



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF PUR # 426



FEDERAL ELECTION COMMISSION

Memorandum to Bob Costa
from William Aldaker

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Date

Suzanne M. Lallahan
3/30/78



FEDERAL ELECTION COMMISSION

1234 K STREET, N.W.
WASHINGTON, D.C. 20463

December 19, 1977

Thomas J. Geraghty, Treasurer
Committee to Promote Jobs,
Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02184

Dear Mr. Geraghty:

On December 7, 1977, the Commission voted to terminate its inquiry into possible violations of 2 U.S.C. §432, §434, and §441 by the Committee to Promote Jobs, Construction and the Economy (the Committee).

The Commission has concluded that on the basis of the information contained in your letter of September 29, 1977, the Federal Election Campaign Act of 1971, as amended, has not been violated.

Accordingly, the Commission intends to take no further action and close the file in this matter.

If you have any questions please contact Suzanne Callahan (202/ 523-4166), the staff member now assigned to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20463

Thomas J. Geraghty, Treasurer
Committee to Promote Jobs,
Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02184

Dear Mr. Geraghty:

On December 1, 1977, the Commission voted to terminate its inquiry into possible violations of 2 U.S.C. §432, §434, and §441 by the Committee to Promote Jobs, Construction and the Economy (the Committee).

The Commission has concluded that on the basis of the information contained in your letter of September 29, 1977, the Federal Election Campaign Act of 1971, as amended, has not been violated.

Accordingly, the Commission intends to take no further action and close the file in this matter.

If you have any questions please contact Suzanne Callahan (202/ 523-4166), the staff member now assigned to this matter.

W.C.O.
12/14

Sincerely,

William C. Oldaker
General Counsel



December 2, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 426 Team #2 Callahan

7 3 1 4 1 0 1 3 5 8
Please have the attached General Counsel's Report
on MUR 426 circulated to the Commission and placed on the
Compliance Agenda for the Commission meeting of December 7.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Promote Jobs,)
Construction and the)
Economy)

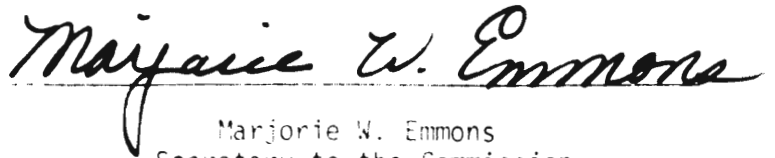
MUR 426 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 7, 1977, the Commission determined by a vote of 5-0 to terminate its inquiry into possible violations of 2 U.S.C. Sections 432, 434, and 441 by the Committee to Promote Jobs, Construction and the Economy (the Committee).

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

Accordingly, the file in the above-captioned matter has been closed.


Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION
December 2, 1977

In the Matter of Committee)
)
to Promote Jobs, Construction) MUR 426 (77)
)
and the Economy)

GENERAL COUNSEL'S REPORT

SUMMARY

On August 26, 1977, the Commission found reason to believe that the Committee to Promote Jobs, Construction and the Economy (the Committee), an unauthorized committee supporting the re-election of Congressman James Burke of Massachusetts in 1976, may have committed the following violations:

(1) 2 U.S.C. §441a(a)(1)(A), by expending approximately \$6,940 for in-kind contributions on behalf of Congressman Burke's campaign.

(2) 2 U.S.C. §434(b), in light of the fact that these should have been reported as in-kind contributions.

(3) 2 U.S.C. §432(c) and (d), in that the treasurer of the respondent Committee did not keep detailed and exact accounts of contributions and expenditures and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.

EVIDENCE

We notified the respondent Committee, as well as Congressman Burke and his principal campaign committee, of these findings and requested them to answer specific questions.

The Congressman submitted a response on September 14, 1977, stating that "any activity by the "Committee" was totally unauthorized and done without my knowledge, consent, authorization, or permission; ..." Congressman Burke further stated that when he became aware of the advertising campaign by the Committee, he instructed the media to discontinue running the unauthorized ads.

Thomas Geraghty, treasurer of the Committee, submitted a response on September 29, 1977. Mr. Geraghty stated that the Committee was formed without "permission" from the candidate as "indicated on the organization statement."

Mr. Geraghty further stated that receipted bills had been furnished to the Audit Division and all contributions were recorded.

LEGAL ANALYSIS

The Act provides that "expenditures made by any person in cooperation, consultation, concert, with, or at the request or suggestion of, a candidate ... shall be considered a contribution to such candidate." 2 U.S.C. §441a(a)(7)(B)(i).

An analysis of the statements submitted by both Congressman Burke and the Committee indicate that the Committee was, in fact, unauthorized.

RECEIVED
SEP 29 1977
U.S. HOUSE OF REPRESENTATIVES
OFFICE OF CLERK

Therefore, the \$6,940 expended on behalf of Burke by the Committee would not be considered an in-kind contribution under §441a(a)(7)(B) and consequently, not required to be reported under §434(b).

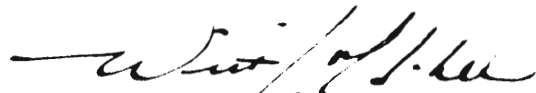
In light of the fact that the Committee has provided the Audit Division with a list of receipted bills and have listed all contributions on their reports, they have complied with the requirements of 2 U.S.C. §432(c) and (d). 1/

RECOMMENDATION

The Commission should take no further action in this matter, close the file, and notify the respondent Committee.

12/2/77

DATE



WILLIAM C. OLDAKER
GENERAL COUNSEL

1/ In our earlier report to the Commission, withdrawn on December 1st, we indicated that a 441d notice did not appear on the photocopied ad submitted by the respondent. Subsequent to that writing, we received information indicating that Committee ads did provide a disclaimer notice.

In this same report, it was recommended that clarification and elaboration of the Congressman's and the Committee's answers to our prior questions be requested. We have re-evaluated those statements and consider them to be sufficient.

RECEIVED
JAN 11 1978
GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20463

Thomas J. Geraghty, Treasurer
Committee to Promote Jobs,
Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02184

Dear Mr. Geraghty:

On December , 1977, the Commission voted to terminate its inquiry into possible violations of 2 U.S.C. §432, §434, and §441 by the Committee to Promote Jobs, Construction and the Economy (the Committee).

The Commission has concluded that on the basis of the information contained in your letter of September 29, 1977, the Federal Election Campaign Act of 1971, as amended, has not been violated.

Accordingly, the Commission intends to take no further action and close the file in this matter.

If you have any questions please contact Suzanne Callahan (202/ 523-4166), the staff member now assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

November 23, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 426 (77) Team #2 Callahan

Please have the attached General Counsel's Report on MUR 426 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of November 29, 1977.

Thank you.

10/20/77 10:00 177

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

November 23, 1977

In the Matter of Committee	)	
	)	MUR 400 (77)
to Promote Jobs, Construction	)	
	)	
and the Economy	)	

General Counsel Report

SUMMARY

On August 26, 1977, the Commission found reason to believe that the Committee to Promote Jobs, Construction and the Economy (the Committee), an unauthorized committee supporting the re-election of Congressman James Burke of Massachusetts in 1976, may have committed the following violations:

(1) 2 U.S.C. §441a(a)(1)(A), by expending approximately \$6,940 for in-kind contributions on behalf of Congressman Burke's campaign.

(2) 2 U.S.C. §434(b), in light of the fact that these should have been reported as in-kind contributions.

(3) 2 U.S.C. §432(c) and (d), in that the treasurer of the respondent Committee did not keep detailed and exact accounts of contributions and expenditures and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.

RECEIVED
FEDERAL ELECTION COMMISSION
NOV 27 1977
OFFICE OF GENERAL COUNSEL

EVIDENCE

We notified the respondent Committee, as well as Congressman Burke and his principal campaign committee, of these findings and requested them to answer specific questions. The treasurer of the Committee submitted responses on September 29, 1977 and the Congressman submitted responses on September 14, 1977.

Both Congressman Burke and the Committee were asked whether any contributions mailed to the Congressman were then sent to the Committee. Neither set of answers specifically responded to this question. Both sets of responses appear inadequate in that they do not specifically address the issue of contacts among the respondent Committee, the Congressman and his principal campaign committee.

ADDITIONAL VIOLATION: 2 U.S.C. §441d

Respondent's submission also indicated the possibility of another violation. The Committee ran newspaper ads on behalf of Congressman Burke and submitted a copy of one of these ads in response to our questions. The advertisement in support of Congressman Burke did not appear to have statement of non authorization as required by §441d. This section requires that a newspaper advertisement expressly advocating the election of a clearly identified candidate

FEDERAL ELECTION COMMISSION
OFFICE FILE COPY
OFFICE OF GENERAL COUNSEL

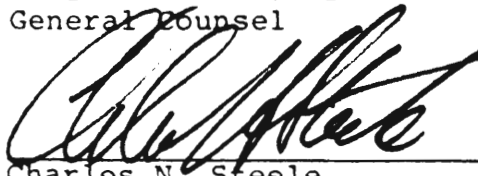
which is not authorized by a candidate "clearly and conspicuously . . . state that the communication is not authorized by any candidate . . ."

RECOMMENDATION

The Commission should find there is reason to believe that the Committee violated 2 U.S.C. §441d and authorize the sending of the attached letter to the respondent committee. The letter also contains questions to clarify certain matters not clearly answered by the respondent on September 29th. These questions, as well as clarifying questions to Congressman Burke, which are also attached, should be authorized.

DATE: 23 November 1977

William C. Oldaker
General Counsel



Charles N. Steele
Associate General Counsel

UNITED STATES COMMISSION
ON
FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James A. Burke
214 House Office Building
Washington, D.C. 20515

Re: MUR 426 (77)

Dear Congressman Burke:

This is in reference to your letter of September 14, 1977, in which you submitted responses to our questions concerning the Committee to Promote Jobs, Construction, and the Economy (the Committee).

The Commission has determined that clarification and elaboration is needed from you on the following questions:

1. In our question number 3, we asked you to identify all conversations and correspondence with the Committee. Your answer, in part, stated that once you learned that ads were being placed by the Committee, you told the papers not to print them. You also stated that these activities by the Committee were unauthorized. Please state what conversations, correspondence, etc. you had with the Committee concerning these ads.

2. At what point (exact date if possible), during the course of your campaign did you, your principal campaign committee or other agents, become aware of the existence of the Committee?

3. After it was called to your attention that unauthorized advertisements were allegedly being paid for by the Committee, did you or any of your agents have any conversations or correspondence with the Committee concerning their activities on your behalf? If so, please describe these conversations, the individuals involved, and the dates on which they were held.



FEDERAL ELECTION COMMISSION
U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20547
SEP 21 1977

4. Public records on file with the Commission disclose that the Transportation Political Education League reported a \$1,000 contribution to you in Washington, D.C. on September 1, 1976; the Committee reported the receipt of a \$1,000 contribution from this same group on September 9, 1976.

(a) Do you know whether the above described contributions were in fact the same contribution? If they were, please state whether it was first sent to you and then forwarded to the Committee.

(b) If the contribution was not forwarded to the Committee, please set out what you, your principal campaign committee or other agents did with this reported contribution.

5. You did not specifically address your answers to our Question No. 4. This question is: Did you, your principal campaign committee, or other agents: (a) suggest to actual or potential contributors to your campaign that they send their contributions to the Committee?

(b) Receive any contributions which you forwarded to the Committee?

We would appreciate a response from you within ten days of your receipt of this letter.

If you have any questions, please contact Suzanne Callahan, (202-523-4166) the staff member now assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
SEP 11 1976
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. Geraghty, Treasurer
Committee to Promote Jobs, Construction
and the Economy
1765 Canton Avenue
Milton, Massachusetts 02184

Re: MUR 426 (77)

Dear Mr. Geraghty:

The Commission has received your statement of September 29th in response to our request for information in this matter, which included a copy of a newspaper advertisement by the Committee to Promote Jobs, Construction and Economy (hereinafter the Committee) in support of Congressman Burke. As set forth in 2 U.S.C. §441d, all political advertisements, "if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, . . . state that the communication is not authorized by any candidate, . . ."

On November , 1977, the Commission determined there was reason to believe your Committee violated 2 U.S.C. §441d for failure to produce such a disclaimer on the face of the advertisement. In this connection, please (1) state whether or not all political advertisements by the Committee in support of Congressman Burke contained a non-authorization notice; and (2) submit full copies of all such political advertisements.

The Commission also determined that clarification and elaboration is needed from you regarding your answers to our questions of August 30, 1977. The questions are as follows:

1. While you stated in those answers that Congressman Burke did not authorize your committee, did your committee ever seek authorization from Congressman Burke to receive contributions and make expenditures on his behalf?



FEDERAL ELECTION COMMISSION
RECEIVED COPY
OCT 11 1977

2. Public records on file with the Commission disclose that the Transportation Political Education League reported a \$1,000 contribution to Congressman Burke in Washington, D.C. on September 1, 1976; your committee reported the receipt of a \$1,000 contribution from this same group on September 9, 1976. While your answers stated that "all checks received were payable to the Committee," (a) do you know whether the above described contributions were in fact the same contribution? If they were, please state whether it was first sent to Congressman Burke and then forwarded to your committee.

(b) Please provide copies of any correspondence which accompanied that contribution, including the envelope in which it was sent to you.

(c) Did your Committee receive any other contributions which were first sent to Congressman Burke and then forwarded to you? If so, please describe such contributions (i.e.; date, donor, amount and the person(s) who processed them).

3. With regard to the election night rally attended by Congressman Burke, your answer stated that "... we invited him to make an appearance after his re-election had been assured." Please state specifically when, how and by whom this invitation was made.

In connection with these matters, you may provide any other information you think is relevant. Please set out your answers in a statement and submit this information within ten days of your receipt of it.

