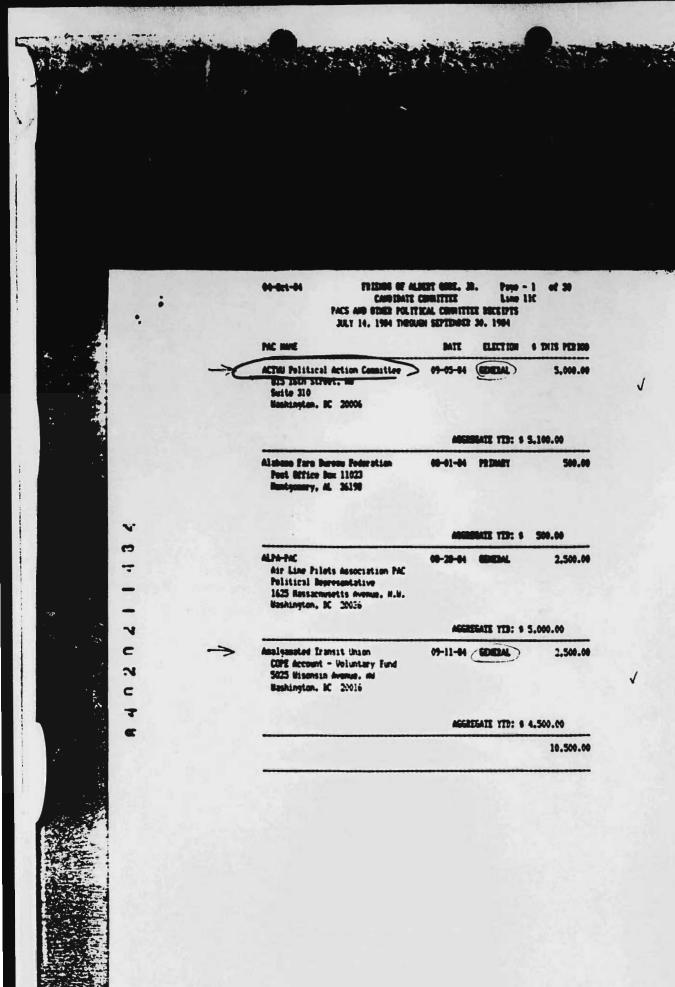


EXHIBIT I

Feb.17.88	15:37P

AMALGAMATED TRANSIT UNION COPE ACCOUNT—VOLUNTARY FUND
SO25 WISCONSIN AVENUE, N.W. October 27 1983 15-55 540
PAY TO THEFriends of Albert Gore, Jr \$ 500.00
Dollars & 00/100Dollars
WAMERICAN SECURITY John Rouland
WASHINGTON, B. C. SESIS
INTERNATIONAL SECRETARY TREASURER



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Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C 20016 202-537-1645

- Office of the International Secretary-Treasurer -

October 28, 1983

Friends of Albert Gore, Jr. P. O. Box 3000 Nashville, Tennessee 37219

Gentlemen:

The Amalgamated Transit Union welcomes the opportunity to support the activities of your committee.

Enclosed please find a check for \$500.00 and a receipt which is to be returned to my office.

With best wishes, I am

Sincerely,

R. C. Wallace

R.C. Wallence

International Secretary-Treasurer and COPE Director

Enclosures

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EXHIBIT J

27-Jun-84 FRIENDS OF ALFERT GOPE, JR. CREPAIGH CORNITTEE Face - 3
LEC LINE 11C - PACS AND OTHER POLITICAL COPETTEE NECFIPTE
JULY 1 THRU DECEMBER 31, 1983

DATE ELECTION PAC TARE S THIS PERIOD 11-61-63 PRIMPRY 5 500.00 11-21-63 PRIMPRY 5 1,000.00 - Italcarated Transit Union \$ 1,000.00 CCIF Account - Voluntary Fund Attn: Yr. R. C. Wallace 5025 Wisconsin Avenue, Y. W. Warhington, DC 20016 ACCREGATE YTD: \$ 1,500.00 American Adriculture Povement PAC 11-10-83 PRIMARY S 550.00 Attention: David Serter 100 Maryland Avenue, 1.F., Suite 500A PCT (9 C Washington, DC 20002 ,7 AGGEERATE YTD: S 55C.CO 5 550.00 Arerican Chirographic Association F/C 11-21-83 FFIV/FY ? Attn: "r. David O'Bryon, Director Cong. Rel. American Chiropractic Perociation 1916 Wilson Forleyard Trinston, VA 12201 . . :: AGGIFGATE AID: 5 1,050.00 C -----American Cental FAC 11-21-23 FFINARY # 500.00 Attention: Reverly 7. vaile; 1111 17th Etreet, 0.V. Duit: 1006 Vachington, Tr 20036 AGGREGATE YTT: 1 SCC.CC 10-74-63 FRIMARY C 500.00 iruticat 'Artest 'nemittes for Temporaltic Covernment Attra fr. Erry 1. Troetan 2700 - Street, . T., 707 Nortaniton, 70 20006

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EXHIBIT K

AMALGAMATED TRANSIT UNION COPE ACCUUNT—VOLUNTARY FUND 6028 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016

No. 1036

November 15 1983 18-56

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PAY TO THE ORDER OF_

Friends of Albert Goro, Jr. -----

-----One Thousand Dollars & 00/100-----

1,000.00

DOLLARS

AND TRUST COMPANY
WASHINGTON, B.G. 20013

C INTERNATIONAL PRESIDENT

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Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016 202-537-1645

Office of the International Secretary-Treasurer

November 15, 1983

Friends of Albert Gorc, Jr. Jack Wright Robinson, Treasurer Route 2 Carthage, Tenn. 37030

Gentlemen:

The Amalgamated Transit Union is delighted to join in your efforts to elect Representative Albert Gore, Jr., of Tennessee, to the U.S. Senate seat now held by Majority Leader Howard Baker, who is retiring.

Representative Gore has not only been a popular member of the House, he is also a very able person.

In order to be helpful in this effort, enclosed is check #1036 in the amount of \$1,000.00. Please sign the enclosed receipt and return it to the undersigned in order that we may comply with the Corrupt Practices Act.

