



FEDERAL ELECTION COMMISSION

1200 K STREET, N.W.
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 376





1400 1841

1400 1841



PROBATION

UNITED STATES NOTES - "OUR MONEY" (WE CAN
TRUST, "REAL MAIL" - GUARANTEED!)



IF THESE, "NOTES" ARE "LEGAL TENDER," WHAT
IS A, "DOLLAR?" WHO HAS ALL OUR, "DOLLARS?"







FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20543

February 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Proofrock
20814 South Hawaiian Avenue
Lakewood, CA 90715

Re: MUR 376(76)

Dear Mr. Proofrock:

The Federal Election Commission has terminated its investigation of your complaint in MUR 376.

Under 2 U.S.C. §441b, a union is prohibited from making contributions in connection with elections to Federal office. As stated in your complaint and the newsletter, CWA Local 11586's Executive Board voted to send \$50 monthly to CWA COPE. CWA COPE uses the money for political education only; it does not support Federal candidates and thus contributions to it from Local 11586 do not violate the Federal Election Campaign Act of 1971, as amended ("the Act").

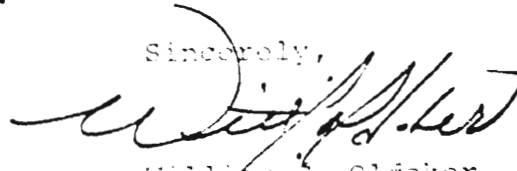
A separate segregated fund, CWA COPE Political Contributions Committee, contributes to Federal candidates and can accept only voluntary contributions. Although our investigation found that one contribution from a union local was accepted by the predecessor committee to the CWA COPE Political Contribution Committee, that contribution was transferred to CWA COPE in what the Commission determined to be substantial voluntary compliance with the Act.



Accordingly upon my recommendation, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,



William C. Oldaker
General Counsel

MUR 376 *Thedford*

PS Form 3811, Apr 1977

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

1. The following service is requested (check one):
☒ Show to whom and date delivered
Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. John Proctor
30814 S. Hawaiian Ave.
La Habra, CA 90715

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
643144

(Always obtain signature of addressee or agent)

I have received the article described above:
SIGNATURE _____ Address _____ Authorized agent _____

4. DATE OF DELIVERY *2/6/78* POSTMARK *FEB 6 1978*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS _____

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1101 N. STREET, N.W.
WASHINGTON, D.C. 20543

February 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William C. Demers
Treasurer
CWA District 11 Political
Action Committee
3340 Wilshire Boulevard
Suite 915
Los Angeles, CA 90010

RE: MUR 376(77)

Dear Mr. Demers:

On February 1, 1978, the Federal Election Commission found no reasonable cause to believe that CWA District 11 Political Action Committee violated 2 U.S.C. §441b in connection with possible contributions from certain union locals.

Specifically, the Commission found:

(1) The transfer of \$125 from CWA COPE PCC to the CWA District 11 Political Education Committee constituted substantial voluntary compliance with the Act in connection with the contribution from Local 11532.

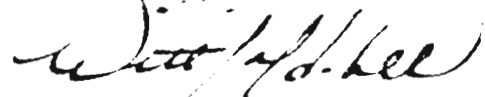
(2) The contributions which were reported as being made by Locals 11500, 11531, and 11538 were, in fact, lawful voluntary contributions from union members.



Accordingly, upon my recommendation, the Commission has decided to close its file in this matter. A copy of the Commission's certification and General Counsel's Report is enclosed for your information.

If you have any further questions, please contact Judy Thorford, the staff member assigned to this matter, at 202-523-4166.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

MUR 376 *Thorford*

● SENDER Complete items: Add your address in the "RETURN TO" space on reverse	
1. The following service is requested (check one): ☒ Show to whom and date delivered ☐ Show to whom, date, and address of delivery ☐ RESTRICTED DELIVERY ☐ Show to whom and date delivered ☐ RESTRICTED DELIVERY ☐ Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>Mr. William Demers</i> <i>3540 Wilshire Blvd. Suite 815</i> <i>Los Angeles, CA 90010</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>943145</i>	CERTIFIED NO. _____ INSURED NO. _____
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE _____ Address _____ Authorized agent _____	
4. DATE OF DELIVERY _____	POSTMARK <i>APR 16 1977</i>
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE _____	CLERK'S INITIALS _____

PS Form 3811 Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
CWA District 11 Political)
Action Committee)

MUR 376 (76)

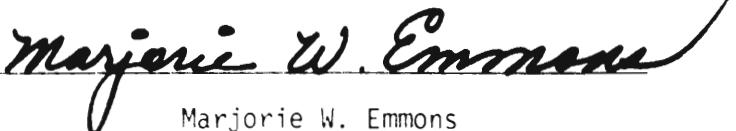
CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 1, 1978, the Commission determined by a vote of 5-0 to adopt the following recommendations of the General Counsel in reference to the above-captioned matter:

1. Find no reasonable cause to believe a violation of 2 U.S.C. Section 441b has been committed by CWA District 11 PAC in that substantial voluntary compliance was achieved with respect to the \$125 contribution from Local 11502 and the contributions reported as coming from Locals 11500, 11501, and 11588 were, in fact, voluntary contributions from individual members and not prohibited by the Act or Regulations.
2. Send the draft letters attached to the FEC General Counsel's report dated January 18, 1978.

Commissioner Springer was not present at the time of the vote on this matter.

Accordingly, this file has been closed.



Marjorie W. Emmons
Secretary to the Commission

January 19, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 376 Team #3 Thedford

Please have the attached General Counsel's Report on MUR 376 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of February 1, 1978.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

January 5, 1978

EXECUTIVE DIVISION

In the Matter of)
)
) MUR 376(76)
CWA District 11 Political)
Action Committee)

GENERAL COUNSEL'S REPORT

I. Allegations

The complaint¹ originally alleged that CWA Local 11586 violated 2 U.S.C. §441b when the Executive Board voted to send \$50 monthly to CWA COPE. In our review of the disclosure reports filed by CWA COPE PCC and the district level PACs concerning the complainant's allegation, it appeared that many locals had contributed to CWA PACs which would be in violation of 2 U.S.C. §441b.

On May 5, 1977, the Commission referred this matter to the Disclosure Division. The Disclosure Division noted four contributions to CWA District 11 PAC from labor

¹The complaint was originally filed with the Department of Justice and forwarded to the Commission. The complainant was contacted by the Commission and refiled the complaint with the Commission.

union locals. The contributions which appeared to violate 2 U.S.C. §441b are listed below:

CWA Local 11502	5-14-76	\$125.00
CWA Local 11501	5-14-76	304.00
CWA Local 11588	5-21-76	86.25
CWA Local 11500	5-25-76	700.00

II. Evidence

The Disclosure Division was unable to obtain clarification from CWA District 11 PAC regarding the contributions reported from labor union locals.

A summary of those attempts is listed in the previous General Counsel's Report.

On August 3, 1977, the General Counsel's Office contacted Mr. Demers, Treasurer of CWA District 11 PAC, and notified him that this matter had been referred to our office. Mr. Demers said his response would follow; however, a response was not received.

On August 25, 1977, the Commission subpoenaed CWA District 11 PAC to respond. The Commission received the attached documentation (Exhibit A) on September 8, 1977 in response to the subpoena. One contribution of \$125 was acknowledged by the respondent to be a union contribution in violation of 2 U.S.C. §441b. The res-

pondent stated that said contribution would be returned to the local. The other entries were explained as "free money" voluntary contributions.

On October 19, 1977, the Commission voted to defer final action in this matter until a copy of a CWA COPE PCC² cancelled check (front and back) was submitted as evidence that the \$125 contribution had been returned to the local. In addition, the Commission asked for a detailed explanation of the term "free money", used in connection with reported contributions from Locals 11501, 11588, and 11500; and the term "Transfer of funds free money for Treasury money" used in connection with Local 11501's contribution.

The respondent did not make a timely response to our notification. We contacted Mr. Demers by telephone on November 18, 1977. He explained his delay in replying as resulting from complications in contacting past presidents of the locals for an explanation of the terms.

We received Mr. Demers' response (Exhibit B), on November 29, 1977. The explanation of the term "Transfer of funds free money for Treasury money" was

²
CWA District 11 PAC terminated on the July 10, 1976, report. All funds were transferred to CWA COPE PCC.

somewhat ambiguous as to whether individual contributors or the local was reimbursed; and whether the individual "free money" contributions were segregated by the local or commingled with the local's treasury funds before being sent to the CWA District 11 PAC.

On November 29, 1977, we tried to contact Mr. Demers, but he was out of town. Ms. Dee Mack, who said she had actually prepared the responses, called the Commission on December 2, 1977. She explained the reimbursements by stating that the district union's general treasury reimbursed the local's general treasury for the same amount of money as the local union had raised in voluntary contributions and forwarded to the CWA District 11 PAC.

On December 5, 1977, we reached Mr. Demers and asked about possible commingling of dues money and voluntary "free money" by the local. Mr. Demers stated the local forwarded the individual contributor's checks directly to the CWA District 11 PAC.

III. Analysis

A. Union Contribution

The copy of CWA COPE PCC's check³(front and back)

³It should be noted that the union treasury money from Local 11502 was not returned to the local; instead, CWA COPE PCC transferred \$125 to CWA District 11 Political Education Committee.

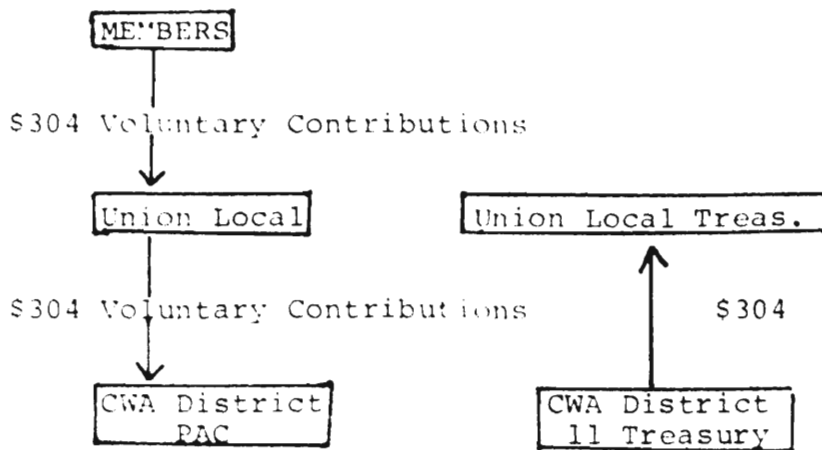
to CWA District 11 Political Education Committee (Attachment B) is evidence that the \$125 contribution in violation of 2 U.S.C. §441b has been withdrawn from CWA District 11 CWA COPE separate segregated fund. This appears to place the respondent in substantial voluntary compliance with the Act.

B. "Free Money"

The explanation of the term "free money" given by the respondent (Attachment B) as "voluntary individual contributions" appears to be within the meaning of "Voluntary contributions to a separate segregated fund" as defined in 11 C.F.R. §114.5(a).

C. "Transfer of Funds Free Money for Treasury Money"

The respondent described this term as a reimbursement to the local treasury from the district treasury in an amount equal to the local's members voluntary contributions to the district political action committee. The situation is diagrammed below:



Reimbursing a local's treasury with funds from the district treasury does not appear to violate 2 U.S.C. §441b or 11 C.F.R. §114.5. CWA District 11 Political Action Committee received individual contributors' checks in a total amount of \$304 from Local 11501 members. There is no evidence of commingling of voluntary funds with treasury funds. Transferring treasury money from a district to a union local by itself does not violate the Act.⁴

⁴It should be noted that the district's reimbursing the local's treasury under these facts could be interpreted as an exchange of treasury money for voluntary contributions which is prohibited by 11 CFR §114.5(b); and the reimbursement process thereby would be considered an incentive or prize for soliciting voluntary contributions. Such use of funds would be subject to the 3-1 ratio prescribed in 11 CFR §114.5(b)(2).

The conference committee report (Attachment C) discusses 11 CFR §114.5 in terms of union/corporate treasury monies being used for the solicitation of voluntary con-



FEDERAL ELECTION COMMISSION

1100 STREET NW
WASHINGTON, DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Proefrock
20814 South Hawaiian Avenue
Lakewood, CA 90715

Re: MUR 376(76)

Dear Mr. Proefrock:

The Federal Election Commission has terminated its investigation of your complaint in MUR 376.

Under 2 U.S.C. §441b, a union is prohibited from making contributions in connection with elections to Federal office. As stated in your complaint and the newsletter, CWA Local 11586's Executive Board voted to send \$50 monthly to CWA COPE. CWA COPE uses the money for political education only; it does not support Federal candidates and thus contributions to it from Local 11586 do not violate the Federal Election Campaign Act of 1971, as amended ("the Act").

A separate segregated fund, CWA COPE Political Contributions Committee, contributes to Federal candidates and can accept only voluntary contributions. Although our investigation found that one contribution from a union local was accepted by the predecessor committee to the CWA COPE Political Contribution Committee, that contribution was transferred to CWA COPE in what the Commission determined to be substantial voluntary compliance with the Act.



- 2 -

Accordingly upon my recommendation, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1100 STREET N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William C. Demers
Treasurer
CWA District 11 Political
Action Committee
3540 Wilshire Boulevard
Suite 615
Los Angeles, CA 90010

Re: MUR 376(76)

Dear Mr. Demers:

On January 1978, the Federal Election Commission found no reasonable cause to believe that CWA District 11 Political Action Committee violated 2 U.S.C. §441b in connection with possible contributions from certain union locals.

Specifically, the Commission found:

(1) The transfer of \$125 from CWA COPE PCC to the CWA District 11 Political Education Committee constituted substantial voluntary compliance with the Act in connection with the contribution from Local 11502.

(2) The contributions which were reported as being made by Locals 11500, 11501, and 11588 were, in fact, lawful voluntary contributions from union members.



- 2 -

Accordingly, upon my recommendation, the Commission has decided to close its file in this matter. A copy of the Commission's certification and General Counsel's Report is enclosed for your information.

If you have any further questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4166.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

ATTACHMENT A

CWA COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN
AFFILIATED WITH AFL-CIO

2540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3171

SEP 27 1977

THANKS HEADQUARTERS
CWA DISTRICT ELEVEN

September 9, 1977

File: 1.34

770911

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

Re: The District Eleven Political Action Committee

Dear Sirs:

In response to your Subpoena dated August 25, 1977 to produce Books, Records, and other relevant Documents pertaining to the CWA District Eleven Political Action Committee, we are enclosing herewith Xerox copies of all of our accounting records.

Further investigation into this matter, and in particular to the items indicated in yellow in your original attachment, reveals the following pertinent information:

CWA Local 11502 - \$125.00 - \$125.00 did represent treasury money and therefore we are requesting (see attached letter) the CWA-COPE PCC Account (free money account in Washington, D.C.) to make the refund.

CWA Local 11501 - \$304.00 - Represents voluntary contributions raised by the membership at a Dance (free money).

CWA Local 11501 - \$6.35 - Represents voluntary contributions raised by the membership at a Dance (free money).

Federal Election Commission
September 6, 1977
Page Two

CWA Local 11500 - \$700.00 - Cashier's Check was drawn out of a Savings Account in which they deposit voluntary contributions for CWA Local 11500 CWA. This Savings Account is held at the Security Pacific Bank at 6th and Spring Branch, Los Angeles, California.

I trust the above clarification is self-explanatory.

Sincerely,

W.C. Demers
by Nina S. Beaumont

W. C. Demers
Treasurer
CWA District 11
Political Action Committee

per Nina S. Beaumont, Chairperson

DCB/la
Attachments

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

cc: I. Maria Bowen



COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN
AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

DINA G. BEAUMONT
VICE PRESIDENT

September 6, 1977

File: 1.34

CWA-COPE POC
1835 K Street, N. W.
Washington, D. C. 20006

Attention: Loretta Bowen

Re: CWA District Eleven Political Action Committee

Gentlemen:

This is to request a refund be made out of CWA-COPE POC Account (free money account) in the amount of \$125.00. This refund is requested since as a result of our investigation we find that CWA Local 11502 made a contribution to the CWA District Eleven Political Action Account of Local treasury funds.