If you have any questions, please contact Suzanne Callahan, (202-523-4166) the staff member now assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

UNITED STATES ELECTION COMMISSION
ORIGINAL FILE COPY
WILLIAM C. OLDAKER, GENERAL COUNSEL

JAMES A. BURKE
ELEVENTH DISTRICT
MASSACHUSETTS

241 HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

Congress of the United States

House of Representatives

Washington, D.C. 20515 2:59

9/14/77
DEC #1475-300
45

MEMBER:
COMMITTEE ON
WAYS AND MEANS

CHAIRMAN:
SOCIAL SECURITY COMMITTEE

MEMBER:
UNEMPLOYMENT COMPENSATION
COMMITTEE

JOINT COMMITTEE ON
INTERNAL REVENUE TAXATION

September 14, 1977

682622

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

RE: MUR 426(77)

Attention: Ms. Nancy L. Simmons

Dear Sirs:

This is in response to your certified letter of August 30, 1977, in which you seek certain information of me concerning possible violations of the Federal Election Campaign Act of 1971 by a "Committee to Promote Jobs, Construction and the Economy."

Your letter was addressed to me at my Milton, Massachusetts, address and, unfortunately, did not reach me until this past weekend.

The finances for my 1976 campaign were handled exclusively and in their entirety by my official campaign committee which is designated as follows:

Ms. Jeanne M. Ryan, Treasurer
Committee to Re-Elect Congressman James A. Burke
and Nomination and Election of Other Democratic
Candidates

The report of my re-election campaign committee was timely filed with your Commission and is available to you.

I at no time authorized any person, agent or committee, other than my official campaign committee, referred to above, to either raise or expend any money in my behalf in connection with my 1976 re-election campaign. Further, no one on my Congressional staff was authorized to either raise or expend, or cause to be raised or expended, any campaign funds on my 1976 re-election campaign. Additionally, no one acting as my agent was authorized to raise or expend, or to cause to be raised or expended, any funds on behalf of my 1976 re-election campaign, other than the official campaign committee referred to above.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY

Federal Election Commission

Page two

(2)

It was called to my attention at one point during the course of my re-election campaign in 1976 that unauthorized advertisements and spot radio announcements, allegedly paid for by a "Committee to Promote Jobs, Construction and the Economy" were being run by certain newspapers and radio stations. Immediately, when I found out about this wholly unauthorized activity, I instructed the media not to continue to run such unauthorized ads. As a direct result thereof, I was informed that the Quincy Patriot Ledger and the Brockton Enterprise cancelled full page advertisements allegedly to be paid for by the referenced "Committee," and that 30 to 40 spot advertisements by radio station WJDA in Quincy, Massachusetts, likewise were cancelled. I want to emphasize that any activity by the "Committee" was totally unauthorized and done without my knowledge, consent, authorization or permission; you must inquire of them as to such activities.

I hope this completely clears up any question which may have been raised by any possible allegations connecting me with the "Committee" to which you referred.

I am enclosing a copy of a telegram which was sent to about 25 news outlets in and around my Congressional District when the unauthorized ads were brought to my attention. In addition the attached news release was sent as a follow-up, to all news outlets in my District. If you require copies of the telegrams, I will be happy to ask Western Union to provide them for you.

Sincerely,

James A. Burke

JAMES A. BURKE
Member of Congress
11th District of Massachusetts

JAB:ds
enclosures: two telegrams, news release
and covering letter

RECEIVED
FEB 11 1977
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Telegraph

NO. WDS - CL. OF SVC.	PD. OR COLL.	CASH NO.	CHARGE TO THE ACCOUNT OF	THIS MESSAGE WILL BE SENT AS A TELEGRAM UNLESS IT IS OTHERWISE INDICATED.	PRESS DPR NPR	OVERNIGHT TELEGRAM
			CWA 082871			

Transmit the following message, subject to the Telegraph Company's conditions, rules and regulations, which are on file with regulatory authorities.

September 10, 1976

BOOK MESSAGE
HAND DELIVER
DO NOT PHONE

Publisher

I respectfully request that you refuse any advertisements which might be offered on my behalf by any unauthorized group. This is in keeping with my pledge to neither raise nor spend money this year. I trust that you will honor my pledge and respect this request.

Sincerely,

JAMES A. BURKE
Member of Congress

From: James A. Burke
241 Cannon House Office Building
Washington, D.C. 20515

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



T. J. GERAGHTY

BUILDING CONTRACTOR - LAND DEVELOPER

TRUMAN PLAZA BLDG., 605 TRUMAN HIGHWAY, HYDE PARK, MASS. 02136

PHONE: 364-4000 / 296-9622

September 29, 1977

702886

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

Attn: MR 426 (77) Attorney Simons

Gentlemen:

The below answers are made in response to the questionnaire I received from your office a few weeks ago:

1. The "Committee to Promote Jobs, Construction and the Economy" was organized in full compliance with the law, as known to us, as an unauthorized committee after Congressman James A. Burke had publicly stated that he would neither solicit nor expend any funds whatsoever in behalf of his campaign for reelection. Inquiries to the FEC revealed that it was perfectly proper and legal to form an unauthorized committee without the permission of the candidate which was so indicated on the organization statement originally sent to the commission.

- 2.a Thomas J. Geraghty, Treasurer
1735 Canton Avenue, Milton, MA 02186
Louis Contini
97 Grove Street, Quincy, MA 02169
William M. White,
75 Fairbanks Road, Milton, MA 02186
William Purcell
39 Fullers Street, Brockton, MA 02401
b No prior campaign activity

FEDERAL ELECTION COMMISSION
ORIGINAL COPY
DATE 10/11/77

3. James A. Burke. The purpose of the unauthorized committee was to support the reelection of Congressman James A. Burke with all contributions received expended for that purpose. Copy of political ad is attached.

- 4.a No.
ii No.

Because our committee supported Congressman Burke's reelection - and his alone - we invited him to make an appearance after his reelection had been assured.

NOT
WE ASKED

9/29/77

4. b No.

5. a Solicitations were made by telephone and correspondence

b Contributions were received mostly by mail - and some in person contributions from friends.

c All checks were made payable to the "Committee to Promote Jobs, Construction and the Economy." The purpose of the Committee was explained to each contributor - that it was an unauthorized committee supporting the reelection of Congressman Burke.

d Correspondence attached.

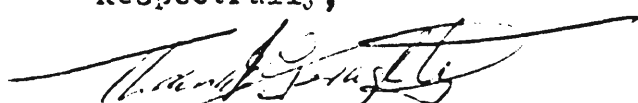
6. No. All checks received were payable to the committee.

7. The purpose of the unauthorized committee was to assist a candidate for reelection who was admired by his entire constituency. The candidate had made a firm commitment that he would neither accept nor expend funds to further his reelection. His opponent took advantage of this situation and flooded the district with questionable material. Because of this we formed the committee.

Our efforts were of the best intentions, although our bookkeeping was not without flaws, all contributions were properly recorded. We did subsequently obtain a complete list of receipted bills which were furnished to your audit division.

Our records indicate that all contributions were recorded. Presently, all records are current and any further requests by your commission to verify any or all of these records will be forwarded upon request.

Respectfully,


Thomas J. Geraghty
Treasurer

j
Enc 3

FEDERAL ELECTION COMMISSION
CENTRAL FILE COPY
OFFICE OF GENERAL COUNSEL

THOMAS J. GERAGHTY, Treasurer
1765 Canton Avenue
Milton, Mass. 02186

00-76

COMMITTEE TO PROMOTE JOBS. CONSTRUCTION. & THE ECONOMY

Re: Question 5 (d)

September, 1976

(Typed in 1976, or 1977? - type as his Oct 1977 re: 1977)

Dear

In 1976, our mutual friend, Congressman Jim Burke, 11th District, made a firm commitment to run for re-election on his record in the Congress without benefit of any contributions. This prompted those opposed to his philosophy to heavily contribute to his opponent in an all out drive to defeat Jim.

However, Jim Burke remained firm in his commitment to run solely on his record and did not accept contributions.

This obvious disadvantage caused concern among many of his friends. Accordingly, this committee was formed in compliance with the Federal Election Commission and proceeded to place newspaper ads, purchase bumper stickers, signs and other campaign items.

It is for that reason we are respectfully requesting your assistance at this time.

Thank you for your courtesy, I am,

Respectfully,

THOMAS J. GERAGHTY
Treasurer

j

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
U.S. DEPARTMENT OF JUSTICE

THOMAS J. GERAGHTY, Treasurer
1765 Canton Avenue
Milton, Mass. 02186

00-76

COMMITTEE TO PROMOTE JOBS. CONSTRUCTION. & THE ECONOMY

Re: Question 5 (d)

November, 1973

Many thanks for your kind and generous assistance in our efforts to conduct an effective campaign in behalf of Congressman Jim Burke.

We feel certain that our mutual cooperation has been indicative of the final results.

Again, our sincere gratitude for your help.

Respectfully,

THOMAS J. GERAGHTY
Treasurer

j

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON DC 20463

October 14, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 426 (77)

Please have the attached report on MUR 426 (77)
distributed to the Commission and placed on the Compliance
Agenda for the Commission meeting of October 19, 1977.

Thank you.



FEDERAL ELECTION COMMISSION
CONFIDENTIAL COPY
OFFICE OF GENERAL COUNSEL

In the Matter of)
) MUR 426 (77)
Committee to Promote Jobs,)
Construction and Economy)

On August 26, 1977, the Commission adopted the recommendation of the General Counsel and found reason to believe that the Committee to Promote Jobs, Construction and the Economy (the Committee) may have violated 2 U.S.C. § 441a(a)(1)(A) and 434(b) by expending \$6,940 on behalf of the 1976 re-election campaign of Congressman Burke of Massachusetts which may have been in cooperation or consultation with the candidate. The Commission also found reason to believe the Committee may have violated 2 U.S.C. § 432(c) and (d) due to the Committee's failure, disclosed by the Audit Division, to keep contribution or expenditure records and receipted bills as required.

DATE:

FEDERAL BUREAU OF INVESTIGATION
 OFFICE OF THE DIRECTOR
 WASHINGTON, D. C. 20535

ACC 1727



T. J. GERAGHTY

BUILDING CONTRACTOR - LAND DEVELOPER

TRUMAN PLAZA BLDG., 605 TRUMAN HIGHWAY, HYDEPARK, MASS. 02136

PHONE: 364-4000 / 296-9622

September 29, 1977

702386

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20543

Attn: 100-423 (77) Attorney General

Gentlemen:

The below answers are made in response to the questionnaire I received from your office a few weeks ago:

1. The "Committee to Reelect Jois, Construction and the Ecology" was organized in full compliance with the law, as far as us, as an unauthorized committee after Congressman James A. Burke had publicly stated that he would neither solicit nor expend any funds whatsoever in behalf of his campaign for reelection. Inquiries to the F.E.C. revealed that it was perfectly proper and legal to form an unauthorized committee without the permission of the candidate which was so indicated on the organization statement originally sent to the commission.

2. a. Thomas J. Geraghty, Treasurer
1735 Boston Avenue, Milton, MA 02136
Louis Costini
97 Grove Street, Quincy, MA 02138
William L. White,
75 Fairbanks Road, Milton, MA 02136
William Purcell
36 Millers Street, Brockton, MA 01901
b. No prior campaign activity

3. James A. Burke. The purpose of the unauthorized committee was to support the reelection of Congressman James A. Burke with all contributions received expended for that purpose. Copy of political ad is attached.

4. a. No.
b. No.

Because our committee supported Congressman Burke's reelection - and his alone - we invited him to make an appearance after his reelection had been assured.

FILE COPY
OFFICE OF GENERAL COUNSEL

9/29/77

4. b No.

5. a Solicitations were made by telephone and correspondence

b Contributions were received mostly by mail - and some in person contributions from friends.

c All checks were made payable to the "Committee to Promote Jobs, Construction and the Economy." The purpose of the Committee was explained to each contributor - that it was an unauthorized committee supporting the reelection of Congressman Burke.

d Correspondence attached.

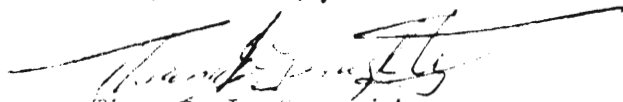
6. No. All checks received were payable to the committee.

7. The purpose of the unauthorized committee was to assist a candidate for reelection who was admired by his entire constituency. The candidate had made a firm commitment that he would neither accept nor expend funds to further his reelection. His opponent took advantage of this situation and flooded the district with questionable material. Because of this we formed the committee.

Our efforts were of the best intentions, although our bookkeeping was not without flaws, all contributions were properly recorded. We did subsequently obtain a complete list of receipted bills which were furnished to your audit division.

Our records indicate that all contributions were recorded. Presently, all records are current and any further requests by your commission to verify any or all of these records will be forwarded upon request.

Respectfully,


Thomas J. Geraghty
Treasurer

J
Enc 3

RECEIVED
SEP 30 1977
U.S. HOUSE OF REPRESENTATIVES
OFFICE OF CLERK

THOMAS J. GERAGHTY, Treasurer
1765 Canton Avenue
Milton, Mass. 02186

62-76

COMMITTEE TO PROMOTE JOBS. CONSTRUCTION. & THE ECONOMY

Re: Question 5 (d)

September, 1973

Dear

In 1972, our mutual friend, Congressman Jim Burke, 11th District, made a firm commitment to run for re-election on his record in the Congress without benefit of any contributions. This prompted those opposed to his philosophy to heavily contribute to his opponent in an all out drive to defeat Jim.

However, Jim Burke remained firm in his commitment to run solely on his record and did not accept contributions.

This obvious disadvantage caused concern among many of his friends. Accordingly, this committee was formed in compliance with the Federal Election Commission and proceeded to place newspaper ads, purchase bumper stickers, signs and other campaign items.

It is for that reason we are respectfully requesting your assistance at this time.

Thank you for your courtesy, Sir,

Respectfully,

THOMAS J. GERAGHTY
Treasurer

J

RECEIVED
SEP 11 1973
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

THOMAS J. GERAGHTY, Treasurer
1765 Canton Avenue
Milton, Mass. 02186

69-76

COMMITTEE TO PROMOTE JOBS, CONSTRUCTION, & THE ECONOMY

Re: Question 5 (a)

November, 1973

Many thanks for your kind and generous assistance in our efforts to conduct an effective campaign in behalf of Congressman Jim Burke.