Sincerely,

R. C. Wallace,

RC Miller

International Secretary-

Treasurer and

ATU-COPE Director

RCW/vh

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Attinates with American Federation of Lebor and Congress of Industrial Organizations and Cenadian Labour Congress

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Sanoiles MC	BINEF 1809 No. 1107
AMALGAMATED TRANSIT UNION BUPE ACCOUNT—VOLUNTARY FUND 5025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016	Feb. 28 19.84 540
PAY TO THE Friends of Albert Gore, ORDER OF Five Hundred Dollars & MINIMARKED AND TRUST COMPANY WASHINGTON, D. C. 60013	INTERNATIONAL PRESIDENT INTERNATIONAL BECRETARY-TREASURER
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NAME R.C. Wallace N. AUD	U. Abb
H. PHONE , CO. C. C.	11. MIONE 202 - 537-1645

EXHIBIT M

CHO TO THE PARTY OF THE PARTY O 10-Apr-84 Page - 1 of 23 Line 11C FRIENDS OF ALBERT CORE. JR. PACS AND OTHER POLITICAL CONNITTEE RECEIPTS
JANUARY 1 THRU MARCH 31, 1984 PAC NAME DATE ELECTION S THIS PERIOD 20th Century Political Action Committee 25 Century Park May 02-21-84 PRIMARY 250.00 Salt Lake City, UT 84118 AGGREGATE YTD: 6 250.00 550.00 Alliance of American Insurers 03-15-84 PRIMARY Federal Political Action Committee 1501 Heedfield Read Schausburg, IL 60195 0 AGGREGATE YTD: 8 550.00 Amaigamated Transit Union COPE Account - Voluntary Fund 03-20-84 (PRIMARY) 500.00 Attn: Mr. R. C. Hallace 5025 Misconsin Avenue, M M. Mashington, DC 20016 AGGREGATE YTD: S 500.00 3 C American Agriculture Movement 03-15-84 PRIMARY 200.00 Political Action Committee Attn: Ms. Joan Senter, Treasurer N 100 Maryland Avenue, N. E., Suite 500A C Hashington, DC 20002 AGGREGATE YTD: 8 200.00 1.500.00 EXHIBIT N

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AMALGAMATED TRANSIT UNION COPE ACCOUNT—VOLUNTARY FUND 6025 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016	32995 No. 1246
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ORDER OFFriends of Albert Gore, J.	r
One Thousand Five Hundred Dollars &	00/100 DOLLARS
AND TRUST COMPANY WASHINGTON, R.C. 80013	Hahri Louland
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07-05-04

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MIT CLECTION & DATE PERSON

ACTMO Political Action Committee 825 16th Street, NO Suite 310 Heshington, BC 2006

5,000.00

ACCRECATE TES: 4 5,100.50

Alabama Fare Durone Poderation Post Office Dax 11023 Hantgemery, AL 36190

00-01-04 PERMEY

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ACCRECATE YED: 6 500.00

ALPA-PAC Air Line Pilots Association PAC Political Representative 1625 Hossachusetts Avenue, H.W. Washington, BC 20036 10-29-04 EDEDAL 2,500.00

AGGREGATE YTD: \$ 5,000.00

Amalgamented Transit Union

COFE Account - Voluntary Fund

09-11-04 (EDEDAL)

2,500.00

5025 Wisensin Avenue, no Washington, BC 20016

AGGREGATE YTD: \$ 4.500.00

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FEDERAL ELECTION COMMISSION FEDERAL ELECTION COMMISSION

999 E Street, N.W. 20463 Washington, D.C.

88 APR 15 PM 12: 01

FIRST GENERAL COUNSEL'S REPORT

MUR 2584 DATE COMPLAINT RECEIVED BY OGC: March 1, 1988 DATE OF NOTIFICATION TO RESPONDENTS: March 8, 1988 STAFF MEMBER: Sandra H. Robinson

COMPLAINANT:

Ray O. Brooks, Jr.

RESPONDENTS:

Senator Albert Gore, Jr.

Friends of Albert Gore, Jr. and William P.

Puryear, as treasurer

Amalgamated Trust Union - COPE Account Voluntary Fund and Raymond C. Wallace, as

treasurer

Amalgamated Trust Union - COPE and Raymond C.

Wallace, as treasurer

Amalgamated Clothing and Textile Workers

Union

Amalgamated Clothing and Textile Workers Union - Political Action Committee and

Charles Sallee, as treasurer

Seafarers Political Activity Donation and

Marianne Rogers, as treasurer

RELEVANT STATUTES:

2 U.S.C. § 441a(a)(2)(A) 2 U.S.C. § 441a(f) 11 C.F.R. § 104.14(d)

INTERNAL REPORTS

CHECKED:

Disclosure Reports

FEDERAL AGENCIES

CHECKED:

None

I. GENERATION OF MATTER

On March 1, 1988, Ray O. Brooks, Jr., filed a complaint against Senator Albert Gore, Jr.; Friends of Albert Gore, Jr. ("the Gore Committee") and William P. Puryear, as treasurer;

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Amalgamated Transit Union - COPE ("ATU-COPE") and Raymond C. Wallace, as treasurer; Amalgamated Clothing and Textile Workers Union - Political Action Committee ("ACTWU-PAC") and Charles Sallee, as treasurer; and Seafarers Political Activity Donation ("SPAD") and Marianne Rogers, as treasurer. The complaint alleged that during the 1984 primary and general election Senator Gore and the Gore Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from ATU-COPE, SPAD and ACTWU-The complaint also alleged that ATU-COPE and Raymond C. Wallace, as treasurer; SPAD and Marianne Rogers, as treasurer; and ACTWU-PAC and Charles Sallee, as treasurer, 1 violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Gore Committee during the 1984 election cycle. The complaint also alleged that each treasurer violated 11 C.F.R. § 104.4(d) by providing inaccurate information in disclosure reports filed with the Commission.

Respondents were notified of the complaint on March 8, 1988.

ATU-COPE responded to the complaint on March 22, 1988; SPAD responded to the complaint on March 23, 1988; and Senator Gore and the Gore Committee submitted a combined response on March 28, 1988 (this response also included information on behalf of the Gore Committee's past treasurer). On March 24, 1988, this

Charles Sallee is the current treasurer of ACTWU-PAC, and in comformity with the Commission's policy, had been notified as a respondent in this matter, in his capacity as treasurer. The complaint actually named Jack Sheinkman, who apparently was the treasurer at the time of the alleged violations.

- 3 -Office received a request from counsel for ACTWU-PAC and Charles Sallee, as treasurer, for an extension until April 12, 1988, to respond to the complaint. Counsel stated that in order to provide a complete response, files in Washington, D.C. and New York City would have to be examined. In light of this circumstance, the extension of time was granted. After receiving the response from ACTWU-PAC and evaluating it along with those already received, this Office will report to the Commission with appropriate recommendations. 2 Lawrence M. Noble N General Counsel 0 3 0 BY: Associate General Counsel 0 V 0 00 α



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

LAWRENCE M. NOBLE GENERAL COUNSEL

FROM:

MW BARJORIE W. EMMONS/JOSHUA MCFADDER A

DATE:

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APRIL 19, 1988

SUBJECT:

MUR 2584 - FIRST GENERAL COUNSEL'S REPORT SIGNED APRIL 14, 1988

The above-captioned matter was received in the Office of the Secretary of the Commission Friday, April 15, 1988 at 12:01 P.M. and circulated to the Commission on a 24-hour no-objection basis Monday, April 19, 1988 at 11:00 A.M.

There were no objections received in the Office of the Secretary of the Commission to the First General Counsel's Report at the time of the deadline.



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003-3377 (212) 242-0700

JACK SHEINKMAN

CHARLES SALLEE
Secretary-Tressurer

ARTHUR LOEVY Executive Vice President

APRIL 8, 1988 EXPRESS MAIL 88 APR -8 AHIO: 17

Lawrence M. Noble, General Counsel Federal Elections Commission 999 E Street, N.W. Washington, D.C. 20463

RE: MUR 2584

Amalgamated Clothing and Textile Workers Union Political Action Committee, Charles Sallee, as Treasurer

Dear Mr. Noble:

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This letter is in response to your letter dated March 8, 1988 notifying the Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") and Charles Sallee, Treasurer, that a complaint had been filed by Roy O. Brooks, Jr. in the above-captioned matter, alleging that ACTWU-PAC made two campaign contributions to the Friends of Albert Gore, Jr. totalling \$1,000.00 in excess of the statutory limit in violation of the Federal Election Campaign Act of 1971 (the "Act") for the general election in 1984.

