



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF TCR # 666

Date Filmed _____ Camera No. --- 2

Cameraman _____



FEDERAL ELECTION COMMISSION

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

January 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Weinberg
Zwerdling and Maurer
1211 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 666

Dear Mr. Weinberg:

On January 30, 1979, the Commission voted to find no reasonable cause to believe that the Retired Public Employees Council of Washington, (RPECW), violated 2 U.S.C. §441b. The Commission also voted to take no further action on RPECW's violation of 2 U.S.C. §434, contingent upon the filing of a proper termination report. A copy of the Commission's determination and the General Counsel's Report is enclosed for your information.

Please instruct RPECW to submit a properly completed year end report which must indicate both the distribution of the Committee's cash on hand, and that there are no debts and obligations outstanding. If you have any questions, please contact Scott Rinn, the attorney assigned to this matter at 523-4000.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Commission certification
General Counsel Report



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Retired Public Employees) MUR 666
Council of Washington)

CERTIFICATION

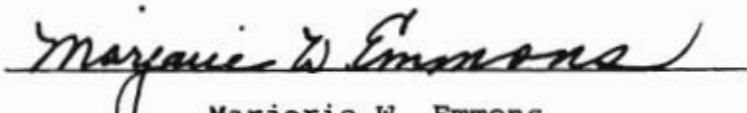
I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 30, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated January 24, 1979, regarding the above-captioned matter:

1. Find no reasonable cause to believe that RPECW violated 2 U.S.C. §441b.
2. Take no further action with respect to RPECW's violation of 2 U.S.C. §434, contingent upon RPECW's filing of a proper termination report.
3. Send the letter attached to the above-named report.

Voting for this determination were Commissioners Springer, Aikens, Tiernan, McGarry, and Thomson.

Attest:

1/30/79
Date


Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 1-25-79, 1:31
Circulated on 48 hour vote basis: 1-26-79, 11:00

January 25, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 666

Please have the attached General Counsel's Report on MUR 666 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040101832

BEFORE THE FEDERAL ELECTION COMMISSION

79 JAN 25 P 1: 31

In the Matter of)
)
) MUR 666
Retired Public Employees)
Council of Washington)

GENERAL COUNSEL'S REPORT

BACKGROUND

On May 15, 1978, the Reports Analysis Division referred to the Office of General Counsel the Retired Public Employees Council of Washington (RPECW), with recommendations that RPECW violated 2 U.S.C. §§441b(a) and 441b(3)(A) by making prohibited contributions. This recommendation was based on information gathered in a telephone conversation with, and a subsequent letter from, RPECW's President, Mildred Cole. Ms. Cole stated that RPECW members were unaware that a portion of their dues money was being placed in a separate segregated fund from which political contributions were made to the Public Employees Organized to Promote Legislative Equality (P.E.O.P.L.E.), a registered committee supporting candidates seeking federal office. The Reports Analysis Division also recommended that the Commission find reason to believe (RTB) that RPECW failed to file their April 10 Quarterly Report because respondent failed to properly terminate on its 1977 year end report by apparently leaving a residual \$5,180 cash on hand unaccounted for. On September 6, 1978, the Commission found RTB

that a violation had occurred, with instructions to send letters to RPECW and the American Federation of State, County and Municipal Employees (AFSCME) requesting certain information.

On September 18, 1978, the Office of General Counsel mailed letters to RPECW and AFSCME requesting the information sought by the Commission. Both parties' answers were received by the General Counsel's Office on October 16, 1978, (answers attached).

ANALYSIS

The evidence indicates that RPECW has had a policy of requiring, as a condition of membership, that a portion of an applicant's membership dues be allocated to a separate segregated fund, from which political contributions were made. At issue is whether this policy violates 2 U.S.C. §441b.

The following analysis will demonstrate that:

- (1) RPECW is not a labor organization and therefore not subject to the prohibitions on the means of obtaining contributions from its members imposed by 2 U.S.C. §441b(b) (3) (A) (B) (C).
- (2) RPECW is not a corporation and therefore not subject to the provisions of 2 U.S.C. §441b(b) (3) (A) (B) (C).

(3) RPECW is a membership organization.

(4) 11 CFR §114.7(g) expanded the application of 2 U.S.C. §441b(b)(3)(A)(B)(C) to include membership organizations as of May 1, 1977.

(5) All of RPECW's activity which generated this MUR occurred prior to the enactment of the regulations, and therefore, RPECW should not be subject to the expanded application of 2 U.S.C. §441b(b)(3)(A)(B)(C).

(6) Since May 1, 1977, the date the regulations were approved, RPECW made one additional contribution of \$100 from its legislative and political action fund. But, for reasons stated in the analysis, no further action should be taken against RPECW.

A. RPECW's Statement of Organization indicates that RPECW is "fraternally" affiliated with AFSCME. This type of affiliation is specifically authorized by AFSCME's Constitution which states:

Councils, acting singly or in joint action with other councils in the same state, may sponsor council-wide or statewide organizations of retired members and/or of former members who have retired, to carry on programs of interest to retired persons. The sponsorship of such organizations shall be subject to the approval of the International President or the International Executive Board, and upon the granting of such approval the International Union shall issue a certificate of fraternal affiliation with the International Union.^{1/}

Although RPECW is an organization fraternally related to AFSCME, it is not necessarily a labor organization as defined by 2 U.S.C. §441(b)(1) which states:

^{1/} This identical language appears in AFSCME's 1972, 1974 and 1975 Constitutions.

For the purposes of this section the term "labor organization" means any organization of any kind, or any agency or employee representation committee or plan, in which employees participate and which exists for the purpose, in whole or in part, of dealing with employers concerning grievances, labor disputes, wages, rates of pay, hours of employment, or conditions of work.

For RPECW to be classified as a "labor organization," its members must be considered "employees." The Federal Election Campaign Act of 1971, as amended, ("the Act") does not define "employees," but the Labor Management Relations Act of 1947, which contains the identical definition of "labor organization" as found in the Act, does.

The term "labor organization" means any organization of any kind, or any agency or employee representation committee or plan, in which employees participate and which exists for the purpose, in whole or in part, of dealing with employers concerning grievances, labor disputes, wages, rates of pay, hours of employment, or conditions of work. 29 U.S.C. §152(5).

The term "employee" shall include any employee, and shall not be limited to the employees of a particular employer, unless this subchapter explicitly states otherwise, and shall include any individual whose work has ceased as a consequence of, or in connection with, any current labor dispute or because of any other regular and substantially equivalent employment, but shall not include any individual employed as an agricultural laborer, or in the domestic service of any family or person at his home, or any individual employed by his parent or spouse, or any individual having the status of an independent contractor, or any individual employed as a supervisor, or any individual employed by an employer subject to the Railway Labor Act, as amended from time to time, or by any other person who is not an employer as herein defined. 29 U.S.C. §152(3).

This definition of "employee" was interpreted by the United States Supreme Court in Allied Chemical and Alkali Workers of America v. Pittsburgh Plate Glass Co., 404 U.S. 157 (1971) as not including retired workers:

No decision under the Act is cited, and none to our knowledge exists, in which an individual who has ceased work without expectation of further employment has been held to be an "employee."
(at p. 168)

Therefore, the General Counsel's Office recommends that RPECW should not be treated as a labor organization, and therefore not in violation of 2 U.S.C. §441b(a).

B. RPECW's answers to the questions sent to them by this office indicate that RPECW was not incorporated until July 17, 1978, more than two years after the last RPECW contribution to AFSCME. Therefore, the General Counsel's Office recommends that RPECW should not be treated as a corporation, and therefore not in violation of 2 U.S.C. §441b.

C. While RPECW cannot be considered either a labor organization or a corporation, it does come under the classification of a "membership organization." A close reading of those sections of the Act which specifically mention "membership organizations" indicates that they may establish, administer and solicit contributions from its members to a separate segregated fund, if the organization does not have capital stock. 2 U.S.C. §441b(b)(4)(C).

The prohibitions on the means of obtaining such contributions, as stated in 2 U.S.C. §441b(b)(3)(A)(B)(C), however, do not apply to membership organizations specifically, but relate only to labor organizations and employees.

However, 11 C.F.R. §114.7(g) states:

(g) A membership organization, cooperative, or corporation without capital stock and the separate segregated funds of the organizations are subject to the provisions in §114.5(a).

§114.5(a) essentially restates the prohibitions in 2 U.S.C. §441b(b)(3)(A)(B)(C). Although 11 C.F.R. §114.7(g) applies the prohibition sections to membership organizations, the regulations were not applicable until May 1, 1977, more than a year after RPECW made its last contribution to P.E.O.P.L.E., and therefore, RPECW did not have notice of the expanded application of 2 U.S.C. §441b.

D. In RPECW's last report, received by the Commission on October 30, 1978, schedule B shows that RPECW purchased a \$100 dinner ticket for Congressman Don Bonker on June 14, 1978. RPECW's legislative and political action fund was subsequently abolished in September 1978.

The Commission's procedures for handling corporate/union contributions, date October 25, 1978, establishes a threshold contribution of \$100 or more before making the contributor a respondent. Applied to RPECW (although RPECW is a membership organization rather than a union)

the Office of General Counsel recommends that in light of the amount of the contribution (\$100), and the fact that RPECW's legislative and political action fund has now been abolished after making only one contribution, that the file be closed upon receipt of RPECW's year end report and proper termination of its committee.

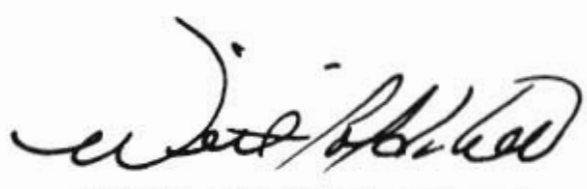
In the questions sent to RPECW, this office requested an explanation of the distribution of the residual \$5,180.06 cash on hand which was unaccounted for at the end of the July 10 reporting period. We also requested that RPECW send in another year end report so that RPECW could properly terminate.

RPECW's answers state that this money was transferred to its general treasury after the legislative and political action fund of RPECW, which contained the money, was abolished by amendment to the RPECW Constitution. As of this date, RPECW has not submitted its year end report as requested.

RECOMMENDATION

1. Find no reasonable cause to believe that RPECW violated 2 U.S.C. §441b.
2. Take no further action with respect to RPECW's violation of 2 U.S.C. §434, contingent upon RPECW's filing of a proper termination report.
3. Send attached letter.

1/24/79
Date



William C. Oldaker
General Counsel

Attachment: Answers to Office of General Counsel's questions.
Letter to Larry Weinberg



AFSCME®

American Federation of State, County and Municipal Employees
 1625 L Street, N.W., Washington, D.C. 20036
 Telephone (202) 452-4800
 Telex 89-2376

RECEIVED
 FEDERAL ELECTION
 COMMISSION

18 OCT 16 4:34

806936

October 13, 1978

Jerry Wurl
 President
 William Lucy
 Secretary-Treasurer

Vice Presidents

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 Johnson City, Mo.