Please make this refund immediately.

Fraternally,

Dina G. Beaumont
Chairperson
CWA District Eleven
Political Action Committee

3/13/4-

cc: James B. Booe
Federal Elections Commission

Deposits

1926 DATE	ITEM	AMOUNT
5-14	Local 11502 - Money (money) 4/24/26	125.00 *
	Local 11501 - Money (money) for Money (money) Mr. A. Martin Philip S. Hammer Michael S. Frankie Mr. A. Martin Mrs. Jack Turner Frankie Mr. A. Martin for money (money) (cash)	30.00 * 100.00 50.00 50.00 50.00 50.00 50.00 50.00 50.00 50.00 72.00
5-21	Local 11500 Money (money) Local 11501 Money (money) Local 11502 Money (money)	86.25 * 75.00 90.20 200.00
	Local 11503 Money (money) Local 11504 Money (money)	700.00 * 50.00 50.00 50.00



ATTACHMENT B

ACC# 2098
NEW

COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN
AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

MUR 376

DINA G. BEAUMONT
VICE PRESIDENT

November 21, 1977

File 1.22

Mr. William Oldaker
Federal Election Commission
1324 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

In response to your three queries in your correspondence dated October 31, 1977, received at this office on November 3, 1977 and received by me on November 10, 1977, please be advised—

1. "Free Money" is a misnomer used to indicate voluntary individual contributions. "Free" indicated it is free from restrictions under Federal law for use in Federal campaigns.
2. "Transfer of funds free money for treasury money" - This was a clerical notation indicating the voluntary individual contribution was "Free" to be used in Federal campaigns. 11501 contributed \$304.00 of voluntary individual contributions (free money) for use by the District Eleven Political Action Committee. They were reimbursed in the same amount in Treasury funds (non-free). It is my understanding that the law does not require reporting and disclosure on this item.
3. Enclosed is a copy of CWA-COPE PAC's cancelled check (front and back) acknowledging the \$125.00 return of contribution.

Hoping this information is satisfactory, I remain,

Sincerely,

W.C. Demers
W.C. Demers, Treasurer
CWA District Eleven
Political Action Committee

WCD:jim ope 3, afl-cio (233)

Encl.

Certified Mail - Return Receipt Requested

cc: Loretta Bowen

CWA COPE-PCC
1925 K STREET, N.W.
WASHINGTON, D.C. 20006

109

9/15/77 19

1-337
200

PAY TO THE ORDER OF CWA DISTRICT 11 POLITICAL EDUCATION COMMITTEE \$ 125.00

*****ONE HUNDRED TWENTY-FIVE DOLLARS AND NO/100***** DOLLARS

The Amalgamated Bank of New York
111 NASSAU SQUARE
NEW YORK, N.Y.

⑆0260⑉0337⑆ 01011081⑈

⑈0000012500⑈

9 6 7

80 0210 0120 0 FFB NY 0210 0120 0
80 PAY ANY BANK 32 1377

5
26
9

9 6 7

80 0210 0120 0 FFB
80 PAY ANY BANK

0210 0120 0
COMM

0210 0120 0
COMM

10.7

[illegible][illegible]

It is the Government's policy to support the development of the home textile industry. This industry is the backbone of the textile industry in the United States. It is the Government's policy to support the development of the home textile industry. This industry is the backbone of the textile industry in the United States. It is the Government's policy to support the development of the home textile industry. This industry is the backbone of the textile industry in the United States.

December 16, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 376 Team #3 Thedford

Please have the attached Interim Report on MUR 376 distributed to the Commission and placed on the Compliance Agedda for the Commission meeting of December 21, 1977.

Thank you.

In the Matter of)
)
CWA District 11 Political) MUR 376 (77)
Action Committee

INTERIM REPORT

On October 19, 1977, the Commission accepted the recommendation of the General Counsel to defer final determination in this matter until the Commission received evidence proving that the \$125 contribution which represented union treasury money had been returned to Local 11502. As evidence, the Commission requested a copy of the check (front and back) from CWA-COPE PCC to Local 11502 or a receipt from Local 11502. In addition, the Commission requested a detailed explanation of respondent's use of the term "free money" on its deposit listings.

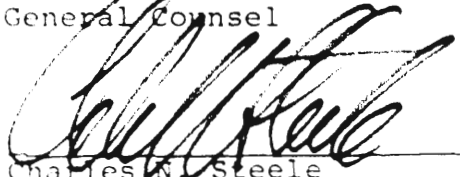
When respondent did not respond to our notification, we contacted Mr. Demers, treasurer of CWA District 11 Political Action Committee. On November 18, 1977, Mr. Demers explained that he had been delayed in replying because of complications in trying to contact the president of the local for an explanation of the term "free money". The response was received on November 29, 1977 (see Attachment I).

- 2 -

Respondent's explanation of the term "Transfer of funds free money for Treasury money" was somewhat unclear as to who gets "reimbursed" with the treasury funds (the local union of the individual contributors); and whether the individual "free money" contributions are somehow segregated by the local or commingled with treasury funds before being sent to the District 11 Political Action Committee. After several conversations with Mr. Demers and a CWA District 11 staff member, we have obtained the necessary clarification of the phrase and we expect to present the General Counsel's report and recommendation at the next Commission meeting.

16 December 1977
DATE

William C. Oldaker
General Counsel



Charles W. Steele
Associate General Counsel



COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN

AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

MUR 376

DINA G. BEALMONT
VICE PRESIDENT

November 31, 1977

File 1.22

Mr. William Oldaker
Federal Election Commission
1334 K Street N.W.
Washington, D.C. 20543

Dear Mr. Oldaker:

In response to your three queries in your correspondence dated October 31, 1977, received at this office on November 3, 1977 and received by me on November 10, 1977, please be advised—

1. "Free Money" is a misnomer used to indicate voluntary individual contributions. "Free" indicates it is free from restrictions under Federal law for use in Federal campaigns.
2. "Transfer of funds free money for treasury money" - This was a clerical notation indicating the voluntary individual contribution was "Free" to be used in Federal campaigns. 11501 contributed \$404.00 of voluntary individual contributions (free money) for use by the District Eleven Political Action Committee. They were reimbursed in the same amount in Treasury funds (non-free). It is my understanding that the law does not require reporting and disclosure on this item.
3. Enclosed is a copy of CWA-COPE POC's cancelled check (front and back) acknowledging the \$105.00 return of contribution.

Hoping this information is satisfactory, I remain,

Sincerely,

W.C. Demers
W.C. Demers, Treasurer
CWA District Eleven
Political Action Committee

WCD:ajm ope 3, afl-cio (233)

Encl.

Certified Mail - Return Receipt Requested

cc: Loretta Bowen

ATTACHMENT I

CWA COPE-PCC
1925 K STREET, N.W.
WASHINGTON, D.C. 20006

109

9/15/77 19

1-337
200

PAY TO THE ORDER OF CWA DISTRICT 11 POLITICAL EDUCATION COMMITTEE \$ 125.00

*****ONE HUNDRED TWENTY-FIVE DOLLARS AND NO/100***** DOLLARS

The Amalgamated Bank of New York
1115 UNION SQUARE
NEW YORK, N.Y.

⑆0260⑉0337⑆ 01011081⑈

⑈0000012500⑈

967

CC 021001208 FPD NY 021001208
CC PAY ANY BANK 83 1977

26
9

CC 021001230
CC PAY ANY BANK

05202

COMMUNICATIONS SECTION

NEW YORK CITY

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NEW YORK CITY

NEW YORK CITY

Doc. 2131

underneath

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J. P. PROFFROCK



UNITED STATES OF AMERICA
FEDERAL RESERVE NOTE

UNITED STATES OF AMERICA
FEDERAL RESERVE NOTE

UNITED STATES OF AMERICA
FEDERAL RESERVE NOTE
WE WILL ALL OUR, TWO DOLLARS



FEDERAL BUREAU OF INVESTIGATION

NOV 28 AM 4:47



AMSTERDAM

POSTAL TELEGRAPH
UNITED STATES



100-2098
ALM



COMMUNICATIONS WORKERS OF AMERICA

DISTRICT ELEVEN

AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

MUR 536

DINA G. BEAUMONT
VICE-PRESIDENT

November 11, 1977

File 1.22

Mr. William Clicker
Federal Election Commission
1111 F Street, N.W.
Washington, D.C. 20543

Dear Mr. Clicker:

In response to your three queries in your correspondence dated October 11, 1977, received at this office on November 3, 1977 and repeated by me on November 17, 1977, please be advised--

1. "Free Money" is a misnomer used to indicate voluntary individual contributions. "Free" indicates it is free from restrictions under Federal law for use in Federal campaigns.
2. "Transfer of funds from free money for treasury money" - This was a clerical notation indicating the voluntary individual contribution was "Free" to be used in Federal campaigns. 11501 contributed \$304.00 of voluntary individual contributions (free money) for use by the District Eleven Political Action Committee. They were withdrawn in the same amount in Treasury funds (non-free). It is my understanding that the law does not require recording and disclosure on this item.
3. Enclosed is a copy of WA-CORE PAC's cancelled check (front and back) acknowledging the \$155.00 return of contribution.

Very truly yours, Dina G. Beaumont, Treasurer,

Enclosed,

Dina G. Beaumont
Treasurer
1111 F Street, N.W.
Washington, D.C. 20543

(213) 387-3371

cc:

Registered Mail - Return Receipt Requested

cc: Loretta Brown

CWA COPE-PCC
1925 K STREET, N.W.
WASHINGTON, D.C. 20006

109

9/15/77 19

1337
109

PAY TO THE
ORDER OF

CWA DISTRICT 11 POLITICAL EDUCATION COMMITTEE

\$ 125.00

*****ONE HUNDRED TWENTY-FIVE DOLLARS AND NO/100***** DOLLARS

The Amalgamated Bank of New York
111 UNION SQUARE
NEW YORK, N.Y.

⑆0260⑉0337⑆ 01011081⑈

⑈0000012500⑈

00 0210 0170 0 FRS NY 010170 0
00 PAY ANY BANK 33 1377

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9

00 0210 0120 0
00 PAY ANY BANK

00202
COMM

201476





FEDERAL ELECTION COMMISSION

1100 STREET NW
WASHINGTON, D.C. 20543

October 28, 1977

MEMORANDUM

TO : Kent C. Cooper
Disclosure Division

THROUGH : William C. Oldaker *Rice*
General Counsel

FROM : Judy Thedford

SUBJECT : CWA COPE PCC

On October 19, 1977 the Commission voted to refer the following matter to the Disclosure Division for further action.

In review of disclosure reports pertaining to a compliance matter, it was revealed that the CWA COPE PCC has failed to report the following transfers to CWA District 11 Political Action Committee:

10-23-75	\$ 72.50
11-18-75	10.00
12-23-75	48.25
12-30-75	750.00
4-9-76	10.50
4-27-76	530.00

These transfers are reported by CWA District 11 PAC as transfers in from CWA COPE PCC (reports attached).

cc: Commission Secretary



for a Candidate or
Principal Campaign Committee
(To be used only in campaigns in which gross receipts or expenditures do not exceed \$50,000 per election and the candidate has authorized only the principal campaign committee)

10:37

1. 11th DISTRICT ELEVEN. POLITICAL ACTION COMMITTEE
Name of Candidate or Committee (in full)
Washington, D.C., Suite 815
Address (number and street)
Washington, D.C.
City, State, and ZIP Code ☐ Check if address is different than previously reported

2. I.D. # 95-6541298

3. Office Sought _____ State/District _____

4. Type of Report
☒ April 10 Report ☐ October 10 Report ☐ Tenth Day Pre-Election Report
☐ July 10 Report ☐ January 31 Report ☐ Thirtieth Day Post-Election Report

Check if appropriate ☐ Amended filing ☒ Termination Report

SUMMARY OF RECEIPTS AND EXPENDITURES

5. Covering Period <u>April 1, 1976</u> through <u>June 30, 1976</u>		This period	Calendar year to
6. Cash on Hand January 1, 1976			<u>1,378.67</u>
7. Cash on Hand at beginning of reporting period		<u>1,472.67</u>	
8. Receipts			
Itemized (use schedule 6A)		<u>2,275.45</u>	
Unitemized		<u>-</u>	
Total Receipts		<u>2,275.45</u>	<u>2,605.45</u>
9. Expenditures			
Itemized (use schedule 6B)		<u>3,754.12</u>	
Unitemized		<u>-</u>	
Total Expenditures		<u>3,754.12</u>	<u>4,054.12</u>
10. Cash on Hand at close of reporting period		<u>-0-</u>	
11. Debts and obligations owed to the committee (use schedule 6C)		<u>-0-</u>	
12. Debts and obligations owed by the committee (use schedule 6C)		<u>-0-</u>	

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

June 30, 1976 (Date)
[Signature] (Signature of Treasurer for committee report, Signature of Candidate for candidate report)
Chairperson

Note: Submission of false, amended, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §441. (Text on reverse side of form)

Loans, Rebates, and Transfers

(Indicate the type for each entry)
(See Instructions on back)

Page 2 of 6 Pages

Name of Candidate or Committee in full
CWA DISTRICT ELEVEN POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code CWA Local 11502 1100 K Street, N.W. Washington, D.C. 20002	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 4/9/76 4/11/76	Amount of each receipt this period 10.50 530.00
Principal place of business CWA Local 11502 1100 K Street, N.W. Washington, D.C. 20002	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 530.00		
Full Name, mailing address and ZIP code CWA Local 11502 6116 Hollywood Boulevard, Suite 100 Los Angeles, CA 90028	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 125.00
Principal place of business CWA Local 11502 6116 Hollywood Boulevard, Suite 100 Los Angeles, CA 90028	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 125.00		
Full Name, mailing address and ZIP code CWA Local 11501 3010 South Flower Street, Suite 100 Los Angeles, CA 90015	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 314.00
Principal place of business CWA Local 11501 3010 South Flower St., Suite 100 Los Angeles, CA 90015	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 314.00		
Full Name, mailing address and ZIP code William R. Martin Communications Workers of America 3540 Wilshire Boulevard, Suite 100 Los Angeles, CA 90010	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76 5/14/76 5/14/76	Amount of each receipt this period 100.00 50.00 50.00
Principal place of business William R. Martin CWA, 3540 Wilshire Blvd., Suite 100 Los Angeles, CA 90010	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 200.00		
Full Name, mailing address and ZIP code Philip G. Hanneman CWA Local 11511, P.O. Box 755 San Marcos, CA 92069	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 50.00
Principal place of business Philip G. Hanneman, CWA Local 11511 P.O. Box 755 San Marcos, CA 92069	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 50.00		
Full Name, mailing address and ZIP code Philip G. Hanneman CWA Local 11511, P.O. Box 755 San Marcos, CA 92069	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 50.00
Principal place of business Philip G. Hanneman, CWA Local 11511 P.O. Box 755 San Marcos, CA 92069	Occupation ☐ Check if contributor is self-employed Receivable for ☐ primary ☐ general Aggregate Year-to-Date Δ \$ 50.00		
Total amount reported this page Δ			\$ 1,000.00
Total amount reported first page on VI Δ			\$

C00039412

3 1/2
FEDERAL ELECTION COMMISSION

76 FEB 4 A9:19

WASHINGTON, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES
FOR A
POLITICAL COMMITTEE
SUPPORTING ANY CANDIDATE(S) FOR NOMINATION OR ELECTION TO
FEDERAL OFFICE

76030091994
CWA DISTRICT 11 - POLITICAL
(Full Name of Committee)

ACTION COMMITTEE - 95-4541298

3540 WILSHIRE BLVD.
(Street)

☐ Check if New Address LOS ANGELES, CALIF. 90010
(City, State, ZIP code)

TYPE OF ELECTION

☐ PRIMARY ☐ GENERAL ☐ SPECIAL ☐ RUNOFF ☐ CONVENTION OR CAUCUS

TYPE OF REPORT

☐ 10 DAY PRE-ELECTION ☐ 30 DAY POST-ELECTION

☐ APRIL 10 ☐ AMENDMENT TO _____ REPORT
☐ JULY 10 ☐ SUSPENSION
☐ OCTOBER 10 ☐ TERMINATION
☒ JANUARY 10

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS REPORT INCLUDING SCHEDULES AND STATEMENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND COMPLETE.