As will be discussed in detail below, the two campaign contributions in question were contributions to the primary election, not the general election as alleged in the complaint. The purported illegal contribution of \$200.00 was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements. This clerical error was corrected on with the filing of an Amended Report. The allegedly illegal \$800.00 contribution, however, was in fact correctly reported as a contribution to the primary election on the Respondent's Report of Receipts and Disbursements. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

The complaint alleges that ACTWU-PAC contributed \$6,000.00 to the 1984 federal general election for the Friends of Albert Gore, Jr. in violation of the \$5,000.00 statutory limit provided in 2 U.S.C. Section 441(a)(2)(A) in the following amounts:

VICE PRESIDENT

JOHN ALLERUZZO NOEL BEASLEY KILMER CABAN ED CLARK ANTHONY COSTANZA JEAN-MARC COUTURE DLGA DIAZ JAMES DILLON HENRY DROPKIN BRUCE DUNTON GARRY FERRARIS JOHN FOX JOSEPH HUIGHE JAMES A JOHNSON RICHARD MACFADYEN CHESTER MAKOSKI JOYCE D MILLER MURRAY MORENO DANIEL MYERS FRANK NICHOLAS, JR CARMEN PAPALE BRUCE RAYNOR THOMAS RUMORE LECN SPITZER AMANDA STEVENS CECIL TOPPIN UM WALRAVEN
 Date Contributed
 Amount

 11/17/83
 \$200.00

 12/30/83
 \$800.00

 8/22/84
 \$5,000.00

Our records demonstrate that on November 17, 1983, ACTWU-PAC made a \$200.00 contribution by check made payable to the Friends of Albert Gore, Jr. for tickets to a fundraising dinner. A copy of the letter sent to the Friends of Albert Gore, Jr.½ and the accompanying check are attached hereto as Exhibits 1 and 2 respectively. This \$200.00 contribution was not designated in writing for any particular election. The check was made payable to the Friends of Albert Gore, Jr. and was specifically designated for tickets in the margin. The letter accompanying the check stated that the check was for tickets for a fund raiser held on November 5, 1983.

Thus, the \$200.00 in question was intended as a contribution for the primary election and was contributed well in advance of the Tennessee primary of August 7, 1984. The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election is deemed a contribution for a primary election if made before the date of the primary. 11 C.F.R. Sections 110.2(a) (1);110.1(2) (ii) (A),(B). Pursuant to FEC regulations, the undesignated \$200.00 contribution of November 17, 1983 is properly considered a contribution for the primary election of August 7, 1984.

As a result of a clerical error, the \$200.00 contribution was attributed to the general election instead of the primary election in Schedule B Item H of ACTWU-PAC's Report of Receipts and Disbursements for November 1983, attached hereto as Exhibit 3. This clerical error was corrected in Schedule B Item H of ACTWU-PAC's Amended Report of Receipts and Disbursements for November 1983, dated February 12, 1988, attached hereto as Exhibit 4. In all respects, the parties consistently treated the \$200.00 contribution as a contribution to the primary election, with the exception of ACTWU's clerical reporting error, which has been corrected.

With regard to the allegedly illegal \$800.00 contribution, our records show that on December 19, 1983, ACTWU-PAC made an \$800.00 contribution to the Friends of Albert Gore, Jr. A copy of the letter sent to the Gore committee and the accompanying

^{1/} Due to a typographical error, the letter is dated November 7, 1983 instead of November 17, 1983.

check are attached hereto as Exhibits 5 and 6 respectively. This \$800.00 contribution was not designated for any particular election, and was correctly reported as a contribution to the primary campaign in Schedule B Item F of ACTWU-PAC's Report of Receipts and Disbursements for December 1983, attached hereto as Exhibit 7.

It is clear that the \$200.00 contribution made on November 17, 1983 and the \$800.00 contribution made on December 30, 1983 were intended for the August 7, 1984 primary election rather than the November 6, 1984 general election, and that ACTWU-PAC made its best efforts to comply with the statutory maximum contribution limits. ACTWU-PAC treated these contributions as primary contributions in monitoring all other contributions to the Friends of Albert Gore, Jr. For example, a \$100.00 contribution made on March 14, 1984 (months after the questionable \$200.00 and \$800.00 contributions were made) was reported as a contribution to the primary election although the check and the accompanying letter did not designate which election the contribution was for. A copy of the check and the accompanying letter are attached hereto as Exhibits 8 and 9 respectively. Schedule B Item I of ACTWU-PAC's Report of Receipts and Disbursements for March 1984, which reflects this primary contribution is attached hereto as Exhibit 10.

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Below is a breakdown of ACTWU-PAC's contributions to the Gore Senate Campaign for primary and general elections held in 1984:

Date Contributed	Amount	Election
6/8/83	\$500.00	Primary
6/15/83	\$1,000.00	Primary
11/17/83	\$200.00	Primary
12/19/83	\$800.00	Primary
3/14/84	\$100.00	Primary
8/22/84	\$5,000.00	General

Total contributed to the 8/7/84 primary election = \$2,600.00 Total contributed to the 11/6/84 general election = \$5,000.00

ACTWU-PAC's contribution activity demonstrates that it was aware of the statutory limits and made good faith efforts to comply with the Act. ACTWU-PAC's contributions to the August 1984 primary election, including the \$200.00 and \$800.00 contributions in question, totalled \$2,600.00 ACTWU-PAC's contribution to the general election (which contribution was made immediately following the primary) was limited to \$5,000.00 to comply with

the \$5,000.00 ceiling per election.

All of the parties consistently treated the \$200.00 and \$800.00 as contributions to the primary election. It is our understanding that both the \$200.00 and \$800.00 contributions were deposited in the Gore committee's primary account and were reported by the Friends of Albert Gore, Jr. as contributions to its primary account on page 1 of its January 27, 1984 FEC line 11C Report of Receipts - July 1 through December 31, 1983. The

Moreover, ACTWU-PAC has changed its procedures to ensure that this kind of administrative error will not occur in the future. Our checks now specifically designate whether the contribution is for the primary or general election.

it be considered a contribution to the primary election.

inadvertent clerical error misidentifying the \$200.00 should not be dispositive of the designation of the contribution, where the FEC's own regulations and the conduct of the parties require that

For the foregoing reasons, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

Very truly yours,

Arthur M. Goldberg General Counsel

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Jean Grumet
Assistant General Counsel

cc: Sandra Robinson, Esq.
Charles Sallee
Elizabeth M. Smith

4:g:PAC

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SCOTT HOYMAN

AFL-CIO, CLC 815 SIXTEENTH ST., N.W. . WASHINGTON, D.C. 20006

ELIZABETH M. SMITH, Director Legislative and Political Education Department

(202) 628-0214

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November 7, 1983

Friends of Albert Gore, Jr. P. O. Box 3000 Nashville, Tennessee 37219

Dear Friends:

Enclosed is our check for \$200.00 to cover the cost of tickets to the reception for Congressman Gore which was held in Knoxville on November 5. Our manager, Mrs. Geneva Sneed, and three others attended the reception.