Donald J. Barling
 Dallas, Texas

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 Miami, Fla.

David K. Trask, Jr.
 Honolulu, Hawaii

Maynard White
 Houston, Texas

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

Re: MUR 666

Attn: Scott Rinn

This is in response to a letter of September 18, 1978 requesting certain information from us concerning the Retired Public Employees Council of Washington (RPECW). The numbers of the answers given below correspond to the numbers of your questions.

1. We have checked our records back through 1972, and find no record of any disbursement or any transfer of money by AFSCME to RPECW.
2. A check of our records reveals no evidence of any written solicitation of contributions by AFSCME from RPECW.
3. AFSCME received contributions from RPECW on the dates and in the amounts indicated

<u>DATE</u>	<u>AMOUNT</u>
September 20, 1974	\$ 500.00
October 11, 1974	500.00
October 29, 1974	500.00
January 14, 1975	300.00
April 28, 1975	500.00
July 29, 1975	1,000.00
December 15, 1975	750.00
February 9, 1976	500.00
April 7, 1976	1,200.00
April 7, 1976	300.00

in the public service

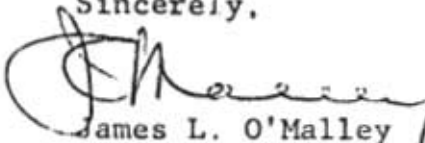
We have enclosed copies of the checks of which copies were retained.

4. To our knowledge, RPECW was not incorporated at the time AFSCME received contributions from it.

Per your request, we have enclosed copies of AFSCME's Constitution as it existed during the periods relevant to your investigation.

I hope the above information is sufficient for your purposes.

Sincerely,


James L. O'Malley
Business Manager

JLO'M:1ws

70010101841

PAY TO THE
ORDER OF

P. E. O. P. L. E.

\$ 500.00

Feb. 10, 1976 No. 10

Five hundred and 00/100

DO NOT



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Theresa Lee

CONTRIBUTION

125105491 33515 719

12/4 1975 NO. 7

PAY TO THE
ORDER OF

P. E. O. P. L. E.

\$ 250.00

Seven hundred fifty ⁰⁰/₁₀₀

DOLLAR



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Richard Cole

⑆1251⑈0549⑆ 33515 719⑈

Dep. in Nabil PEOPLE acc
12-15-75

72040101841

98-549
1251

July 25, 1975 NO. 8

PAY TO THE ORDER OF P.E.O.P.L.E.

\$1,000⁰⁰

One thousand and ^{no}/₁₀₀

DOLLARS



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL

LEGISLATIVE & POLITICAL ACTION FUND

Contribution

Missed Cole

⑆1251⑈0549⑆ 33515 719⑈

Dep. in Nat'l PEOPLE acct

7-29-75

PAY TO THE
ORDER OF

98-549
1251

April 23 19 75 NO. 7

P.E.O.P.L.E.

Five hundred and ^{no} 100

\$500

DOLLARS



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Michael Cole

⑆1251⑈0549⑆ 33515 719⑈

79010171843

08-349
1251
9, 1975 NO. 5
TO THE ORDER OF **P.E.O.P.L.E.** \$300.00
Three hundred and no
RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND
SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA
Richard Cole
⑆1251⑆0549⑆33515⑆719⑆

Dep. in Nat'l acct 1-14-75

720710101815

FEDERAL ELECTION COMMISSION QUESTIONS
AND RESPONSES OF RPECW

- 7 0 0 1 0 1 8 4 7
- (1) Are there any members of AFSCME's board of directors, or any of AFSCME's officers, who are also members of RPECW's board of directors, or serve as RPECW's officers. ANSWER. No.
- (2) Did any member of AFSCME participate in the establishment of RPECW? If the answer is yes, please provide the following information in each instance:
- (a) the name and title of the AFSCME member,
ANSWER. Norm Schut, Director Washington Federation of State Employees, Council 28.
- (b) a description of the services provided,
ANSWER. Mr. Schut was directly involved in the organization of the RPECW as an auxiliary organization sponsored by Council 28.
- (c) the approximate dates that the services were provided,
ANSWER. These services were performed during the period when the RPECW was being organized in 1972.
- (3) Has any member of AFSCME participated in the administration of RPECW? If the answer yes, please provide the following information for each instance:
- (a) the name and title of the AFSCME member,
ANSWER. Not applicable.
- (b) a description of the services provided,
ANSWER. Not applicable.
- (c) the approximate dates that the services were provided,
ANSWER. Not applicable.
- (4) Are there any member of RPECW, active or inactive, who are also members, active or inactive, of AFSCME?
ANSWER. Our client has no records from which it can determine whether any of its members are also members of AFSCME. However, we have been advised that they are not aware of any RPECW members who are also active or inactive members of AFSCME.

- (5) Account for any transfer of money AFSCME has ever made to RPECW, including:
- (a) dates, ANSWER. Not applicable.
 - (b) amounts, ANSWER. Not applicable.
 - (c) nature of the transfer, ANSWER. Not applicable.
 - (d) copies of the transaction. ANSWER. Not applicable.
- (6) Has AFSCME ever solicited contributions from RPECW? If the answer is yes, please provide the following for each solicitation: ANSWER. No.
- (a) date, ANSWER. Not applicable.
 - (b) amounts, ANSWER. Not applicable.
 - (c) a copy of the solicitation. Not applicable.
- (7) Has AFSCME ever received contributions, solicited or unsolicited, or any other monies of any nature, solicited or unsolicited, from RPECW? If the answer is yes, please provide the following for each instance. ANSWER. Yes.
- (a) date,
 - (b) amount,

<u>DATE</u>	<u>AMOUNT</u>
September 20, 1974	\$ 500.00
October 11, 1974	500.00
October 29, 1974	500.00
January 14, 1975	300.00
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December 15, 1975	750.00
February 9, 1976	500.00
April 7, 1976	1,200.00
April 7, 1976	300.00

- (c) the nature of the transaction,
ANSWER. All such transactions were by check.
- (d) a copy of the transaction,
ANSWER. We do not yet know if copies of the checks are available. If they are, we will obtain them and forward them under separate cover.

(8) Is RPECW incorporated?

ANSWER. RPECW was incorporated on July 17, 1978. It was not incorporated prior to that date.

(9) According to RPECW's 1977 year end report, there was a residual \$5,180.06 cash on hand. For each and every distribution of this money, please state:

- (a) the amount distributed,
- (b) to whom distributed,
- (c) when the distribution was made,
- (d) a copy of the transaction.

ANSWER. It is our understanding that the legislative and political action fund of RPECW, which contained the balance referred to in this question, was abolished by amendment to the RPECW Constitution in September of this year and the balance remaining in that fund transferred to the general treasury of RPECW. We have not yet received the documents which evidence this transaction. When they are received we will forward them to you.

79010101811



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Weinberg
Zwerdling and Maurer
1211 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 666

Dear Mr. Weinberg:

On January , 1979, the Commission voted to find no reasonable cause to believe that the Retired Public Employees Council of Washington, (RPECW), violated 2 U.S.C. §441b. The Commission also voted to take no further action on RPECW's violation of 2 U.S.C. §434, contingent upon the filing of a proper termination report. A copy of the Commission's determination and the General Counsel's Report is enclosed for your information.

Please instruct RPECW to submit a properly completed year end report which must indicate both the distribution of the Committee's cash on hand, and that there are no debts and obligations outstanding. If you have any questions, please contact Scott Rinn, the attorney assigned to this matter at 523-4000.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Commission certification
General Counsel Report





FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: JANUARY 8, 1979
SUBJECT: MUR 666 - Interim Investigation Report
dated 1-2-79; Received in OCS 1-5-79,
11:04

The above-named document was circulated on a 24
hour no-objection basis at 3:00, January 5, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigation Report as of
4:00, this date.

January 3, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 666

Please have the attached Interim Investigative
Report on MUR 666 distributed at the Commission on a
24 hour no-objection basis.

Thank you.

79040101852

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JAN 5 All: 04

In the Matter of)

Retired Public Employees)
Council of Washington)

MUR 666

INTERIM INVESTIGATION REPORT

One of the issues in this matter concerns the status of retired employees as applied to the labor organization provisions of the Act. A similar issue has come up in the matter of Masters, Mates and Pilots Pensioners Action Fund ("PAF"), MUR 773.

Before these matters are sent to the Commission for consideration, the Office of the General Counsel will coordinate policy concerning the status of retired employees in these two matters.

2 January 1979
Date


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: OCTOBER 25, 1978
SUBJECT: MUR 666 - Interim Report dated 10-23-78
Received in OCS: 10-24-78,
10:10

The above-named document was circulated on a 24 hour no-objection basis at 12:00, October 24, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 12:00 this date.

70010101851

October 24, 1978

MEMORANDUM TO: Marge Emmons
FROM: Eliasa T. Carr
SUBJECT: MUR 666

Please have the attached Interim Report on MUR 666 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040101835

RECEIVED
OFFICE OF THE
COMMISSIONER

BEFORE THE FEDERAL ELECTION COMMISSION

78 OCT 24 AM: 10

In the Matter of)
)
Retired Public Employees) MUR 666
Council of Washington)

Interim Report

The Office of the General Counsel has received on October 16, 1978 answers to the questions submitted to the Retired Public Employees Council of Washington (RPECW) and the American Federation of State, County and Municipal Employees (AFSCME), as requested by the Commission.

The General Counsel's Office is currently preparing a second General Counsel's Report.

10/23/78
Date

William C. Oldaker
General Counsel



AFSCME®

American Federation of State, County and Municipal Employees
 1625 L Street, N.W., Washington, D.C. 20036
 Telephone (202) 452-4800
 Telex 89-2376

RECEIVED
 FEDERAL ELECTION
 COMMISSION

18 OCT 16 09:34

806936

October 13, 1978

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 William Lucy
 Secretary-Treasurer

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Dominic J. Badolato
 Berlin, Conn.

Rev. Albert B. Blatz
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 Garden City, Mich.

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 Grand Rapids, Mich.

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Earl Stout
 Philadelphia, Pa.

Lee A. Tafel
 Miami, Fla.

David K. Trask, Jr.
 Honolulu, Hawaii

Maynard White
 Houston, Texas

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

Re: MUR 666

Attn: Scott Rinn

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1. We have checked our records back through 1972, and find no record of any disbursement or any transfer of money by AFSCME to RPECW.
2. A check of our records reveals no evidence of any written solicitation of contributions by AFSCME from RPECW.
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in the public service

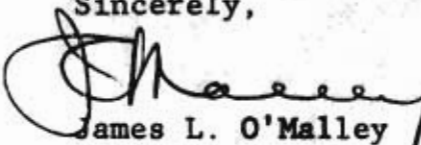
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4. To our knowledge, RPECW was not incorporated at the time AFSCME received contributions from it.

Per your request, we have enclosed copies of AFSCME's Constitution as it existed during the periods relevant to your investigation.

I hope the above information is sufficient for your purposes.