William E. Demers
Signature of Treasurer of Committee

1-30-76
Date

RETURN COMPLETED REPORT AND ATTACHMENTS TO:

FEDERAL ELECTION COMMISSION
1225 K STREET, N.W.
WASHINGTON, D.C. 20463

(U) For Handling Page 1, 2, 3, 4

TOTAL THIS PERIOD 1,580.7
(Last page of this Part only)



FEDERAL ELECTION COMMISSION

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

October 31, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Demers, Treasurer
CWA District 11 Political
Action Committee
3540 Wilshire Boulevard
Suite 815
Los Angeles, CA 90010

Re: MUR 376

Dear Mr. Demers:

We acknowledge receipt of certain documentation from your committee concerning contributions from several labor union locals listed on your committee's July 10, 1976 disclosure report.

The Commission requests that you provide a more detailed explanation of your use of the term "free money" on your deposit listing (copy enclosed) in connection with the contributions reported from Locals 11501, 11588, and 11500; specifically, the Commission requests that you explain the meaning of the entry "Transfer of funds free money for Treasury money" in connection with the contribution from Local 11501.

The Commission also requests that a copy of CWA-COPE PCC's cancelled check (front and back), or a receipt from Local 11502 acknowledging the repayment of \$125, be submitted to evidence return of the contribution.



The Commission is under a duty to conduct its investigations expeditiously. Therefore, we request that you submit the requested materials within ten days of your receipt of this letter.

If you have any questions, please contact Judy Thedford (telephone no. 523-4166), the staff member assigned to this matter.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

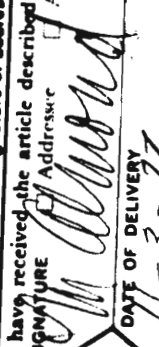
PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one)
☒ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
☐ Show to whom and date delivered
☐ RESTRICTED DELIVERY
☐ Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 William C. Demers, Treas.
 3540 Wilshire Blvd. Suite 815
 Los Angeles, CA 90010

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 438441 INSURED NO.
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE  ADDRESS ☐ Authorized agent

4. DATE OF DELIVERY 11-3-77 POSTMARK 

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO 1977-O-334-337

Deposits

1976		DATE	ITEM	AMOUNT	
5	14		Local 11502 - Reimb. Congressional Dinner 4/24/76	125	00 *
			Local 11501 - R. (Transfer of funds Free money for Treasury money)	304	00 *
			Wm. R. Martin	100	00
			Philip H. Hammer	50	00
			Michael P. Crowell	50	00
			Wm. R. Martin (for George Turner credit)	50	00
			Wm. R. Martin (for Warren Donning credit)	50	00
				729	00
5	21		CWA Local 11588 (Free money)	86	21 *
			Lila + Marie Edge (Local 11570) Free money	76	50
			Lila + Marie Edge (Local 11570) Free money	43	20
				205	95
5	25		CWA Local 11500 (Cashier's check)	700	00 *
6	4		Ronald R. Arlin	50	00
			James L. Catnick	50	00
				100	00

7 3 0 4 1 1 3 3 7



FEDERAL ELECTION COMMISSION

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

October 28, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: HUR 376 (77) Revised Letter

The above-mentioned document was transmitted to the Commissioners on October 27, 1977 at 9:30.

As of 4:15, October 28, 1977, no objections have been received in the Office of Commission Secretary to the revised letter.



October 26, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 376

Please have the attached revised letter and memo
on MUR 376 circulated to the Commission on a 24 hour
no-objection basis.

Thank you.

7804003375



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO : The Commissioners *Bue*
FROM : William C. Oldaker
SUBJECT : MUR 376 (77)

Attached is a revised copy of the letter to Mr. Demers as requested by the Commission at the October 19, 1977 meeting.





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Demers, Treasurer
CWA District 11 Political
Action Committee
3540 Wilshire Boulevard
Suite 815
Los Angeles, CA 90010

Re: MUR 376

Dear Mr. Demers:

We acknowledge receipt of certain documentation from your committee concerning contributions from several labor union locals listed on your committee's July 10, 1976 disclosure report.

The Commission requests that you provide a more detailed explanation of your use of the term "free money" on your deposit listing (copy enclosed) in connection with the contributions reported from Locals 11501, 11588, and 11500; specifically, the Commission requests that you explain the meaning of the entry "Transfer of funds free money for Treasury money" in connection with the contribution from Local 11501.

The Commission also requests that a copy of CWA-COPE PCC's cancelled check (front and back), or a receipt from Local 11502 acknowledging the repayment of \$125, be submitted to evidence return of the contribution.



- 2 -

The Commission is under a duty to conduct its investigations expeditiously. Therefore, we request that you submit the requested materials within ten days of your receipt of this letter.

If you have any questions, please contact Judy Thedford (telephone no. 523-4166), the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

730417667

Deposits

1976		DATE	ITEM	AMOUNT
5	14		Local 11502 - Presb. Congrega- tional Dinner 4/24/76	125 00 *
			Local 11501 - R (Transfer of funds free money for Treasury money)	304 00 *
			Wm. R. Martin	100 00
			Philip J. Henneman	50 00
			Michael P. Crowell	50 00
			Wm. R. Martin (for George Turner credit)	50 00
			Wm. R. Martin (for Warren Dunning credit)	50 00
				729 00
5	21		CLWA Local 11538 (Free money)	86 24 *
			Lila + Marie Edger Local 11574 Free money	76 50
			Lila + Marie Edger Local 11570 Free money	43 20
				205 94
5	25		CLWA Local 11500 (Cash on hand)	700 00 *
6	4		Ronald R. Lytle	50 00
			James H. Catbark	50 00
				100 00

*no date
on report*

October 3, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 376 Team #3

Please have the attached General Counsel's Report on MUR 376 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of October 13, 1977.

Thank you.

78040053380

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
CWA District 11) MUR 376
Political Action Committee)

GENERAL COUNSEL'S REPORT

I. ALLEGATION

The complaint^{1/} originally alleged that CWA Local 11586 violated 2 U.S.C. §441b when the Executive Board voted to send \$50 monthly to CWA COPE. In our review of the disclosure reports filed by CWA COPE PCC and the district level PACs concerning the complainant's allegation, it appeared that many locals had contributed to CWA PACs which would be in violation of 2 U.S.C. §441b.

On May 5, 1977, the Commission referred this matter to the Disclosure Division. The Disclosure Division cited four contributions to CWA District 11 PAC from labor union locals. The contributions which allegedly violated 2 U.S.C. §441b are listed below:

CWA Local 11502	5/14/76	\$125.00
CWA Local 11501	5/14/76	\$304.00
CWA Local 11588	5/21/76	\$86.25
CWA Local 11500	5/25/76	\$700.00

II. EVIDENCE

Disclosure made several attempts to obtain clarification from CWA District 11 PAC regarding the contributions reported from labor union locals. None of the attempts was successful. The following is a summary of those attempts:

1/ The complaint was originally filed with the Department of Justice and forwarded to the Commission. The complainant was contacted by the Commission and refiled the complaint with the Commission.

1) On May 27, 1977, a surface violation letter was sent questioning the contributions which had been reported on the July 10, 1977 Report of Receipts and Expenditures, and appeared to be in violation of 2 U.S.C. §441b.

2) On June 15, 1977, the Commission received a telephone call from the Committee's treasurer, Mr. Demers, requesting an extension of time in which to respond. Mr. Demers was informed by the Disclosure Division of the Commission's reluctance to grant extensions. He was invited to submit for the public record a written explanation of the delay.

3) On July 8, 1977, the Commission, not having received an adequate response, found reason to believe CWA District 11 PAC violated 2 U.S.C. §441b.

4) Upon request of the General Counsel, Disclosure referred this matter to the Office of the General Counsel on August 1, 1977. Disclosure's August 1, 1977 report recommended finding reasonable cause to believe a violation of 2 U.S.C. §441b had been committed by CWA District 11 PAC.

On August 3, 1977, the Office of the General Counsel contacted Mr. Demers and was told that Mr. Demers' response was delayed due to a convention he had attended and a nationwide strike. He said he needed to get in touch with the locals before responding and was hoping to have the response in the mail by August 5, 1977. No response was received from Mr. Demers.

The Commission by subpoena on August 25, 1977, ordered CWA District 11 PAC to produce books, records, and other relevant documents relating to the reported union local contributions.

On September 8, 1977, the attached materials (Exhibit A) were received in response to the Commission's subpoena. The materials consisted of explanations, check book stubs, ledger records, and requests for contributions. CWA District 11 PAC acknowledged that one of the reported contributions was from a labor union local and that it will return said contribution. The other entries were explained in the copies of the deposit sheets submitted to the Commission as "free money" voluntary contributions.

III. ANALYSIS

A. The Contributions Received by CWA District 11 PAC

Under 2 U.S.C. §432(c) and §102.9 of the Regulations, a political committee must keep an account of all contributions received by recording identification of the contributor, occupation, principal place of business, amount of the contribution, and the date the contribution was received for every contribution or contributions in excess of \$100. It appears from the submitted material that CWA District 11 PAC has met the record-keeping requirements for the questioned contributions.

Only one of the four contributions which appeared to be in violation of 2 U.S.C. §441b is actually from union treasury money, according to the information submitted to the Commission.

CWA District 11 PAC has requested that the contribution received from CWA Local 11502 on May 14, 1976, in the amount of

\$125 be paid back by CWA COPE PCC.² In view of the small size of the amount in violation, upon repayment both CWA District 11 PAC and CWA Local 11502 will be in substantial compliance.

B. Unreported Transfers Made by CWA COPE PCC

Our review of the subpoenaed material and the disclosure reports filed by CWA District 11 PAC and CWA COPE PCC revealed that CWA COPE PCC failed to report the following transfers to CWA District 11 PAC:

10-23-75	\$ 72.50
11-18-75	\$ 10.00
12-23-75	\$ 48.25
12-30-75	\$750.00
4- 9-76	\$ 10.50
4-27-76	\$530.00

These transfers must be reported under 2 U.S.C. §434(b)(4).

IV. RECOMMENDATION:

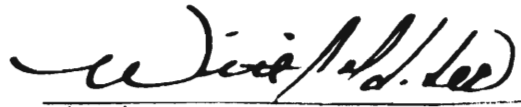
We recommend:

1) Defer final determination until the Commission receives evidence proving the \$125 has been returned to CWA Local 11502 by CWA COPE PCC; and send the attached letter to CWA District 11 PAC . Upon receipt of such evidence, find no reasonable cause to believe against CWA District 11 PAC in that compliance has been voluntarily achieved. Close the file.

2) Refer the unreported transfers between CWA COPE PCC and CWA District 11 PAC to the Disclosure Division for further action.

²CWA District 11 PAC reported termination on its July 10, 1976 report. Its funds have been transferred to CWA COPE PCC.

10/3/77
(Date)



William C. Oldaker
General Counsel

10/3/77



FEDERAL ELECTION COMMISSION

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

William Demers, Treasurer
CWA District 11 Political
Action Committee
3540 Wilshire Boulevard
Suite 815
Los Angeles, California 90010

Re: MUR 376

Dear Mr. Demers:

We acknowledge receipt of certain documentation from your committee concerning contributions reported on your committee's July 10, 1976 disclosure report from several labor union locals. The Commission has determined that, based on the documentation your committee submitted for the three contributions from Locals 11501, 11583, 11500, those three contributions were not in violation of the Federal Election Campaign Act of 1971, as amended.

The Commission requests that a copy of CWA-COPE PCC's cancelled check (front and back), or a receipt from Local 11502 acknowledging the repayment of \$125, be submitted as evidence that said contribution has been returned.

If you have any further questions, please contact Judy Thedford (telephone no. 523-4166), the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Certified Mail
Return Receipt Requested



COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN
AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

SEP 8 11 23

DINA G. DEAUMONT
VICE PRESIDENT

September 6, 1977

File: 1.34

772640

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

Re: CWA District Eleven Political Action Committee

Dear Sirs:

In response to your Subpena dated August 25, 1977 to Produce Books, Records, and other relevant Documents pertaining to the CWA District Eleven Political Action Committee, we are enclosing herewith Xerox copies of all of our accounting records.

Further investigation into this matter, and in particular to the items indicated in yellow in your original attachment, reveals the following pertinent information:

CWA Local 11501 - \$125.00 - \$125.00 did represent treasury money and therefore we are requesting (see attached letter) the CWA-COPE FCC Account (free money account in Washington, D.C.) to make the refund.

CWA Local 11501 - \$304.00 - Represents voluntary contributions raised by the membership at a Dance (free money).

CWA Local 11501 - \$86.25 - Represents voluntary contributions raised by the membership (free money).

Federal Election Commission
September 6, 1977
Page Two

CWA Local 11500 - \$700.00 - Cashier's Check was drawn out of a Savings Account in which they deposit voluntary contributions for CWA Local 11500 COPE. This Savings Account is held at the Security Pacific Bank at 6th and Spring Branch, Los Angeles, California.

I trust the above clarification is self-explanatory.

Sincerely,

W.C. Demers
by Dina G. Beaumont

W. C. Demers
Treasurer
CWA District 11
Political Action Committee

per Dina G. Beaumont, Chairperson

DGB/ld
Attachments

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

cc: Roberta Bowen



COMMUNICATIONS WORKERS OF AMERICA
DISTRICT ELEVEN
AFFILIATED WITH AFL-CIO

3546 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

DINA G. BEAUMONT
VICE-PRESIDENT

September 6, 1977

File: 1.34

CWA-COPE PCC
1925 K Street, N. W.
Washington, D. C. 20006

Attention: Loretta Bowen

Re: CWA District Eleven Political Action Committee

Gentlemen:

This is to request a refund be made out of CWA-COPE PCC Account (free money account) in the amount of \$125.00. This refund is requested since as a result of our investigation we find that CWA Local 11502 made a contribution to the CWA District Eleven Political Action Account of Local treasury funds.

Please make this refund immediately.

Fraternally,

Dina G. Beaumont
Chairperson
CWA District Eleven
Political Action Committee

DL/ST

cc: James B. Booe
Federal Elections Commission

Deposits

1976

DATE	ITEM	AMOUNT
5 14	Local 11502 - Nemo. Congres- sional Dinner 4/24/76	125 00 *
	Local 11501 - R. (Transfer of funds Free money for Treasury money)	304 00 *
	Wm. R. Martin	100 00
	Philip H. Hammer	50 00
	Michael D. Crowell	50 00
	Wm. R. Martin (for Long-Term Credit)	50 00
	Wm. R. Martin (for Warren Savings credit)	50 00
		<u>729 00</u>
5 21	CWA Local 11508 (Free money)	86 25 *
	Lila + Marie Edge Local 11510 Free money	76 50
	Lila + Marie Edge Local 11514 Free money	43 20
		<u>205 95</u>
5 25	CWA Local 11500 (cash on check)	700 00 *
6 4	Ronald R. Arlin	50 00
	James R. Caruth	50 00
		<u>100 00</u>



77 SEP 8 PM 5:23

File: 1.34

CWA Local 11588 - \$ 86.25 - Represents voluntary contributions raised by the membership (free money).

Federal Election Commission
September 6, 1977
Page Two

CWA Local 11500 - \$700.00 - Cashier's Check was drawn out of a Savings Account in which they deposit voluntary contributions for CWA Local 11500 COPE. This Savings Account is held at the Security Pacific Bank at 6th and Spring Branch, Los Angeles, California.

I trust the above clarification is self-explanatory.

Sincerely,

W.C. Demers
by Dina G. Beaumont

W. C. Demers
Treasurer
CWA District 11
Political Action Committee

per Dina G. Beaumont, Chairperson

DGB/dm
Attachments

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

cc: Loretta Bowen

7804773391



COMMUNICATIONS WORKERS OF AMERICA

DISTRICT ELEVEN

AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

DINA G. BEAUMONT
VICE-PRESIDENT

September 6, 1977

File: 1.34

CWA-COPE PCC
1925 K Street, N. W.
Washington, D. C. 20006

Attention: Loretta Bowen

Re: CWA District Eleven Political Action Committee

Gentlemen:

This is to request a refund be made out of CWA-COPE PCC Account (free money account) in the amount of \$125.00. This refund is requested since as a result of our investigation we find that CWA Local 11502 made a contribution to the CWA District Eleven Political Action Account of Local treasury funds.