This contribution is made possible by the voluntary contributions of our members in Tennessee.

Sincerely,

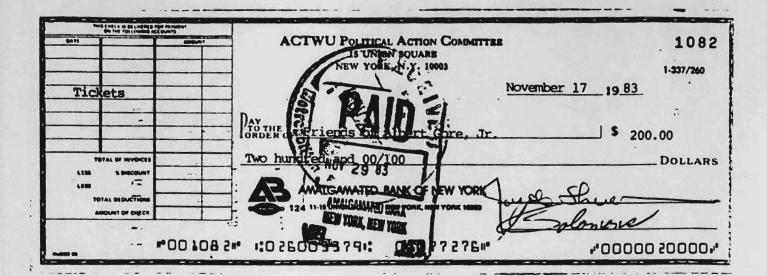
Murray Finley

Jack Sheinkman

MF/JS:jav

Enclosure: \$200.00 check

cc: Geneva Sneed



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

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Name of Committee (in Full)

Guarini for Congress Committe	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
P O Box 2884 Washington, D. C. 20013 N.J.	Disbursement for: DPrimary X General	11- 7-83	500.00
B. Full Name, Mailing Address and ZIP Code Ferraro for Congress, 1978 218 Lafayette Street New York, N.Y. 10012 N.Y.	Purpose of Disbursement Tickets Disbursement for: Primary XXGeneral Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Perio
C. Full Name, Mailing Address and ZIP Code Ed Markey for Congress Commit 401 C Street, N.E. Suite 303	Purpose of Disbursement teEickets	Date (month, day, year)	Amount of Each Disbursement This Perio
Washington, D. C. 20002 Mass	Disbursement for: Primary & General Other (specify):	11- 7-83	250,00
Columbia, Md 21045 Columbia, Md 21045 Columbia Address and ZIP Code Columbia Address and ZIP Code Columbia	Purpose of Disbursement Tickets Disbursement for: □Primary ★ General □ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period 250.00
E. Full Name, Mailing Address and ZIP Code Harrison for Congress Committee 15 S. Franklin St. 9th fl Wilkes-Barre, PA 18701 PA.	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perior
F. Full Name, Mailing Address and ZIP Code Paul Simon for Senate 603 E Capitol St., NE Washington, D. C. 20002 IL.	Purpose of Disbursement Tickets Disbursement for: Primary Seneral Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Perior
G. Full Name, Mailing Address and ZIP Code Democratic National Committee, Eleanor Roosevelt Fund 1625 Massachusetts Ave. NW Washington, D. C. 20036	Purpose of Disbursement / Tickets Disbursement for: E Primary E General E Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Perior
H. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. P.O. Box 3000 Nashville, Tn. 37219 TN.	Purpose of Disbursement Tickets Disbursement for: Primary & General Other (specify):	Date (month, day, year) 11 - 17 - 83	Amount of Each Disbursement This Period 200.00
1. Full Name, Mailing Address and ZIP Code Oberstar "84 Committee P O Box 33993	Purpose of Disbursement Tickets Disbursement for: Primary & General	Date (month, day, year)	Amount of Each Disbursement This Period

III 187	AND DESCRIPTION OF THE PERSON NAMED IN
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	each category of the
De	tailed Summary Page

PAGE OF 2 FOR LINE NUMBER 21

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NAME OF COMMITTEE (in Full) Amalgamated Clothing and Textile Workers Union Political Action Committee A. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date Imonth. Amount of Each Disbursement This Period day, year) Guarini for Congress Committee Disbursement for: | Primary P.O. Box 2884 11/7/83 500.00 Washington, D. C. 20013 Other (specify) Purpose of Disbursement B. Full Name, Mailing Address and ZIP Code Date (month. Amount of Each day, year) Ferraro for Congress, 1978 Disbursement This Period 218 Lafayette Street Tickets New York, N.Y. 10012 Dispursement for: | Primary X General 11/7/83 250.00 Other (specify) N.Y. C. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Amount of Each Date (month, Disbursement This Period day, year) Ed Markey for Congress Committee 401 C Street, N.E. Suite 303 Tickets Washington, D. C. 20002 Dispursement for: | Primary 11/7/83 250.00 | X | General MASS. Other (specify) D. Full Name, Mailing Address and ZIP Code Kaptur for Congress Committee Purpose of Disbursement Amount of Each Date (month, Disbursement This Period day, year) 7041 Knichthood Lane Tickets Columbia, MD 21045 Discursement for: Primary X General 11/7/83 250.00 OHIO Other (specify) E. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Amount of Each Date Imonth. Harrison to Congress Committee day, year) Dispursement This Period 15 S. Franklin St. 9th Floor Tickets Wilkes-Barre, Pa 18701 Dispursement for: Primary 250.00 11/7/83 PENNA Other (specify) 4 F. Full Name, Mailing Address and ZIP Code Date (month, Amount of Each Purpose of Dispursement Paul Simon for Senate day, year) Dispursement This Period 0 603 E. Capitol St., N.E. Tickets Washington, D. C. 20002 Disbursement for: | Primary 11/7/83 500.00 Other (specify) ILL. G. Full Name, Mailing Address and ZIP Code Amount of Each Purpose of Disbursement Date (month, a Disbursement This Period day, year) Democratic National Committee/ Eleanor Roosevelt Fund Tickets 11/17/83 100.00 1625 Massachusetts Avenue N.W. Disbursement for: Primary Washington, D. C. 20036 Other (specify) H. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. Purpose of Disbursement Date Imonth, Amount of Each day, year) Dispursement This Period P.O. Box 3000 Tickets Nashville, Tenn. 37219 Dispursement for: X | Primary General 11/17/83 200.00 TENN. Other (specify) Purpose of Disbursement 1. Full Name, Mailing Address and ZIP Code Date (month, Amount of Each Oberstar "84 Committee day, year) Dispursement This Period P.O. Box 33993 Tickets Washington, D. C. 20033 Disbursement for: | Primary X General 11/17/83 250.00 MINN. Other (specify) TOTAL This Period (last page this line number only)



JACOS SHEINKMAN
Secretary-Treasurer
SCOTT HOYMAN
Executive Vice President

AFL-CIO, CLC 815 SIXTEENTH ST., N.W. • WASHINGTON, D.C. 20008 (202) 628-0214

ELIZABETH M. SMITH, Director Legislative and Political Education Department

December 19, 1983

Honorable Albert Gore, Jr. 1131 Longworth House Office Building Washington, D.C. 20515

Dear Congressman Gore:

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Enclosed is our contribution in the amount of \$800.00 to your campaign for election to the Senate.

This contribution is made possible by the voluntary donations of members of the Amalgamated Clothing and Textile Workers Union.

Best wishes to you. I am looking forward to working with you and your staff during the second session of the 98th Congress.