Sincerely,


James L. O'Malley
Business Manager

JLO'M: lws

70010101813

TO THE ORDER OF P. E. O. P. L. E. no 5 300
Three hundred and 00 DOLLARS
RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND
1 **SEATTLE-FIRST NATIONAL BANK**
OLYMPIA BRANCH / OLYMPIA
Richard Cole
1251-0549-33515-719

Dep. in Nat'l acct 1-14-75

7001010185

98-549
1251

PAY TO THE
ORDER OF

April 23 19 75 NO. 7

P.E.O.P.L.E.

\$500

Five hundred and no/100

DOLLARS



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Michael Cole

⑆1251⑆0549⑆33515 719⑆

72010101867

98-549
1251

July 25, 1975 NO. 8

PAY TO THE
ORDER OF P.E.O.P.L.E.

\$1,000⁰⁰

One thousand and $\frac{20}{100}$

DOLLARS



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL

LEGISLATIVE & POLITICAL ACTION FUND

Contribution

Missed Cole

⑆1251⑈0549⑆ 33515 719⑈

Dep. in Nat'l PEOPLE acct

7-29-75

12/4 1975 NO. 7.

PAY TO THE
ORDER OF

P. E. O. P. L. E.

\$ 750⁰⁰

Seven hundred fifty ²⁰/₁₀₀

DOLLARS



SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIA

RETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Theresa Cole

⑆1251⑉0549⑆ 33515 719⑈

Dep. in Nat'l PEOPLE acc
12-15-75

22710101002

PAY TO THE
ORDER OF

P.E.O.P.L.E.

Feb. 2, 1976 NO. 10

\$500⁰⁰Five hundred and ^{no}/₁₀₀

DOLLAR

SEATTLE-FIRST NATIONAL BANK
OLYMPIA BRANCH / OLYMPIARETIRED PUBLIC EMPLOYEES COUNCIL
LEGISLATIVE & POLITICAL ACTION FUND

Mickie Cal

CONTRIBUTION

⑆1251⑈0549⑆33515 719⑈

FIRST CLASS MAIL

Postage Guaranteed

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

General in Charge of
State Council

EMPLOYEES



AFSCME®

American Federation of State, County and Municipal Employees
1625 L Street, N.W., Washington, D.C. 20036
Telephone (202) 452-4800
Telex 89-2376

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 OCT 12 PM 3:02

October 10, 1978

806881

Jerry Wurt
President

William Lucy
Secretary-Treasurer

Vice Presidents

Bob Anderson
Jefferson City, Mo.

Dominic J. Badolato
Berlin, Conn.

Rev. Albert B. Blatz
St. Peter, Minn.

Joseph Bolt
Richmond, Ind.

Joseph M. Bonavita
Boston, Mass.

Robert A. Brindza
Cleveland, Ohio

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Baltimore, Md.

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Irving Flaumenbaum
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Thomas G. Gerber, Sr.
Eau Claire, Wisc.

Larry Goodman
Olympia, Wash.

Victor Gotbaum
New York, N.Y.

Bob Johnson
Garden City, Mich.

Henry LeBert
Baton Rouge, La.

Larry Marquardt
Chicago, Ill.

Gerald W. McEntee
Harrisburg, Pa.

Georgia M. McGhee
Grand Rapids, Mich.

William L. McGowan
Albany, N.Y.

Jack Merkel
Trenton, N.J.

Richard P. Morton
New York, N.Y.

John Sefenan
Manhattan Beach, Cal.

Earl Stoul
Philadelphia, Pa.

Lee A. Tafel
Miami, Fla.

David K. Trask, Jr.
Honolulu, Hawaii

Maynard White
Houston, Texas

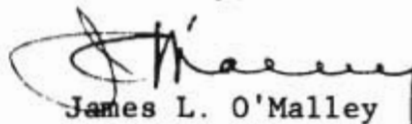
William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 666

Dear Mr. Oldaker:

We are in receipt of your letter requesting certain information with regard to the Retired Public Employees Council of Washington. We are attempting to gather that information and will get it to you as quickly as possible.

Sincerely,


James L. O'Malley
Business Manager

JLO'M:lws

in the public service



AFSCME

American Federation of State,
County and Municipal Employees
1525 L Street, N.W., Washington, D.C. 20036

20 : 9 71 100 02

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

GOC# 5181

RECEIVED
FEDERAL ELECTION
COMMISSION

LAW OFFICES
ZWERDLING AND MAURER

1211 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

(202) 220-6374

78 OCT 16 PM 3:01

A. L. ZWERDLING
GEORGE M. MAURER, JR.
LARRY P. WEINBERG
JANET KOHN
WENDY L. KAHN
JOHN C. DEMPSEY
MICHAEL T. LEINIG
GEORGE B. WASHINGTON *
KENNETH W. HALLS *
JUDITH A. SCOTT *
LYLE D. RUSSELL, JR. *

MICHIGAN OFFICE
800 RENAISSANCE CENTER
DETROIT, MICHIGAN 48243
(313) 959-1770

October 13, 1978

806957

* NOT ADMITTED IN D. C.

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

Re: MUR 666

Dear Mr. Oldaker:

As we have already advised Mr. Rinn of your office, we will be representing the Retired Public Employees Council of Washington (RPECW) in connection with this matter. This is in response to the questions raised by your letter of September 18, 1978. We have attached hereto a document which repeats those questions and sets forth the answers to them on behalf of the RPECW.

Your letter of September 18, 1978 described the violation which you believe was committed by the RPECW as follows:

"RPECW made contributions from its treasury, made up of membership dues, to another political committee, thereby violating 2 U.S.C. §441b which prohibits a labor organization from making political contributions."

For the reasons set forth briefly below, it is our belief that RPECW is not a labor organization as that term is defined in 2 U.S.C. §441b(b)(1) and, therefore, not subject to the prohibition on political contributions in connection with federal elections by labor organizations.

The term "labor organization" is defined in 2 U.S.C. §441b(b)(1) as follows:

"For the purposes of this section the term 'labor organization' means any organization of any kind.

The term "employee" is not defined in §441b. However, the definition of "labor organization" in that section is identical to that in §2(5) of the Labor Management Relations Act of 1947, 20 U.S.C. §152(5), and the United States Supreme Court has held that the term "employees" as used in that section and Act does not include retirees, those who have left the work force with no expectation of returning. Allied Chemical and Alkali Workers of America v. Pittsburgh Plate Glass Co., 404 U.S. 157 (1971).*/ Since the Supreme Court has held that retirees are not employees, an organization such as the Retired Public Employees Council of Washington, whose membership consists entirely of retirees and their spouses, cannot be an organization "in which employees participate." Therefore, since the RPECW does not fall within the definition of labor organization contained in the Act, it is not subject to the restrictions placed upon labor organizations by §441b.

Sincerely,

Larry P. Weinberg

LPW/slm

FEDERAL ELECTION COMMISSION QUESTIONS
AND RESPONSES OF RPECW

- (1) Are there any members of AFSCME's board of directors, or any of AFSCME's officers, who are also members of RPECW's board of directors, or serve as RPECW's officers. ANSWER. No.
- (2) Did any member of AFSCME participate in the establishment of RPECW? If the answer is yes, please provide the following information in each instance:
- (a) the name and title of the AFSCME member,
ANSWER. Norm Schut, Director Washington Federation of State Employees, Council 28.
 - (b) a description of the services provided,
ANSWER. Mr. Schut was directly involved in the organization of the RPECW as an auxiliary organization sponsored by Council 28.
 - (c) the approximate dates that the services were provided,
ANSWER. These services were performed during the period when the RPECW was being organized in 1972.
- (3) Has any member of AFSCME participated in the administration of RPECW? If the answer yes, please provide the following information for each instance:
- (a) the name and title of the AFSCME member,
ANSWER. Not applicable.
 - (b) a description of the services provided,
ANSWER. Not applicable.
 - (c) the approximate dates that the services were provided,
ANSWER. Not applicable.
- (4) Are there any member of RPECW, active or inactive, who are also members, active or inactive, of AFSCME?
ANSWER. Our client has no records from which it can determine whether any of its members are also members of AFSCME. However, we have been advised that they are not aware of any RPECW members who are also active or inactive members of AFSCME.

- (5) Account for any transfer of money AFSCME has ever made to RPECW, including:
- (a) dates, ANSWER. Not applicable.
 - (b) amounts, ANSWER. Not applicable.
 - (c) nature of the transfer, ANSWER. Not applicable.
 - (d) copies of the transaction. ANSWER. Not applicable.
- (6) Has AFSCME ever solicited contributions from RPECW? If the answer is yes, please provide the following for each solicitation: ANSWER. No.
- (a) date, ANSWER. Not applicable.
 - (b) amounts, ANSWER. Not applicable.
 - (c) a copy of the solicitation. Not applicable.
- (7) Has AFSCME ever received contributions, solicited or unsolicited, or any other monies of any nature, solicited or unsolicited, from RPECW? If the answer is yes, please provide the following for each instance. ANSWER. Yes.
- (a) date,
 - (b) amount,

<u>DATE</u>	<u>AMOUNT</u>
September 20, 1974	\$ 500.00
October 11, 1974	500.00
October 29, 1974	500.00
January 14, 1975	300.00
April 28, 1975	500.00
July 29, 1975	1,000.00
December 15, 1975	750.00
February 9, 1976	500.00
April 7, 1976	1,200.00
April 7, 1976	300.00

- (c) the nature of the transaction,
ANSWER. All such transactions were by check.
- (d) a copy of the transaction,
ANSWER. We do not yet know if copies of the checks are available. If they are, we will obtain them and forward them under separate cover.

- ANSWER. RPECW was incorporated on July 17, 1978. It was not incorporated prior to that date.

- (9) According to RPECW's 1977 year end report, there was a residual \$5,180.06 cash on hand. For each and every distribution of this money, please state:

- (a) the amount distributed,
- (b) to whom distributed,
- (c) when the distribution was made,
- (d) a copy of the transaction.

ANSWER. It is our understanding that the legislative and political action fund of RPECW, which contained the balance referred to in this question, was abolished by amendment to the RPECW Constitution in September of this year and the balance remaining in that fund transferred to the general treasury of RPECW. We have not yet received the documents which evidence this transaction. When they are received we will forward them to you.

LAW OFFICES

ZWERDLING AND MAURER

1211 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

7 13 78

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



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: OCTOBER 3, 1978
SUBJECT: MUR 666 - Interim Report dated 9-28-78
 Received in OCS: 9-29-78, 12:24

The above-named document was circulated on a 24 hour no-objection basis at 11:30, October 2, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 12:00 this date.

72930101873

September 29, 1978

MEMORANDUM TO: Marge Parsons
FROM: Elissa T. Carr
SUBJECT: MJR 666

Please have the attached Interim Report on MJR 666
distributed to the Commission.

Thank you.