Please make this refund immediately.

Fraternally,

Dina G. Beaumont
Chairperson
CWA District Eleven
Political Action Committee

DGB/dm

cc: James B. Booe
✓ Federal Elections Commission

7 3 3 4 1 1 1 3 3 3

Deposit 9/18/75
 Deposit 9/24/75

101

BAL.
 BRO'T
 FORD

969 841
 18 69

10/20 19 75

TO Parker & Son, Inc

FOR 10/9/75 - #11835 (one half
 of amt.)

TOTAL

157 53

AMOUNT THIS CHECK

177 55

BALANCE

810 98
 72 50

Deposit 11/23/75

9/25/75 Bank Charge (indemnity stamp)

10/17/75 (checked) 102

10/18/75 Deposit

11/24/75 Deposit

11/25 19 75

11 30
 10 06
 42 2
 10 00

TO Democratic National
 Finance Committee

FOR Contribution for
 Dina D. Beaumont

TOTAL

1380 42

AMOUNT THIS CHECK

1,000 00

BALANCE

380 42
 200 00
 580 42
 48 25

Deposit 12/17/75
 Deposit 12/23/75
 Deposit 12/30/75
 Deposit 1/30/76

103

1/29 19 76

TO Hartigan for Assembly

FOR Campaign Expenses

TOTAL

1778 67

AMOUNT THIS CHECK

~~400 00~~

BALANCE

1778 67

Checkbook Stub Record

Deposits

DATE	ITEM	AMOUNT
9/18/75	opening deposit CWA - Cope	969 84
9/24/75	CWA - Cope ck #983 refund - 1/2 contributions 8/1 - 8/31/75	18 69
10/23/75	CWA - Cope ck #997 refund 1/2 contri- butions 9/1 - 9/30/75	72 50
11/18/75	CWA - Cope ck #1010 refund - 1/2 contri- butions 10/1 - 10/31/75	10 00
11/24/75	CWA - COPE - PCC ck #1025	500 00
12/17/75	CWA Local 11513 (Cope) - reimburse- ment re Berrien Fund Raiser	200 00
12/23/75	CWA Cope ck # 1041 - refund voluntary contri- butions 7/10/31/75 thru 11/30/75	48 25
12/30/75	CWA Cope ck #1044 - one-half voluntary contri- butions Local 11513	750 00
1/30/76	CWA Local 11513 (for Party for assembly)	400 00

1031175391

7334111337

BAL. BRO'T FOR'D

104 ✓
3/17 19 76

TO	Royal Campaign Committee		1778	67
FOR	Donation - 2/14/76 Royal Dinner - Dance	DEPOSITS		
TOTAL			1778	67
AMOUNT THIS CHECK			50	00
BALANCE			1728	67 1/2

105 ✓
3/2 19 76

TO	Committee To Re-Elect Patterson To Congress			
FOR	2 Dinner Tickets (Jim Carrick) @ \$25 ⁰⁰ each	DEPOSITS		
TOTAL			1728	67
AMOUNT THIS CHECK			250	00
BALANCE			1478	67 1/2

Deposit 4/9/76 ✓

106 ✓
4/22 19 76

TO	Congressional Committee			
FOR	1 table of 10 - Dinner Honoring Calif.'s Democratic Congressional Delegation	DEPOSITS		
TOTAL			1478	67 1/2
4/24/76 AMOUNT THIS CHECK			1,250	00
BALANCE			239	17 1/2

Deposits

1976 DATE		ITEM	AMOUNT	
4	9	CWA - Cope ck # 1069 - refund 1/1 - 2/29/76	10	5-0
4	27	CWA - Cope ck # 1103 - refund December, 1975	53	000

73141013807

4/27/76 Deposit ✓

107
5/11 19 76

BAL.
BRO'T
FOR D

239 17
530 00 ✓
769 17

TO CWA District 11
Political Education Committee

FOR Transfer of funds
incorrectly paid out of
CWA Dist. 11 PEC TOTAL

769 17

a/c (Glenn M. Anderson Campaign
Committee - 2 Dinner - Dance
Tickets 4/21/76)

AMOUNT THIS CHECK

200 00

BALANCE

569 17

108 ✓
5/11 19 76

TO CWA District 11
Political Education Committee

FOR Transfer of funds in
correctly paid out of CWA
Dist. 11 PEC a/c (Congregation)

Jim Lloyd Birthday
Celebration - dated 9/25/75
4 tickets - 9/27/75

TOTAL

569 17

AMOUNT THIS CHECK

100 00

BALANCE

469 17

109 ✓
5/11 19 76

TO CWA District 11 Political
Education Committee

FOR Transfer of funds in
correctly paid out of
Dist. 11 PEC a/c (Corman)

Dinner Committee -
1 ticket 10/17/75

TOTAL

569 17

AMOUNT THIS CHECK

65 00

BALANCE

724 17

7314170339

Deposits

1976

DATE	ITEM	AMOUNT
5 14	Local 11502 - Reimb. Congressional Dinner 4/24/76	125 00 *
	Local 11501 - Re Transfer of funds Free money for Treasury (money)	304 00 *
	Wm. R. Martin	100 00
	Philip D. Hammer	50 00
	Michael D. Cronell	50 00
	Wm R. Martin (for George Turner credit)	50 00
	Wm R. Martin (for Warren Downing credit)	50 00
		729 00
5 21	CWA Local 11588 (Free money)	86 25 *
	Leslie + Marie Ridge (Local 11510) Free money	76 50
	Leslie + Marie Ridge (Local 11514) Free money	43 20
		205 95
5 25	CWA Local 11500 (Cashier's check)	700 00 *
6 4	Ronald R. Azlin	50 00
	James L. Carriek	50 00
		100 00

771417133

Deposit 5/14/76 ✓
Deposit 5/21/76 ✓
Deposit 5/25/76 ✓ 110
5/25 19 76

BAL.
BRO T
FOR D

729 00

33 12
205 95

1339 12

700 00

2039 12

TO Citizens for
Senator Tunney

FOR
Campaign Contribution

TOTAL

2,039 12

AMOUNT THIS CHECK

2,000 00

BALANCE

39 12

Deposit 6/4/76 ✓

100 00

139 12

111
6/7 19 76

TO Jeffery '76 Committee

FOR Calif. 40th Congressional
District - Campaign
Contribution

TOTAL

139 12

AMOUNT THIS CHECK

100 00

BALANCE

39 12

112
6/9 19 76

TO CWA-COPE PCC

FOR TO close out
account

TOTAL

39 12

AMOUNT THIS CHECK

39 12

BALANCE

-0-

CWA Dist. 11 Political
Action Committee Ledger Record

Date	Ch#	To Whom Paid	Amount Paid	Deposit	Bal. Brought Forw.	Bal. Brought Forw.
5/14/76				729.00		1133.17
5/21/76				205.95		1339.12
5/25/76				100.00		2039.12
7/25/76	110	Catuzina For Senator Tunney	2,000.00			39.12
6/4/76				100.00		139.12
6/7/76	111	Jeffery '76 Committee	100.00			39.12
6/9/76	112	CWA-COPE PCC	39.12			-0-

Statement of Financial Position
Committee

1	2	3	4	5	6	7	8	9	10
Date	Ref	Description	Debit	Credit	Balance			Balance	
1/25/75					200.00			200.00	
1/25/75					200.00			400.00	
1/25/75	1	Bank of America Inc.	177.55					222.45	
1/23/75					72.50			294.95	
9/25/75		Bank charge (Endorsement Stamp)	3.00					291.95	
10/17/75		Bank charge (Checks)	10.06					281.89	
11/18/75					10.00			291.89	
11/24/75					500.00			791.89	
11/25/75	102	Democratic National Finance Committee	1,000.00					1791.89	
12/17/75					200.00			1991.89	
12/23/75					48.25			2040.14	
12/30/75					750.00			2790.14	
1/30/76					400.00			3190.14	
1/29/76	103	Hartigan for County	400.00			VOID		2790.14	
2/17/76	104	Royal Campaign Committee	50.00					2740.14	
3/2/76	105	Committee to Re-Elect Patterson to Congress	250.00					2490.14	
4/9/76					10.50			2500.64	
4/22/76	106	Congressional Committee	1,250.00					1250.64	
4/27/76					530.00			720.64	
5/11/76	107	CWA PEC Committee - (Gene Anderson Tr. of funds)	200.00					520.64	
5/11/76	108	CWA PEC Committee - (Jim Floyd Brubaker Celebration Tr. of funds)	100.00					420.64	
5/11/76	109	CWA PEC Committee - (Corman Conner Committee Tr. of funds)	65.00					355.64	

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS.

DATE:

SIGNATURE: _____
DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED.

MISCELLANEOUS

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS,

DATE:

SIGNATURE: _____
DINA G. BEAUMONT,

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED

MISCELLANEOUS

REQUEST FOR CONTRIBUTION

44

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:
W.C. DEMERS - Treasurer, CWA District 11
Box 171, Van Nuys, CA 91410

CHECK APPROVED AND SIGNED: Dina G. Beaumont 3/1/76

DATE: SIGNATURE: W.C. DEMERS.

DATE: SIGNATURE: DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED

MISCELLANEOUS

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:
#13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000-1001-1002-1003-1004-1005-1006-1007-1008-1009-1010-1011-1012-1013-1014-1015-1016-1017-1018-1019-1020-1021-1022-1023-1024-1025-1026-1027-1028-1029-1030-1031-1032-1033-1034-1035-1036-1037-1038-1039-1040-1041-1042-1043-1044-1045-1046-1047-1048-1049-1050-1051-1052-1053-1054-1055-1056-1057-1058-1059-1060-1061-1062-1063-1064-1065-1066-1067-1068-1069-1070-1071-1072-1073-1074-1075-1076-1077-1078-1079-1080-1081-1082-1083-1084-1085-1086-1087-1088-1089-1090-1091-1092-1093-1094-1095-1096-1097-1098-1099-1100-1101-1102-1103-1104-1105-1106-1107-1108-1109-1110-1111-1112-1113-1114-1115-1116-1117-1118-1119-1120-1121-1122-1123-1124-1125-1126-1127-1128-1129-1130-1131-1132-1133-1134-1135-1136-1137-1138-1139-1140-1141-1142-1143-1144-1145-1146-1147-1148-1149-1150-1151-1152-1153-1154-1155-1156-1157-1158-1159-1160-1161-1162-1163-1164-1165-1166-1167-1168-1169-1170-1171-1172-1173-1174-1175-1176-1177-1178-1179-1180-1181-1182-1183-1184-1185-1186-1187-1188-1189-1190-1191-1192-1193-1194-1195-1196-1197-1198-1199-1200-1201-1202-1203-1204-1205-1206-1207-1208-1209-1210-1211-1212-1213-1214-1215-1216-1217-1218-1219-1220-1221-1222-1223-1224-1225-1226-122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CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS.

DATE:

SIGNATURE: _____
DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED.

MISCELLANEOUS

SUB

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:
Treasurer is: John Alston, 9484 Wilshire Blvd.,
Beverly Hills, CA 90212

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS.

DATE:

SIGNATURE: _____
DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED : IS NOI REQUIRED

STATE REPORTING IS REQUIRED : IS NOI REQUIRED.

MISCELLANEOUS

SUB

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

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PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS,

DATE:

SIGNATURE: _____
DINA G. BEAUMONT,

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED

MISCELLANEOUS

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS: L.D. # HR-23-243

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS.

DATE:

SIGNATURE: _____
DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED

MISCELLANEOUS

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS,

DATE:

SIGNATURE: _____
DINA G. BEAUMONT,

FEDERAL REPORTING IS REQUIRED : IS NOT REQUIRED

STATE REPORTING IS REQUIRED : IS NOT REQUIRED.

MISCELLANEOUS

CWA DISTRICT ELEVEN
POLITICAL ACTION COMMITTEE

REQUEST FOR CONTRIBUTION

DATE: AMOUNT: \$

CHECK NUMBER:

CHECK PAYABLE TO:

PURPOSE OF CONTRIBUTION:

CHECK SENT TO:

ADDRESS:

REMARKS:

CHECK APPROVED AND SIGNED:

DATE:

SIGNATURE: _____
W.C. DEMERS.

DATE:

SIGNATURE: Dina G. Beaumont
DINA G. BEAUMONT.

FEDERAL REPORTING IS REQUIRED: IS NOT REQUIRED

STATE REPORTING IS REQUIRED: IS NOT REQUIRED.

MISCELLANEOUS

1 2 3 4 5 6 7 8 9 10 11



'77 SEP 3 10 5:23

C. and the Attorney General of the United States

Washington, D.C. 20540

Dear Mr. Attorney General:

I am writing to you regarding the

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subject: to Produce Books, Records, and other relevant Documents

To: Mr. William Dwyers, Treasurer
District 11 CWA Political
Action Committee
3840 Wilshire Boulevard
Suite 615
Los Angeles, California 90010

At the direction of the Federal Election Commission
pursuant to 2 U.S.C. §437d, you are hereby required to deliver
for inspection and copying to authorized representatives of
the Federal Election Commission, at 1325 K Street, N.W.,
Washington, D.C. 20044, within 10 days following receipt
of this subpoena, the following documents:

1. Books to clarify, verify, and explain the
accuracy of the source of the contributions reported from
this election in the July 13, 1976 Report of Receipts and
Expenditures.

2. A copy of the Statement of the Federal Election Commission
pertaining to any fund at Washington, D.C., this 15th
day of July, 1977.

Date

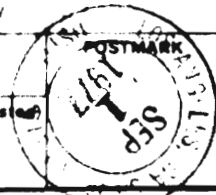
W. J. Dwyers
W. J. Dwyers
Treasurer

For the Federal Election Commission

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1 through 5. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one):		
☐ Show to whom and date delivered. 15¢		
☒ Show to whom, date, & address of delivery. 35¢		
☐ RESTRICTED DELIVERY Show to whom and date delivered. 65¢		
☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery. 85¢		
2. ARTICLE ADDRESSED TO		
3. ARTICLE DESCRIPTION		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE	Addressee	Authorized agent
4. DATE OF DELIVERY		
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE		
CLERK'S INITIALS		



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
CWA District 11)
Political Action Committee)

MUR 376

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 25, 1977, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to issue a subpoena to William Demers, Treasurer of CWA District 11 Political Action Committee, in connection with the above-captioned matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

AUTHORIZATION TO ISSUE A SUBPOENA TO CWA DISTRICT 11 PAC IN CONNECTION WITH MUR 376(77)

The Commission hereby authorizes a subpoena to be issued to William Demers, Treasurer of CWA District 11 Political Action Committee.

Address: 3540 Wilshire Boulevard
Suite 815
Los Angeles, California 90010

Thomas E. Harris

Thomas E. Harris, Chairman

Vernon W. Thomson, Commissioner

Joan D. Aikens, Vice Chairman

Neil O. Staebler, Commissioner

William L. Springer, Commissioner

Robert O. Tiernan, Commissioner



August 17, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 376

Please have the attached General Counsel's Report on MUR 376 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of August 25, 1977.

Thank you.

In the Matter of)
)
CWA District 11) MUR 376
Political Action Committee)

AUG 25 1977

CWA Local 11502	5/14/76	\$125.00
CWA Local 11501	5/14/76	304.00
CWA Local 11588	5/21/76	86.25
CWA Local 11500	5/25/76	700.00

The complaint originally alleged that Local 11586 CWA, violated 2 U.S.C. §441b when the Executive Board voted to send \$50.00 monthly to CWA COPE. In our review of the disclosure reports filed by CWA COPE PCC and the district level pacs concerning the complainant's allegations, the following was revealed: 1) CWA District 11 PAC received a \$50.00 contribution

from the President of Local 11586 and 2) many locals were reported as having contributed to CWA pacs which could be in violation of 2 U.S.C. §441b.

On May 5, 1977, the Commission voted to refer this matter to the Disclosure Division, Reports Analysis Section.