We feel certain that our mutual cooperation has been indicative of the final results.

Again, our sincere gratitude for your help.

Respectfully,

THOMAS J. GERAGHTY
Treasurer

j

RECEIVED
OFFICE COPY
OFFICE OF GENERAL COUNSEL

"The Wealth of Our Nation Comes from the Payrolls of Our Nation"

...HARRY S. TRUMAN

FEDERAL REVENUE SHARING RECEIVED

	Jan. 72 thru June 76	DUE in next 5 months
Abington.....	\$991,251	\$91,209
Avon.....	543,230	56,184
Braintree.....	3,362,163	420,006
Brockton.....	10,117,015	1,589,241
Holliston.....	1,061,807	119,945
Milton.....	1,408,997	182,311
Quincy.....	7,441,411	747,389
Randolph.....	2,492,919	311,606
Stoughton.....	1,928,546	262,764
Weymouth.....	1,432,721	112,720
Boston.....	91,443,634	12,045,605
Norfolk County.....	2,094,838	233,227
Plymouth County.....	2,401,473	336,068

BURKE RATINGS

In the past few months, responsible public interest groups have released their "ratings" of Members of Congress on votes taken on the floor of the House of Representatives during 1975 which they consider to be of major importance to their association. The ratings which they have given are provided for your interest:

ORGANIZATION	RATING
AFL-CIO	100%
Americans For Democratic action	84%
American Federation of County, Municipal & State Employees	100%
American Parents Committee, Inc.	100%
Building and Construction Trades, AFL-CIO	100%
Consumer Federation of America	100%
League of Women Voters	100%
National Council of Senior Citizens	100%
National Education Association	100%

CONGRESSMAN JAMES A. BURKE AGREES...

DEMOCRAT

...WHEN HE SAYS:

**"JOBS-JOBS and MORE JOBS! THAT IS THE NUMBER
ONE ISSUE IN THE 11TH CONGRESSIONAL DISTRICT."**

**AS OUR CONGRESSMAN WE NEED NOW-MORE THAN EVER-SOMEBODY
WITH THE COURAGE-STANCE-YES, SENIORITY AND "CLOUT"-TO
SPEAK OUT IN A STRONG AND EFFECTIVE VOICE AS CONGRESSMAN
BURKE HAS ALWAYS DONE FOR OUR AREA-ITS PEOPLE-AND OUR
INDUSTRIES-LARGE AND SMALL**

HERE ARE THE RECORDS-THE CHANCE IS YOURS...

CONGRESSMAN BURKE'S RECORD AND DATA SOUND

SECOND RANKING MEMBER OF POWERFUL
HOUSE WAYS AND MEANS COMMITTEE
CHAIRMAN-SUBCOMMITTEE ON SOCIAL SECUR-
ITY

RANKING MEMBER-HOUSE COMMITTEE ON UN-
EMPLOYMENT COMPENSATION

MEMBER-JOINT COMMITTEE ON INTERNAL REV-
ENUE TAXATION

RANKING MEMBER OF THE RECENT HOUSE-
SENATE TAX CONFERENCE COMMITTEE

HAD 1751 ROLL CALL VOTES AS MEMBER OF
MASSACHUSETTS STATE LEGISLATURE

HAS HAD 6886 ROLL CALL VOTES IN UNITED
STATES CONGRESS.

HAS CONTINUALLY INVOLVED HIMSELF IN EF-
FORTS TO INSURE THE EXISTENCE OF LONG TERM
EMPLOYMENT OPPORTUNITIES AT THE QUINCY-
FORE RIVER YARD OF GENERAL DYNAMICS
PARTICULARLY AS RELATED TO FEDERAL SHIP-
BUILDING SUBSIDIES FROM THE UNITED STATES
MARITIME ADMINISTRATION. OVER 5,000 PER-
SONS ARE CURRENTLY WORKING ON THIS
BILLION DOLLAR LONG SHIPBUILDING PRO-
GRAM AT THE QUINCY YARD WHICH IS GENER-
ALLY ACKNOWLEDGED TO BE ONE OF THE FEW
ECONOMIC BRIGHT SPOTS IN THE ENTIRE STATE
OF MASSACHUSETTS.

CONGRESSMAN BURKE HAS BEEN EN-
DORSED BY THE FOLLOWING:

MASSACHUSETTS STATE LABOR
COUNCIL AFL-CIO

NOTE: CONGRESSMAN BURKE WAS THE RECIPI-
ENT OF LARGEST AWARD OF MERIT-
THE PRESTIGIOUS GOMPERS-MURRAY
AWARD-FROM THE MASSACHUSETTS
STATE COUNCIL OF THE AFL-CIO AT A
DINNER IN HIS HONOR AT THE
TREADWAY INN IN CHICOPEE, MASS. ON
MAY 14, 1975.

NORFOLK COUNTY COUNCIL-AFL-CIO

GREATER BROCKTON CENTRAL LABOR UNION-
AFL-CIO

LEGISLATIVE COUNCIL FOR OLDER AMERICANS-
FRANK MANNING, PRESIDENT

BUILDING and CONSTRUCTION TRADES COUN-
CIL OF THE METROPOLITAN DISTRICT-BOSTON
AREA-AFL-CIO

STATE COUNCIL OF MACHINISTS UNION-AFL-
CIO

ELECTRICIANS'S UNION-103 I.B.E.W.-AFL-CIO
PLUS MANY OTHERS. LIMITED SPACE PRO-
HIBITS US FROM LISTING

HIS OPPONENT'S RECORD

From California. Has never been elected to a Public Office.
A resident of the 11th Congressional District (Randolph) only since 1975.

ON PRIMARY DAY NEXT TUESDAY, SEPTEMBER 14

THE CHANCE IS YOURS

ON HIS RECORD-CONGRESSMAN BURKE IS OURS

NOTE: THIS NON-AUTHORIZED COMMITTEE WAS ORGANIZED AND RUN IN FULL
COMPLIANCE WITH THE REGULATIONS OF THE FEDERAL ELECTION COMMISSION.

**"THE COMMITTEE TO PROMOTE JOBS
CONSTRUCTION AND THE ECONOMY"**

Thomas J. Geraghty-Treasurer, 1765 Canton Ave., Milton, Mass.

78911

5

110

THE NATIONAL ASSOCIATION OF
 PUBLIC DEFENDERS
 1100 15TH STREET, N.W.
 WASHINGTON, D.C. 20004
 (202) 331-3700

FROM

10

CERTIFIED

3

10

THOMAS J. GERAGHTY, Treasurer
1785 Canton Avenue
Milton, Mass. 02188

69-76

Sec # 1528

77 SEP 19
12:43

COMMITTEE TO PROMOTE JOBS. CONSTRUCTION. & THE ECONOMY

September 10, 1977

720760

Federal Election Commission
1825 K Street N.W.
Washington, D. C. 20463

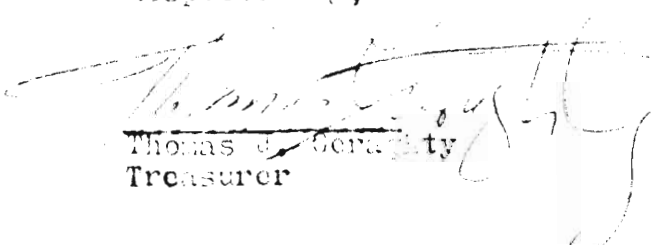
Attn: MR 426 (77)

Gentlemen:

Please be advised that the last piece of correspondence which I have received from your office was on September 10th. This was by reason of the fact that on two occasions when I went to the Post Office to pick up my registered mail, the carrier had your item en route with him. So I will not be able to respond to your questionnaire within the time frame which you have allowed me.

I respectfully request a three-week extension of time, so that I may respond with answers to all your questions.

Respectfully,


Thomas J. Geraghty
Treasurer

j

FEDERAL ELECTION COMMISSION
FREE COPY
MILTON, MASS.

1700 Canton Ave.
114 N. 10th. 02108



17 SEP 1977

RECEIVED
17 SEP 1977
114 N. 10th.
02108

114 N. 10th. 02108

SEC # 1476

Committee for Re-Election of Congressman JAMES A. BURKE

FEDERAL ELECTION COMMISSION

'77 SE 3:20

JEANNE M. RYAN
Campaign Treasurer
19 BELVOIR ROAD
MILTON, MASS.
OXford 8-7000

770743

September 12, 1977

Re MUR 426 (77)

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street
Washington, D C 20463

Dear Mr. Steele:

With reference to your letter of August 30, 1977, please be advised that this committee did not solicit nor accept contributions beyond those reported on proper forms to your commission.

This principal committee remained inactive throughout the campaign in accordance with the specific instructions of the candidate.

Proper forms were submitted as required by the FEC regulations with the termination report filed shortly after the general election.

I trust this reply will be of assistance,
I am

Very truly yours,

Jeanne M. Ryan
Jeanne M. Ryan
Treasurer

FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL COUNSEL

JMR
19 Belvoir Road
Milton, MA 02186



Federal Election Commission
1325 K Street
Washington, D C 20463

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

322 #1466



Telegram

LLC344 WAB314(1836)(1-021648B257-001)PD 09/14/77 1321

ICS IPMWAWA WSH

VIA
Telephone

SUSPECTED DUPLICATE: 1-012214A257 WAF 195 ICS IPMUAWA WSH

11037 GOVT BU WASHINGTON DC 38 09-14 211P EDT

PMS

NANCY SIMMONS, DLLR

FEDERAL ELECTION COMMISSION

1325 K ST N W FRANKLIN SQUARE BUILDING

WASHINGTON DC 20463

BT

RECEIPT OF YOUR LETTER WAS DELAYED AS IT WAS FORWARDED
TO MY HOME ADDRESS IN MILTON AND ONLY RECEIVED BY
ME THIS WEEKEND.

REQUEST THAT I BE GRANTED SEVENTY-TWO HOUR EXTENSION.

THANK YOU FOR YOUR COOPERATION.

3825102

09-10-22-2-10-3

RECEIVED
SEP 14 1977
FEDERAL ELECTION COMMISSION
CLERK



western union

Telegram

SINCERELY,

JAMES A BURKE MEMBER OF CONGRESS

NNNN

SF-1201 (R5-69)



western union

Telegram

100 1-121 12-437
11 SEP 1-11 12-437

September 14, 1977

MEMORANDUM TO: MUR 426 File

FROM: Nancy Simmons *NS*

SUBJECT: Telephone conversation of September 14, 1977,
with Congressman James Burke

Congressman Burke called OGC on September 13, 1977, at approximately 5:40 p.m., and asked to talk to Charlie Steele regarding an extension of time in which to respond to our letter of August 30, 1977.

I returned his call at 10:30 a.m. on September 14 (Mr. Burke was then chairing hearings). He called me back at 12:30; the substance of our conversation is as follows:

The Congressman said he had just had his foot amputated (July 9), and may have to have his other one amputated also (diabetes)--he is going to the hospital this Friday. He said he had just received "over the weekend" our letter of August 30 requesting that he furnish information regarding the Committee to Promote Jobs, etc., within 15 days, which is due tomorrow. The letter was sent to his Massachusetts district, and about a week later was picked up and forwarded to his Washington, D. C., office. He said he would therefore need 72 additional hours to respond.

I said I was sorry to hear about his foot, and noted that while the Commission was generally reluctant to give extensions of time, . . . He interrupted me and said it wasn't an "extension"--he had just barely received it.

I then said we would like some sort of initial response within a few days if possible, and suggested that under the circumstances he might wish to take a little more time to respond fully. Mr. Burke said this was not necessary (stating, "there doesn't seem to be much there"--or something). He stated that he wanted to consider our questions carefully, but would be able to answer them within 72 hours. He said he would send a telegram today (9/14/77) to that effect.

I thanked him, and noted that I would make a memorandum of his call.

cc: Charlie Steele ✓
Lester Scall
Carolyn Reed
Congressional File

JAMES A. BURKE
ELEVENTH DISTRICT
MASSACHUSETTS

241 HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

Congress of the United States
House of Representatives
Washington, D.C. 20515

SEC. # 1482

MEMBER:
COMMITTEE ON
WAYS AND MEANS
CHAIRMAN:
SOCIAL SECURITY COMMITTEE
MEMBER:
UNEMPLOYMENT COMPENSATION
COMMITTEE
JOINT COMMITTEE ON
INTERNAL REVENUE TAXATION

September 14, 1977

CERTIFIED MAIL

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

ATTENTION: NANCY SIMMONS

Dear Commissioners:

Receipt of your letter was delayed as it was mailed to my home address in Milton, Massachusetts, and only received by me in Washington over the weekend.

I am formally requesting that I be granted an extension of seventy-two hours.

Thank you for your cooperation in this matter.
(This letter will confirm telegram sent by me earlier today.)

With all good wishes, I am

Sincerely,

James A. Burke
JAMES A. BURKE
Member of Congress

JAB/ds

Congress of the United States
House of Representatives
Washington, D.C. 20515

OFFICIAL BUSINESS

CERTIFIED

NOV 21 1963

MAIL

ATTENTION: WANCY SIMMONS

CERTIFIED MAIL

RECEIPT REQUESTED

3:59
Federal Election Commission
Franklin Square Building
1325 K Street, N.W.
Washington, D.C. 20463

James A. Burke
N.C.

FREDERICK DOUGLASS



FREDERICK DOUGLASS



FREDERICK DOUGLASS



~~MASSACHUSETTS~~

JAMES A. BURKE
ELEVENTH DISTRICT
MASSACHUSETTS

241 HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

Congress of the United States
House of Representatives
Washington, D.C. 20515

DEC #1475
MEMBER:
COMMITTEE ON
WAYS AND MEANS
CHAIRMAN:
SOCIAL SECURITY COMMITTEE
MEMBER:
UNEMPLOYMENT COMPENSATION
COMMITTEE
JOINT COMMITTEE ON
INTERNAL REVENUE TAXATION

September 14, 1977

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

RE: MUR 426(77)

Attention: Ms. Nancy L. Simmons

Dear Sirs:

This is in response to your certified letter of August 30, 1977, in which you seek certain information of me concerning possible violations of the Federal Election Campaign Act of 1971 by a "Committee to Promote Jobs, Construction and the Economy."