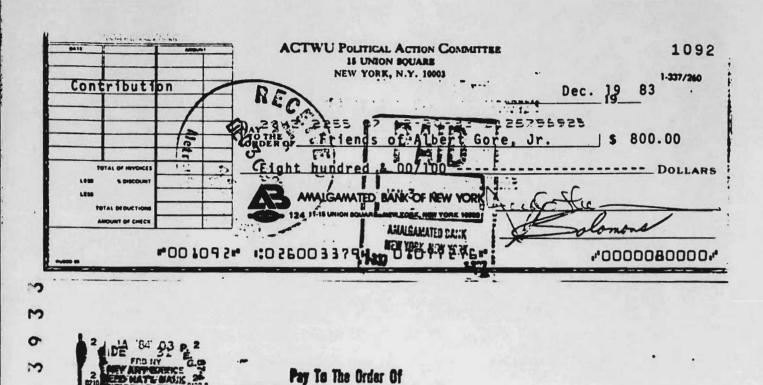
Sincerely,

Elizabeth M. Smith Legislative & Political Director

EMS: jav

Enclosure

Exhibit 5



METROPOLITAN FEBERAL SAYINGS AND

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FRIENDS OF ALBERT SELECTION IR.

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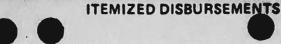
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Name of Committee (in Full)

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION POLITICAL ACTION COMMITTEE

Friends of Lane Evans P. O. Box 1222 Rock Island, Ill. 61201 ILL. B. Full Name, Mailing Address and ZIP Code Bill Gray for Congress Committee 602 Vernon Road Philadelphia, Pa. 19119 PA. C. Full Name, Mailing Address and ZIP Code Melcher for Senate Committee P. O. Box 23655	Contribution Disbursement for: "Primery & General "Other (specify): Purpose of Disbursement Contribution Disbursement for: "Primery "General X Other (specify): "82 Debt	day, year) 12/15/83 Date (month, day, year)	Disbursement This Period 500 - 00 Amount of Each Disbursement This Period
Rock Island, Ill. 61201 ILL. B. Full Name, Mailing Address and ZIP Code Bill Gray for Congress Committee 602 Vernon Road Philadelphia, Pa. 19119 PA. C. Full Name, Mailing Address and ZIP Code Melcher for Senate Committee	Disbursement for: Primary & General Dother (specify): Purpose of Disbursement Contribution Disbursement for: Primary Deneral X Other (specify): *82 Debt	Date (month, day, year)	Amount of Each
Bill Gray for Congress Committee 602 Vernon Road Philadelphia, Pa. 19119 PA. C. Full Name, Mailing Address and ZIP Code Melcher for Senate Committee	Contribution Disbursement for: Primary General Xb Other (specify): '82 Debt	day, year)	
Philadelphia, Pa. 19119 PA. C. Full Name, Mailing Address and ZIP Code Melcher for Senate Committee	Disbursement for: Primary General Xb Other (specify): 182 Debt		1.55.55
Melcher for Senate Committee		12/15/83	500.00
1 · O. BOX 23033	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Washington, D. C. 20024 MONTANA	Disbursement for: OPrimary OGeneral **Dispursement for: OPrimary OGeneral **Dispursement for: OPrimary OGeneral	12/15/83	2500.00
D. Full Name, Mailing Address and ZIP Code The 1984 Democratic Presidential Tr. P.O. Box 1800	Purpose of Disbursement St Tickets	Date (month, day, year) 12/15/83	Amount of Each Disbursement This Period 5000.00
Washington, D. C. 20013	Disbursement for: © Primary 🏋 General Dother (specify):		
E. Full Name, Mailing Address and ZIP Code Tsongas For Senate Committee P. O. Box 2	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Andover, Ma. 01810	Disbursement for: X Primary General Other (specify):	12/19/83	1000.00
F. Full Name, Mailing Address and ZIP Code Friends of Albert Gore, Jr. P.O. Box 3000	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Nashville, Tenn. 37219	Contribution Disbursement for: X Primary General Other (specify):	12/19/83	800.00
G. Full Name, Mailing Address and ZIP Code Citizens for D'Amours	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C/O S. Beauchesne 2950 Van Ness St. N. W. #222 Washington, D. C. 20008 N.H.	Contribution Disbursement for: X Primary General Other (specify):	12/19/83	1500.00
H. Full Name, Mailing Address and ZIP Code Friends of Jay Rockefeller C/O Governor & Mrs. W. Averell Harri	Purpose of Disbursement man Tickets	Date (month, day, year)	Amount of Each Disbursement This Period
3038 N. Street N. W. Washington, D. C. 20007 W. Va.	Disbursement for: XXPrimary	12/20/83	1000.00
1. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify):		

Exhibit 7

March 10, 1984 1.0 Honorable Albert Gore, Jr. U.S. House of Representatives Washington, DC 20515 Dear Al: 2 Enclosed is a check in the amount of \$100. This contribution to your campaign for election to the U.S. Senate, is made possible by James and Ruby Oliver of 2009 McClain Road, Knoxville, TN 37912. 0 Mrs. Oliver is a member of Local 147G in Tennesee, and she earmarked her contribution to ACTMU-PAC for your campaign. 0 I should appreciate it very much if you would send a letter acknowledging the contribution to Mr. and Mrs. Oliver. 00 Best wishes for a successful campaign. Very truly yours, Elizabeth M. Smith EMS: emg Enclosure Exhiby 8

See that recommend the bearing ACTWU POLITICAL ACTION COMMITTEE 8418 1126 15 UNION SQUARE NEW YORK, N.Y. 1003 . 1-337/260 19.84 March 14 Contribution \$ 100.00 One hundred and 00 DOLLARS BANK OF NEW YORK ANALGANATED BANK AMOUNT OF CHECK **00000 T0000** 3 0 1AP '84 09 3 TARGET NOTE OF THE STANDARD THE PROPERTY OF TH 0 O FEDERAL G-SENELL 158 T 0 8 0 0 00 111059411 : 44503