Disclosure made several attempts to obtain clarification from CWA District 11 PAC regarding the contributions reported from labor union locals; however, none of these attempts were successful. The following is an outline of those attempts:

1) On May 27, 1977, a surface violation letter questioning the contributions, which reported on the July 10, 1976 Report of Receipts and Expenditures were in violation of 2 U.S.C. §441b, was sent.

2) On June 15, 1977, the Commission received a phone request from the Committee's treasurer, Mr. Demers, for an extension of time in which to respond. Mr. Demers was informed by Disclosure of the Commission's position on granting extensions. He was invited to submit for the public record a written explanation of the delay.

3) On July 8, 1977, the Commission, not having received an adequate response, found reason to believe CWA District 11 PAC violated 2 U.S.C. §441b.

4) Disclosure referred this matter to the Office of the General Counsel on August 1, 1977, upon the request of the General Counsel. Disclosure's report of August 1, 1977 recommended

finding reasonable cause to believe a violation of 2 U.S.C. §441b had been committed by CWA District 11 PAC.

On August 3, 1977, the Office of the General Counsel contacted Mr. Demers to inform him that this matter had been referred to us and that we were proceeding forward. Mr. Demers stated his response was delayed due to a previously mentioned convention he had attended and a nationwide strike. He said he needed to get in touch with the locals before responding and was hoping to have the response in the mail by August 5, 1977.

III. Analysis

CWA District 11 PAC has received the two notifications from the Commission, a surface violation letter and a reason to believe letter, informing them that they appear to be in violation of 2 U.S.C. §441b. The only responses the Commission received from Mr. Demers were a phone call requesting additional time and a letter stating the responses would be delayed. In the phone conversation of June 15, 1977, Mr. Demers was notified by a Disclosure employee that his request for additional time to respond due to union business would not be granted by the Commission; and that his response would be considered inadequate. In the same conversation, Mr. Demers stated the report would be forthcoming. However, it has been two months since the conversation and no clarification of the entries has been submitted.

The phone conversation with Mr. Demers by the Office of the General Counsel revealed that the response has not been mailed and that it was to be mailed by August 5, 1977.

IV. Recommendation

Because of the delay of the respondent in answering, and in light of our repeated contacts, it is recommended that the attached subpoena be sent.

8/17/77
Date

William C. Oldaker
William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter of

CIA District Eleven
Political Action Committee

)
)
) 2SV2/77-37
)
)

DISCLOSURE'S REPORT

I. Findings

This Surface Violation was initiated internally on the basis of a review by the Non-Party Branch of the Disclosure Division of the July 10 Quarterly Report/Termination Report filed by the CIA District Eleven Political Action Committee. (The Disclosure Division has not advised the committee that its reporting obligations have been relieved.)

In their report, the CIA District Eleven Political Action Committee disclosed certain entries indicating that the committee may have accepted contributions from two labor unions.

On May 27, 1977, the Commission requested clarification of the apparent violations. On June 20, 1977, the Commission received a request from the committee's treasurer for an extension in responding to the letter from the Commission. The Disclosure Division informed the committee of the Commission's position on the matter of granting extensions and invited the committee to submit an explanation of the

delay for the public record. To date, there has been no response.

The Commission found reason to believe on July 8, 1977, that the committee was in violation of 2 U.S.C. 441b.

II. Synopsis of Reporting History

The Committee filed a Statement of Organization with the Commission on September 19, 1975 and has filed all required reports through its final termination report in July, 1976.

On May 17, 1976, in responding to a Request for Additional Information from the Commission, the committee indicated that expenditures made during the period from September 16 to October 6, 1975, had been paid out of the treasury funds of the union; \$100 on 9/25/75 to the Jim Lloyd Birthday Celebration, and \$65 to the Commem Dinner Committee. The treasury was reimbursed by the political action committee for these expenditures (see Exhibit A).

III. Recommendations

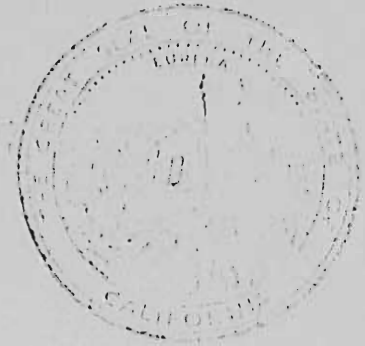
It is recommended that the Commission find reasonable cause to believe that the CWA District Eleven Political Action Committee violated 2 U.S.C. 441b.

EXHIBIT A

POLITICAL ACTION COMMITTEE

DINA G. BEAUMONT, Chairperson

WILLIAM C. DEMERS, Treasurer



3540 Wilshire Blvd., Suite 815

Los Angeles, California, 90010

387 0371

SA, [illegible]

C00339412

Q3 [illegible]
May 12, 1976

Ms. Patricia Schering
Chief, Reports Examining
Federal Election Commission
1335 K Street, N. W.
Washington, D. C. 20463

Dear Ms. Schering:

In reply to your letter dated April 23, 1976 regarding the late filing of our April 10, 1976 Quarterly Report of Receipts and Expenditures as required by the Federal Election Campaign Act, I wish to state the following information.

1. The Treasurer of our CWA District 11 Political Action Committee, William C. Demers, was stricken with a heart attack, and, therefore, unable to complete and sign the report. I am therefore completing and signing for him in his absence as I am Chairperson of the Committee.
2. Enclosed please find FEC Form 3a covering the period of January 1-March 31, 1976 period (April 10, 1976 Report).
3. Further, I wish to state that we incorrectly paid out funds from our Treasury money (CWA District 11 Political Education Committee) which should have been paid out of our voluntary money (CWA District 11 Political Action Committee) during the period of September 16-October 6, 1975 (October 10, 1975 Report). Therefore, we are amending that Report by means of this letter advising you of the following transfer of funds from our CWA District 11 Political Action Committee Account to our CWA District 11 Political Education Committee Account:

Stacy [illegible]
[illegible]

Ms. Patricia Schering
May 12, 1976
Page Two

5/11/76 - Transfer of funds incorrectly paid
out of CNA District 11 Political
Education Account (payable to
Congressman Jim Lloyd Birthday Cele-
bration - dated 9/25/75 - \$100.00.)
Treasurer: James M. Favronite,
100 S. Vincent Avenue, #305, West
Covina, CA 9179.

5/11/76 - Transfer of funds incorrectly paid out
of CNA District 11 Political Education
Account (payable to Cornan Pinner
Committee - dated 10/5/75 - \$65.00.)
Treasurer: James R. Anderson, Post
Office Box 273, Van Nuys, CA 91408.

Sincerely,

Dina G. Beaumont

Dina G. Beaumont
Chairperson

DGB/dm
Attachment

cc: Loretta Boxen

Certified Mail
Return Receipt Requested



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20543

July 8, 1977

William C. Demers, Treasurer
CWA District Eleven Political
Action Committee
3540 Wilshire Boulevard, Suite 815
Los Angeles, California 90010

Dear Mr. Demers:

On May 27, 1977, you were notified that certain entries in the July 10 Quarterly Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on June 15, 1977, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days of receipt of this letter.

If you have responded to the above or you require additional information, please contact Bruce Shelton, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

James E. Harris

Commissioner

Certified Mail:
Return Receipt Requested





COMMUNICATIONS WORKERS OF AMERICA

DISTRICT ELEVEN

AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 387-3371

DINA G. BEAUMONT
VICE-PRESIDENT

June 15, 1977

File 1.14

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

771953

Dear Sir:

Reference our telephone conversation this date, because of our National Convention in Kansas City I will be out of town and request additional time to respond to your letter received by me on today's date with a reference reply number of 2SV1/77-33.

Your understanding and cooperation is appreciated.

Sincerely,

William C. Demers
Assistant to the
Vice President

WCD:cjm
opc 3, afl-cio (233)

June 10, 1977

TELECON

From: Bruce Shelton, Non-Party Team

Concerning: CWA District Eleven Political Action Committee/2SV1/77-33

Mr. William Demers called the Commission today and expressed concern about the Surface Violation letter that he received. Mr. Demers indicated that he would be out of town for the next two weeks attending a convention and would respond to our letter upon his return. He did state that he was aware of the problem and that it would be a matter of going through the books for the required information. I indicated to Mr. Demers that the committee had been given adequate time to respond and that we are required to follow-up with a second letter if a response is not received within the required time period. I suggested that he might file a reply for public record which would briefly explain why he was unable to respond immediately and that a full response would be forthcoming when he returned.



FEDERAL ELECTION COMMISSION

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

6/17
C. H. L. 410
g. m. and j. m.
H. C. L. 1
May 27, 1977

William C. Demers, Treasurer
CWA District Eleven Political
Action Committee
3540 Wilshire Boulevard, Suite 815
Los Angeles, California 90010

Dear Mr. Demers:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. One such provision precludes a corporation or a union from making a contribution in connection with an election to Federal office. It does, however, permit a contribution by segregated funds established by corporations and by unions.

During review of the July 10 Quarterly Report of Receipts and Expenditures filed with the Federal Election Commission, we noticed entries indicating that you may have accepted contributions prohibited by Federal law. A copy of that portion of your report is attached so that a review of your records can be made.

If you find your identification of the source of these contributions is incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

If you find you have accepted prohibited contributions, the Commission recommends that you return the full amounts to the donors. These returns should be reported immediately by letter and should be reflected as expenditures on your next report of receipts and expenditures.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on these matters. If you have any questions, please do not hesitate to contact Bruce Shelton (202/523-4048) our reports analyst assigned to you.

Sincerely,

Orlando B. Potter
Staff Director



Enclosure
Return Receipt
Requested: Certified

Itemized Receipts, Contributions, Loans, Rebates, and Transfers

(Indicate the type for each entry)
(See Instructions on back)

Page 2 of 6 Pages

Name of Candidate or Committee in full

CWA DISTRICT ELEVEN POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code CWA-COPE 1925 K Street, N. W. Washington, D.C. 20006	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 4/9/76 4/27/76	Amount of each receipt this period 10.50 530.00
Principal place of business CWA-COPE 1925 K Street, N.W. Washington, D.C. 20006	Occupation Labor Union-Headquarters ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$530.50		
Full Name, mailing address and ZIP code CWA Local 11502 6253 Hollywood Boulevard, Suite 715 Los Angeles, CA 90028	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☒ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 125.00
Principal place of business CWA Local 11502 6253 Hollywood Boulevard, #715 Los Angeles, CA 90028	Occupation Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$125.00		
Full Name, mailing address and ZIP code CWA Local 11501 2010 South Flower Street, Suite 406 Los Angeles, CA 90015	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☒ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 304.00
Principal place of business CWA Local 11501 2010 South Flower St., Ste 406 Los Angeles, CA 90015	Occupation Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$304.00		
Full Name, mailing address and ZIP code William R. Martin Communications Workers of America 3540 Wilshire Boulevard, Suite 815 Los Angeles, CA 90010	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☒ transfer in	Date (month, day, year) 5/14/76 5/14/76 5/14/76	Amount of each receipt this period 100.00 50.00 50.00
Principal place of business William R. Martin CWA, 3540 Wilshire Blvd. #815 Los Angeles, CA 90010	Occupation Representative, Labor ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$200.00		
Full Name, mailing address and ZIP code Philip G. Hanneman CWA Local 11511, P.O. Box 755 San Marcos, CA 92069	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☒ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 50.00
Principal place of business Philip G. Hanneman, CWA Local 11511, P.O. Box 755 San Marcos, CA 92069	Occupation Prof., Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$50.00		
Full Name, mailing address and ZIP code Michael R. Crowell CWA Local 11588 314 West "E" Street Mariposa, CA 91762	Indicate type of receipt: ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☒ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 50.00
Principal place of business Michael R. Crowell, CWA Local 11588, 314 West "E" Street, Mariposa, CA 91762	Occupation P.W., Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Aggregate Year to Date > \$50.00		

Subtotal of receipts this page > \$1,269.50

Unitemized Receipts, Contributions, Loans, Rebates, and Transfers

(Indicate the type for each entry)
(See instructions on back)

Page 3 of 6 pages

Name of Candidate or Committee in full

AA DISTRICT ELEVEN POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code CWA Local 11588 114 West "E" Street Ontario, CA 91762	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/21/76	Amount of each receipt this period 86.25
Principal place of business CWA Local 11588 114 West "E" Street Ontario, C 91762	Occupation Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$ 86.25		
Full Name, mailing address and ZIP code Marie Ridge c/o CWA Local 11510 1311 Chapman Ave., Suite 207 Garden Grove, CA 92640	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/21/76 5/21/76	Amount of each receipt this period 76.50 43.20
Principal place of business Marie Ridge c/o CWA Local 11510, 12311 Chapman Ave. #207, Garden Grove, CA 92640	Occupation Labor Union Member ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$ 119.70		
Full Name, mailing address and ZIP code CWA Local 11500 1313 W. 8th Street, Suite 200 Los Angeles, CA 90017	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/25/76	Amount of each receipt this period 700.00
Principal place of business CWA Local 11500, 1313 W. 8th Street, Suite 200, Los Angeles, CA 90017	Occupation Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$ 700.00		
Full Name, mailing address and ZIP code Ronald W. Azlin CWA Local 11586 9125 E. Whittier Blvd., Suite 202 Rico Rivera, CA 90660	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 6/4/76	Amount of each receipt this period 50.00
Principal place of business CWA Local 11586 9125 E. Whittier Blvd. #202 Rico Rivera, CA 90660	Occupation President, Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$ 50.00		
Full Name, mailing address and ZIP code James L. Carrick CWA Local 11510 1311 Chapman Ave., Suite 207 Garden Grove, CA 92640	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 6/4/76	Amount of each receipt this period 50.00
Principal place of business CWA Local 11510 1311 Chapman Ave., Suite 207 Garden Grove, CA 92640	Occupation President, Labor Union Local ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$ 50.00		
Full Name, mailing address and ZIP code	Indicate type of receipt ☒ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if contributor is self-employed Receipt for ☒ primary ☐ general Appropriate Year-to-Date ... > \$		

Total of receipts this page ... \$1,005.91



FEDERAL ELECTION COMMISSION

1155 K STREET NW
WASHINGTON, DC 20463

To Judy Thelmer
Thru Docket
From [unclear]
what's
JUNE 22, 1977 this
all about

MEMORANDUM

TO: William Oldaker

THROUGH: Kent Cooper *KC*

FROM: Lois Zella *LZ*

SUBJECT: MUR 376

In response to your memos of June 21, 1977, attached are the steps the Disclosure Division has taken with regards to MUR 376. Also, attached is the next letter to be sent to the entity in question.

May 27, 1977 - Surface Violation letter sent questioning several contributions

June 10, 1977 - Telecon requesting additional time

June 15, 1977 - Written statement saying response would be delayed.

Proposed letter - Commission has "reason to believe"

If your office has any further questions or requires additional information, please let me know.

Attachments (9)





FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20543

PROPOSED LETTER TO BE SENT UPON COMMISSION APPROVAL

William C. Deters, Treasurer
CWA District Eleven Political
Action Committee
3540 Wilshire Boulevard, Suite 815
Los Angeles, California 90010

Dear Mr. Deters:

On May 27, 1977, you were notified that certain entries in the July 10 Quarterly Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 43b.

We received a response from you on July 16, 1977, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 43b.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days of receipt of this letter.

If you have responded to the above or you require additional information, please contact Bruce Shelton, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4049.

Sincerely,

Commissioner

cc: Mr. Deters
cc: Mr. Shelton



COMMUNICATIONS WORKERS OF AMERICA

DISTRICT ELEVEN

AFFILIATED WITH AFL-CIO

3540 WILSHIRE BOULEVARD, SUITE 815
LOS ANGELES, CALIFORNIA 90010
(213) 397-3371

JOHN G. BEAUMONT
VICE-PRESIDENT

June 15, 1977

File 1.14

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

771956

Dear Sir:

Reference our telephone conversation this date, because of our National Convention in Kansas City I will be out of town and request additional time to respond to your letter received by me on today's date with a reference reply number of 25V1/77-33.

Your understanding and cooperation is appreciated.