Your letter was addressed to me at my Milton, Massachusetts, address and, unfortunately, did not reach me until this past weekend.

The finances for my 1976 campaign were handled exclusively and in their entirety by my official campaign committee which is designated as follows:

Ms. Jeanne M. Ryan, Treasurer
Committee to Re-Elect Congressman James A. Burke
and Nomination and Election of Other Democratic
Candidates

The report of my re-election campaign committee was timely filed with your Commission and is available to you.

I at no time authorized any person, agent or committee, other than my official campaign committee, referred to above, to either raise or expend any money in my behalf in connection with my 1976 re-election campaign. Further, no one on my Congressional staff was authorized to either raise or expend, or cause to be raised or expended, any campaign funds on my 1976 re-election campaign. Additionally, no one acting as my agent was authorized to raise or expend, or to cause to be raised or expended, any funds on behalf of my 1976 re-election campaign, other than the official campaign committee referred to above.

Federal Election Commission

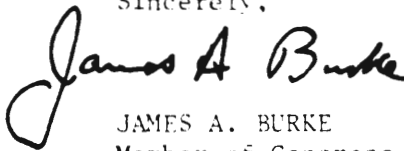
Page two

It was called to my attention at one point during the course of my re-election campaign in 1976 that unauthorized advertisements and spot radio announcements, allegedly paid for by a "Committee to Promote Jobs, Construction and the Economy" were being run by certain newspapers and radio stations. Immediately, when I found out about this wholly unauthorized activity, I instructed the media not to continue to run such unauthorized ads. As a direct result thereof, I was informed that the Quincy Patriot Ledger and the Brockton Enterprise cancelled full page advertisements allegedly to be paid for by the referenced "Committee," and that 30 to 40 spot advertisements by radio station WJDA in Quincy, Massachusetts, likewise were cancelled. I want to emphasize that any activity by the "Committee" was totally unauthorized and done without my knowledge, consent, authorization or permission; you must inquire of them as to such activities.

I hope this completely clears up any question which may have been raised by any possible allegations connecting me with the "Committee" to which you referred.

I am enclosing a copy of a telegram which was sent to about 25 news outlets in and around my Congressional District when the unauthorized ads were brought to my attention. In addition the attached news release was sent as a follow-up to all news outlets in my District. If you require copies of the telegrams, I will be happy to ask Western Union to provide them for you.

Sincerely,



JAMES A. BURKE
Member of Congress
11th District of Massachusetts

JAB:ds
enclosures: two telegrams, news release
and covering letter

NO WDS - CL OF SVC	PD OR COLL	CASH NO	CHARGE TO THE ACCOUNT OF	THIS MESSAGE WILL BE SENT AS A TELEGRAM UNLESS IT IS OTHERWISE INDICATED	PRESS		OVERNIGHT TELEGRAM
			CNA 082871		OPR	NPR	

Send the following message, subject to the Telegraph Company's conditions, rules and regulations, which are on file with regulatory authorities.

September 10, 1976

BOOK MESSAGE
LAND DELIVER
DO NOT PHONE

Publisher

I respectfully request that you refuse any advertisements which might be offered on my behalf by any unauthorized group. This is in keeping with my pledge to neither raise nor spend money this year. I trust that you will honor my pledge and respect this request.

Sincerely,

JAMES A. BURKE
Member of Congress

From: James A. Burke
241 Cannon House Office Building
Washington, D.C. 20515

FEDERAL ELECTION COMMISSION
RECEIVED
SEP 15 1976
FEDERAL COUNCIL

FOR IMMEDIATE RELEASE
FROM THE WASHINGTON OFFICE OF
CONGRESSMAN JAMES A. BURKE

SEPTEMBER 10, 1976

In keeping with his campaign pledge to refrain from accepting or spending any money on his campaign for re-election, CONGRESSMAN JAMES A. BURKE (D-MILTON, MASS.) today asked the media organizations serving the Eleventh District not to accept unauthorized advertisements in his behalf.

Commenting on the request, BURKE said, "The primary is only four days away now, and so far I've managed to keep my pledge. I don't want any action taken which might jeopardize that pledge."

FEDERAL ELECTION COMMISSION
RECEIVED
SEP 11 1976
CENTRAL COUNSEL

241 HONORARY OFFICE BUILDING
WASHINGTON, D.C. 20515

Congress of the United States
House of Representatives
Washington, D.C. 20515

COMMITTEE ON
WAYS AND MEANS
CHAIRMAN:
SOCIAL SECURITY COMMITTEE

MEMBER:
UNEMPLOYMENT COMPENSATION
COMMITTEE

JOINT COMMITTEE ON
INTERNAL REVENUE TAXATION

September 14, 1977

REGISTERED MAIL

Federal Election Commission
1315 K Street, N.W.
Franklin Square Building
Washington, D.C. 20463

ATTENTION: NANCY SIMONS

Dear Commissioners:

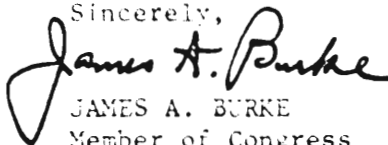
Receipt of your letter was delayed as it was mailed
to my home address in Milton, Massachusetts, and only
received by me in Washington over the weekend.

I am formally requesting that I be granted an ex-
tension of seventy-two hours.

Thank you for your cooperation in this matter.
(This letter will confirm telegram sent by me earlier
today.)

With all good wishes, I am

Sincerely,


JAMES A. BURKE
Member of Congress

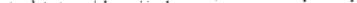
JAB/ds

RECEIVED
FEDERAL ELECTION COMMISSION
SEP 15 1977
WASHINGTON, D.C.

Washington, D.C. 20515

$\text{C}_6\text{H}_{10}\text{O} + \text{H}_2 \rightarrow \text{C}_6\text{H}_{12}\text{O}$

James A. Burke



SPECIAL DELIVERY

... ..

ENTER

MAIL



SPECIAL DELIVERY

SPECIAL DELIVERY

60

90

~~MASSACHUSETTS~~



FEDERAL ELECTION COMMISSION

Washington, D.C. 20543

October 1, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James A. Burke
United States Congress
55 Brook Hill Road
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Congressman Burke:

This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. One finding by the Commission involves the Committee's activities in support of your 1976 re-election to the United States House of Representatives from the 11th District of Massachusetts; the Commission has found reason to believe the contribution limitations in 2 U.S.C. §441a(a) may have been exceeded through in-kind contributions totalling approximately \$6,940 made by the Committee to your re-election effort.

The Commission is required to investigate alleged violations of the Act after it finds reason to believe such violations have occurred. See 2 U.S.C. §437g(a)(2). We have accordingly notified the Committee of the Commission's findings, and have requested the Committee's response to questions believed relevant in this matter. Since one of the possible violations found involves the Committee's financial support of your re-election, we also request that you respond to the following questions involving the relationship between you, your principal campaign committee, or other agents of the Committee. A copy of this letter is being sent to the treasurer of your principal campaign committee, who is also requested to respond where appropriate.

(1) Is any individual, other than yourself, an authorized agent of your principal campaign committee, or of any other agent of the Committee, who is authorized to act on behalf of the Committee in connection with the 1976 re-election effort?

1

(2) When did you, your principal campaign committee, or other agents have knowledge of (a) the existence of the Committee, and (b) its proposed or present activities on behalf of your re-election?

(3) Identify all conversations and correspondence you or your congressional or campaign staff had with the Committee or any of its officers, members or agents, including the dates and content thereof, and the parties thereto. This would include any requests by the Committee for authorization by you, and any conveyances of appreciation for the Committee's efforts on your behalf.

(4) Did you, your principal campaign committee, or other agents--

(a) suggest to possible contributors to your re-election campaign that they send their contributions to the Committee? If so, please describe the manner in which the suggestions were made and the reasons therefor, and identify the parties involved.

(b) receive any contributions which you forwarded to the Committee? If so, please describe the circumstances under which such contributions were received and subsequently transferred.

Please note that 18 U.S.C. §437g(a)(3) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the person with respect to whom the investigation is made.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact Nancy L. Simmons (telephone no. 202-513-4175), the attorney assigned to this matter.

Sincerely yours,

William C. [Signature]
General Counsel

[Signature]
Charles H. [Signature]
Associate General Counsel

cc: Mr. Thomas M. Ryan, Director
Committee to Re-elect Congressman James H. Burke
and Nomination and Election of Other Democratic
Candidates
100 Kilboir Road
Boston, Massachusetts 02111

RECEIVED
JUL 11 1971
U.S. HOUSE OF REPRESENTATIVES
CLERK

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James A. Burke
United States Congress
55 Brook Hill Road
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Congressman Burke:

7 3 0 4 1 1 0 0 3 3
This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. One finding by the Commission involves the Committee's activities in support of your 1976 re-election to the United States House of Representatives from the 11th District of Massachusetts; the Commission has found reason to believe the contribution limitations in 2 U.S.C. §441a(a) may have been exceeded through in-kind contributions totalling approximately \$6,940 made by the Committee to your re-election effort.

The Commission is required to investigate alleged violations of the Act after it finds reason to believe such violations have occurred. See 2 U.S.C. §437g(a)(2). We have accordingly notified the Committee of the Commission's findings, and have requested the Committee's response to questions believed relevant in this matter. Since one of the possible violations found involves the Committee's financial support of your re-election, we also request that you respond to the following questions involving the relationship between you, your principal campaign committee, or other agents and the Committee. A copy of this letter is being sent to the treasurer of your principal campaign committee, who is also requested to respond where appropriate.

(1) Identify the individuals and/or committees you authorized to receive contributions and make expenditures on behalf of your 1976 re-election campaign.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

(2) When did you, your principal campaign committee, or other agents have knowledge of (a) the existence of the Committee, and (b) its proposed or present activities on behalf of your re-election?

(3) Identify all conversations and correspondence you or your congressional or campaign staff had with the Committee or any of its officers, members or agents, including the dates and content thereof, and the parties thereto. This would include any requests by the Committee for authorization by you, and any conveyances of appreciation for the Committee's efforts on your behalf.

(4) Did you, your principal campaign committee, or other agents--

(a) suggest to possible contributors to your re-election campaign that they send their contributions to the Committee? If so, please describe the manner in which the suggestions were made and the reasons therefor, and identify the parties involved.

(b) receive any contributions which you forwarded to the Committee? If so, please describe the circumstances under which such contributions were received and subsequently transferred.

Please note that 2 U.S.C. §437g(a)(3) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the person with respect to whom the investigation is made.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact Nancy L. Simmons (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Ms. Jeanne M. Ryan, Treasurer
Committee to Re-Elect Congressman James A. Burke
and Nomination and Election of Other Democratic
Candidates
19 Belvoir Road
Milton, Massachusetts 02186

NSimmons/scc 8/23/77

715 8/27/77

FEDERAL ELECTION COMMISSION
RECEIVED THE COPY
AUG 27 1977



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C.
20543

February 30, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas J. Geraghty
Treasurer, Committee to Promote
Jobs, Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Mr. Geraghty:

This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has encountered certain information which suggests that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. We have numbered this matter MUR 426; please refer to this number in all future correspondence.

The Commission has found reason to believe that the Committee may have violated 2 U.S.C. §441a(a)(1)(A) by expending approximately \$6,940 in in-kind contributions on behalf of the election campaign of Congressman James A. Burke. 2 U.S.C. §441a(a)(7)(B)(i) states that "expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate . . . shall be considered a contribution to such candidate." Contributions from the Committee to Mr. Burke were limited under the Act to \$1,000 per election, or a total of \$2,000 (\$1,000 for the primary and \$1,000 for the general election). The Commission has found reason to believe a violation of 2 U.S.C. §4348 may also have occurred in that the \$6,940 in expenditures on behalf of Mr. Burke should have been reported as in-kind contributions.

In addition, the Commission has, in addition, found reason to believe the Committee may have violated 2 U.S.C. §432(c) and (d), which require that the treasurer of a political committee



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
FEB 28 1977

keep detailed and exact accounts of contributions and expenditures, and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. We further request that you respond to the questions enclosed herein. 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 15 days after receipt of this notification.

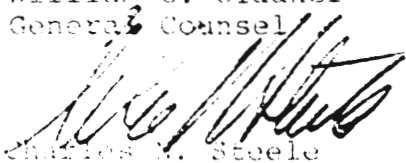
This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission, in writing, that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

If you have any questions, please contact Nancy L. Simmons (telephone no. 202-523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure


Charles A. Steele
Associate General Counsel

RECEIVED
U.S. COMMISSION
JAN 1977
WASHINGTON, D.C.

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Mail 426 Simmons

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

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

☐ Show to whom and date delivered 15¢

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

☐ RESTRICTED DELIVERY Show to whom and date delivered 65¢

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

2. ARTICLE ADDRESSED TO
*Thomas J. Geraghty, Treas.
Comm. to Premier, Jobs,
Construction & Economy*

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 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

U.S. G.P.O. 1976 O-203-456

RECEIVED BY COMMISSION
COPY
OFFICE OF GENERAL COUNSEL

ENCLOSURE, letter to Mr. Conaghty, MOR 426(77)

(1) Describe the purpose for which the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") was organized. If the Committee's sole purpose was the support of Congressman James A. Burke for re-election, why was Mr. Burke's name left out of the Committee name? Did the Committee ever seek authorization from Mr. Burke to receive contributions and make expenditures on his behalf?

(2) Identify the organizers, officers, members, and personnel of the Committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Burke? If so, please identify who was so engaged, and on what dates.

(3) What candidate(s) was/were supported by the Committee, and in what manner and amounts? Please attach a representative copy of any advertisements made by the Committee.

(4) (a) Did you or any other Committee officers or members discuss or correspond with Mr. Burke or any of his campaign or congressional staff (i) regarding the Committee or its activities or (ii) in any other business or social way? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications. In this connection, please describe how Congressman Burke was invited to attend the election night rally held by the Committee.