79040101874

RECEIVED
OFFICE OF THE
MISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 29 12:25

In the Matter of)
Retired Public Employees) MUR 666
Council of Washington)

INTERIM REPORT

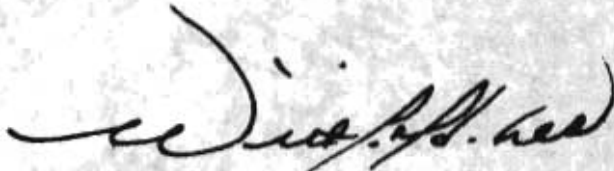
Reason to believe was found by the Commission on August 23, 1978, but certification was not received by Office of General Counsel until September 7, 1978.

Letters to respondent and the American Federation of State, County and Municipal Employees (AFSCME) were sent on September 18, 1978 (letters attached), requesting the information contained in the certification.

Representatives of RPECW called on September 22, 1978 stating that they had received our letter and would tender their response shortly.

On September 27, 1978 the attorney for RPECW called, stated he had just been retained as counsel, and requested additional time to answer our questions. Our office gave him ten (10) additional days.

9/28/78
Date


William C. Oldaker
General Counsel

Attachments:

Letters
Returned receipt - AFSCME

790101875

MEMORANDUM TO: Marge Emmons

FROM: William C. Oldaker
General Counsel

SUBJECT: Certification for MUR 666 - Executive
Session of August 23, 1978

79040101875
Listed below are the motions set forth during the discussion of MUR 666 during the Commission meeting of August 23, 1978. Due to the complicated style of certifications, the motions are in memo form in the hope that the Commission Secretary would transfer them into the proper style.

- 1) Springer motion to find RTB against the Retired Public Employees Council of Washington for violation of the FECA.
- 2) The motion was lost. The vote was 3-3.
- 2) Tiernan motion to reconsider the vote to find RTB.

The motion was approved. The vote was 5-1.
Harris voted against the motion.

- 3) Tiernan motion to send letters to the RPECW and AFSCME.

The letter to AFSCME should contain a request for their constitution, by-laws and the status of RPECW.

The letter to RPECW should ask whether they are incorporated; how much cash they have on hand; request a copy of their year-end report.



FEDERAL ELECTION COMMISSION

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

September 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

American Federation of State,
County and Municipal
Employees, AFL-CIO
1625 L Street, N.W.
Washington, D.C. 20036

RE: MUR 666

TO WHOM IT MAY CONCERN:

The Federal Election Commission is currently conducting an investigation of the Retired Public Employees Council of Washington (RPECW) for possible violation of the Federal Election Campaign Act of 1971, as amended, ("the Act").

We are writing to you because RPECW indicated in its "Statement of Organization For a Political Committee," that it was affiliated with your organization, and we therefore believe that you may have information that could assist us in our investigation.

Please answer the following questions:

- (1) Account for any transfer of money AFSCME has ever made to RPECW, including:
 - (a) dates,
 - (b) amounts,
 - (c) nature of the transfer,
 - (d) copies of the transaction.
- (2) Has AFSCME ever solicited contributions from RPECW? If the answer is yes, please provide the following for each solicitation.
 - (a) date,
 - (b) amounts,
 - (c) a copy of the solicitation.

- (3) Has AFSCME ever received contributions, solicited or unsolicited, or any other monies of any nature, solicited or unsolicited, from RPECW? If the answer is yes, please provide the following for each instance:

- (a) date,
- (b) amount,
- (c) the nature of the transaction;
- (d) a copy of the transaction.

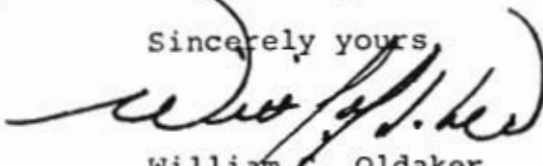
- (4) To your knowledge, is RPECW incorporated?

The Commission would also greatly appreciate a copy of AFSCME's constitution and by-laws. Please enclose a copy of each with your answers to the previous questions.

The attorney who will be handling this matter is Scott Rinn; please direct your response or questions to his attention.

Please note that 2 U.S.C. §437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission until the person or group complained against agrees in writing to make public the investigation.

Sincerely yours,



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

September 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Mildred Cole
Retired Public Employees Council of
Washington
1501 So. Capitol Way, Room 302
Olympia, WA 98501

RE: MUR 666

Dear Mrs. Cole:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission ("the Commission") has found reason to believe that the Retired Public Employees Council of Washington (RPECW) may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that:

RPECW made contributions from its treasury, made up of membership dues, to another political committee, thereby violating 2 U.S.C. §441b which prohibits a labor organization from making political contributions.

We have numbered this matter MUR 666.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Scott Rinn, the attorney assigned to this matter, at (202) 523-4024.

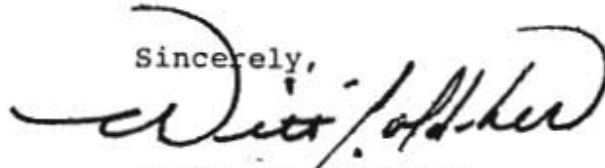
This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

-2-

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

Finally, the reports analysis division and the Commission has requested that you submit another year end report for 1977. The report submitted earlier was lacking information concerning the disposition of the residual \$5,180.06 cash on hand, and the current status of any debts or obligations. Your committee cannot be terminated until this information is submitted, and it is therefore essential that you fully complete and return the enclosed FEC form 3.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

Questions
FEC Form 3

FEDERAL ELECTION COMMISSION

QUESTIONS

Please answer the following questions:

- (1) Are there any members of AFSCME's board of directors, or any of AFSCME's officers, who are also members of RPECW's board of directors, or serve as RPECW's officers.
- (2) Did any member of AFSCME participate in the establishment of RPECW? If the answer is yes, please provide the following information in each instance:
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 - (c) when the distribution was made,
 - (d) a copy of the transaction.

7 9 3 4 0 1 0 1 8 9

Wink (666) - S. R. R.

1. SENDER (Complete only if not paid)
Add your address in the RETURN TO space on
reverse

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

3. ARTICLE ADDRESSED TO
*American Federal of State,
Chicago and Minneapolis
Postmaster AFL-CIO
Chicago, Ill. 60603*

4. ARTICLE DESCRIPTION
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
943225

(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE ☐ Addressee ☐ Authorized agent
P. Amick

5. DATE OF DELIVERY *9-17-73* POSTMARK

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE
CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

September 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

American Federation of State,
County and Municipal
Employees, AFL-CIO
1625 L Street, N.W.
Washington, D.C. 20036

RE: MUR 666

TO WHOM IT MAY CONCERN:

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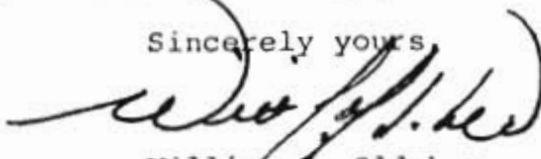
(4) To your knowledge, is RPECW incorporated?

The Commission would also greatly appreciate a copy of AFSCME's constitution and by-laws. Please enclose a copy of each with your answers to the previous questions.

The attorney who will be handling this matter is Scott Rinn; please direct your response or questions to his attention.

Please note that 2 U.S.C. §437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission until the person or group complained against agrees in writing to make public the investigation.

Sincerely yours,



William C. Oldaker
General Counsel

PS Form 3811, Apr 1977

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

2. ARTICLE ADDRESSED TO:
 American Federation of State, County & Municipal Employees, Local 1210
 1010 12th St NW
 Washington, D.C. 20004

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 943225 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
 I have received the article described above:
 SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY 8-19-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

PS Form 3811, Apr 1977 - 0-249-985

Handwritten: Mike (606) - S. Rinn



FEDERAL ELECTION COMMISSION

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

September 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Mildred Cole
Retired Public Employees Council of
Washington
1501 So. Capitol Way, Room 302
Olympia, WA 98501

RE: MUR 666

Dear Mrs. Cole:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission ("the Commission") has found reason to believe that the Retired Public Employees Council of Washington (RPECW) may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that:

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We have numbered this matter MUR 666.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

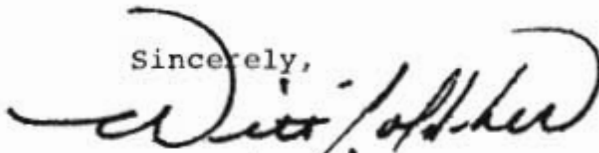
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This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

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

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Sincerely,



William C. Oldaker
General Counsel

Enclosure

Questions
FEC Form 3

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUK6666 S. Rine

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

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

2. ARTICLE ADDRESSED TO:
*Richard C. Coley
Retired Public Employees Council
1501 S. Capital Way Room 302
Washington, D.C. 20540*

3. ARTICLE DESCRIPTION: *Algebra*
REGISTERED NO. _____ CERTIFIED NO. _____ INSURED NO. _____

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
Esther Stahl

4. DATE OF DELIVERY _____ POSTMARK _____

5. ADDRESS (Complete only if requested) _____

6. UNABLE TO DELIVER BECAUSE: *9-27* CLERK'S INITIALS _____

FEDERAL ELECTION COMMISSION

QUESTIONS

Please answer the following questions:

- (1) Are there any members of AFSCME's board of directors, or any of AFSCME's officers, who are also members of RPECW's board of directors, or serve as RPECW's officers.
- (2) Did any member of AFSCME participate in the establishment of RPECW? If the answer is yes, please provide the following information in each instance:
 - (a) the name and title of the AFSCME member,
 - (b) a description of the services provided,
 - (c) the approximate dates that the services were provided.
- (3) Has any member of AFSCME participated in the administration of RPECW? If the answer is yes, please provide the following information for each instance:
 - (a) the name and title of the AFSCME member,
 - (b) a description of the services provided,
 - (c) the approximate dates that the services were provided.
- (4) Are there any members of RPECW, active or inactive, who are also members, active or inactive, of AFSCME?
- (5) Account for any transfer of money AFSCME has ever made to RPECW, including:
 - (a) dates,
 - (b) amounts,
 - (c) nature of the transfer,
 - (d) copies of the transaction.
- (6) Has AFSCME ever solicited contributions from RPECW? If the answer is yes, please provide the following for each solicitation:
 - (a) date,
 - (b) amounts,
 - (c) a copy of the solicitation.

- (7) Has AFSCME ever received contributions, solicited or unsolicited, or any other monies of any nature, solicited or unsolicited, from RPECW? If the answer is yes, please provide the following for each instance.
- (a) date,
 - (b) amount,
 - (c) the nature of the transaction,
 - (d) a copy of the transaction.
- (8) Is RPECW incorporated?
- (9) According to RPECW's 1977 year end report, there was a residual \$5,180.06 cash on hand. For each and every distribution of this money, please state:
- (a) the amount distributed,
 - (b) to whom distributed,
 - (c) when the distribution was made,
 - (d) a copy of the transaction.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Retired Public Employees)
Council of Washington)

MUR 666

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 23, 1978, at an Executive Session at which a quorum was present, the Commission acted upon the following motions in the above-captioned matter:

1. MOVED BY COMMISSIONER SPRINGER that the Commission find reason to believe that the Retired Public Employees Council of Washington may be in violation of the Federal Election Campaign Act, as amended, and to direct the Office of the General Counsel to submit questions to the respondent.