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Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code Illinois 7th Congressional District Delegates for Mondale	Purpose of Disbursement . Contribution	Date (month, dey, year)	Amount of Each Disbursement This Period
429 W. Superior Street Apt. 511 Chicago, Il 60610 Il	Disbursement for: N Primary General Other (specify):	3- 8-84	1,000.00
B. Full Name, Mailing Address and ZP Code Democratic Senatorial Campaign Committee	Purpose of Disbursement Contribution Disbursement for: © Primary & General	Date (month, day, year)	Amount of Each Disbursement This Period
400 North Capitol Street, Suite 319 Washington, D. C. 20001	Disbursement for: Orrimary X General	3- 8-84	5,000.00
C. Full Name, Mailing Address and ZIP Code Jim Shannon for Senate Committe P O Box 597	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Lawrence, Massachusetts 01842	Disbursement for: Primary General Other (specify):	3- 8-84	1,500.00
D. Full Name, Mailing Address and ZIP Code Studds for Congress	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
38 Rosa's Lane Scituate, Mass. 02066	Contribution Disbursement for: Primary General Other (specify):	3- 8-84	1,500.00
E. Full Name, Mailing Address and ZIP Code Dyson for Congress Route 1, Box 177-A	Purpose of Disbursement Tickets	Date (month, day, year)	Amount of Each Disbursement This Period
Accokeek, Maryland 20607	Disbursement for: Primary General Other (specify):	3- 8-84	300.00
F. Full Name, Mailing Address and ZIP Code Congressman Murphy Campaign Committee	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
3026 Tennyson Street, N.W. Washington, D. C. 20015	Disbursement for: Primary General Other (specify):	3- 8-84	100.00
G. Full Name, Mailing Address and ZIP Code Yatron for Congress Committee	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
P 0 Box 8032 Reading, Pa. 19603	Tickets Disbursement for: OPrimary (General Other (specify):	3-8 -84	100.00
H. Full Name, Mailing Address and ZIP Code Lloyd Doggett Campaign Fund 406 W 13th Street	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Austin, Texas 78701	Disbursement for: ♥ Primary □ General □ Other (specify):	3-12-84	1,500.00
I. Full Name, Mailing Address and ZIP Code Friends of Albett Gore, Jr.	Purpose of Disbursement Earmarked	Date (month, day, year)	Amount of Each Disbursement This Period
P O Box 3000 Nashville, TN 37219	Contribution Disbursement for: ₹Primary □ General □ Other (specify):	3-14-84	100.00
SUBTOTAL of Disbursements This Page (optional)			

PEDERAL ELECTION COMMISSION

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BEFORE THE FEDERAL ELECTION CONNEISSION

In the Matter of

Senator Albert Gore, Jr.

Friends of Albert Gore, Jr. and William P. Puryear, as treasurer 1

Amalgamated Transit Union-COPE2/ and Raymond C. Wallace, as treasurer

Amalgamated Clothing and Textile Workers)
Union

Amalgamated Clothing and Textile Workers)
Union-Political Action Committee and
Charles Sallee, as treasurer

Seafarers Political Activity Donation and Marianne Rogers, as treasurer

MUR 2584

GENERAL COUNSEL'S REPORT

I. BACKGROUND

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On March 1, 1988, Ray O. Brooks, Jr., through counsel, filed a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") by the respondents. Specifically, it was alleged that Senator Albert Gore, Jr. and his principal campaign committee, Friends of Albert Gore, Jr. ("the Gore Committee") and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions during the 1984 election cycle from the Amalgamated

The complaint named Jack Wright Robinson, the past treasurer; however, in keeping with the Commission's policy, the current treasurer has been named a respondent and was notified of the complaint.

Although the Amalgamated Transit Union - COPE Account-Voluntary Fund is listed separately in the complaint it is not a separate committee or federal account. It is the name of the bank account of the registered committee, Amalgamated Transit Union - COPE, from which the contributions at issue were made.

Transit Union - COPE ("ATU-COPE) and Raymond C. Wallace, as treasurer; the Amalgamated Clothing and Textile Workers Union - Political Action Committee ("ACTWU-PAC") and Charles Sallee, as treasurer; and the Seafarers Political Activity Donation ("SPAD") and Marianne Rogers, as treasurer. The complaint also alleged that these respective donor committees and their treasurers violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Gore Committee during the 1984 election cycle. 3/ The complainant also sought to impose personal liability on the respective treasurers pursuant to 11 C.F.R. § 104.14(d) for reporting inaccurate information.

Senator Gore, the Gore Committee and William P. Puryear, as treasurer, designated the same counsel, who submitted a joint response to the complaint on March 28, 1988. Attachment I.

SPAD and Marianne Rogers, as treasurer, submitted a response to

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^{3/} The Act prohibits a labor organization from making a contribution or expenditure in connection with any election for Federal office. 2 U.S.C. § 441b(a). Pursuant to 2 U.S.C. § 431(9)(B)(iii) Amalgamated Clothing and Textile Workers Union ("ACTWU") reports the costs of any communications it makes to its membership which expressly advocate the election or defeat of a clearly identified candidate, if such costs exceed \$2,000 for any election. ACTWU has been assigned a "C-7" number by the Commission for the filing of such reports. It is noted that Senator Albert Gore, Jr., was not reported by ACTWU as the identified candidate in any of its Reports of Communication Costs filed in the 1983-1984 election cycle. Although the complaint specifically listed ACTWU as a separate respondent, there are no allegations that go directly to the union. Therefore, this Office makes no recommendations with respect to ACTWU.

The same counsel was also designated by the past treasurer of the Gore Committee, Jack Wright Robinson, who joined in the response.

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the complaint on March 23, 1988. Attachment II. ACTWU-PAC and Charles Sallee, as treasurer, designated counsel, who requested an extension of time to respond to the complaint. See MUR 2584 - First General Counsel's Report, signed April 15, 1988.

Subsequently, a response was submitted on April 11, 1988.

Attachment III. ATU-COPE submitted a response, through counsel, on March 22, 1988. Attachment IV.

II. FACTUAL AND LEGAL ANALYSIS

Section 441a(f) of the Act prohibits a candidate or political committee from knowingly accepting any contribution or making any expenditure in violation of the provisions of Section 441a. Officers and employees of political committees are prohibited from knowingly accepting any contribution or making any expenditure in violation of the limitations imposed by Section 441a.

Section 441a(a)(2)(A) of the Act prohibits a multi-candidate committee from making contributions to any candidate for Federal office, or to a candidate's political committee, with respect to any election, which in the aggregate exceed \$5,000.

Section 110.2(a) (1), 5/ which pertained to contributions made by a multi-candidate committee, incorporated 11 C.F.R. § 110.1(a) (2) to define the term "with respect to any election." The definition stated that a contribution designated in writing for a particular election shall be for the election so

^{5/} The cite is to the regulation in effect during the 1984 election cycle, the period of the alleged violations. The revised regulation became effective in April 1987.

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Section 104.14(d) of the Commission's Regulations states that the treasurer of a political committee shall be personally responsible for the timely filing of complete reports and statements and for the accuracy of any information contained therein.6/

Albert Gore, Jr. was a candidate for the U.S. Senate from the state of Tennessee in the 1984 elections. He was unopposed in the primary election and won the general election with 61 percent of the vote. The Friends of Albert Gore, Jr. is the principal campaign committee for Senator Albert Gore, Jr.

SPAD, ACTWU-PAC, and ATU-COPE are multi-candidate committees in accordance with 2 U.S.C. § 441a(a)(4).

Allegations Concerning Contributions from SPAD

The complaint alleged that the Gore Committee accepted \$10,000 from SPAD for the 1984 primary election and that it

The complaint in this matter seeks to impose personal Tiability on the treasurers under this provision. The Commission, however, ordinarily has made findings of possible violations of this section against the committee and the treasurer of record in his or her official capacity. 2110 - General Counsel's Report, signed May 21, 1986.

inaccurately reported \$5,000 of that amount. The Gore Committee reported that a \$5,000 contribution was received on December 23, 1983, designated for the general election, while SPAD reported it as made on December 7, 1983, and designated it for the primary election. The complaint cited the Gore Committee's disclosure reports which, upon review by this Office, showed that the contributions from SPAD were reported as represented. As to SPAD and Marianne Rogers, as treasurer, the complaint alleged that they made excessive contributions in the amount of \$5,000 to the 1984 primary election campaign of the Gore Committee.