(b) Did Mr. Burke, his principal campaign committee, or agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.

(5) With regard to Committee solicitations, please describe or respond to the following:

(a) How were the solicitations conducted?

(b) In what manner were contributions received?

(c) Were contributions to the Committee ever earmarked for the benefit of a particular candidate, and if so for whom?

(d) Please attach a copy of any solicitation materials utilized by the Committee.

(e) Did the Committee receive any contributions which were given to Congressman Burke by Mr. [redacted]? If so, please describe the circumstances under which the Committee

RECEIVED
FEB 1977
SAC [redacted]

received the funds, including any contacts between the Committee and Mr. Burke or any of his agents.

(7) It is our understanding, based on a review of the Committee's records conducted by the Commission's Audit Division, that the Committee did not retain contributor records of donors in excess of \$50, including occupation and principal place of business of contributors aggregating in excess of \$100; nor did the Committee retain expenditure records for all expenditures, and receipted bills for expenditures in excess of \$100 to the same person. Would you please confirm whether this is correct, and explain the Committee's reason for not maintaining such records?

RECEIVED
JAN 10 1964
U.S. DEPT. OF JUSTICE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas J. Geraghty
Treasurer, Committee to Promote
Jobs, Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Mr. Geraghty:

This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has encountered certain information which suggests that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. We have numbered this matter MUR 426; please refer to this number in all future correspondence.

The Commission has found reason to believe that the Committee may have violated 2 U.S.C. §441a(a)(1)(A) by expending approximately \$6,940 in in-kind contributions on behalf of the election campaign of Congressman James A. Burke. 2 U.S.C. §441a(a)(7)(B)(i) states that "expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate . . . shall be considered a contribution to such candidate." Contributions from the Committee to Mr. Burke were limited under the Act to \$1,000 per election, or a total of \$2,000 (\$1,000 for the primary and \$1,000 for the general election). The Commission has found reason to believe a violation of 2 U.S.C. §434(b) may also have occurred in that the \$6,940 in expenditures on behalf of Mr. Burke should have been reported as in-kind contributions.

The Commission has, in addition, found reason to believe the Committee may have violated 2 U.S.C. §432(c) and (d), which require that the treasurer of a political committee

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
JAN 11 1978

keep detailed and exact accounts of contributions and expenditures, and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. We further request that you respond to the questions enclosed herein. 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 15 days after receipt of this notification.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission, in writing, that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

If you have any questions, please contact Nancy L. Simmons (telephone no. 202/523-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

NSimmons/scc 8/22/77

76 8/21/77

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
JUL 21 1977

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Promote Jobs,)
Construction and the Economy)

MUR 426 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 26, 1977, the Commission adopted the recommendation of the General Counsel to take the following actions:

1. Find reason to believe a violation of 2 U.S.C., Section 441a(a)(1)(A) had been committed by the respondent by expending approximately \$6,940 in in-kind contributions on behalf of the election campaign of Congressman James A. Burke.
2. Find Reason to believe a violation of 2 U.S.C., Section 434(b) had been committed in that the \$6,940 in expenditures on behalf of Mr. Burke should have been reported as in-kind contributions.
3. Find reason to believe the Committee to Promote Jobs, Construction and the Economy had violated 2 U.S.C., Section 432(c) and (d) which require that the treasurer of a political committee keep detailed and exact accounts of contributions and expenditures, and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.
4. Send attached letters and questions to Mr. Thomas J. Geraghty, Treasurer of the Committee and to Mr. Burke and his principal campaign committee.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20463

August 26, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

M. W. Emons

SUBJECT: MUR 426 (77) - First General Counsel Report

The above-mentioned document was transmitted to the Commissioners on August 25, 1977 at 9:00 a.m.

As of 4:30, August 26, 1977, no objections have been received in the Office of Commission Secretary to the recommendations of the staff in MUR 426 (77).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



FEDERAL ELECTION COMMISSION

1275 K STREET, N.W.
WASHINGTON, D.C. 20543

August 24, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 426 (77)

Please have the attached 7 day General Counsel's Report on MUR 426 (77) distributed to the Commission on a 24 hour no-objection basis.

Thank you.



FEDERAL ELECTION COMMISSION
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FEDERAL ELECTION COMMISSION
Washington, D. C.

FIRST GENERAL COUNSEL REPORT

MUR NO. 426(77)

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

DATE COMPLAINT RECEIVED
BY OGC July 20, 1977

STAFF MEMBER Nancy Simmons

Complainant's Name:

Internally generated from Audit and Disclosure Divisions

Respondent's Name:

Committee to Promote Jobs, Construction and the Economy

Relevant Statute:

2 U.S.C. §441a(a)(1)(A); §434(b); §432(c) and (d)

Internal Reports Checked: Respondent's file Federal Agencies Checked None

SUMMARY OF ALLEGATION

(1) Respondent Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") violated the contribution limitations of 2 U.S.C. §441a(a)(1)(A) in that expenditures made by the Committee on behalf of Congressman James A. Burke's candidacy in the amount of \$6,940 were not independent, and were therefore contributions in-kind subject to limitation. In addition, since the Committee did not report the expenditures as contributions in-kind, a §434(b) reporting violation is also indicated. (Continued)

PRELIMINARY LEGAL ANALYSIS

This matter was referred to the Office of General Counsel from the Audit Division, after an audit of the Committee was conducted based on a referral from the Disclosure Division. (See Attachment.)

(1) The Committee registered on August 27, 1976, as an unauthorized committee supporting only one candidate, James A. Burke for the U.S. House of Representatives in Massachusetts. During the course of the campaign the Committee reported approximately \$6,940 as expenditures for "political ads" and "political printing"; when the Disclosure Division sent requests for additional information as to the particular purpose of these expenditures, the Committee amended its reports to indicate that the \$6,940 consisted of independent expenditures on behalf of Congressman Burke. (Continued)

RECOMMENDATION

Find reason to believe that the Committee failed to comply with 2 U.S.C. §441a(a)(1)(A), §434(b), and §432(c) and (d); send attached letters and questions to Mr. Thomas J. Geraghty, Treasurer of the Committee, and to Mr. Burke and his principal campaign committee.

Date of Next Commission Review:

RECEIVED
JUL 27 1977
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SUMMARY OF ALLEGATIONS (Continued)

(2) Respondent failed to keep records of contributions and expenditures, and receipted bills, in violation of 2 U.S.C. §432(c) and (d).

PRELIMINARY LEGAL ANALYSIS (Continued)

An analysis of reports filed by both Congressman Burke and the Committee indicates that there may have been a substantive connection between the Congressman and the "unauthorized" committee supporting him. For example, contributions to the Committee in many cases appear in the donors' reports as to "James Burke, Committee to Promote Jobs, Construction and the Economy." Further, an analysis by the Audit Division of Mr. Burke's principal campaign committee and this Committee to determine whether a recommendation should be made to audit one or both of the committees disclosed "a mutual misunderstanding regarding the proper reporting of year-to-date totals on the part of each Committee, . . . [indicating] a relationship between the two committees which would invalidate the independence of the expenditures made." Compliance Review Division, Audit Recommendation #15a.

Neither Congressman Burke nor his principal campaign committee reported the receipt or expenditure of any funds in connection with his 1976 re-election campaign (total receipts of \$1,271 were reported, the result of three in-kind contributions). This is in contrast to his 1974 and 1972 campaigns, when Mr. Burke's campaign committee spent \$32,000 and \$10,000, respectively.

The Act provides that "expenditures made by any person in cooperation, consultation, concert, with, or at the request or suggestion of, a candidate . . . shall be considered a contribution to such candidate." 2 U.S.C. §441a(a)(7)(B)(i). The evidence suggests a strong possibility that there was "cooperation [and] consultation" between candidate Burke and the Committee; hence the \$6,940 expended on behalf of Burke would be a contribution in-kind under §441a(a)(7)(B). In this event a reporting violation would exist under §434(b) for failure to report as contributions the \$6,940 expended for Mr. Burke. Furthermore, under the Act the Committee could have contributed only \$1,000 per election to Mr. Burke, or \$2,000 (primary plus general election); the \$6,940 in

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JAN 11 1977
U.S. HOUSE OF REPRESENTATIVES
CLERK OF THE HOUSE

PRELIMINARY LEGAL ANALYSIS (Continued)

in-kind contributions would therefore be \$4,940 in excess of the Act's contribution limits, in violation of §441a(a)(1)(A). */

(2) The audit of the Committee disclosed that no contribution or expenditure records or receipted bills were kept by the Committee, in violation of the recordkeeping provisions of the Act, 2 U.S.C. §432(c) and (d). (See Attachment.)

*/ In view of this, the motivation for the formation of the Committee is unknown. All the contributions to, and expenditures by, the Committee could have been made by the Congressman or his principal campaign committee without running afoul of these provisions.





FEDERAL ELECTION COMMISSION

 1100 N. GLENN
 WASHINGTON, D.C. 20543

June 21, 1977

MEMORANDUM

TO: BILL GUDAKER

THROUGH: ORLANDO B. POTTER *OB*
 STAFF DIRECTOR

FROM: *RJC* BOB COSTA/JOAN MCSERLEY

SUBJECT: AUDIT OF THE COMMITTEE TO PROMOTE
 JOBS, CONSTRUCTION, AND THE ECONOMY

Based on a request for audit and a referral from the Disclosure Division (see attached), an audit was conducted of the Committee to Promote Jobs, Construction, and the Economy (the Committee). The main question raised in the referral and our mandate was whether the activities of an unauthorized committee holding independent expenditures on behalf of Congressman James H. Burke were undertaken and controlled with the cooperation of the Congressman and his official campaign committee.

The Committee's records consisted of bank statements, cancelled checks, deposit tickets, and a copy of a full page advertisement Congressman Burke paid for by the Committee. The Committee maintained no ledgers, journals, check registers, or contribution receipts. The Committee did not maintain the required receipt stubs for its expenditures but did have copies of bank statements. The Treasurer of the Committee, Mr. James Gerardo, who was not available at the time of the audit, testified in a telephone interview on June 1, 1977, [redacted] that he would be able to obtain the original receipts and bank statement copies to the Commission.

A review of the Committee's available records raised other questions which warrant further review. An invoice for [redacted] which the Committee made payment and received receipt, was billed to Congressman Burke as the Committee claims. The Committee reported making an independent expenditure on 9/1/77 for \$1,400.00 on behalf of Congressman Burke's Secretary [redacted]. In addition, the Committee reported expenditures to an [redacted] caterer, and particularly for a rally on election night with Congressman Burke attended.


 FEDERAL ELECTION COMMISSION
 OFFICE OF GENERAL COUNSEL
 COPY

After obtaining and verifying copies of the other missing invoices, further questions may be raised which may be answered by contacting vendors to determine whether there was consultation with Congressman Burke or his Principal Campaign Committee.

In addition to questions raised on expenditures, a review of receipts revealed the majority of loans received by the Committee were from employees of two firms. The Committee reported receiving two \$1,000 loans and one \$100 loan from a secretary, maintenance foreman, and maintenance supervisor respectively. All of these individuals were employed by Ambassador Realty owned by Mr. Geraghty. In addition, the owner of an auto dealership, a relative of the owner and three employees of the auto dealership were reported as loaning or contributing \$100.00 each to the Committee. The Public Finance is currently preparing confirmation letters to contributors to determine the source of the contributed funds or loans. Please comment on the attached draft of letters.

Based on the information being maintained by the Committee and patterns of receipts of the Committee, it is recommended that the Committee should conduct a contribution pattern and source analysis.

Very respectfully,

Very truly yours,
[Signature]
[Name]
[Title]



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas J. Geraghty
Treasurer, Committee to Promote
Jobs, Construction and the Economy
1765 Canton Avenue
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Mr. Geraghty:

This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has encountered certain information which suggests that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. We have numbered this matter MUR 426; please refer to this number in all future correspondence.

The Commission has found reason to believe that the Committee may have violated 2 U.S.C. §441a(a)(1)(A) by expending approximately \$6,940 in in-kind contributions on behalf of the election campaign of Congressman James A. Burke. 2 U.S.C. §441a(a)(7)(B)(i) states that "expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate . . . shall be considered a contribution to such candidate." Contributions from the Committee to Mr. Burke were limited under the Act to \$1,000 per election, or a total of \$2,000 (\$1,000 for the primary and \$1,000 for the general election). The Commission has found reason to believe a violation of 2 U.S.C. §434(b) may also have occurred in that the \$6,940 in expenditures on behalf of Mr. Burke should have been reported as in-kind contributions.

The Commission has, in addition, found reason to believe the Committee may have violated 2 U.S.C. §434(c) and (d), which require that the treasurer of a political committee



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543
OFFICIAL RECORD COUNCIL

keep detailed and exact accounts of contributions and expenditures, and obtain and keep receipted bills for expenditures aggregating in excess of \$100 during a calendar year.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. We further request that you respond to the questions enclosed herein. 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 15 days after receipt of this notification.

This matter will remain confidential in accordance with 2 U.S.C. §437a(a)(3) unless you notify the Commission, in writing, that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

If you have any questions, please contact Nancy L. Simmons (telephone no. 202/323-4175), the attorney assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

COMMISSION
COPY
GENERAL COUNSEL

ENCLOSURE, letter to Mr. Geraghty, MUR 426(77)

(1) Describe the purpose for which the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") was organized. If the Committee's sole purpose was the support of Congressman James A. Burke for re-election, why was Mr. Burke's name left out of the Committee name? Did the Committee ever seek authorization from Mr. Burke to receive contributions and make expenditures on his behalf?

(2) Identify the organizers, officers, members, and personnel of the Committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Burke? If so, please identify who was so engaged, and on what dates.

(3) What candidate(s) was/were supported by the Committee, and in what manner and amounts? Please attach a representative copy of any advertisements made by the Committee.