Sincerely,

William C. Peters
Assistant to the
Vice President

WCP:ejn
our 3, afl-cio (233)

100

From: Bruce Shelton, Non-Party Team



FEDERAL ELECTION COMMISSION

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

6/17

6/17
1125 K Street, N.W.
Washington, D.C. 20463

May 27, 1977

William C. Doners, Treasurer
CNA District Election Political
Action Committee
3540 Wilshire Boulevard, Suite 815
Los Angeles, California 90010

Dear Mr. Doners:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. One such provision precludes a corporation or a union from making a contribution in connection with an election to Federal office. It does, however, permit a contribution by segregated funds established by corporations and by unions.

During review of the July 10 Quarterly Report of Receipts and Expenditures filed with the Federal Election Commission, we noticed entries indicating that you may have accepted contributions prohibited by Federal law. A copy of that portion of your report is attached so that a review of your records can be made.

If you find your identification of the source of these contributions is incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

If you find you have accepted prohibited contributions, the Commission recommends that you return the full amounts to the donors. These returns should be reported immediately by letter and should be reflected as expenditures on your next report of receipts and expenditures.

Please notify the Commission within ten (10) days of receipt of this letter of the steps being taken to comply with the law. If you have any questions please call Mr. John J. Smith at (202) 453-4048, our agency's designee, assigned to you.

Sincerely,

Charles E. Smith

Chief Counsel
More...

Itemized Receipts, Contributions, Loans, Rebates, and Transfers

(Indicate the type for each receipt)
(See instructions on back)

Page 1 of 1 Pages

Name of Candidate or Committee in full

AKA DISTRICT ELEVEN POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Indicate type of receipt	Date (month, day, year)	Amount of each receipt this period
Full Name, mailing address and ZIP code CWA Local 11502 1925 K Street, N.W. Washington, D.C. 20006	Indicate type of receipt ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 4/9/76 4/27/76	Amount of each receipt this period 10.00 23.00
Principal place of business CWA Local 11502 1925 K Street, N.W. Washington, D.C. 20006	Occupation (if other than self-employed) ☐ Check if contributor is self-employed Recipient for ☐ primary ☐ general Approximate Year and Date		
Full Name, mailing address and ZIP code CWA Local 11502 1925 K Street, N.W. Los Angeles, CA 90028	Indicate type of receipt ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 1.00
Principal place of business CWA Local 11502 1925 K Street, N.W. Los Angeles, CA 90028	Occupation (if other than self-employed) ☐ Check if contributor is self-employed Recipient for ☐ primary ☐ general Approximate Year and Date		
Full Name, mailing address and ZIP code CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Indicate type of receipt ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 30.00
Principal place of business CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Occupation (if other than self-employed) ☐ Check if contributor is self-employed Recipient for ☐ primary ☐ general Approximate Year and Date		
Full Name, mailing address and ZIP code CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Indicate type of receipt ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76 5/14/76 5/14/76	Amount of each receipt this period 100.00 50.00 50.00
Principal place of business CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Occupation (if other than self-employed) ☐ Check if contributor is self-employed Recipient for ☐ primary ☐ general Approximate Year and Date		
Full Name, mailing address and ZIP code CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Indicate type of receipt ☐ contribution ☐ interest or dividend ☐ loan, loan payment ☐ rebate, refund ☐ transfer in	Date (month, day, year) 5/14/76	Amount of each receipt this period 20.00
Principal place of business CWA Local 11501 1925 K Street, N.W. Los Angeles, CA 90028	Occupation (if other than self-employed) ☐ Check if contributor is self-employed Recipient for ☐ primary ☐ general Approximate Year and Date		

Page 2 of 6



FEDERAL ELECTION COMMISSION

1100 SULLY SW
WASHINGTON, D.C. 20543

TO: KENT COOPER

June 21, 1977

FROM: BILL OLDAKER *Bill*

SUBJECT: REFERRAL OF MUR 376 TO DISCLOSURE FOR
REPORTS ANALYSIS

On May 5, 1977, the Commission voted to refer the above mentioned MUR to the Office of Disclosure for further analysis of their reports filed.

I would very much appreciate receiving a status report on the progress made regarding this matter. Our office would like to present to the Commission a final determination of this case in the near future.

Thank you.





FEDERAL ELECTION COMMISSION

1111 OIdaker
WASHINGTON, D.C. 20543

MEMORANDUM TO: Kent Cooper

FROM: Bill Oldaker *Bill*

RE: MUR 376

DATE: June 21, 1977

I would like a report on the current status of MUR 376 in the Report
Analysis Section.

Thank-You.

7304006644

THE SECRETARY OF THE ARMY

WASHINGTON, D.C.

1941

MEMORANDUM FOR THE SECRETARY

SUBJECT:

RE: [illegible]

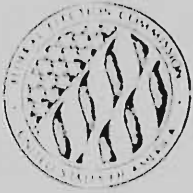
[illegible]

This is to inform you that [illegible]

it is the policy of the Department [illegible]

and [illegible]

100-417641



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20063

May 12, 1977

MEMORANDUM TO: KENT COOPER

FROM: MARJORIE W. EMMS *mwe*

SUBJECT: MUR 376

This is to inform you that the Commission determined in its meeting of May 5, 1977, by a vote of 5-0, to refer MUR 376 (77) to Reports Analysis.

781499, 1441

53

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Local 11586 Communications)
Workers of America)

MLR 376 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 5, 1977, the Commission determined by a vote of 5-0 to refer the above-captioned matter to Reports Analysis and to send the request for additional information.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

April 26, 1977

MEMORANDUM TO: Charles Steele
FROM: Marjorie W. Emmons *mwe*
SUBJECT: MUR 376 (77)

The above-mentioned document was transmitted to the Commissioners on April 26, 1977.

Commissioner Harris submitted an objection at 11:45, April 26, 1977.

MUR 376 (77) has been placed on the Agenda for April 28, 1977.



DATE AND TIME OF TRANSMITTAL: _____

NO. MUR 376 (77)

REC'D: 3/18/77

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: John P. Proefrock

Respondent's Name: Local 11586 Communications Workers of America

Relevant Statute: 2 U.S.C. §441(b), 18 U.S.C. §610

Internal Reports Checked: 1976 reports of CWA COPE Political Contributions Committee and 12 district level CWA political action committees.

Federal Agencies Checked: none

SUMMARY OF ALLEGATION

Complainant alleges that Local 11586 CWA violated 2 U.S.C. §441b when the Executive Board voted to send dues money to CWA COPE, that the motion should have been submitted prior to action, and that the contributions should come from voluntary donations.

PRELIMINARY LEGAL ANALYSIS

The complaint was originally filed with the Department of Justice, which investigated, closed (on grounds of smallness of amount of \$50/month), and forwarded the case to the Commission. The complainant was contacted by the Commission and the complaint was submitted to the Commission.

The minutes from an executive session, published in the Local 11586

Continued

RECOMMENDATION

Find reason to believe and send attached letters.

newspaper, informed Local 11586 members that the Executive Board had voted to contribute \$50 monthly to CWA COPE in 1976. The complainant alleges that the monthly payments were to be used for political purposes and were made from the Union's treasury (dues), thereby violating 2 U.S.C. §441(b).

CWA COPE is a committee which uses funds for political education only. It does not support federal candidates; therefore, the committee is exempt from reporting to the Commission. The political activity of contributing to candidates is handled by a separate committee, CWA COPE Political Contributions Committee, which reports to the Commission.

The complainant and the Local's newsletter both state the monthly payments were made to CWA COPE; not to the political contributions committee. The Department of Justice, investigating in 1976, interviewed Mr. Azlin, President of Local 11586 CWA (attached). Mr. Azlin confirmed that the Executive Board voted to send monthly payments to CWA COPE, the payments had been made, and that it was assumed the money would be used legally for political education. Monthly payments made to CWA COPE are clearly not in violation of the statute.

However, in review of reports for CWA COPE Political Contribution Committee and the 12 district level political action committees, a contribution of \$50. from Local 11586

CWA is reported as being received by CWA District 11 Political Action Committee on June 4, 1976. The \$50 contribution seems to be in violation of 2 U.S.C. §441(b).

It can not be determined at this time to whom each monthly payment referred to in the Local's newspaper was made. Payments made to CWA COPE would be legal and not reported to the Commission. However, since a \$50 payment was reported as a contribution to CWA District 11 Political Action Committee, the possibility exists that other monthly payments may have been contributed to CWA COPE Political Contributions Committee or the 12 district level CWA political action committees which would be in violation of 2 U.S.C. §441(b).

It should be noted that many locals contribute to CWA political action committees. Whether these other locals have established separate segregated funds in accordance with the statute can not be determined from the reports. This leads to the possibility of other locals violating 2 U.S.C. §441(b).

20814 S. Hawaiian Ave.,
Lakewood, Ca 90715
March 15, 1977

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

Re: CC #1275, March 3, 1977

I am hereby formally charging my union, Local 11586, Communications Workers of America with violation of §441b (b) (3) (A) of the Federal Election Campaign Act, to wit, expropriating a portion of my dues money for political purposes.

Facts: On January 14, 1976, the above-named labor organization at 9125 East Whitlier Blvd., Suite 202; Pico-Rivera, Ca 90660; (213) 692 7221, Ron Aslin, President; unlawfully coerced me in the exercise of my rights as a U. S. citizen and voter by passing a motion in executive board session to "donate \$50.00 a month to COPE (Committee on Political Education)." I submit in evidence of this illegal act a photocopy of Page 2 of the local's newspaper, The Challenger, for January-February 1976 where admission of said act is published as an excerpt of the minutes of said session.

I submit that this motion was passed in camera without my knowledge and that of the general membership; further that said motion should properly have been submitted to the membership at the general meeting one week prior on January 7, or held for the general meeting on March 3; further that notification of intent to present said motion should have been given the membership in writing prior to one of the aforesaid general meetings so that all could have had an opportunity to vote on it.

It is my opinion that COPE is a partisan political organization, specifically an arm of the Democratic Party which supports candidates for federal offices in addition to state and local offices, and ergo constitutes an arrangement whereby Republican and independent voters are forced to support candidates not of their choice. Our rights as citizens and voters have been and are being abrogated. COPE consistently supports candidates I, an independent voter, would not vote for under any circumstances whatsoever!

In conclusion I contend that all moneys contributed to COPE, or any other political organization, group or candidates, should come from strictly voluntary donations, that the executive board of the above-named union local grossly overstepped its authority and is in flagrant violation of the aforesaid §441b (b) (3) (A) of the Federal Campaign Act, as amended, guaranteeing a citizen's right to support candidates of his choice; that it violated the long-extant CWA precept that inter alia CWA is a "democratic union" run by and for the membership, and finally, in view of all the foregoing, that Local 11586, CWA should malum prohibitum be immediately enjoined to rescind the aforesaid motion and discontinue the usurpation of members' dues money for COPE and all other political purposes and candidates.

I swear that all of the foregoing statements and charges are true and accurate to the best of my knowledge and recollection.

John P. Proefrock, Member
Local 11586, CWA

State of California

County of Los Angeles

Subscribed and sworn to before me this 15 day of March 1977

Notary Public





EDITORIAL

By Bruce Marchese, Vice President

1977 will be the year of the challenge! Just 12 short months from today CWA will meet with General of California (and the General system) to talk about our contract.

Some members may say that it is too early to begin asking ourselves where we are headed, but I must disagree. Already, throughout our work locations, I hear words from management's side trying to lead our members in a direction that is foreign to the very core of our Union. It is an approach to lull us into believing that we have gained enough, that even in some areas we must step back, that we should consider ourselves lucky that we even have a job. To all that I say, "BUNK!"

With the company's profits increasing, and our productivity increasing, we expect to get more in 1977. Improved pension plans and better wages are on the minds of many of our members, and other local items will be submitted by our members as items for the agenda.

And that is important—submitting these items in writing to any of the officers of your Local. Each Local in turn puts these items up for consideration through our Council, and then the items that are most demanding from our members are then presented to our Bargaining Committee.

The important point is to submit these items today, NOW, so that your Local officers can help prepare the way for our 1977 contract.

Personnel Files

In what may be a sign of things to come, California has passed a law that will give employees the right, subject to certain restrictions, to see what is in their personnel files. The law, which is effective January 1976, requires employers to permit an employee who so requests to inspect, at reasonable times, personnel files that "are used or have been used to determine that employees' qualifications for employment, promotion, additional compensation or termination or other disciplinary action."

EXCEPTIONS: Excluded from the open-the-files requirement, however, are (1) employee records relating to "the investigation of possible criminal offense," and (2) letters of reference.

The California law is the first to open up the personnel files of private-sector employers. At the federal level, two new laws apply to files of any federal agency, including files that contain information regarding individuals.

Motion Will Be Published

Beginning with this issue of the *Challenger*, we will print all motions made, seconded and either carried (M/S/C) or defeated (M/S/D) from the Executive Board and General Meetings and the reasons why. If you have any questions, be sure to attend the next Union Meeting. It's your Meeting, too.

January 14, 1976

M/S/D to sponsor one participant at the tribute dinner for Mayor Tom Bradley. Reasons: There are several other Locals within the jurisdiction of Los Angeles City who could represent C.W.A.

M/S/C to sponsor one participant at the Fund Raiser for Assemblyman McVittie. Reasons: He always votes for Labor when it is necessary. He received very little support from C.W.A. in his last campaign. We have a number of members who live in his District.

M/S/C to donate \$40.00 a month to C.W.A. COPE. Reasons: Our By-Laws call for participation in all C.W.A. programs, of which COPE is one.

M/S/C to adopt the new Local Safety Procedure as presented by V.P. Lacey. Reasons: The plan will provide a uniform treatment and control of Safety Violations.

January 7, 1976 Membership

M/S/C to support the striking members of the two Kentucky Locals by sending \$100.00 a month to each Local for the duration of the strike.

Nov.-Dec. Financial Report

Editorial, November 1, 1975

\$ 11,144.31

Receipts

22,275.00

Editorial, November 1, 1975

1,574.11

Members' wages & expenses

1,075.22

Post

275.97

Telephone

403.22

Supplies

1,413.12

Post

5,413.11

Travel

50.00

Equipment

400.00

Contributions

350.00

Advertising

1,000.00

Postage

1,000.00

S & P Fund

1,000.00

Total Expenses

22,275.00

Editorial, November 1, 1975

\$ 11,144.31

Total - 1975

\$ 8,413.11

This Financial Report was reported at the January 7, 1976 Membership Meeting.



THE CHALLENGER

Bruce Marchese, Editor

692-7221 330-0797

STAFF

Michele Green, Writer

THE CHALLENGER IS PUBLISHED AS THE
OFFICIAL NEWSPAPER OF LOCAL 11386
COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO

NOMINATIONS FOR THE 1976 CONVENTION OPEN
AT OUR MARCH 3RD GENERAL MEETING.
BE SURE TO ATTEND!

664 10 75

UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

11 FEB 13 11:13
16 FEB 1977

Address Reply to the

Division Indicated

and Refer to Initial and Number

THH:RAH:CCD:ph

72-017-12c

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

770533

Re: Local 11586
Communication Workers of America

Dear Mr. Oldaker:

Last year this Department received a complaint from a Mr. John P. Proefrock of Lakewood, California, who is a member of the captioned union local, complaining that the Local's Executive Committee had voted in January, 1976 to donate \$50.00 each month from the Union's treasury to National CWA-COPE.

We have conducted a limited investigation into this complaint, and have confirmed that the Local's Executive Committee did indeed vote to make the alleged monthly donations. However, the circumstances surrounding these donations, and their small amount, have led us to close the matter under both 18 U.S.C. 610 (with respect to donations made before May 11, 1976), and under 2 U.S.C. 441b and 441j (with respect to any donations made thereafter).

However, in view of the Commission's possible interest in this matter, we are sending it to you for whatever further investigation and compliance action you may consider appropriate. Should any further investigation which you may undertake in this matter reveal knowing and wilful violations of 441b that exceed the jurisdictional floors specified in 441j, we would appreciate your referring the matter to this



- 2 -

Department for prosecution.

If we can be of further assistance to you in this matter,
please advise.