The motion did not carry. The vote was:

YEA (3) Commissioners Aikens, Springer, and Thomson

NAY (3) Commissioners Harris, Staebler, and Tiernan

2. MOVED BY COMMISSIONER TIERNAN to reconsider the previous question.

The motion to reconsider carried. The vote was:

YEA (5) Commissioners Aikens, Springer, Staebler, Thomson, and Tiernan

NAY (1) Commissioner Harris

3. COMMISSIONER TIERNAN AMENDED THE PREVIOUS MOTION TO READ AS FOLLOWS:

- a) That the Commission find reason to believe that the Retired Employees Council of Washington may be in violation of the Federal Election Campaign Act, as amended.

CONTINUED ON PAGE TWO

- b) That the Office of the General Counsel be directed to send a letter to AFSCME requesting their constitution, by-laws, and the status of RPECW.
- c) That the Office of the General Counsel be directed to send a letter to RPECW asking whether they are incorporated; how much cash they have on hand; and request a copy of their year-end report.

The Amended motion carried. The vote was:

YEA (5) Commissioners Aikens, Springer, Staebler,
Thomson, and Tiernan.

NAY (1) Commissioner Harris.

Attest:

9/4/78

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

August 21, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: MUR 666 - First General Counsel's Report
dated August 17, 1978
Received in Office of
Commission Secretary: 8-17-78,
3:14
OBJECTION

The above-named document was circulated on a 48
hour vote basis at 4:00 p.m., August 17, 1978.

Commissioner Aikens submitted an objection at
4:06 this date thereby placing MUR 666 on the Amended
Agenda for August 23, 1978.



August 17, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 666

Please have the attached First General Counsel's
Report on MUR 666 distributed to the Commission on a 48
hour tally basis.

Thank you.

79040101893

Date 5/15/78 7 0 0 4 0 Analyst Marybeth Tarrant *MT*

Team Chief Steve Mims *SM*

TO: William Oldaker

MUR 666

Compliance Review

THROUGH: Staff Director *BB*

FROM: Assistant Staff Director for Reports Analysis *TJH*

DESCRIPTION:

Candidate/Committee Retired Public Employees Council of Washington

Treasurer Marvel Phelps

Address 1501 So. Capital Way, Room 302 Olympia, WA 98501

REPORTS: (For reports reviewed, amendments, RFAL's, etc, see indices, Attachment 1)

Period Covered from 1/1/77 to 6/30/77

Total Receipts \$ 3500 Total Expenditures \$ 544

Cash on Hand \$ 5180 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>prohibited contributions (union dues)</u>	<u>§441b.(b)(3)(A)</u>	<u>4,5</u>
	<u>§441b.(a)</u>	
<u>Regulations</u>	<u>114.2(a)</u>	
	<u>114.5(a)</u>	

HISTORY:

5/2/77 - Committee was sent letter requiring them to file a Statement of Organization. (Attachment 2)

7/7/77 - Committee filed a Statement of Organization (Attachment 3), Year End 1975 Report of Receipts and Expenditures (Attachment 4), and 1976 Year End Report of Receipts and Expenditures. (Attachment 5)

7/14/77 - Committee filed the July 10 Quarterly Report of Receipts and Expenditures. (Attachment 6)

10/31/77 - Committee was sent a Reason To Believe notice for failing to file the October 10 Quarterly Report. (Attachment 7)

11/1/77 - Telephone call from the Chairman of the committee, Mrs. Cole, regarding the non-filer notice. (Attachment 8)

11/10/77 - Letter received from Mrs. Cole regarding the nature of their

RAD File # 81-49

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PAGE 2

Retired Public Employees Council of Washington

OGC Referral

receipts. (Attachment 9)

2/16/78 - Committee filed a Termination Report. (Attachment 10)

Due to information provided in the telephone conversation and the written statement submitted to the Commission, serious questions have arisen concerning the nature of the committee's funds and the possible use of dues money.

During the above mentioned telephone conversation, Mrs. Cole was asked to submit a statement to the Commission concerning the collection of "contributions" from members of the union association because of her reference to "dues collected." She said that the individual contributors did not know that any portion of their assessment was being used for political contributions. While the Retired Public Employees Council has not made any direct contributions to federal candidates, they have contributed indirectly through transfers to Public Employees Organized to Promote Legislative Equality, (P.E.O.P.L.E.), a registered committee, supporting candidates seeking Federal office.

It should be noted that the committee did not properly terminate and is still required to file all necessary reports. Due to the fact that the "termination" report filed by the committee changed the filing frequency in the computer, the committee did not appear on the April 10 Quarterly Non-Filer list.

On 5/8/78, Marybeth Tarrant, a Reports Analyst, called Larry Weinberg, legal representative for the committee. The question was raised as to the disposition of the \$5,180 cash on hand at the end of the July 10 reporting period. Mr. Weinberg said he would inquire further on this matter and call back.

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PAGE 3

Retired Public Employees Council of Washington

OGC Referral

RECOMMENDATION:

It is recommended that the Commission find Reason To Believe that the Retired Public Employees Council of Washington has made prohibited contributions and that such contributions should be reported as returned , to the treasury fund, on their next report.

It is recommended that the Commission find Reason To Believe that the committee failed to file the April 10 Quarterly Report of Receipts and Expenditures.

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION AUG 17 1978

MUR NO. 666
DATE COMPLAINT RECEIVED
BY OGC
STAFF
MEMBER Richard Hirn

SOURCE: Reports Analysis Division Referral

RESPONDENT'S NAME: Retired Public Employees Council of Washington

RELEVANT STATUTE: 2 U.S.C. §433d and §441b

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

BACKGROUND

This MUR was referred to the Office of General Counsel by the Reports Analysis Division in the belief that the Retired Public Employees Council of Washington ("RPECW") violated the Federal Election Campaign Act by making prohibited contributions of union dues and by failing to file the April 10 Quarterly report.

LEGAL ANALYSIS

The Retired Public Employees Council of Washington is not in violation of the Federal Election Campaign Act.

RPECW is not a union or a "labor organization" as defined by the Act or the regulations. It is a council of former union members. Its Statement of Organization states that it is "not a local union, district council or other subordinate body of AFSCME." (Exhibit 3, page 2). As such, it does not fall within the purview of the §441b. RPECW is merely a membership organization which has registered with the FEC as a political committee, and which from time to time, contributed a portion of its treasury which was gained through membership dues to another political committee, within the Act's \$5,000 contribution limitation.

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RPECW terminated as a political committee in 1977 and had no obligation to file an April Quarterly report. On November 7, 1977, RPECW's president, Milard Cole, wrote the Commission indicating that RPECW was no longer making contributions to P.E.O.P.L.E., the only PAC to which it ever contributed, and that because of this RPECW requested that it "be relieved of the necessity of reporting." (Exhibit 9, page 2). On February 13, 1978 RPECW filed a termination report properly checking box "g" - "Termination Report" and stating "No reportable activity during 1977." This clearly fulfills the §433(d) requirement of "Disbanding of political committees." This section of the Act requires a committee which determines that it will no longer make expenditures exceeding \$1000 a year to inform the Commission of that fact in order to be relieved of reporting.

Regulation §102.4, however, makes a further requirement that such a notification include a "statement as to the disposition of residual funds" if the committee is disbanding. At the time of the termination report RPECW had \$5180 cash on hand. But the implication of President Cole's letter is that these funds will be used as part of RPECW's general operating funds in the future. In addition, it must be remembered that RPECW is not "disbanding" de facto, but only de jure as far as acting as a political committee. Section 433(d) notes this distinction in the language "disbanding or determines that it will no longer receive contributions or make expenditures." Since the latter is the case for RPECW, a strict reading of regulation §102.4 would require RPECW to state the disposition of the residual funds only if it were disbanding.

RECOMMENDATIONS

1. Find no reason to believe that the Retired Public Employees Council of Washington violated the Federal Election Campaign Act.
2. Close the file on MUR 666.

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ATTACHMENT 1

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (76)

DATE 10/24/78
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
WASHINGTON RETIRED PUBLIC EMPLOYEES COUNCIL	1975 YEAR END REPORT		2,664		2,654	1JAN75 -31DEC75	4	77FEC/055/0176
	1976 YEAR END REPORT	3,824		2,034		1JAN76 -31DEC76	5	77FEC/055/0180
	REQUEST FOR ADDITIONAL INFORMATION					1JAN76 -31DEC76	2	77FEC/061/1474
	TOTAL	3,824	2,664	2,034	2,654		11	TOTAL PAGES

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

DATE 11MAY78
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RETIRED PUBLIC EMPLOYEES COUNCIL OF WASHINGTON CONNECTED ORGANIZATION: STATE,COUNTY AND MUNICIPAL EMPLOYEES								ID# C00078444
1977	MISCELLANEOUS TRANSACTION FROM F.E.C.					2MAY77	1	77FEC/059/1114
	MISCELLANEOUS TRANSACTION TO F.E.C.					23MAY77	2	77FEC/058/1065
	STATEMENT OF ORGANIZATION					7JUL77	5	77FEC/055/0171
	MISCELLANEOUS TRANSACTION TO F.E.C.					7JUL77	2	77FEC/055/0134
	MISCELLANEOUS TRANSACTION TO F.E.C.					10NOV77	4	77FEC/061/4272
	JULY 10 QUARTERLY	3,500		544		1JAN77 -30JUN77	5	77FEC/056/3079
	JULY 10 QUARTERLY - AMENDMENT					1JAN77 -30JUN77	3	77FEC/056/4574
	YEAR END REPORT - TERMINATED					1JAN77 -31DEC77	3	78FEC/067/1382
	TOTAL	3,500	0	544	0		25	TOTAL PAGES

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ATTACHMENT 2



FEDERAL ELECTION COMMISSION

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

Washington Retired Public
Employees Council
1501 S. Capitol #302
Olympia, Washington 98501

May 2, 1977

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you may know, many and sometimes complex provisions. 2 U.S.C. 431(d) defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal election. Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures".

Our review of the receipts reported by other political committees indicates that your organization may have in fact contributed in excess of \$1,000 to committees supporting Federal candidates. Therefore, it would appear that your organization may qualify as a "political committee" under the Act.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and, if you agree that your organization is a political committee, please submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC FORM 3. If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter for public record.

If you have any questions concerning this matter, please do not hesitate to contact Bruce Shelton (202/523-4048), our Reports Analyst assigned to you.

ADEQUATE RESPONSE REC'D

Refer To: 77030561065

Enclosure

Return Receipt

Requested: Certified



Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

70040101903

ATTACHMENT 3

LAW OFFICES
ZWERDLING AND MAURER
128 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 223-6374

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 JUL 7

A. L. ZWERDLING **
GEORGE M. MAURER, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. KAHN *
JOHN C. DEMPSEY *
MICHAEL T. LEIBIO *
RONALD H. JANETZKE **
GEORGE B. WASHINGTON **
JAMES M. O'REILLY *
KENNETH W. KALLS *
JUDITH A. SCOTT **

* D. C. * MICH. * OHIO * VA.
* MASS. * ILL. * NY.

MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 665-7000
OHIO OFFICE
3801 S. KETTERING BLVD.
DAYTON, OHIO 45439
(613) 264-0053

July 5, 1977.

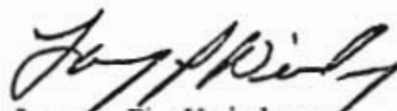
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

Enclosed for filing on behalf of the above-captioned political committee are its statement of organization and cumulative reports covering the years 1975 and 1976. Please advise if any further filings for these periods are required.

Sincerely yours,


Larry P. Weinberg

LPW:r

cc: Bruce Shelton
Federal Election Commission

77 JUL 5 1977

Statement of Organization of a Political Committee

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

(See Reverse Side For Instructions.)

RECEIVED
FEDERAL ELECTION
COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington	2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Room 302	3 Date 6-28-77
(c) City, State and ZIP code Olympia, WA 98501	4 Is this an amended statement: ☐ Yes ☒ No If "YES" FILL IN 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
(Federal office sought) (Year of election)
to be held in the State of _____
(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED 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 in _____, and will file all reports and statements with the candidate's principal campaign
(Year of election in State)
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 _____ (Name of Candidate) but is not an authorized committee.
☒ (d) This committee supports more than one Federal candidate and is not a party committee.
☐ (e) This committee is a _____ committee of the _____ Party.
(National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
American Federation of State, County & Municipal Employees, AFL-CIO	1625 L St., N. W. Washington, D. C. 20036	Fraternally affiliated - not a local union, district council or other form of subordinate body of AFSCME

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
☐ Corporation ☒ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

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

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Form 1
1976
Federal Election Commission
11 K Street, N.W.
Washington, D.C. 20463

Name of Committee

Retired Public Employees Council of Washington

2. 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
 (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☐ Yes ☒ No

3. (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
Multi-candidate committee			

3. (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
Multi-candidate committee			

9. If this committee is supporting the entire ticket of a party, give name of party: ☐

10. Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Mildred Cole, President	1501 So. Capitol Way, Rm 302 Olympia, WA 98501	President, Retired Public Employees Council of Washington

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

Name of Committee
Retired Public Employees Council of Washington

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Mildred Cole	1501 So. Capitol Way, Rm 302 Olympia, WA 98501	President
Marvel Phelps	Same as above	Secretary-Treasurer

12 Does this committee plan to stay in existence beyond the current calendar year? ☒ Yes ☐ No
If "Yes" for how long? ☒ Indefinitely

13 In the event of dissolution, what disposition will be made of residual funds? returned to general account of the Retired
Public Employees Council of Washington

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

Name of bank, repository, etc.	Mailing address and ZIP code
Olympia Branch - Seattle-First National Bank	5th & Columbia, Olympia, WA 98501

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
Washington Public Disclosure Commission Forms	Monthly (except in specified circumstances)	Washington State Public Disclosure Commission	403 Evergreen Plaza Olympia, WA 98504

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

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

Marvel Phelps
(Signature of Treasurer)

6-28-77

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further
information
contact:

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

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ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20036

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

79340101911

ATTACHMENT 4

SECRET

Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

RECEIVED
FEDERAL ELECTION
COMMISSION

77 JUL 7 1977 1:55

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington		2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Rm. 302		3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No
(c) City, State and ZIP code Olympia, WA 98501		(b) If "Yes," for which election? _____ on _____ (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable) (a) ☐ Amendment For _____ (Which report?) (b) ☐ April 10 Quarterly Report (c) ☐ July 10 Quarterly Report (d) ☐ October 10 Quarterly Report (e) ☒ January 31 Year End Report 1975 (f) ☐ Monthly Report _____ (Month) (g) ☐ Termination Report (h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date) (i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **1/1/75** Through **12/31/75**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1975		\$ 424.76
7 Cash on hand at beginning of reporting period	\$ 424.76	
8 Total receipts (from line 19)	\$ 2,664.75	\$ 2,664.75
(a) Subtotal (Add lines 7 and 8)	\$ 3,089.51	\$ 3,089.51
9 Total expenditures (From line 25)	\$ 2,654.75	\$ 2,654.75
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 434.76	\$ 434.76
11 Contributed items on hand to be liquidated (attach itemized list) NONE		\$ on-going committee

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ None

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

Marvel Phelps, Treasurer

(Typed Name of Treasurer or Candidate)

Marvel Phelps

(Signature of Treasurer or Candidate)

6-28-77

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g or §441 (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Name of Candidate or Committee Retired Public Employees Council of Washington		REPORT COVERING THE PERIOD FROM: 1-1-75 TO: 12-31-75	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ 2,664.75	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions and other income		\$ 2,664.75	\$ 2,664.75
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$ 2,664.75	\$ 2,664.75
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ 104.75	
(c) Subtotal of operating expenditures		\$ 104.75	\$ 104.75
21 Independent Expenditures (use Schedule E)		\$ --	\$ --
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ --	\$ --
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$ --	\$ --
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$ 2,550.00	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$ 2,550.00	\$ 2,550.00
25 Total Expenditures		\$ 2,654.75	\$ 2,654.75
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 2,664.75	
29 Transfers In (from line 18(a))		\$ 2,664.75	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$ 2,654.75	
32 Transfers out (from line 24(a))		\$ 2,550.00	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 104.75	

Unrecorded 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 1 for

LINE NUMBER 24

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington contributions to:

P.E.O.P.L.E.

Full Name, mailing address and ZIP code Public Employees Organized for Political & Legislative Equality P.E.O.P.L.E. 1625 L Street, N. W. Washington, D. C. 20036	Purpose of Expenditure Contribution	Date (month, day, year) 1-10-75	Amount of each expenditure this period \$300.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 4-23-75	Amount of each expenditure this period \$500.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (Same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 7-25-75	Amount of each expenditure this period \$1,000.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (Same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 12-4-75	Amount of each expenditure this period \$750.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶ \$ 2,550.00

Total this period (last page this line number only) ▶ \$ 2,550.00

7 7 00 43 00 15 05 10 91 17 59

ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20036

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

72040101913

ATTACHMENT 5

10/10/2008 10:10:10

Election Commission
Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures
for Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

RECEIVED
FEDERAL ELECTION
COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed
Retired Public Employees Council of Washington

2 Identification Number

(b) Address (number and street)
1501 So. Capitol Way, Room 302

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No

(b) If "Yes," for which election? _____ on _____ (date)
(general, primary, runoff)

(c) City, State and ZIP code
Olympia, WA 98501

4 Type of Report (Check appropriate box and complete, if applicable)

(e) ☒ January 31 Year End Report 1976

(a) ☐ Amendment For _____ (Which report) (c) ☐ July 10 Quarterly Report

(f) ☐ Monthly Report _____ (Month)

(b) ☐ April 10 Quarterly Report

(g) ☐ Termination Report

(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____
(primary, general or convention) (date)

(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____
(primary, general or convention) (date)

Candidate or Committee Summary of Receipts and Expenditures

Covering Period: From 1-1-76 Through 12-31-76

Section A - Cash Balance Summary

Column A
This Period

Column B
Calendar Year-To-Date

Cash on hand January 1, 1976		\$ 434.76
Cash on hand at beginning of reporting period	\$ 434.76	
Total receipts (from line 19)	\$ 3,824.00	\$ 3,824.00
(a) Subtotal (Add lines 7 and 8)	\$ 4,258.76	\$ 4,258.76
Total expenditures (From line 25)	\$ 2,034.48	\$ 2,034.48
Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 2,224.28	\$ 2,224.28
11 Contributed items on hand to be liquidated (attach itemized list)	\$ --	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ --

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

Marvel Pheips, Treas.

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

6/28/77

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441; (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee Retired Public Employees Council of Washington		REPORT COVERING THE PERIOD FROM: 1-1-76 TO: 12-31-76	
PART I - RECEIPTS		Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:			
(a) Itemized (use Schedule A)	\$ 500.00		
(b) Unitemized	\$ 3,324.00		
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ ----)			
(d) Subtotal of contributions and other income	\$ 3,824.00	\$ 3,824.00	
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$ --	\$ --	
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of refunds, rebates, returns	\$ --	\$ --	
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$		
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$		
(c) Subtotal of transfers in	\$ --	\$ --	
19 Total Receipts	\$ 3,824.00	\$ 3,824.00	
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$ 34.48		
(c) Subtotal of operating expenditures	\$ 34.48	\$ 34.48	
21 Independent Expenditures (use Schedule E)	\$ --	\$ --	
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ --	\$ --	
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of fundraising expenditures	\$ --	\$ --	
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$ 2,000.00		
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$		
(c) Subtotal of transfers out	\$ 2,000.00	\$ 2,000.00	
25 Total Expenditures	\$ 2,034.48	\$ 2,034.48	
PART III - DEBITS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$ --		
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$ --		
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)	\$ 3,824.00		
29 Transfers In (from line 18(c))	\$		
30 Net Receipts (Subtract line 29 from line 28)	\$ 3,824.00		
31 Total Expenditures (from line 25)	\$ 2,034.48		
32 Transfers out (from line 24(a))	\$ 2,000.00		
33 Net Expenditures (Subtract line 32 from line 31)	\$ 34.48		

**Prepaid Receipts,
Contributions, Ticket Purchases, Loan
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 15(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee-in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code

**Retired Public Employees Chapter No. 2, Olympia Area
5714 S.E. 7th Ave.
Lacey, WA 98503**

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Olympia, WA

Occupation

Not a Union

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ **500.00**

9-29-76

\$500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$ **500.00**

Total this period (last page this line number only)

▶ \$ **500.00**

Unized 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 1 for

LINE NUMBER 24 (a)

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Public Employees Organized for Political & Legislative Equality (P.E.O.P.L.E.) 1625 L St., N. W. Washington, D. C. 20036	Contribution	2/2/76	\$500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
P.E.O.P.L.E. 1625 L Street, N. W. Washington, D. C. 20036	Contribution	4/1/76	\$1,500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$ 2,000.00
Total this period (last page this line number only)			\$ 2,000.00

7 7 0 3 0 5 5 0 9 8 4

ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20035

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

SS:1 NY 2 TOP 22

79040101922

ATTACHMENT 6

LAW OFFICES
ZWERDLING AND MAURER

1201 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 223-6374

A. L. ZWERDLING **
GEORGE M. MAURER, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. HAIN *
JOHN C. DEMPNEY *
MICHAEL Y. LEIDIG *
RONALD H. JANETZKE *
GEORGE B. WASHINGTON **
JAMES M. O'HEILLY *
KENNETH W. HALLS *
JUDITH A. SCOTT **

* D.C. * MICH. * OHIO * VA.
* MASS. * ILL. * N.Y.