(4) (a) Did you or any other Committee officers or members discuss or correspond with Mr. Burke or any of his campaign or congressional staff (i) regarding the Committee or its activities or (ii) in any other business or social way? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications. In this connection, please describe how Congressman Burke was invited to attend the election night rally held by the Committee.

(b) Did Mr. Burke, his principal campaign committee, or agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.

(5) With regard to Committee solicitation, please describe or respond to the following:

(a) How were the solicitations conducted?

(b) In what manner were contributions received?

(c) Were contributions to the Committee ever earmarked for the benefit of a particular candidate, and if so for whom?

(d) Please attach a copy of any solicitation materials utilized by the Committee.

(e) Did the Committee receive any contributions which were first sent to Congressman Burke by the donor? If so, please describe the circumstances under which the Committee

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JAN 19 1977
FBI - NEW YORK
COPY

received the funds, including any contacts between the Committee and Mr. Burke or any of his agents.

(7) It is our understanding, based on a review of the Committee's records conducted by the Commission's Audit Division, that the Committee did not retain contributor records of donors in excess of \$50, including occupation and principal place of business of contributors aggregating in excess of \$100; nor did the Committee retain expenditure records for all expenditures, and receipted bills for expenditures in excess of \$100 to the same person. Would you please confirm whether this is correct, and explain the Committee's reason for not maintaining such records?

OFFICE OF GENERAL COUNSEL
COPY



FEDERAL ELECTION COMMISSION

1200 NEW YORK AVENUE
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James A. Burke
United States Congress
55 Brook Hill Road
Milton, Massachusetts 02186

Re: MUR 426(77)

Dear Congressman Burke:

This is to notify you that in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Committee to Promote Jobs, Construction and the Economy (hereinafter "the Committee") may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. One finding by the Commission involves the Committee's activities in support of your 1976 re-election to the United States House of Representatives from the 11th District of Massachusetts; the Commission has found reason to believe the contribution limitations in 2 U.S.C. §441a(a) may have been exceeded through in-kind contributions totalling approximately \$6,940 made by the Committee to your re-election effort.

The Commission is required to investigate alleged violations of the Act after it finds reason to believe such violations have occurred. See 2 U.S.C. §437g(a)(2). We have accordingly notified the Committee of the Commission's findings, and have requested the Committee's response to questions believed relevant in this matter. Since one of the possible violations found involves the Committee's financial support of your re-election, we also request that you respond to the following questions involving the relationship between you, your principal campaign committee, or other agents and the Committee. A copy of this letter is being sent to the treasurer of your principal campaign committee, who is also requested to respond where appropriate.

(1) Identify the individuals and/or committees you authorized to receive contributions and make expenditures on behalf of your 1976 re-election campaign.



COMMISSION
COPY
DEPT. OF GENERAL COUNSEL

(2) When did you, your principal campaign committee, or other agents have knowledge of (a) the existence of the Committee, and (b) its proposed or present activities on behalf of your re-election?

(3) Identify all conversations and correspondence you or your congressional or campaign staff had with the Committee or any of its officers, members or agents, including the dates and content thereof, and the parties thereto. This would include any requests by the Committee for authorization by you, and any conveyances of appreciation for the Committee's efforts on your behalf.

(4) Did you, your principal campaign committee, or other agents--

(a) suggest to possible contributors to your re-election campaign that they send their contributions to the Committee? If so, please describe the manner in which the suggestions were made and the reasons therefor, and identify the parties involved.

(b) receive any contributions which you forwarded to the Committee? If so, please describe the circumstances under which such contributions were received and subsequently transferred.

Please note that 2 U.S.C. §437c(a)(3) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the person with respect to whom the investigation is made.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact Nancy L. Simmons (telephone no. 202/523-4175), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Ms. Jeanne M. Ryan, Treasurer
Committee to Re-Elect Congressman James E. Burke
and Reimbursement and Election of other Democratic
Candidates
19 Bayview Road
Milton, Massachusetts 01860

ORIGINAL COPY
BUREAU OF RECORDS



FEDERAL ELECTION COMMISSION

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

July 11, 1977

MEMORANDUM TO: Bill Oldaker
FROM: Nancy Simmons *NIS*
SUBJECT: Audit Memorandum Concerning the Committee
to Promote Jobs, Construction and the
Economy

The facts in this matter involve a Federal candidate, Congressman James A. Burke, who apparently did not receive any contributions or make any expenditures for his 1976 re-election campaign, with the exception of \$1,271.10 listed and reported as three in-kind contributions (and corresponding expenditures) for printing and "poll workers." Financial support for the Congressman was provided by the Committee to Promote Jobs, Construction and the Economy, which registered August 27, 1976, as an unauthorized committee supporting only one candidate--James A. Burke. Essentially, the Committee appears to have operated as an unauthorized principal campaign committee.

According to the attached memoranda and materials, the Committee reported \$6,940 as Independent Expenditures for printing and media advertising on behalf of Congressman Burke. Both the Disclosure and Audit Divisions questioned the independence of the Committee's transactions; the June 21, 1977, memo from Bob Costa recommends that a MUR be opened, "based on the incomplete records maintained by the Committee and patterns of contributions."

I have reviewed the attached papers and also looked through the reports filed by Congressman Burke and the Committee. It appears there may have been violations of the recordkeeping provisions of 2 U.S.C. §432(c), and perhaps also of the contribution limitations of §441a(a), if the independent expenditures are found in fact not to have been "independent." Therefore, if it is your practice to open a MUR in cases similar to this, you may wish to follow the Audit recommendation. As an alternative, if this does not merit MUR status, the Committee might be informed by letter of the Act's (1) record-keeping requirements, and (2) independent expenditure



requirements which must be met in order for an expenditure not to be considered a contribution in-kind subject to limit.

With respect to comments requested from this Office on the proposed letter from Bob Costa to contributors to the Committee, I offer the following:

- (1) If a MUR is opened, which might of necessity involve an analysis of contributions received by the Committee, would it be customary for the Audit Division to concurrently send letters to Committee contributors?
- (2) There is a question raised as to the applicable limitation on contributions to the Committee. The Committee at first appears to be "any other political committee" under 2 U.S.C. §441a(a)(1)(C) and (2)(C), thereby entitled to \$5,000 per calendar year from contributors. However, if the Committee is a "single candidate committee," its donors would be considered contributing to the candidate supported, and would thereby be limited to contributing \$1,000 or \$5,000 per election. See §110.1(h) of the regulations. It is not clear from the figures cited in the Costa memo (see page 2) as loans or contributions to the Committee whether the Act's contribution limits were exceeded since Congressman Burke ran in two elections the Committee could thus receive either \$2,000 from individuals or \$10,000 from multi-candidate committees, or \$5,000 if the Committee were "any . . . political committee." Of course, if there is reasonable doubt as to whether there has been proper reporting under §434(b) of the true contributors of the loans/contributions to the Committee, such a letter might be justified.
- (3) If it is decided to send the proposed Costa letter, point 4 of the letter refers to "the answer to 2"; I believe they mean "3."

Attachments



FEDERAL ELECTION COMMISSION

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

June 21, 1977

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER *OB*
STAFF DIRECTOR

FROM: *APC* BOB COSTA/JOANN MCSORLEY

SUBJECT: AUDIT OF THE COMMITTEE TO PROMOTE
JOBS, CONSTRUCTION AND THE ECONOMY

Based on a recommendation for audit of a referral from the Disclosure Division (see attached), an audit was conducted of the Committee to Promote Jobs, Construction, and the Economy ("the Committee"). The main question raised in the referral and recommendation was whether the activities of an unauthorized committee making Independent Expenditures on behalf of Congressman James P. Burke were undertaken and conducted with the cooperation of the Congressman and his principal campaign committee.

The Committee's records consisted of bank statements, cancelled checks, deposit tickets, and a copy of a full page ad supporting Congressman Burke paid for by the Committee. The Committee maintained no ledgers, journals, check registers, or contribution records. The Committee did not maintain the required receipted bills for its expenditures but did have copies of three invoices. The Treasurer of the Committee, Mr. Thomas Geraghty, who was not available at the time of the audit, indicated in a telephone interview on June 1, 1977, (see attached memo) that he would be able to obtain the missing invoices and would mail copies to the Commission.

The review of the Committee's available records raised other questions which warrant further review. An invoice from Brockton Enterprises, upon which the Committee made payments and received credits, was billed to Congressman Burke at the Committee address. The Committee reported making an Independent Expenditure on 9/8/76 for \$1,463.65 on behalf of Congressman Burke to Brockton Enterprises. In addition the Committee reported expenditures to an Elks Hall, a caterer, and bartender for a rally on election night which Congressman Burke attended.



After obtaining and examining copies of the other missing invoices, further questions may be raised which may be answered by contacting vendors to determine whether there was consultation with Congressman Burke or his Principal Campaign Committee.

In addition to questions raised on expenditures, a review of receipts revealed the majority of loans received by the Committee were from employees of two firms. The Committee reported receiving two \$1,000 loans and one \$100 loan from a secretary, maintenance foreman, and maintenance supervisor respectively. All of these individuals were employed by Ambassador Realty owned by Mr. Geraghty. In addition, the owner of an auto dealership, a relative of the owner and three employees of the auto dealership were reported as loaning or contributing \$100.00 each to the Committee. The Audit Division is currently preparing confirmation letters to contributors to determine the source of the contributed funds or loans. Please comment on the attached proposed letter.

Based on the incomplete records maintained by the Committee and patterns of contributions, the audit team recommends that a MUR be opened regarding those contribution patterns and absent records.

Attachment as stated



FEDERAL ELECTION COMMISSION

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

Dear Contributor:

The Federal Election Commission has the responsibility to perform audits of Political Committees supporting candidates for Federal office.

Reports filed by the Committee to Promote Jobs, Construction, and the Economy disclose a contribution/loan received from you. During a review of contribution records your loan/contribution has been selected by the Federal Election Commission for verification.

Please confirm contribution/loan by answering the following questions.

- 1) The amount and date of the loan/contribution was?

- 2) How was the loan/contribution solicited?

- 3) If the contribution was a loan, was a written loan agreement prepared?

- 4) If the answer to 2, is yes, please include a copy of the loan agreement.

Signature

After completing the answers to the above questions, please sign your name and return this letter to the Federal Election Commission within 10 days, in the enclosed self-addressed stamped envelope.

If you have any questions please feel free to contact Mr. Raymond Lisi at (202) 523-4155. Thank you for your cooperation.

Sincerely,

Robert J. Costa
(Acting) Assistant
Staff Director for
the Audit Division



June 7, 1977

Memorandum

To: File

From: Ray Lisi

Subject: Telephone conversation with Thomas Geraghty, Treasurer, Committee to Promote Jobs, Construction, and the Economy.

John McSorley and I spoke to Mr. Geraghty concerning the operations of the Committee to Promote Jobs, Construction and the Economy (The Committee) and the reasons for its formation.

Mr. Geraghty explained that the committee was formed to support Congressman Burke because the members of the Committee felt that Cong. Burke had done a great deal for the district and they did not feel that his opponent had the experience needed. Cong. Burke was not aware that the committee was being formed. Contributions were solicited by telephone and no mailings were made. No contributor records were maintained, but copies of invoices for expenditures made could be obtained. The Committee did receive loans but no formal loan agreements were drawn up.

When asked about a full page ad appearing in the Quincy Sun on behalf of Cong. Burke, paid for by the Committee, Mr. Geraghty explained that information for the ad had been obtained by one of the members of the Committee. Expenditures for printing went for bumper stickers and printed ballot cards.

Mr. Geraghty was asked about an outstanding check for \$240.92 made payable to him for reimbursement of lumber. He said he could not recall the item but would check into it.

Mr. Geraghty explained that the Elks Hall in Quincy Ma. was rented by the Committee and the candidate attended a reception there given by the Committee on election night.

The Committee had no paid workers; only volunteers.

We explained to Mr. Geraghty that we would be in contact with him again to clear up any matters still pending.

COMMUNICATION
COPY
UNSC



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON DC 20543

Compliance Review Division Audit Recommendation #15a

Candidate/Committee: Committee to Promote Jobs, Construction and Industry, an unauthorized single candidate committee supporting Congressman James A. Burke

Total Receipts \$11,334
Total Expenditures \$11,328

Referred by: Disclosure Division on March 29, 1977

ANALYSIS

1) Reporting History

During the period August 21, 1976 through November 29, 1976, the Committee filed six (6) disclosure reports and five (5) amendments thereto. Three (3) Requests for Additional Information have been sent. Each requested amendments to correct reported year-to-date totals for receipts and expenditures. Each also advised that reported expenditures, if made on behalf of a candidate, were to be disclosed either as in-kind contributions or properly itemized as independent expenditures. Two (2) of the requests generated the proper disclosure. The third remains outstanding.

2) OGC Action

Compliance - None
Opinions - None

3) Factors Considered

The referral mentions cash balance discrepancies caused by the overlapping of coverage dates. Our analysis revealed this occurred when the Committee filed a quarterly report which included activity previously reported on its pre and post primary reports which were filed within the quarter. The discrepancies were later clarified by amendments; therefore, we feel disclosure has not been hampered due to those errors.



The referral also states that in many instances the Committee accepted transfers to be used on behalf of the candidate. In that the Statement of Organization clearly disclosed the Committee supported only Congressman Burke, and the name of the Committee when itemized as the payee, did not identify outright on whose behalf it was operating, it appears the multicandidate committees were merely enhancing disclosure by including the Congressman's name within the itemization. However, one multi-candidate committee reported a transfer out to the candidate in care of his office address; yet it was in turn reported as a receipt by this unauthorized Committee.

Expenditures totalling \$6,940 (exclusive of loan repayments) were made for printing and media advertising on behalf of Congressman Burke and were certified as Independent Expenditures on amendments requested by the Commission.

RECOMMENDATION

The public record indicates that the candidate may have directed contributions to an unauthorized committee making Independent Expenditures on his behalf. Therefore, we recommend an audit of this unauthorized Committee to determine whether the expenditures are qualified to be Independent Expenditures or whether the contribution limits have been exceeded. Further, during our analysis of the principal campaign committee and this unauthorized Committee, we noted a mutual misunderstanding regarding the proper reporting of year-to-date totals on the part of each Committee. This may also be an indication that there is a relationship between the two committees which would invalidate the independence of the expenditures made.