Sincerely,

THOMAS H. HENDERSON, JR.
Chief, Public Integrity Section
Criminal Division



By:

CRAIG C. DON SANTO
Attorney, Public Integrity Section

731400-1411
Enclosures

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

1 - USA, Los Angeles
(ATTN: AUSA EARL E. BOYD)

Report of: J. HAROLD MARSHALL OSA: Los Angeles
Date: 7/7/76

Field Office File #: 56-266 Bureau File #:

Title: Communication Workers of America,
Local 11586,
Pico Rivera, California;
JOHN PROEFROCK -
Complainant

Character: ELECTION LAWS

Synopsis:

RONALD AZLIN, President, Communication Workers
of America (CWA), Local 11586, Pico Rivera, California,
advised Executive Board did vote in January, 1976, to
furnish \$600 over entire year to COPE, CWA, Washington,
D.C., National Headquarters. Money furnished to Washington,
D.C. is money collected in dues and he assures CWA head-
quarters will use money lawfully. His local has citizen-
ship fund which raises money separate from dues for political
activities on Federal level.

- C -

DETAILS

This is a limited investigation.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/11/76

RONALD AZLIN, President, Commercial Union Workers of America, Local 11586, 9125 East Whittier Boulevard, Suite 202, Pico Rivera, California, was contacted at his office. He was advised of the identity of the interviewing agents and that investigation was being conducted concerning the donation of money to the Committee on Political Education (COPE) by Local 11586. AZLIN was furnished a copy of an "Interrogation; Advice of Rights" form which he read, stated he understood, but declined to sign. He said he understood his rights and had talked to an attorney and to the national organization of CWA and that he would discuss the matter with the agents but would reserve the right to stop the interview at any time. AZLIN then furnished the following:

On January 14, 1976, the Executive Board of Local 11586 met and a motion was made by AZLIN to furnish \$600 during the year 1976 to the CWA National Office of COPE. The donation would be in the form of a check of \$50 per month for the 12 month period. The Executive Board has the privilege of acting on behalf of the membership in between membership meetings.

The \$600 is dues money which is being furnished to the National CWA Headquarters, COPE, 1925 K Street Northwest, Washington, D.C. It is his understanding and feeling that this money will be used in the proper manner and lawfully by the National COPE committee and he feels it will be used for political education and not for the use of any Federal election campaign.

Local 11586 has not filed with the Federal Election Commission at any time. They do have a Local Citizenship fund which money for that fund is raised by Local benefits and the money in that fund can be used in Federal campaigns. They can use dues money in making contributions to local campaigns and that is done.

Interviewed on 7/6/76 at Pico Rivera, California File # Los Angeles 56-266

by SAs J. HAROLD MARSHALL and
LAWRENCE C. HENRICH/JS/afv

Date dictated 7/6/76

90-266

Copies of checks donated to COPI are not available but can be produced if necessary.

It is the assertion of AZLIN that JOHN PROEFROCK, a local member of CPA, made this complaint and PROEFROCK also made two complaints to the National Labor Relations Board concerning use of Local 11586 money and both were denied by the National Labor Relations Board.

AZLIN furnished SA J. HAROLD MARSHALL with a copy of the Executive Board meeting minutes dated January 14, 1976, and advised that the minutes were approved by the membership in March of 1976 at the normal membership meeting.

AZLIN said Local 11586 has nothing to hide and that he would be more than happy to cooperate in this matter in anyway possible.

EXCERPT FROM MEETING

1-18-76

President Akin explained the objectives of the Office. He explained the grievance log in the light of the fact that the majority of the President's Akin's are in the field. He said that the Office is to be a "field office" and that the Office is to be a "field office" and that the Office is to be a "field office".

VP Knecht said the local paper should be informed by letter. He discussed the possibility of a "field office" in the area of the local paper. He discussed the possibility of a "field office" in the area of the local paper. He discussed the possibility of a "field office" in the area of the local paper. He discussed the possibility of a "field office" in the area of the local paper.

VP Knecht received a fund raised by the local paper for the local paper.

VP Knecht asked that any change in the local paper be discussed with the local paper.

VP Knecht reported that the next meeting will be held on the next meeting. The local paper will be held on the next meeting. The local paper will be held on the next meeting.

VP Knecht said he will continue on with the local paper. He discussed the local paper. He discussed the local paper.

Resolution H/S/D to send one person to the dinner for the local paper.

Resolution H/S/D to send one person to the dinner for the local paper.

Resolution H/S/D the local donate \$50.00 a month to the local paper.

President Akin spoke on the importance of being at the local office to check for information to be passed along the field. He spoke on participation to check for information.

VP Knecht spoke on the importance of getting information to the members such as the wage increase and the Pension Plan.

VP Knecht requested all members and please for the local paper. He spoke of plans for the local paper.

VP Knecht reported on the grievance log. He discussed the local paper. He discussed the local paper.

SHORT FORM
Report of Receipts and Expenditures
for a Candidate or
Principal Campaign Committee

(To be used only in campaigns in which gross receipts or expenditures do not exceed \$50,000 per election and the candidate has authorized only the principal campaign committee)

10:37

1. CWA DISTRICT 21 NVPOLITICAL ACTION COMMITTEE

2. ID. # 95-6541298

Name of Candidate or Committee (in full)

3541 W. 4th St. Suite 315

Address (number and street)

Los Angeles, CA 90010

City, State, and ZIP Code

☐ Check if address is different than previously reported

3.

Office Sought

State/District

4. Type of Report

☐ April 10 Report

☐ October 10 Report

☐ Tenth Day Pre-Election Report

☒ July 10 Report

☐ January 31 Report

☐ Thirtieth Day Post-Election Report

Check if appropriate

☐ Amended filing

☐ Termination Report

SUMMARY OF RECEIPTS AND EXPENDITURES

Covering Period 12/1/75 through June 30, 1976

This period

Calendar year to

6. Cash on Hand January 1, 1976

1,478.67

1,378.67

7. Cash on Hand at beginning of reporting period

1,478.67

8. Receipts

Itemized (use schedule 8A)

2,275.45

Unitemized

-

Total Receipts

2,275.45

2,675.45

9. Expenditures

Itemized (use schedule 8B)

3,754.12

Unitemized

-

Total Expenditures

3,754.12

4,054.12

10. Cash on Hand at close of reporting period

-0-

11. Debts and obligations owed to the committee (use schedule 8C)

-0-

12. Debts and obligations owed by the committee (use schedule 8C)

-0-

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

June 3, 1976

(Date)

(Signature of Treasurer for committee report, Signature of Candidate for campaign report)

John G. ..., Chairperson

Note: Submission of false, erroneous, or incomplete information may result in the person filing this Report to the Committee of the U.S.C. being liable for civil or criminal penalties.

(indicate the type for each entry)
(see formatting rules on back)

Let $\mathcal{A} = \{A_1, \dots, A_n\}$ be a family of n subsets of $\mathcal{P}(S)$ such that

1,005.9



FEDERAL ELECTION COMMISSION

1275 SIXTH ST. N.W.
WASHINGTON, D.C. 20463

Mr. John P. Proefrock
20814 S. Hawaiian Avenue
Lakewood, CA 90715

Re: MUR 376 (77)

Dear Mr. Proefrock:

We have completed a preliminary review of your complaint and have numbered it as MUR 376. Please refer to this number in any further correspondence.

A copy of your complaint has been forwarded to the respondent. If you have any further evidence you wish to make available to us, please submit it within five days of your receipt of this letter.

Please note that 2 U.S.C. §437g(a)(3) enjoins any person from making public the fact of "any notification or investigation" by the Commission until the respondent agrees in writing to make public the investigation. The attorney assigned to this matter is Charles N. Steele (telephone no. 202/523-4039). Please do not hesitate to write or call if you have any further questions.

Sincerely yours,

William Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1375 STREET NW
WASHINGTON, DC 20543

Mr. Ron Azlin, President
Local 11586, Communications
Workers of America
9125 East Whittier Blvd.
Suite 202
Pico-Rivera, CA 90660

Re: MUR 376 (77)

Dear Mr. Azlin:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 376. A copy of the complaint is enclosed.

In review of the disclosure reports of CWA COPE Political Contributions Committee and the 12 district level CWA political action committees filed with the Commission, a contribution of \$50 from Local 11586 CWA is reported as having been received by CWA District 11 Political Action Committee, June 4, 1976. In light of this fact, the Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441(b).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials in connection with the monthly payments made to CWA COPE, which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.



The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Charles N. Steele (telephone no. 202/523-4039), the attorney assigned to this case.

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

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

Sincerely yours,

William Oldaker
General Counsel

DEC #161



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the
Division Indicated
and Refer to Initials and Number
BRC:THH:RAH:CCD:ph
72-017-12c

4 APR 1977

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

771111

Re: Possible Violation of 2 U.S.C. 441b by Local 11586,
Communication Workers of America

Dear Mr. Oldaker:

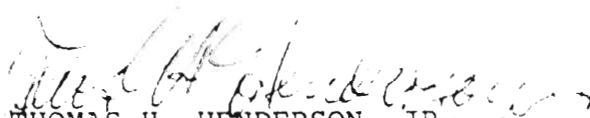
Attached for whatever attention the Commission may consider appropriate under 2 U.S.C. 437g, are copies of materials, including relevant investigative reports prepared by the Federal Bureau of Investigation, which relate to a possible violation of 2 U.S.C. 441b by the referenced labor union local.

We have closed this matter as a possible criminal violation of 2 U.S.C. 441j, and do not contemplate taking further action unless your investigation discloses further information which in your opinion justifies returning the matter to us pursuant to 2 U.S.C. 437g(a)(5)(D).

Sincerely,

BENJAMIN R. CIVILETTI
Assistant Attorney General
Criminal Division

By:


THOMAS H. HENDERSON, JR.
Chief, Public Integrity Section

Attachments



4 APR 1977

BRC THH:RAH CCD:ph
72-017-12c

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

Re: Possible Violation of 2 U.S.C. 441b by Local 11586,
Communication Workers of America

Dear Mr. Oldaker:

Attached for whatever attention the Commission may consider appropriate under 2 U.S.C. 437g, are copies of materials, including relevant investigative reports prepared by the Federal Bureau of Investigation, which relate to a possible violation of 2 U.S.C. 441b by the referenced labor union local.

We have closed this matter as a possible criminal violation of 2 U.S.C. 441j, and do not contemplate taking further action unless your investigation discloses further information which in your opinion justifies returning the matter to us pursuant to 2 U.S.C. 437g(a)(5)(D).

Sincerely,

BENJAMIN R. CIVILETTI
Assistant Attorney General
Criminal Division

By: THOMAS H. HENDERSON, JR.
Chief, Public Integrity Section

Attachments

Pamagatos

ph

2004 E. Canadian Ave.,
Lakewood, Ca 90715
July 13, 1976

Criminal Division
U.S. Department of Justice
Washington, DC 20535

Gentlemen:

I am wondering what is taking place with the case I filed with you on March 31 against the Local 1146, Communications Workers of America. I hope something is being done as I certainly do not want to run into any statute of limitations here.

On May 1- I wrote to your office in Los Angeles and Mr. Robert Gelhardt responded in a letter on the 24th saying that the matter was in your hands and that I should write to you.

I have had a call from an FBI agent inquiring into where I got the information on which I based my original charge. I told him that the executive board of the local had published the minutes of the meeting in the local paper, The Challenger. He said he would attempt to get a copy of the issue in question from the head office. Apparently he did, because I heard nothing more from him. This is the way things stand at this writing, and I feel I am entitled as a member of this outfit and a citizen to just a little better consideration than that. I cannot believe you people are so busy you can't find time to write me a short letter to inform me how things stand.

I am more than a little fed up with the push-around I have had at the hands of the Government which cares not a whit for the All-American Book, the lunchpail-carrying stiff who pays all the bills. You see, I have had this case to the useless NLRB which refused to lift a finger in my behalf, so, understandably, I am more than a little put out. I hope I am not getting the same brushoff from you people.

This union is guilty of a flagrant violation of the law, and I want the chicanery, highbinder and sham practice stopped!

I am enclosing a copy of the letter of March 31 in which I made the charges against Local 1146. Please - I want to hear from you by return mail. I think I have called loud enough that some action from you people.

Yours truly,

John F. Rock
John F. Rock
Member CWA Local 1146

Cc: Robert E. Gelhardt

Handwritten notes and signatures at bottom left.

44-122-0
Handwritten file number and stamps.

CIVIL DIV.
General Investigation Sec.

20814 S. Hawaiian Ave.,
Lakewood, Ca 90715
March 31, 1976

Federal Bureau of Investigation
U. S. Department of Justice
11000 Wilshire Boulevard,
Los Angeles, Ca 90024

Gentlemen:

I am hereby charging my union, Local 11586, Communications Workers of America with violation of Title 18, Section 610 of the United States Code, to wit usurping a portion of my dues money for political purposes.

Facts: On January 18, 1976, the above-named labor organization at 9125 East Whittier Blvd., Suite 202, Pico-Rivera, Ca 90660; (213) 692 7221, whose president is Mr. Ron Azlin, unlawfully coerced me in the exercise of my rights as a citizen and voter by passing a motion in executive board session to "donate \$50.00 a month to COPS (Committee on Political Education)...."

I submit that this motion was passed in camera without my knowledge or that of the general membership; further that said motion should properly have been submitted to the membership at the general meeting one week prior on January 7; further that notification of intent to present said motion should have been given the membership in writing prior to the general meeting so that all could have had an opportunity to vote on it.

I further submit that COPS is a partisan political organization, specifically an arm of the Democratic Party, that supports candidates for federal offices in addition to state and local offices, that by dint of its supporting candidates for federal offices, e.g., George McGovern in the last Presidential election, it violates the aforementioned Title 18, Section 610.

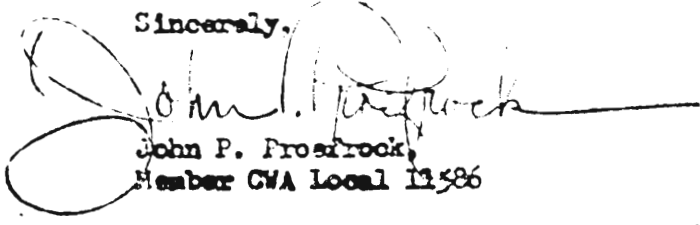
I further submit that the above-named labor organization violates my constitutional and civil rights by arbitrarily contributing a portion of my dues money to candidates I, an independent, conservative voter, would not under any circumstances support for election to any office, and

Further submit that the above-named labor organization violates my rights as a member by in effect telling me whose campaign(s) I shall support; that neither this union nor any other organization has any right whatsoever to capriciously and wilfully "donate" the dues money or any part thereof either directly or through organizations like COPS, to candidates for any office - federal, state or local - without my express permission and that of all other members of that organization.

In conclusion I contend that all moneys contributed to COPS, or any other political organization or group, should come from strictly voluntary donations, that the executive board of the above-named union grossly overstepped its authority and is in serious violation of the law guaranteeing a citizen's right to support candidates of his choice; that it violated the long-extant CWA precept that inter alia CWA is a "democratic union" run by and for the membership, and finally, in view of all the foregoing, that Local 11586, CWA should namum prohibitum be immediately enjoined to rescind the aforesaid motion.

I seek your prompt attention to this matter and please be assured you will have my utmost cooperation. Fiat justitia

Sincerely,


John P. Prosdock,
Member CWA Local 11586

CHN:WHL:181:ph
152-128-0

Mr. John W. Groeffrock
28811 S. Hawaiian Avenue
Inglewood, California 90715

Dear Mr. Groeffrock:

Your letter of September 25, 1978 to the Criminal Division has been referred to the Elections Unit of the Public Integrity Section for reply. Due to the recent transfer of the Elections Unit from the Fraud Section to the Public Integrity Section, there has been a delay in answering your letter, for which we apologize.

Your letter requests a report on what we have done with your allegation that Local 11588 of the Communication Workers of America has made improper political contributions in violation of 18 U.S.C. 610. It is not the policy of the Department of Justice to make public the status or progress of its criminal investigations. The reason for this policy is to prevent prejudice to innocent parties and to avoid jeopardizing evidence gathering.

We can tell you that the Department has studied your allegation carefully and is still looking into it. Should we find sufficient evidence to sustain the charges, rest assured that we will take the necessary steps to terminate the criminal activity and prosecute those who have violated the law. We thank you for bringing this matter to our attention.