In his response, counsel for the Gore Committee, et al., provided copies of the letters which were transmitted with each contribution from SPAD. A letter dated June 30, 1983, designated a \$5,000 contribution for the primary election. Attachment I(18). A letter dated December 7, 1983, designated a second \$5,000 contribution for the general election. Attachment I(22). Counsel also provided copies of the pages from the Gore Committee's disclosure reports in which the contributions are disclosed. Attachment I(20) and (24). The dates of receipt as disclosed by the Gore Committee would, of course, be different from the dates on which SPAD reported making the contributions.

The written designations were made in compliance with 11 C.F.R. § 110.2(a) and the contributions were within the limitation of 2 U.S.C. § 441a(a)(2)(A). The Gore Committee

^{7/} The primary election in Tennessee was held on August 2, $\overline{1}984$.

properly reported the contributions. Therefore, this Office recommends that the Commission find no reason to believe the Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions from SPAD.

In the response on behalf of the Gore Committee, counsel noted that SPAD had initially reported the election designation for the December contribution incorrectly and that an amended report had been filed.

Marianne Rogers, treasurer of SPAD, submitted a response on their behalf. She reiterated that the two contributions from SPAD to the Gore Committee were each designated in writing, one for the primary election and the other for the general election. She also provided copies of the transmittal letters and cancelled checks. Attachment II(5) and (7).

Ms. Rogers provided copies of the relevant disclosure reports filed by SPAD. The contribution made in June was properly reported on the monthly report for that period and indicated that it was for the 1984 primary election. Attachment II(11). Ms. Rogers stated that, due to a clerical error, the December contribution was incorrectly reported for the primary election in the disclosure report covering that period.

Attachment II(2) and (15). That report was amended by the assistant treasurer to correctly disclose that the December contribution was designated for the 1984 general election.

Attachment II(19). SPAD filed that amendment on October 11, 1984, prior to the filing of the complaint in this matter.

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Based on the foregoing, this Office recommends that the Commission find no reason to believe SPAD and Marianne Rogers, as treasurer, violated 2 U.S.C. \$ 441a(a)(2)(A). This Office also recommends that the Commission find reason to believe SPAD and Marianne Rogers, as treasurer, violated 11 C.F.R. \$ 104.14(d) for failing to report accurate information in a timely manner, and take no further action.

B. Allegations Concerning Contributions from ACTWU-PAC

The complaint alleged that the Gore Committee received a total of \$6,000 from ACTWU-PAC for the 1984 general election. The complaint further alleged that the Gore Committee inaccurately reported a \$200 contribution from ACTWU-PAC by designating it for the primary election, while ACTWU-PAC had designated it for the general election.

The complaint alleged that ACTWU-PAC exceeded the contribution limitation by making a \$6,000 contribution to the 1984 general election campaign of the Gore Committee.

In his response, counsel for the Gore Committee stated that all of the contributions received from ACTWU-PAC were undesignated and, in compliance with 11 C.F.R. § 110.2(a)(1), the contributions received prior to the primary election were designated for that election on the respective disclosure reports. Attachment I(8)-(9), (26) and (28). A contribution of \$200 was received on November 26, 1983, and another in the amount of \$800 was received on December 30, 1983. A copy of a page from

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the Gore Committee's disclosure report showed that these contributions were properly reported. 8/ Attachment I(30).

Counsel for the Gore Committee further stated in the response that ACTWU-PAC made the undesignated contribution of \$5,000 to the Gore Committee on August 22, 1984, after the primary election, and therefore, it was reported for the 1984 general election. Attachment I(10). A copy of the page from the disclosure report covering the period of that contribution was submitted. Attachment I(32). Counsel noted that ACTWU-PAC made a mistake in its reporting of some of the contributions, but argued that the recipient committee should not be held liable for such mistakes. Attachment I(10)-(12).

Based on the foregoing, this Office recommends that the Commission find no reason to believe the Gore Committee and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions received from ACTWU-PAC.

The response submitted through counsel on behalf of ACTWU-PAC and Charles Sallee, as treasurer corroborated the assertions made on behalf of the Gore Committee. Attachment III(1)-(4). Counsel stated, however, that due to a clerical error the \$200 contribution made in November 1983 was inadvertently reported for the general election on the 1983 December Monthly Report.

Counsel noted that ACTWU-PAC contributed a total of \$2,600 to the Gore Committee for the 1984 primary election. Attachment I(9).

Attachment III (7). ACTWU-PAC filed an amendment to that report, dated February 12, 1988, wherein it changed the designation to the primary election. Attachment III(8). The amended report was received by the Commission on February 20, 1988, prior to the filing of the complaint in this matter; however, there was a five year delay in filing such amendment. The complaint also alleged that ACTWU-PAC failed to report the \$800 contribution made in December 1983, to the Gore 0 Committee. This disbursement was properly disclosed by ACTWU-PAC 4 in its 1983 Year-End Report. Copies of the relevant page from 0 ~ that report, the cancelled check, and the transmittal letter were 0 submitted as evidence. Attachment III(9)-(11). This Office recommends that the Commission find no reason to 0 believe ACTWU-PAC and Charles Sallee, as treasurer, violated 4 2 U.S.C. § 441a(a)(2)(A). However, this Office recommends that 0 the Commission find reason to believe ACTWU-PAC and Charles 3 00 Sallee, as treasurer, violated 11 C.F.R. § 104.14(d) for failing to report accurate information in a timely manner with respect to the 1983 December Monthly Report, and take no further action. Allegations Concerning Contributions from ATU-COPE Finally, the complaint alleged that the Gore Committee received \$6,000 for the general election from ATU-COPE, and that it failed to accurately report several of those contributions, totalling \$3,500, for the general election. The complaint alleged, in turn, that ATU-COPE exceeded the \$5,000 contribution limitation for the general election.

The Gore Committee responded that all of the contributions from ATU-COPE for the 1984 election cycle were undesignated.

Therefore, in compliance with 11 C.F.R. \$ 110.2(a)(1), the contributions received before the primary election were reported in the Gore Committee's disclosure reports for such election.

The contributions received prior to the primary election totalled \$3,500. One contribution of \$2,500 was received from ATU-COPE after the primary election and was, therefore, reported for the general election. Attachment I(12)-(15). It was noted, however, that ATU-COPE may have inaccurately reported the election designations for the pre-primary contributions. The Gore Committee provided copies of the checks, transmittal letters, and relevant pages from its disclosure reports to substantiate its assertions. Attachment I(34)-(50).

Based on the foregoing, this Office recommends that the Commission find no reason to believe the Gore Committee and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions received from ATU-COPE.

The response submitted by ATU-COPE corroborated the facts as presented by the Gore Committee. Attachment IV(1)-(3). ATU-COPE conceded that it had erroneously reported the election designation for the contributions made to the Gore Committee prior to the primary election. ATU-COPE stated that the intention was to give those contributions, totalling \$3,500, for the benefit of the primary election campaign, and, since each

such contribution was undesignated and given prior to the date of the primary election, they were clearly for such election.