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

Compliance Review Division Audit Recommendation #15b

Candidate/Committee: Congressman James A. Burke (D-11/Ma.)
Committee to Re-Elect James A. Burke
(principal campaign committee)
Receipts: \$1,270 in-kind
Expenditures \$1,270 in-kind

Referred by: Disclosure Division on March 29, 1977

Analysis

1) Reporting History

During the period June 13, 1976 through November 22, 1976, the Committee filed six (6) disclosure reports and one (1) amendment thereto. Four reports were received from two to eleven days after the prescribed filing date. One (1) Request for Additional Information was sent recently on March 25, 1977, regarding incorrect totals on the Summary Page of the Termination Report. A response is yet pending. The Request further asked the Committee to provide information regarding its apparent failure to disclose receipt of two transfers reported made by two multicandidate committees. (Subsequent to receipt of this referral, the Disclosure Division advised Compliance Review that the committee telephoned a response to this item on April 1, 1977, advising that no contributions were accepted and the transfers had been returned to the multicandidate committees). Our analysis of filings relevant to this referral revealed that NACSAPAC reported the returned contribution of \$200 on its Ten Day Pre-General Election Report. The Political Action Together Committee, however, has not reported its contribution as returned. We further note it was directed to an individual other than the Treasurer or Chairman which may be a factor in the Committee's failure to disclose such a refunded contribution.



3) Other Factors Considered

The referral also questions whether a reported independent expenditure of \$367 for printing made by an individual who was also reported by the committee as the contributor of an in-kind contribution of \$350 for printing can be considered as such. While there is always the possibility that such expenditures were made in consultation or co-operation with the benefitting committee, we feel this is not a major consideration in that should the criteria for true independence not be met, the combined contributions would not exceed the contribution limits.

As we noted under Paragraph 1, Reporting History, the failure to report transfers reportedly made by other committees is resolved. The Political Action Together Committee has apparently failed to disclose its receipt of the returned contribution and should be so notified upon receipt at the FEC of the Burke Committee's amended response to the FEC inquiry.

4) Recommendation

The fact that the Committee's filings disclose that no contributions were accepted and no expenditures were made, together with the absence of any filed complaints during the election periods to indicate otherwise, we recommend that no audit based upon the reports filed by this committee be undertaken at this time.

However, should our recommendation on Referral #15a be accepted by the Commission, and matters surface during that audit which indicate an audit of this committee may be warranted, we reserve an option to alter this recommendation at a later time if necessary.

Date and Time of Transmittal: _____

DIS NO. 87 RE-113(12)
15(6)

REC'D: _____

RECOMMENDATION FOR AUDIT:

FEDERAL ELECTION COMMISSION
Washington, D.C.

Method of Origination: Statistical Compilation & Review

House Team / Disclosure Division

Person or Committee to be Audited: Congressman James A. Burke and his authorized and unauthorized committees

Relevant Statute: Sect. 434

Internal Reports Checked: All disclosure documents filed by Congressman Burke, / Committee to Re-Elect James A. Burke, & Committee
Previous Audit History: To Promote Jobs, Construction and the Economy

→ None

SUMMARY OF QUESTIONS RAISED

1. Transfers from special interest cmts. are not reported by candidate.
2. The status of the Cmt. to Promote Jobs, Construction and the Economy as an "unauthorized committee" is questionable.
3. Instances of late filings, failure to provide an adequate response to a Commission REAI, and the overlapping of coverage dates.
4. Discrepancies in figures reported, including total aggregate year-to-date totals, and the carrying of cash balances as caused by overlapping of coverage dates.

PRELIMINARY ANALYSIS

See attached for details.

RECOMMENDATIONS

To audit James A. Burke and his authorized and unauthorized committees, to assure that (1) adequate recordkeeping and reporting procedures are in effect, and (2) all expenditures and contributions relating to Burke's campaign are accurately disclosed.

DATE OF PROPOSED AUDIT: _____

II. COMMITTEE TO PROMOTE JOBS, CONSTRUCTION AND THE ECONOMY-C00062869

-In several instances, the COMMITTEE TO PROMOTE JOBS, CONSTRUCTIONS AND THE ECONOMY accepted transfers to be used in support of Congressman Burke totalling \$3250.

A.F.M. Tempo Political Contribution Committee	\$250.	11-1-76
Carpenters Legislative Improvement Committee	\$300.	10-27-75
Int'l Brotherhood of Firemen & Oilers Political League	\$200.	9-10-76
Laborers Political League	\$500.	9-20-76
Nat'l Education Association Political Action Committee	\$1000.	9-10-75
Transportation Political Education League	\$1000.	9-9-76

-The \$1000. transfer from the TRANSPORTATION POLITICAL EDUCATION LEAGUE was reported to be made to Congressman Burke, however the transfer does not appear on either the Congressman's nor his Committee's reports. It was reported by the COMMITTEE TO PROMOTE JOBS, CONSTRUCTION AND THE ECONOMY on 9-1-76 making Congressman Burke the conduit.

-The COMMITTEE TO PROMOTE JOBS, CONSTRUCTION AND THE ECONOMY reported to have spent \$6940 in independent expenditures on behalf of Congressman Burke, as an unauthorized committee.

-The COMMITTEE TO PROMOTE JOBS, CONSTRUCTION AND THE ECONOMY has only partially answered the RFAL sent out for their 30 Day Post-Election Report. Additional information is needed to clarify certain expenditures made (e.g. political adv. and printing), which appear to be in support of a candidate.

-Overlapping of coverage dates resulted in discrepancies in cash balance figures in the following reports:

- October 10, 1976
- 30 Day Post-Primary
- 10 Day Pre-General

FEC Form 1
January 1975
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20003

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and authorizing contribu-
tions or expenditures in excess of \$1,000 in any calendar year in support
of such candidate(s).

RECEIVED
FEB 10 1975
FEDERAL ELECTION COMMISSION

Note: Committee authorized by a candidate to receive contributions and make expenditures in connection with a particular election must maintain separate records with respect to such election.

1(a) Name of Committee (in full) Committee to Promote Jobs, - Construction and the Economy	2 Committee election number
(b) Address (number and street) 1765 Center Avenue	3 Date of operation (month, day, year) 8/19/76
(c) City, State and Zip Code Wilton, N. H. 03095	4 Is this an amended statement? ☐ Yes ☒ No (If Yes, list only those lines on which there has been a change)

5 Check one

- ☐ (a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)
a candidate for _____ in the _____ Election(s)
(Federal office sought) (General, Primary, Runoff, etc.)
to be held in the State of _____ on _____
(State in which election is held) (Date(s))
(The Principal Campaign Committee will forward to the Commission a copy of the Statement of Organization for each committee required to file with it.)

- ☐ (b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate)
to receive contributions and make expenditures with respect to the _____ Election(s)
(General, Primary, Runoff, etc.)
held on _____, and will file all reports and statements with the candidate's principal campaign
(Date(s))
committee. _____
(Full name of principal campaign committee)

(Attach a copy of Candidate's written authorization) (FEC Form 2a)

- ☒ (c) This committee supports only one candidate **James A. Burke** but is not an authorized committee.
(Name of Candidate)
- ☐ (d) This committee is a multicandidate committee.
- ☐ (e) This committee is a _____ committee of the _____ Party.
(National, state, county, city) (Democratic, Republican, etc.)

6 Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
None		

Submit additional information on separate contribution sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is contributed on some other paper.

76030261320

PEC Form 1
January 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Statement of Organization
For a Committee
(Page 2)

Name of Committee

Committee to Promote Jobs, Construction and the Economy

7 Area, Scope and Jurisdiction of Committee

- (a) Will this committee operate in more than one State? ☐ Yes ☒ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
James A. Burke	55 Brook Hill Road Hilton, MA 02185	U. S. Representative	Democratic

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
None			

9 If this committee is supporting the entire ticket of a party, give name of party: (b)

10 Identify by name and address at least one person in possession of committee books and records

Full name	Mailing address and ZIP code	Title or position
Thomas J. Geraghty	1765 Canton Avenue Hilton, MA 02185	Treasurer

Submit additional information on separate continuation sheets appropriately worded and attached to this Statement of Organization. Indicate in the appropriate section where when information is continued on separate page(s).

76030261321

Statement of Organization For a Committee

(Page 3)

Name of Committee: **Committee to Promote Jobs, Construction and the Economy.**

List by name, address and position, other principal officers of the committee:

Full name	Mailing address and ZIP code	Title or position
Louis Contino	97 Grove Street Quincy, MA 02169	Chairperson
William H. White	75 Fairbanks Road Milton, MA 02185	Member
William Purcell	30 Fuller Street Brookton, MA 02140	Member

12 Does this committee plan to stay in existence beyond the current calendar year? ☐ Yes ☒ No

13 In the event of dissolution, what disposition will be made of your funds? **None anticipated. If so, they will be returned to the contributors.**

14 List all banks or other repositories in which the committee deposits funds, funds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
New England Merchants National Bank	Prudential Center, Boston, MA 02199

15 List all election reports required to be filed by this committee with State and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports furnished to State pursuant to 52 U.S.C. 3041).

Report title	Date required	Name and position of recipient	Mailing address and ZIP code
None	None	Director of State	State Capitol Building
None			

Submit a copy of each report to the appropriate jurisdiction with a copy of this Statement of Organization. Indicate in the appropriate section above when a report is submitted on separate paper.

I certify that I have examined this Statement and the facts of my knowledge and belief are correct and complete.

Thomas J. Purcell
 (Signature)

8/10/78
 (Date)

Note: Submission of false, erroneous, or misleading information may subject the person signing this statement to the penalties of 2 U.S.C. § 441 (Print on reverse side of form)

For further
 information
 contact:

Federal Election Commission
 1225 K Street, N.W.
 Washington, D.C. 20543

76030261322

Items Filed	Documents Not Filed	RFAI Code	Response	Surface Violation	Response	Remarks
1						Unaffiliated committee supporting James A. Buchanan
- PRIMARY		---				Covering 8-21 thru 8-30
EA 10		12-14-76				Summary figures incorrect. Appropriate Year-to-Date figures omitted. Purpose of certain expenditures (unpublished) covering 7-1 thru 9-30.
AMENDED			ADAPTE			Covering 7-1 thru 9-30.
- PRIMARY		---	No RECORD OF RFAI			Summary figures incorrect. Appropriate Year-to-Date figures omitted. Purpose of certain expenditures (unpublished) covering 9-1 thru 10-4.
AMENDED		---				Summary covered figures correct, but covering 9-1 thru 10-4.
AMENDED		12-14-76				Summary figures incorrect. Purpose of certain expenditures (unpublished) covering 10-5 thru 10-18.
AMENDED		---	NOT ADEQUATE			corrected summary figures. Covering 10-5 thru independent expenditures distinct. Covering 10-5 thru
AMENDED			ADAPTE			Celebrate Year-to-Date figures incorrect. Appropriate Year-to-Date totals omitted. Purpose of certain expenditures (unpublished) On the Schedule 13, Line 22.
AMENDED		12-14-76				Advised that committee had no contributions from Patricia Allen Cummings.

Refer to Code Sheet attached.

A(5)

ADAPTE

HISTORY OF DOCUMENTS FILED

COMMITTEE: *Committee on Education and the Laboring*

Documents Filed

Documents Not Filed

Revi Sent

Response

Response

Minutes (Probation)

GENERAL
REMARKS

Overall poor reporting - on all reports.

Constant failure to disclose independent
operational made a matter of Congress
James A. Burke.

Developing of dates for reports.

Division of aggregate Year-to-date totals
for Confidentiality.

Refer to Code Sheet attached.

1. COMMITTEE TO RE-ELECT JAMES A. BURKE

- On 8-26-76 the COMMITTEE TO RE-ELECT JAMES A. BURKE reported receiving an in-kind contribution (printing) from Dr. John M. Andersen of 471 Gallivan Boulevard, Dorchester, Ma. totalling \$367. This appears on the Committee's Termination Report, located at HSE/114/4028.
- On 8-31-76 Dr. Andersen made an independent expenditure on behalf of Congressman Burke totalling \$350. This can be found on the independent expenditure form located at FEC/30/4401.
- 2 U.S.C. Sec. 431(p) states that an independent expenditure must be made without the cooperation or consultation of any candidate, authorized committee or agent of such candidate. Because of the short time involved concerning the actions taken by Dr. Andersen in support of Congressman Burke, it is questionable whether the independent expenditure made on 8-31-76 was made without some type of cooperation or consultation with the candidate, authorized committee or agent of the candidate.
- A transfer from NACSAPAC (National Association of Casualty & Surety Agents) for \$200 on 9-10-76 to the COMMITTEE TO RE-ELECT JAMES A. BURKE was not reported by Burke.
- A transfer from the POLITICAL ACTION TOGETHER COMMITTEE for \$250 on 9-17-76 to Congressman Burke, c/o J.C. Damery of 24 Gilbert Road, Weymouth, Ma. was not reported by Burke.
- The COMMITTEE TO RE-ELECT JAMES A. BURKE received a total of \$1207 in in-kind contributions and transfers. No funds were reported received by the committee. The only other committee supporting Congressman Burke was the COMMITTEE TO PROMOTE JOBS, CONSTRUCTION AND THE ECONOMY, an unauthorized committee.