RECEIVED
FEDERAL ELECTION COMMISSION
MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 965-7000

OHIO OFFICE
5101 S. KETTERING BLVD.
DAYTON, OHIO 45424
(613) 294-0000

July 13, 1977

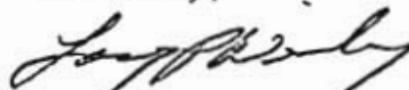
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

Enclosed please find the July 10, 1977 report of the above-named Committee. The report covers all activities since the beginning of this calendar year. The report does not contain the Committee's identification number since the Committee has not yet been advised by the Commission of the number being issued to it.

Sincerely,


Larry P. Weinberg

LPW:j

Enclosure

cc: Esther Stohl

700101921

**Report of Receipts and Expenditures
of a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

FEDERAL ELECTION
COMMISSION

77 JUL 14 10:20

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington		2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Room 302		3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No
(c) City, State and ZIP code Olympia, WA 98501		(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) ☐ Amendment For _____ (Which report)		(e) ☐ January 31 Year End Report
(b) ☐ April 10 Quarterly Report		(f) ☐ Monthly Report _____ (Month)
(c) ☒ July 10 Quarterly Report		(g) ☐ Termination Report
(d) ☐ October 10 Quarterly Report		
(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **1-1-77** **Through** **6-30-77**

Section A - Cash Balance Summary

**Column A
This Period**

**Column B
Calendar Year-To-Date**

6 Cash on hand January 1, 19		\$ 2,224.28
7 Cash on hand at beginning of reporting period	\$ 2,224.28	
8 Total receipts (from line 10)	\$ 3,500.50	\$ 3,500.50
(a) Subtotal (Add lines 7 and 8)	\$ 5,724.78	\$ 5,724.78
9 Total expenditures (From line 25)	\$ 544.72	\$ 544.72
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 5,180.06	\$ 5,180.06
11 Contributed items on hand to be liquidated (attach itemized list)	\$ ---	

**Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)**

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ ---

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

Marvel Phelps, Treas.
(Typed Name of Treasurer or Candidate)

Marvel Phelps
(Signature of Treasurer or Candidate)

7-5-77
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441 (See reverse side of form)

For further
information
Contact:

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

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Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Section Commission
Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee		REPORT COVERING THE PERIOD FROM: 1-1-77 TO: 6-30-77	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ 1,500.00	
(b) Unitemized		\$ 2,000.50	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ --)			
(d) Subtotal of contributions and other income		\$ 3,500.50	\$ 3,500.50
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments received		\$ --	\$ --
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of refunds, rebates, returns		\$ --	\$ --
18 Transfers in:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$ --	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$ --	
(c) Subtotal of transfers in		\$ --	\$ --
19 Total Receipts		\$ 3,500.50	\$ 3,500.50
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ 544.72	
(c) Subtotal of operating expenditures		\$ 544.72	\$ 544.72
21 Independent Expenditures (use Schedule E)		\$ --	\$ --
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ --	\$ --
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of fundraising expenditures		\$ --	\$ --
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$ --	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$ --	
(c) Subtotal of transfers out		\$ --	\$ --
25 Total Expenditures		\$ 544.72	\$ 544.72
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 3,500.50	
29 Transfers In (from line 18(a))		\$ --	
30 Net Receipts (Subtract line 29 from line 28)		\$ 3,500.50	
31 Total Expenditures (from line 25)		\$ 544.72	
32 Transfers Out (from line 24(a))		\$ --	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 544.72	

File A

76
Election Commission
Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 15 (a)

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Retired Public Employees Chapter No. 10, Ft. Steilacoom Area 9542 DeKoven Dr., S.W. Tacoma, WA 98499 Principal place of business Tacoma, Washington	Occupation Not a Union ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00	1-27-77 \$500.00
Retired Public Employees Chapter No. 2, Olympia Area 5714 S.E. 7th Ave. Lacey, WA 98503 Principal place of business Olympia, Washington	Occupation Not a Union ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00	2-28-77 \$1,000.00
Full Name, mailing address and ZIP code Principal place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year) Amount of each receipt this period	
Full Name, mailing address and ZIP code Principal place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year) Amount of each receipt this period	
Full Name, mailing address and ZIP code Principal place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year) Amount of each receipt this period	
Full Name, mailing address and ZIP code Principal place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year) Amount of each receipt this period	
Full Name, mailing address and ZIP code Principal place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Date (month, day, year) Amount of each receipt this period	
Subtotal of receipts this page (optional) ▶		\$ 1,500.00
Total this period (last page this line number only) ▶		\$ 1,500.00

LAW OFFICES
ZWERDLING AND MAUREL
1211 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 333-0374

77 JUL 21 11 44
RECEIVED
FEDERAL ELECTION COMMISSION

A. L. ZWERDLING **
GEORGE M. MAUREL, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. HAHN *
JOHN C. DEMPSEY *
MICHAEL T. LEIBIG **
RONALD H. JANETZKE **
GEORGE B. WASHINGTON **
JAMES M. O'REILLY *
KENNETH W. RALLS *
JUDITH A. SCOTT **

* D. C. * MICH. * OHIO * VA.
- MASS. - ILL. - NY.

MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 905-7090

OHIO OFFICE
6101 S. KETTERING BLVD.
DAYTON, OHIO 45430
(513) 294-0053

July 19, 1977

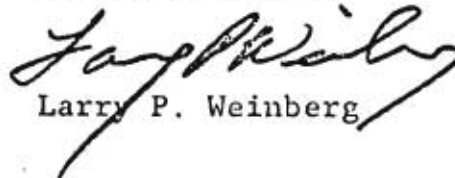
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

When we transmitted the July 10, 1977, report of the above-named Committee, we inadvertently omitted Schedule B, itemizing the expenditures shown on line 20 of the report. Enclosed, please find a completed Schedule B setting forth the information as to the expenditures in question, none of which were made in connection with federal elections.

Sincerely yours,


Larry P. Weinberg

LPW:j

Enclosure

79040101927

Commission
N.W.
D.C. 20463Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code Senior Citizens Lobby 1501 So. Capitol Way, Rm. 302 Olympia, WA 98501	Purpose of Expenditure Contribution - for operation of Lobby during 1977 Wash. State Legislature.	Date (month, day, year) 1-27-77	Amount of each expendi- ture this period \$500.00
Full Name, mailing address and ZIP code Roy J. Carpenter 5513 Englewood Hill Drive Yakima, WA 98908	Purpose of Expenditure Expenses to attend State Legislative Com. Hearing.	Date (month, day, year) 5-20-77	Amount of each expendi- ture this period 44.72
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period

Subtotal of expenditures this page (optional) ▶ \$ 544.72

Total this period (last page this line number only) ▶ \$ 544.72

79040101929

ATTACHMENT 7



FEDERAL ELECTION COMMISSION

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

October 31, 1977

It has come to the attention of the Federal Election Commission that you may have failed to file an October 10 Quarterly Report of Receipts and Expenditures as required by the Federal Election Campaign Act.

Your apparent failure to file the October 10 Report gives the Commission reason to believe you are in possible violation of 2 U.S.C. §134.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within ten (10) days of receipt of this notice with the Federal Election Commission, 1325 K Street, N.W., Washington, DC, 20463. However, if you have filed the above mentioned report or if you require additional information, please contact our Disclosure Division on the Toll Free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris
Chairman



79040101930

72040101931

ATTACHMENT 8

TELECON FOR THE FILES

11/01/77

RETIRED PUBLIC EMPLOYEES OF WASHINGTON - C00078444

Off. 206-352-8262
352-2885

From: Bruce Shelton

Home 352-4772

Subj: Failure to File a Q3 Report

Mrs. Mildred Cole, chairman of the Retired Public Employees of Washington, contacted the Commission about the failure to file notice. She said her committee has had very little activity and she had not supported any federal candidates.

An additional note: This committee registered recently as a result of a compliance action (transfers in to P.E.O.P.L.E.'s committee) and has disclosed activity for 1975, 1976 and through 6/30/77.

Mrs. Cole thought the necessary filing was completed so I advised her of the filing obligations and the necessary steps to terminate should they decide to do so.

Later in the conversation, she mentioned disbursing very few funds and when asked about receipts, she mentioned collection of dues. We talked further and she indicated all the money in their account consisted of dues money and those funds forwarded to P.E.O.P.L.E. was also dues money. The individual members new nothing about any portion of their monthly assesment being applied for political contributions. She also said in the forwarding of these funds to P.E.O.P.L.E., the committee provided no specific instructions as to the use of money.

The nature of the problem with this committee goes beyond the question of non-filing and deals with illegal contributions. If all of the funds transfered to political committees have been union dues, this organization should not be registered and the illegal funds must be refunded.

Separate compliance action will follow

P.E.O.P.L.E. Attorney Larry Weinburg

7 9 0 1 0 1 0 1 0 1 9 3 2

79040101938

ATTACHMENT 9



Handwritten: 000 78 444

**RETIRED PUBLIC EMPLOYEES COUNCIL
OF WASHINGTON**

1501 So. Capitol Way, Room 302
Olympia, Washington 98501
Phone: (206) 352-2885

November 7, 1977

Federal Election Commission

1325 K St N.W.

Washington, D.C. 20463

Attn: Bruce Shelton, Report Analyst

Dear Mr. Shelton:

This letter will confirm our telephone discussion of November 4, 1977 relative to the reports the Retired Public Employees Council has been filing with your Commission.

Our Constitution provides for Chapters in various geographical locations throughout the State and members, upon joining, sign an application card, the lower half of which, if they choose this option,

7706301614272

77903196P4273
characterized the Washington State Department
of Retirement Systems to deduct \$100 per month
from the retirement benefit as a dues payment.
Persons not wishing the deduction pay
cash to the Secretary-Treasurer or Treasurer
of each Chapter.

50¢ of each dues dollar is retained
by the Chapter or the Council depend-
ing on who collects the money. The other
50¢ belongs to the Chapter. Of the
50¢ retained by the Council, 25¢
is put into a general, or operating
fund and 25¢ is deposited in a
separate account, called Legisla-
tive and Political Action and it was
from this fund that the contributions
to the PEOPLE program were made.
We are no longer making contribu-
tions to the PEOPLE program and
this fact prompted my request to
you that we, as Council, be released
of the necessity of reporting.

770030614274
In September 1971, the combined
Constitution and split the office of
Secretary-Treasurer into two (2) sepa-
rate positions. The person who
held the combined position remains
as Secretary and a new Treasurer
was elected. They are Marcell
Sheep and Dilene Springblatt, respec-
tively.

We are completing the reporting forms
for the quarter ending September 30
and will forward them to Dilene Spring-
blatt, Treasurer for her signature and
she will, in turn send them on to your
office.

I hope this information will enable
you to decide we no longer need to file these
reports. If I can give you any other infor-
mation, please contact me.