Sincerely,

THOMAS H. HENNINGSON
Chief, Public Integrity Section
Criminal Division

Records
Election Chron
Brinkema(1)

WJ:

THOMAS H. HENNINGSON

4/12/76

Director, Federal Bureau of Investigation

Richard L. Thornburgh
Assistant Attorney General
Criminal Division

100-442884-100
77-617-12c

Communication Workers of America, Local 11586
Pico Rivera, California
John P. Proffrock - Complainant
Possible violation of 18 U.S.C. 610

Reference is made to your memorandum dated April 15, 1976. Your memorandum indicated that the Los Angeles office of the Bureau had received a letter from John P. Proffrock alleging that Local 11586, CWA, had agreed to donate \$50.00 per month of dues money to the Committee on Political Education. This allegation, if substantiated, would indicate a violation of 18 U.S.C. 610, since that statute prohibits the use of dues money in Federal election campaigns.

Therefore, we request the Bureau to investigate this allegation. We also request that Mr. Proffrock, 20714 S. Hawaiian Avenue, Inglewood, California 90715 be interviewed to obtain any further information he may have with particular reference to the names of all individuals known to Mr. Proffrock to have been present at the executive session which approved the donation. In addition, please obtain any documentary evidence which Mr. Proffrock may possess concerning this matter such as a written notice to the membership. In addition, we request that copies of the Local 11586 CWA dues filed with the Federal Election Commission be obtained to determine how, if at all, these contributions were reported. After obtaining this information, and any other available information and documentation based on leads provided by Mr. Proffrock, we request that Mr. Tom Adlin, President of Local 11586 be interviewed concerning this allegation and that copies of the executive committee resolution concerning the contribution and copies of checks related to CPE be obtained from him.

Logan's
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Lillian chron
M. Kelly (C)
Mr. Thornburgh
Mr. Linderman



UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
Los Angeles, California 90024
April 9, 1976

In Reply, Please Refer to
File No.

COMMUNICATIONS WORKERS OF AMERICA,
LOCAL 11586,
PICO RIVERA, CALIFORNIA
JOHN P. PROEFROCK-
COMPLAINANT
ELECTION LAWS

On April 6, 1976, the FBI, Los Angeles, received a letter from John P. Proefrock, a member of the Communications Workers of America, Local 11586, Pico Rivera, California. Mr. Proefrock alleged that Local 11586 had violated Title 18, Section 610 of the United States Code when the Executive Board Session agreed to donate \$50.00 a month to the Committee On Political Education (COPE).

A copy of this memorandum is being furnished to the United States Attorney, Los Angeles, California.

The letter from Proefrock is as follows:

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.



1000 1st Ave.,
Berkeley, Calif.
March 12, 1968

Federal Bureau of Investigation
U.S. Department of Justice
1100 15th Street, N.W.,
Washington, D.C. 20535

Dear Sir:

I am hereby giving you notice that I am a member of the
National Union of Students (NUS), 1000 1st Ave., Berkeley, Calif. 94704, to wit: [redacted]
for a period of my life.

Re: On March 11, 1968, the above-named labor organization at 9125 East 12th
Ave., Suite 200, Los Angeles, Ca 90046, (213) 921-2221, whose president is
Mr. [redacted], unlawfully coerced me in the exercise of my rights as a citizen and
voter by passing a motion in executive board session to "Monitor 1968 a month
to AIA (Committee on Political Action)...."

I affirm that this motion was passed in camera without my knowledge or that of
the general membership; further that said motion should properly have been sub-
mitted to the membership at a general meeting one week prior on January 2; fur-
ther that notification of this motion should have been given to all members
of the union in advance of the meeting so that all could have had
an opportunity to vote on it.

I affirm that the above-named labor organization, specifically in
violation of the National Labor Relations Act, has coerced me to join
the union to vote for [redacted] candidates for
federal offices, e.g., [redacted] in the last presidential election, in vio-
lation of the National Labor Relations Act, Section 8(a).

I affirm that the above-named labor organization violates my constitutional
rights by unlawfully restricting a period of my life to vote
for [redacted], an individual, conservative voter, could not under any circumstances
support for election to any office, and

I affirm that the above-named labor organization violates my rights as a
citizen by its refusal to allow me to vote for [redacted]; that neither
this union nor any other organization has any right whatsoever to coercively
and unlawfully "force" the dues payer or any part thereof either directly or through
organizations like AIA, to candidates for any office - federal, state or local -
without my express permission and that of all other members of that organization.

In conclusion I demand that all money contributed to UCPA, or any other politi-
cal organization or group, should come from exclusively political donations, that the
executive board of the above-named union expressly oversteered its authority and is
in serious violation of the law by passing a motion to support candi-
dates of its choice; that it violated the law by passing a motion that it was
AIA is a "democratic union" and by not for the membership, and finally, in view
of all the law cited, I demand that AIA should be immediately
refused to provide the above-named motion.

I send your request attention to this matter and please be assured you will have
my utmost cooperation. Sincerely,
[redacted]

Very truly,
[redacted]

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535
JAN 23 1966

The letter furnished by Brookrock is as follows:

10041, Washington, D.C.
Mr. J. Edgar Hoover
May 10, 1950

Walter J. Smith, Asst. Director in Charge
Federal Bureau of Investigation
1100 Wilshire Boulevard
Los Angeles, California

Dear Mr. Gekharuk:

This is in response to your letter of April 9 concerning my official charge against my union, CWA Local 11500.

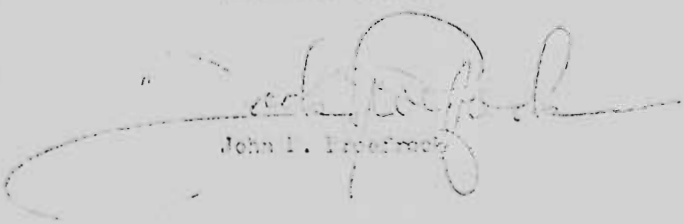
I have heard exactly nothing from Washington and am wondering who you sent the charge to there. I would like to write to him and see what is being done. It doesn't seem to me that there should be any question or doubt as to the Local's in definite violation of Title 18, Section 812 of the U. S. Code in view of facts set forth in my letter of March 31.

One of my co-workers and fellow union members did tell me that at the last meeting on the 5th President Hallin stated that "We have to be careful because we have a suit against us for allocating money to COPS."

I can only conclude that Washington has definitely filed a suit against the Local, but of course have no way of knowing for sure as I have not heard any news from you or anything at all from Washington.

Please advise me about this case. I would like to know the person you referred this matter to in Washington.

Sincerely yours,


John L. Freedman

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Copy to: 1 - USA, Los Angeles
(Attn: AUSA EARL E. BOYD)

Report of: J. HAROLD MARSHALL Office: Los Angeles, California
Date: 6/16/76

Field Office File #: 56-266 Bureau File #:

Title: Communication Workers of America
Local 11586
Pico Rivera, California;
JOHN P. PROEFROCK - COMPLAINANT

Character: ELECTION LAWS

Synopsis: Department of Justice letter, dated 5/21/76, requested investigation of subject for possible election law violations. JOHN P. PROEFROCK, complainant, advised he had no other information concerning alleged violation by Communication Workers of America. He saw an article in "The Challenger" newspaper which is internal organ of Local 11586. The article stated that executive board had agreed to donate \$50 to the Committee on Political Education. Attempts to interview President RONALD ARLIN of Local 11586 unsuccessful to date.

- P -

DETAILS:

This is a limited investigation.

This investigation was initiated upon receipt of a letter from the Department of Justice dated May 21, 1976 requesting investigation of the Communication Workers of America, Local 11586, Pico Rivera, California.

FEDERAL BUREAU OF INVESTIGATION

1Date of transcription 6/10/76

Mr. JOHN PROEFROCK, 20314 South Hawaiian Avenue, Lakewood, California, telephone number 865-6754, was telephonically contacted at his work, telephone number 371-0000. PROEFROCK was advised of the identity of the Agent and that an investigation was being conducted concerning the Communication Workers of America, Local 11585, in Rico Rivera, California, for possible Election Law violations. Mr. PROEFROCK was asked to make himself available for personal interview in this matter. He said that he really could furnish very little information concerning the matter.

The only real information he had was what he saw in an article printed in the newspaper furnished by the union. The newspaper is called "The Challenger" and is put out about every two months. Sometimes the newspaper carried an article stating that the Executive Board had agreed to donate \$50.00 to the Committee on Political Education (COPE). There was no written notice given to the members other than publishing of the minutes in the newspaper. He has received no other information concerning this matter and has no documentary evidence other than the newspaper article which is public document. Mr. PROEFROCK added that the minutes of the executive meeting would have been read at the general meeting of the membership after the executive session was held. He was not at that meeting but he understands all that happened was that the minutes were read to the general meeting.

PROEFROCK said he was extremely angry over a situation like this and he had contacted the Labor Board and complained about the matter. That is when he was told the matter may be a violation of Federal law. He said he could furnish no further information.

6/9/76

Los Angeles, California

Los Angeles 56-266

SA J. HAROLD MARSHALL/ljm

6/10/76

LA 56-266

On June 9, 1976, SA J. HAROLD MARSHALL contacted RONALD AZLIN, home telephone number 714-848-3396. He was advised of the identity of the agent and that investigation was being conducted concerning alleged election law violations by Communication Workers of America, Local 11586. AZLIN said he would be available for interview at his office in Pico Rivera, California on June 15, 1976.

On June 14, 1976, AZLIN advised SA MARSHALL that he would not be able to submit to interview on June 15, 1976 because of an illness in his family. The week after that he is going to be tied up with a convention in Los Angeles and, therefore, it will be after June 20, 1976 before he will be available for interview.

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Copy to: 1 - USA, Los Angeles
(ATTN: AUSA EARL H. BOYD)

Report of: J. HAROLD MARSHALL Office: Los Angeles
Date: 7/7/76

Field Office File #: 56-266 Bureau File #:

Title: Communication Workers of America,
Local 11586,
Pico Rivera, California;
JOHN PROEFROCK -
Complainant

Character: ELECTION LAWS

Synopsis:

RONALD AZLIN, President, Communication Workers of America (CWA), Local 11586, Pico Rivera, California, advised Executive Board did vote in January, 1976, to furnish \$600 over entire year to COPE, CWA, Washington, D.C., National Headquarters. Money furnished to Washington, D.C. is money collected in dues and he assumes CWA headquarters will use money lawfully. His local has citizenship fund which raises money separate from dues for political activities on Federal level.

- C -

DETAILS

This is a limited investigation.

FEDERAL BUREAU OF INVESTIGATION

1

Date of transcription 7/7/76

RONALD AZLIN, President, Communication Workers of America, Local 11586, 9125 East Whittier Boulevard, Suite 202, Pico Rivera, California, was contacted at his office. He was advised of the identity of the interviewing agents and that investigation was being conducted concerning the donation of money to the Committee on Political Education (COPE) by Local 11586. AZLIN was furnished a copy of an "Interrogation; Advice of Rights" form which he read, stated he understood, but declined to sign. He said he understood his rights and had talked to an attorney and to the national organization of CWA and that he would discuss the matter with the agents but would reserve the right to stop the interview at any time. AZLIN then furnished the following:

On January 14, 1976, the Executive Board of Local 11586 met and a motion was made by AZLIN to furnish \$600 during the year 1976 to the CWA National Office of COPE. The donation would be in the form of a check of \$50 per month for the 12 month period. The Executive Board has the privilege of acting on behalf of the membership in between membership meetings.

The \$600 is dues money which is being furnished to the National CWA Headquarters, COPE, 1925 K Street Northwest, Washington, D.C. It is his understanding and feeling that this money will be used in the proper manner and lawfully by the National COPE committee and he feels it will be used for political education and not for the use of any Federal election campaign.

Local 11586 has not filed with the Federal Election Commission at any time. They do have a Local Citizenship fund which money for that fund is raised by Local benefits and the money in that fund can be used in Federal campaigns. They can use dues money in making contributions to local campaigns and that is done.

Interviewed on 7/6/76 Pico Rivera, California File # Los Angeles 56-266

by SAs J. HAROLD MARSHALL and
LAWRENCE C. BENNETT/JHM/afv

Date dictated 7/6/76

-2-

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

2
LA 56-266

Copies of checks donated to COPE are not available but can be produced if necessary.

It is the assumption of AZLIN that JOHN PROEFROCK, a local member of CWA, made this complaint and PROEFROCK also made two complaints to the National Labor Relations Board concerning use of Local 11586 money and both were denied by the National Labor Relations Board.

AZLIN furnished SA J. HAROLD MARHSALL with a copy of the Executive Board meeting minutes dated January 14, 1976, and advised that the minutes were approved by the membership in March of 1976 at the normal membership meeting.

AZLIN said Local 11586 has nothing to hide and that he would be more than happy to cooperate in this matter in anyway possible.

[illegible]

Motion B/S/C to send one person to the Senate for Appointment. B/S/C.



FEDERAL ELECTION COMMISSION

135 K STREET NW
WASHINGTON, DC 20543

MAR 24 1977

Mr. John P. Proofrock
20814 S. Hawaiian Avenue
Lakewood, California 90715

Re: MUR 376 (77)

Dear Mr. Proofrock:

This is to acknowledge receipt of your complaint of March 15, 1977, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely yours,

151

William Oldaker
General Counsel



77081

MUR 3 H

[illegible]

that the total number of persons attending the meeting and that of the special membership; Further that said meeting was held and was subject to the attendance of the special meeting and was held on January 7, or said day or on any preceding day; Further that said act of intent to present said motion was made prior to the meeting; Further that prior to one of the special meetings of the said association, the opportunity to vote was

1. The complaint is that the Commission failed to specifically authorize the Democratic Party and other affiliated parties of offices in addition to state and local offices, and the Commission's subsequent whereby Republican and Independent voters were not to support candidates of their choice, and that the Commission and other parties of offices, abrogated. CCRB consistently supports Article I, which requires voters, who do not vote for under the designated party leave!

in addition, I would like to call your attention to the fact that other political organizations, groups or individuals, including the voluntary donations, that the Executive Committee has received under legal authority overstepping the authority of the Executive Committee of the General Assembly (1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19) (20) (21) (22) (23) (24) (25) (26) (27) (28) (29) (30) (31) (32) (33) (34) (35) (36) (37) (38) (39) (40) (41) (42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52) (53) (54) (55) (56) (57) (58) (59) (60) (61) (62) (63) (64) (65) (66) (67) (68) (69) (70) (71) (72) (73) (74) (75) (76) (77) (78) (79) (80) (81) (82) (83) (84) (85) (86) (87) (88) (89) (90) (91) (92) (93) (94) (95) (96) (97) (98) (99) (100) (101) (102) (103) (104) (105) (106) (107) (108) (109) (110) (111) (112) (113) (114) (115) (116) (117) (118) (119) (120) (121) (122) (123) (124) (125) (126) (127) (128) (129) (130) (131) (132) (133) (134) (135) 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1. The above information is true and correct and accurate to the best of my knowledge.

[illegible]

$\frac{1}{\sqrt{\pi}} \int_{-\infty}^{\infty} f(x) e^{-x^2} dx = \frac{1}{\sqrt{\pi}} \int_{-\infty}^{\infty} f(x) e^{-x^2} dx$

H. F. ...

Some members may say, "I don't want to ask my students what is wrong with them. I don't agree. Already, there are too many negative words from mathematics teachers. I don't want to be in a situation that is negative." I agree with you. It is an approach that is not going to work. I mean, if we have gone far enough that we are not even going to stop talk that we should not even talk about, we should have a rule that we should not talk about it.

Beginning with the issue of the Council's printed motions made, accepted and carried, M.S. is not treated as M.S. in from the House of Commons and General Meetings, and the reasons for this are, presumably, because of the existence of the House of Commons, and the

Nov. - Dec. Financial Report



THE CHALLENGER
Bruce Marchese
NORTON
STATE
MAYOR



Jack Drorstock, K6QEQ



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FEDERAL ELECTION COMMISSION

1111 K STREET NW
WASHINGTON, DC 20543

THIS IS THE END OF MUR # 376