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FES Form 3

(See Instructions on back)

Page 7 of 8 for

Line Number 24 (b)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

AMERICAN FEDERATION OF MUSICIANS -TEMPO POLITICAL CONTRIBUTIONS COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gillis Long Friends of Gillis Long Committee P. O. Box 827 Alexandria, Louisiana 71301	Political Contributions	10-20-76	\$ 250.00
Robert Leggett Congress of the U. S. House of Representatives Washington, D. C. 20515	Political Contributions	10-20-76	250.00
Richard Vander Veen Vander Veen 76 Committee P. O. Box 1510, Grand Rapids Michigan 49501	Political Contributions	10-20-76	250.00
Tim Wirth Committee for Wirth, Inc. 8642 West Colfax Ave. Lakewood, Colorado 80215	Political Contributions	10-20-76	250.00
Mike Clouin 1043 Key Way Dub, Iowa	Political Contributions	10-20-76	250.00
Allard Lowenstein 163 Lindell Blvd. Long Beach, N. Y.	Political Contributions	10-20-76	250.00
Tim Hall c/o Roger D. Vogtmann, Pres. Local 131, A.F.M. 834 Douglas Ave., Aurora, Illinois 60005	Political Contributions	10-22-76	250.00
James A. Burke c/o Thomas J. Geraghty, Treasurer Committee to Promote Jobs, Construction & the Economy 1764 Boston Ave. Milton, Massachusetts 02186	Political Contributions	10-23-76	250.00

Total of expenditures this page (do not include) 3 2,000.00

Total this period (last page the line number only) 3

760304796

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20045

Itemized Expenditures Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See Instructions on back)

Page 1 of 4 forLine Number 24(b)

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

Carpenters Legislative Improvement Committee

(C00001016)

Full Name, mailing address and ZIP code

Moynihan for U.S. Senate Committee
355 Lexington Ave.
New York, N.Y. 10016

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/19/76

Amount of each expenditure this period

1,000.00

Full Name, mailing address and ZIP code

Re-Elect Les McCoin Committee
2445 N.W. Irving Street
Portland, Oregon 97210

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/20/76

Amount of each expenditure this period

500.00

Full Name, mailing address and ZIP code

Les McCoin (D) 1st C.D.-Oregon
Hughes for Congress Committee
15 E. Eight Street
Ocean City, N.J. 08226

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/21/76

Amount of each expenditure this period

500.00

Full Name, mailing address and ZIP code

William J. Hughes (D) 2nd C.D.-N.J.
Committee to Promote Jobs, Construction and the Economy
1765 Canton Avenue, Milton, Mass.
02185

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/21/76

Amount of each expenditure this period

300.00

Full Name, mailing address and ZIP code

James A. Burke (D) 11th C.D.-Mass.
Keep Teno in Congress Committee
P. O. Box 1707
Cheyenne, Wyoming 82001

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/21/76

Amount of each expenditure this period

500.00

Full Name, mailing address and ZIP code

Teno Ponzalio (D) At Large-Wyoming
Citizens for Moffett'76
20 Day Avenue
Suffield, Conn. 06078

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/21/76

Amount of each expenditure this period

200.00

Full Name, mailing address and ZIP code

Anthony Tedy Moffett (D) 6th C.D.-Conn.
Brouillette for Congress Committee
101 East Ludington Street
Iron Mountain, Mich. 49801

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/21/76

Amount of each expenditure this period

300.00

Full Name, mailing address and ZIP code

Francis Brouillette (D) 11th C.D.-Mich.
Panetta for Congress
499 Pacific Street
Monterey, Calif. 93940

Purpose of Expenditure

Congressional Campaign

Date (month, day, year)

10/22/76

Amount of each expenditure this period

500.00

Full Name, mailing address and ZIP code

Leon Panetta (D) 14th C.D.-Calif.

Subtotal of expenditures this page (optional)

3

Total this period (must agree with line on other copy)

1

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Schedule B
July 1976
General Election Commission
1325 M Street, N.W.
Washington, D.C. 20005

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEO Form 3
(see instructions on back)

Page _____ of _____ for
Line number _____ 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Int'l. Brotherhood of Firemen and Oilers Political League

Full Name, mailing address and ZIP code Committee to Re-Elect Thomas P., O'Neill, Jr. Mr. Brian T. O'Neill, Treasurer 20 Ashburton Place Boston, Mass. 02102	Purpose of Expenditure Congressional Campaign	Date (month, day, year) 9-3-76	Amount of each ex- penditure this period \$ 200.00
Full Name, mailing address and ZIP code Committee to Promote Jobs, Constitution and the Economy Mr. Thomas Garaghty 1765 Canton Avenue Hilton, Mass. 02186	Purpose of Expenditure Congressional Campaign of James Burke	Date (month, day, year) 9-3-76	Amount of each ex- penditure this period 200.00
Full Name, mailing address and ZIP code Moynihan for Senate Committee (Hand Delivered)	Purpose of Expenditure Senatorial Campaign	Date (month, day, year) 9-8-76	Amount of each ex- penditure this period 100.00
Full Name, mailing address and ZIP code Shipley for Congress Committee The Honorable Endicott Peabody 1203 - 30th Street, N. W. Washington, D. C. 20007	Purpose of Expenditure Congressional Campaign	Date (month, day, year) 9-15-76	Amount of each ex- penditure this period 100.00
Full Name, mailing address and ZIP code Bob Holhardt Campaign Fund Mr. J. Edwin Smith, Treasurer Box 61404 Houston, Texas 77208	Purpose of Expenditure Congressional Campaign	Date (month, day, year) 9-15-76	Amount of each ex- penditure this period 100.00
Full Name, mailing address and ZIP code Leo J. Ryan for Congress Committee (Hand Delivered)	Purpose of Expenditure Congressional Campaign	Date (month, day, year) 9-27-76	Amount of each ex- penditure this period 100.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each ex- penditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each ex- penditure this period
Subtotal (Expenditures this page (optional))			3
Total this period (Expenditures this line number only)			3 200.00

Schedule B
January 1976
Federal Election Commission
1125 W. Street, N.W.
Washington, D.C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See Instructions on back)

Page 1 of 1 for
LINE NUMBER 23b
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full Laborers' Political League			
Full Name, mailing address and ZIP code "Friends of Les Aspin" Cong. Les Aspin (D-Wisc.) P.O. Box 706, Racine, Wisc. 53401	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 500.00
Full Name, mailing address and ZIP code "Peyser For Senate Committee" Cong. Peter Peyser (R-N.Y.) Box 1976, Irvington, N. Y. 10533	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 500.00
Full Name, mailing address and ZIP code "Gerald Blessey Congressional Campaign Fund", Cong. Cand. Gerald Blessey (D-Miss.), Diane Mitchell, Chairperson, Sam Larosa, Greene, P.O. Box 600, Biloxi, Miss. 39503	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 500.00
Full Name, mailing address and ZIP code "Cttee. To Promote Jobs, Construction and The Economy", Cong. James Burke (D-Mass.), 1765 Canton Ave., Milton, Mass. 02186	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 500.00
Full Name, mailing address and ZIP code "Robert Nix Campaign Cttee." Cong. Robert Nix (D-Pa.), P.O. Box 144, Dickerson, Md. 20753	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 250.00
Full Name, mailing address and ZIP code "Flood For Congress Cttee." Cong. Dan Flood (D-Pa.), 1015 United Penn Bank Building, Wilkes Barre, Pa. 18701	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$1,000.00
Full Name, mailing address and ZIP code "Lindy Boggs Campaign Committee" Cong. Lindy Boggs (D-La.) One Shell Square, Suite 111 New Orleans, La. 70130	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 500.00
Full Name, mailing address and ZIP code "Nolan For Congress Volunteer Cttee." Cong. Rick Nolan (D-Minn.) P.O. Box 1135, St. Cloud, Minn. 56301	Purpose of Expenditure Congressional campaign	Date (month, day, year) 9/ 7/76	Amount of each expenditure this period \$ 200.00
Subtotal of expenditures this period (add)			7 \$
Totals (do not add this line number only)			7 \$

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Schedule D
 1976
 Form 1041
 U.S. Department of the Treasury
 Washington, D.C. 20548

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (See instructions on back)

Page 2 of 2
 Line number 23(b)
 (This schedule is required for each numbered line)

Name of the committee in full			
National Education Association Political Action Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jimmy Love (D) Jimmy Love for Congress Committee Prayer L Sanford, NC 27330	Campaign Contribution North Carolina CD #3 Run-off	8/20/76	\$1,000.00
Full Name, mailing address and ZIP code Harrison A. Williams, Jr. (D) The Williams' Project '76 630 Washington Building Washington, D.C. 20005	Campaign Contribution U.S. Senate, New Jersey General	8/21/76	5,000.00
Full Name, mailing address and ZIP code Norman Dicks (D) Norm Dicks for Congress Committee 210 Broadway, Suite B Tacoma, WA 98402	Campaign Contribution Washington CD #6 Primary	8/21/76	2,000.00
Full Name, mailing address and ZIP code Les AuCoin (D) Reelect Les AuCoin Committee 2445 North West Irving St. Portland, OR 97210	Campaign Contribution Oregon CD #1 General	8/23/76	2,000.00
Full Name, mailing address and ZIP code Sam Shipley (D) Sam Shipley for Congress P.O. Box 8997 Wilmington, DE	Campaign Contribution Delaware AL Primary	8/24/76	2,000.00
Full Name, mailing address and ZIP code Patsy Mink (D) Friends for Patsy Mink for U.S. Senate Committee P.O. Box 36 Honolulu, HI 96810	Campaign Contribution U.S. Senate, Hawaii Primary	8/24/76	3,000.00
Full Name, mailing address and ZIP code John P. Murtha (D) Murtha for Re-election Committee 304 Fisher Building Johnstown, PA 15801	Campaign Contribution Pennsylvania CD #12 General	8/24/76	1,000.00
Full Name, mailing address and ZIP code James Burke (D) Committed to Create Jobs, Construction and the Economy 1765 Canton Ave. Milton, MA 02186	Campaign Contribution Massachusetts CD #11 Primary	8/24/76	1,000.00
Subtotal of expenditures (this page total)			3
Total this section (see this line number only)			3

Schedule B

January 1976
Federal Election Commission
1125 Wisconsin Ave.
Washington, D.C. 20541

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3

(See instructions on back)

Page 1 of 66 for

LINE NUMBER 23 B

(Use separate schedule(s) for each numbered line)

Name of the person or Committee in full

Transportation Political Education League

Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
James A. Burke 241 Cannon Building Washington, D.C.	Campaign contribution	9/1/76	\$1,000.00
Full name, mailing address and ZIP code Till Chappell, Jr. 1104 Longworth Building Washington, D.C.	Campaign contribution	9/1/76	\$500.00
Full name, mailing address and ZIP code Michael T. Blouin 1110 Longworth Building Washington, D.C.	Campaign contribution	9/1/76	\$500.00
Full name, mailing address and ZIP code Andrew Maguire 1314 Longworth Building Washington, D.C.	Campaign contribution	9/1/76	\$500.00
Full name, mailing address and ZIP code Charles Friedman 4303 Pierce St. Hollywood, Fla.	Campaign contribution	9/1/76	\$500.00
Full name, mailing address and ZIP code Stan Kress P. O. Box 5 Firth, Idaho 83236	Campaign contribution	9/1/76	\$500.00
Full name, mailing address and ZIP code Permit V. Kibbert P. O. Box 187 Hope, Idaho	Campaign contribution	9/1/76	\$50.00
Full name, mailing address and ZIP code Don Maynard Clark Fork, Idaho	Campaign contribution	9/1/76	\$50.00

Submit this schedule to your local or Federal Election Commission office with your Form 3.

Enter the number of the page of this schedule in the space provided.

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Schedule B
January 1978
Federal Election Commission
1125 K Street, N.W.
Washington, D.C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 2 of 2 for
Line Number 20B
(Use separate schedule(s) for each
numbered line).

Name of Candidate or Committee in full

Political Action Together - Political Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John C. McDonald 1420 Londondale Parkway Newark, OH 43055	Contribution	9/9/76	\$ 100.00
Don J. Pease 285 Oak Street Oberlin, OH 44074	Contribution	9/9/76	100.00
Joseph M. Montoya 918 18th Street N.W. Washington, D.C. 20006	Contribution	9/13/76	100.00
Edward Borinsky c/o E. Senizo 5333 Grover Omaha, NE 68105	Contribution	9/13/76	200.00
John J. Cavanaugh 468 Aquila Court Omaha, NE 68102	Contribution	9/13/76	150.00
Martin Russo c/o Frank Bryant 1453 W. Adams Street Chicago, IL 60607	Contribution	9/17/76	200.00
Henry Deuss 2801 N. Mexico Ave. N.W. #124 Washington, D.C. 20007	Contribution	9/17/76	100.00
James Burke c/o J.C. Damery 24 Gilbert Road Brynorth, PA 02160	Contribution	9/17/76	250.00

Subtotal of expenditures this period in this category 7 \$ 1,000.00

Total this period (add page this line number only)

7 \$

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Schedule B

January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20004

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3

(see instructions on back)

Page 1 of 3 for

LINE NUMBER 23b

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in Full

NACSAPAC #C000039578, 9/1/76 through 9/30/76

Full Name, mailing address and ZIP code

Committee to Reelect Philip Burton
U. S. House of Representatives
Washington, D. C. 20515

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Committee to Reelect John J. McFall
U. S. House of Representatives
Washington, D. C. 20515

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Committee to Reelect Lloyd Bentsen
U. S. Senate
Washington, D. C. 20510

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Callahan for Congress Committee
6821 Whittier Ave.
McLean, Va. 22101

Purpose of Expenditure

congressional election
campaignDate (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$100.00

Full Name, mailing address and ZIP code

Friends of Newt Steers
11300 Veirs Mill Rd.
Wheaton, Md. 20902

Purpose of Expenditure

congressional election
campaignDate (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Committee to Reelect James A. Burke
U. S. House of Representatives
Washington, D. C. 20515

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Committee to Reelect Bernard J. St. Germain
U. S. House of Representatives
Washington, D. C. 20515

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Full Name, mailing address and ZIP code

Committee to Reelect Howard W. Cannon
U. S. Senate
Washington, D. C. 20510

Purpose of Expenditure

reelection campaign

Date (month,
day, year)

9/10/76

Amount of each expendi-
ture this period

\$200.00

Subtotal (sum of lines 20 through 23)

\$1500.00

Total number of separate checks (number only)

3



FEDERAL ELECTION COMMISSION

1225 K STREET NW
WASHINGTON, DC 20463

THIS IS THE END OF MUR # 426