ATU-COPE provided copies of the disclosure reports wherein it erroneously reported the contributions made prior to the primary election, along with copies of the cancelled checks. Attachment IV(4)-(24). On March 18, 1988, apparently following receipt of the complaint in this matter, ATU-COPE filed amendments to the appropriate disclosure reports to accurately show the election designation for each contribution made to the primary election campaign of the Gore Committee. Copies of these amendments were provided. Attachment IV(26)-(34).

Based on the foregoing, this Office recommends that the Commission find no reason to believe ATU-COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). However, due to the inaccurate reporting of certain contributions and the lengthy period of time taken by ATU-COPE to amend its reports (approximately 5 years), this Office recommends that the Commission find reason to believe ATU-COPE and Mr. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.

D. Allegations Pertaining to Senator Gore

In connection with all of the contributions discussed above, there is no evidence presented in the complaint or in the different reponses to substantiate that Senator Gore, as an agent for his principal campaign committee, accepted excessive contributions. Therefore, this Office recommends that the

- 12 -Commission find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f). III. RECOMMENDATIONS 1. Find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f). 2. Find no reason to believe Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 44la(f) and 11 C.F.R. § 104.14(d). 3. Find no reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). Find reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action. 0 5. Find no reason to believe Amalgamated Clothing and Textile 2 Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). 6. Find reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action. 4 7. Find no reason to believe Seafarers Political Activity 0 Donation and Marianne Rogers, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). 00 0 8. Find reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action. 9. Approve the attached letters. 10. Close the file. Lawrence M. Noble General Counsel 5/6/88 BY: Associate General Counsel

- 13 -Attachments Response from Senator Gore, the Gore Committee and its treasurers 2. Response from SPAD
Response from ACTWU-PAC
Response from ATU-COPE 3. 4. Letters(5) 5. Staff Person: Sandra H. Robinson 0 5 0 1 0 ~ 0 4 0 00 00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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Senator Albert Gore, Jr.

Friends of Albert Gore, Jr. and William P. Puryear, as treasurer

Amalgamated Transit Union-COPE and Raymond C. Wallace, as treasurer

Amalgamated Clothing and Textile Workers
Union

Amalgamated Clothing and Textile Workers Union-Political Action Committee and Charles Sallee, as treasurer

Seafarers Political Activity Donation and Marianne Rogers, as treasurer

MUR 2584

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2584:

- Find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f).
- 2. Find no reason to believe Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d).
- 3. Find no reason to believe Amalgamated Transit Union COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
- 4. Find reason to believe Amalgamated Transit Union COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.

(Continued)

- 5. Find no reason to believe Amalgamated Clothing and Textile Workers Union Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 44la(a)(2)(A).
- 6. Find reason to believe Amalgamated Clothing and Textile Workers Union Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
- 7. Find no reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
- 8. Find reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
- 9. Approve the letters, as recommended in the General Counsel's report signed May 6, 1988.
- 10. Close the file.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision;

Commissioner McDonald did not cast a vote.

Attest:

5-11-88

Date

Marjorie W. Emmons Secretary of the Commission

your W. Emmons

Received in the Office of Commission Secretary:Fri., 5-6-88, 4:31 Circulated on 48 hour tally basis: Mon., 5-9-88, 4:00

Deadline for vote: Wed., 5

Wed., 5-11-88, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 16, 1988

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael Ernest Avakian Center on National Labor Policy 5211 Port Royal Road, Suite 400 North Springfield, Virginia 22151

RE: MUR 2584

Dear Mr. Avakian:

On May 11, 1988, the Federal Election Commission reviewed the allegations of the complaint of your client, Ray O. Brooks, Jr., dated March 1, 1988, and found that, on the basis of the information provided in your complaint and information provided by the respondents, there is no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f) or that Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). On that same date, the Commission found no reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission also found reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Unions - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission determined to take no further action against Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Union -Political Action Committee and Charles Sallee, as treasurer.

Accordingly, on May 11, 1988, the Commission closed the file in this matter. The Federal Election Campaign Act of 1971, as amended ("the Act"), allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Michael Ernest Avakian Page 2 Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. \$ 437g(a)(1) and 11 C.F.R. \$ 111.4. Sincerely, Lawrence M. Noble General Counsel Lois G. Lerner BY: Associate General Counsel 7 Enclosure S General Counsel's Report 0 Ray O. Brooks, Jr. cc: 3 1020 Suzanne Avenue Knoxville, Tennessee 37920 0 0 4 0 9 00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 16, 1988

Donald J. Simon, Esquire Sonosky, Chambers & Sachse 1250 Eye Street, N.W., Suite 1000 Washington, D.C. 20005

RE: MUR 2584

Senator Albert Gore, Jr.; Friends of Albert Gore, Jr. and William P. Puryear, as treasurer

Dear Mr. Simon:

On March 8, 1988, the Federal Election Commission notified your clients, Senator Albert Gore, Jr., Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Senator Albert Gore, Jr. violated 2 U.S.C. § 441a(f) and no reason to believe that Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2584

DATE FILMED 6/3/88 CAMERA NO. 2

CAMERAMAN K.A.U.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2524

DATE FILMED 43/88 CAMERA NO. 2

CAMERAMAN K.A.U.

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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

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THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 2584.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 1988

Robert A. Molofsky, Esquire Amalgamated Transit Union 5025 Wisconsin Avenue, N.W. Washington, D.C. 20016-4139

RE: MUR 2584

Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer

Dear Mr. Molofsky:

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CC.

On March 8, 1988, the Federal Election Commission notified your clients, Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission found reason to believe that your clients, Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that certain contributions made to the Friends of Albert Gore, Jr. Committee were reported inaccurately and amendments to such reports were not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

Robert A. Molofsky Page 2

If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Thomas J. Josefiak

Chairman

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 1, 1988

Marianne Rogers, Treasurer Seafarers Political Activity Donation 5201 Auth Way Camp Springs, Maryland 20746

RE: MUR 2584
Seafarers Political
Activity Donation and
Marianne Rogers, as
treasurer

Dear Ms. Rogers:

On March 8, 1988, the Federal Election Commission notified Seafarers Political Activity Donation ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by you, that there is no reason to believe Seafarers Political Activity Donation and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission found reason to believe that Seafarers Political Activity Donation and you, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that a contribution made to the Friends of Albert Gore, Jr., Committee was reported inaccurately and an amendment to such report was not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

Marianne Rogers Page 2 If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200. Sincerely, Thomas J. Josefiak Chairman Enclosure General Counsel's Report LA 0

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Jean Grumet, Esquire
Amalgamated Clothing and
Textile Workers Union
15 Union Square
New York, New York 10003-3377

RE: MUR 2584
Amalgamated Clothing and
Textile Workers Union Political Action
Committee and Charles

Committee and Charles Sallee, as treasurer

Dear Ms. Grumet:

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On March 8, 1988, the Federal Election Commission notified your clients, Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission found reason to believe that your clients, Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that certain contributions made to the Friends of Albert Gore, Jr., Committee were reported inaccurately and amendments to such reports were not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

Jean Grumet
Page 2 The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Please send such materials to the General Counsel's Office. If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200. Sincerely, Thomas J. Chairman Enclosure General Counsel's Report 1 0 0

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