Sincerely,

Marcell Cole,
President

7 9 0 4 0 1 0 1 9 3 7

Retired Public Employees Council
Of Washington

1507 South Capitol Way, Room 302
Olympia, Washington 98501



7 9 0 4 0 1 0 1 9 3 7

Jillene Election Commission
1325 K St. N.W.
Washington, D.C. 20463

Mr. L. P. Potter

79040101938

ATTACHMENT 10

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

FEDERAL ELECTION
COMMISSION

Election Commission
Street, N.W.
Washington, D.C. 20463

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed <i>Retired Public Employees</i>		2 Identification Number <i>000078444</i>
(b) Address (number and street) <i>1501 S Capitol Way SE</i>		3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☐ No
(c) City, State and ZIP code <i>Albuquerque, NM 87101</i>		(b) If "Yes," for which election? (general, primary, runoff) _____ on _____ (date)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) ☐ Amendment For _____ (Which report)		(e) ☐ January 31 Year End Report
(b) ☐ April 10 Quarterly Report		(f) ☐ Monthly Report _____ (Month)
(c) ☐ July 10 Quarterly Report		(g) ☒ Termination Report
(d) ☐ October 10 Quarterly Report		
(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From <i>1-1-77</i> Through <i>12-31-77</i>	Column A This Period	Column B Calendar Year-To-Date
Section A - Cash Balance Summary		
6 Cash on hand January 1, 1977		\$
7 Cash on hand at beginning of reporting period		\$
8 Total receipts (from line 19)		\$
(a) Subtotal (Add lines 7 and 8)		\$
9 Total expenditures (From line 25)		\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)		\$ <i>1977</i>
11 Contributed items on hand to be liquidated (attach itemized list)	\$	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

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

Harvel Pholns

(Typed Name of Treasurer or Candidate)

Harvel Pholns

(Signature of Treasurer or Candidate)

Feb 13 1978

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441; (See reverse side of form)

For further information Contact:	Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463	Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.
----------------------------------	--	---

Deferred Summary Schedule of Receipts and Expenditures
(Page 2)

Name of Candidate or Committee		REPORT COVERING THE PERIOD FROM: TO:	
PART I - RECEIPTS		Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$			
(d) Subtotal of contributions and other income		\$	\$
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21 Independent Expenditures (use Schedule E)		\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
Total Expenditures		\$	\$
PART III - DEBTS AND OBLIGATIONS			
Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
Receipts (from line 19)		\$	
Transfers In (from line 18(a))		\$	
Receipts (Subtract line 29 from line 23)		\$	
Expenditures (from line 25)		\$	
Transfers Out (from line 24(a))		\$	
Expenditures (Subtract line 32 from line 31)		\$	

Date 5/15/77 9 0 4 9-76 Analyst Marybeth Tarrant MV

TO: William Oldaker

Team Chief Steve Mims SM

Compliance Review _____

THROUGH: Staff Director AB

FROM: Assistant Staff Director for Reports Analysis TJH

DESCRIPTION:

Candidate/Committee Retired Public Employees Council of Washington

Treasurer Marvel Phelps

Address 1501 So. Capital Way, Room 302 Olympia, WA 98501

REPORTS: (For reports reviewed, amendments, RFAI's, etc, see indices, Attachment 1)

Period Covered from 1/1/77 to 6/30/77

Total Receipts \$ 3500 Total Expenditures \$ 544

Cash on Hand \$ 5180 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>prohibited contributions (union dues)</u>	<u>§441b. (b) (3) (A)</u>	<u>4.5</u>
	<u>§441b. (a)</u>	
<u>Regulations</u>	<u>114.2(a)</u>	
	<u>114.5(a)</u>	

HISTORY:

5/2/77 - Committee was sent letter requiring them to file a Statement of Organization. (Attachment 2)

7/7/77 - Committee filed a Statement of Organization (Attachment 3), Year End 1975 Report of Receipts and Expenditures (Attachment 4), and 1976 Year End Report of Receipts and Expenditures. (Attachment 5)

7/14/77 - Committee filed the July 10 Quarterly Report of Receipts and Expenditures. (Attachment 6)

10/31/77 - Committee was sent a Reason To Believe notice for failing to file the October 10 Quarterly Report. (Attachment 7)

11/1/77 - Telephone call from the Chairman of the committee, Mrs. Cole, regarding the non-filer notice. (Attachment 8)

11/10/77 - Letter received from Mrs. Cole regarding the nature of their

RAD File # 81-49

PAGE 2

Retired Public Employees Council of Washington

OGC Referral

receipts. (Attachment 9)

2/16/78 - Committee filed a Termination Report. (Attachment 10)

Due to information provided in the telephone conversation and the written statement submitted to the Commission, serious questions have arisen concerning the nature of the committee's funds and the possible use of dues money.

During the above mentioned telephone conversation, Mrs. Cole was asked to submit a statement to the Commission concerning the collection of "contributions" from members of the union association because of her reference to "dues collected." She said that the individual contributors did not know that any portion of their assessment was being used for political contributions. While the Retired Public Employees Council has not made any direct contributions to federal candidates, they have contributed indirectly through transfers to Public Employees Organized to Promote Legislative Equality, (P.E.O.P.L.E.), a registered committee, supporting candidates seeking Federal office.

It should be noted that the committee did not properly terminate and is still required to file all necessary reports. Due to the fact that the "termination" report filed by the committee changed the filing frequency in the computer, the committee did not appear on the April 10 Quarterly Non-Filer list.

On 5/8/78, Marybeth Tarrant, a Reports Analyst, called Larry Weinberg, legal representative for the committee. The question was raised as to the disposition of the \$5,180 cash on hand at the end of the July 10 reporting period. Mr. Weinberg said he would inquire further on this matter and call back.

PAGE 3

Retired Public Employees Council of Washington

OGC Referral

RECOMMENDATION:

It is recommended that the Commission find Reason To Believe that the Retired Public Employees Council of Washington has made prohibited contributions and that such contributions should be reported as returned , to the treasury fund, on their next report.

It is recommended that the Commission find Reason To Believe that the committee failed to file the April 10 Quarterly Report of Receipts and Expenditures.

ATTACHMENT 1

79040101941

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (76)

DATE 10MAY78
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
WASHINGTON RETIRED PUBLIC EMPLOYEES COUNCIL	1975 YEAR END REPORT		2,664		2,654	1JAN75 -31DEC75	4	77FEC/055/0176
	1976 YEAR END REPORT	3,824		2,034		1JAN76 -31DEC76	5	77FEC/055/0180
	REQUEST FOR ADDITIONAL INFORMATION					1JAN76 -31DEC76	2	77FEC/061/1474
	TOTAL	3,824	2,664	2,034	2,654		11	TOTAL PAGES

2 9 0 0 1 0 1 0 1 9 4

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

DATE 11MAY78
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RETIRED PUBLIC EMPLOYEES COUNCIL OF WASHINGTON								ID# C00078444
CONNECTED ORGANIZATION: STATE,COUNTY AND MUNICIPAL EMPLOYEES								
	1977 MISCELLANEOUS TRANSACTION FROM F.E.C.					2MAY77	1	77FEC/058/1114
	MISCELLANEOUS TRANSACTION TO F.E.C.					23MAY77	2	77FEC/058/1065
	STATEMENT OF ORGANIZATION					7JUL77	5	77FEC/055/0171
	MISCELLANEOUS TRANSACTION TO F.E.C.					7JUL77	2	77FEC/055/0134
	MISCELLANEOUS TRANSACTION TO F.E.C.					10NOV77	4	77FEC/061/4272
	JULY 10 QUARTERLY	3,500		544		1JAN77 -30JUN77	5	77FEC/056/3079
	JULY 10 QUARTERLY - AMENDMENT					1JAN77 -30JUN77	3	77FEC/056/4574
	YEAR END REPORT - TERMINATED					1JAN77 -31DEC77	3	78FEC/067/1382
	TOTAL	3,500	0	544	0		25	TOTAL PAGES

9 4 6 1 0 1 0 1 0 0 2

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ATTACHMENT 2



FEDERAL ELECTION COMMISSION

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

Washington Retired Public
Employees Council
1501 S. Capitol #302
Olympia, Washington 98501

May 2, 1977

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you may know, many and sometimes complex provisions. 2 U.S.C. 431(d) defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1,000 during a calendar year for the purpose of influencing a Federal election. Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures".

Our review of the receipts reported by other political committees indicates that your organization may have in fact contributed in excess of \$1,000 to committees supporting Federal candidates. Therefore, it would appear that your organization may qualify as a "political committee" under the Act.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and, if you agree that your organization is a political committee, please submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC FORM 3. If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter for public record.

If you have any questions concerning this matter, please do not hesitate to contact Bruce Shelton (202/523-4048), our Reports Analyst assigned to you.

ADEQUATE RESPONSE REC'D

Refer To: 77030581065

Enclosure

Return Receipt

Requested: Certified



Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

79040101947

ATTACHMENT 3

LAW OFFICES
ZWERDLING AND MAURER
1211 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 223-6374

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 JUL 7

MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 966-7000

OHIO OFFICE
3904 S. KETTERING BLVD.
DAYTON, OHIO 45439
(513) 964-0050

A. L. ZWERDLING **
GEORGE M. MAUREN, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. KAHN *
JOHN C. DEMPSKY *
MICHAEL T. LEIDIG *
RONALD H. JANITZKE **
GEORGE D. WASHINGTON **
JAMES M. O'REILLY *
KENNETH W. KALLS *
JUDITH A. SCOTT **

* D. C. * MICH. * OHIO * VA.
- MASS. * ILL. * IOWA

July 5, 1977

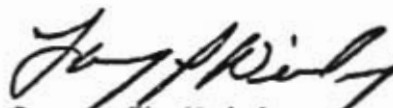
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

Enclosed for filing on behalf of the above-captioned political committee are its statement of organization and cumulative reports covering the years 1975 and 1976. Please advise if any further filings for these periods are required.

Sincerely yours,


Larry P. Weinberg

LPW:r

cc: Bruce Shelton
Federal Election Commission

770909530979

Statement of Organization For a Political Committee

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

(See Reverse Side For Instructions.)

RECEIVED
FEDERAL ELECTION
COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington	2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Room 302	3 Date 6-28-77
(c) City, State and ZIP code Olympia, WA 98501	4 Is this an amended statement ☐ Yes ☒ No If "YES" FILL IN 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
(Federal office sought) (Year of election)
to be held in the State of _____
(State in which election is held)
(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED 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 in _____, and will file all reports and statements with the candidate's principal campaign
(Year of election in State)
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 _____ but is not an authorized committee.
(Name of Candidate)
- ☒ (d) This committee supports more than one Federal candidate and is not a party committee.
- ☐ (e) This committee is a _____ committee of the _____ Party.
(National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
American Federation of State, County & Municipal Employees, AFL-CIO	1625 L St., N. W. Washington, D. C. 20036	Fraternally affiliated--not a local union, district council or other form of subordinate body of AFSCME

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- ☐ Corporation ☒ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

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

Name of Committee

Retired Public Employees Council of Washington

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
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☐ 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
Multi-candidate committee			

(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
Multi-candidate committee			

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Mildred Cole, President	1501 So. Capitol Way, Rm 302 Olympia, WA 98501	President, Retired Public Employees Council of Washington

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

mission
163

Committee
Retired Public Employees Council of Washington
Name, address and position, other principal officers or members (Secretary, assistant treasurer, assistant secretary, or finance committee):

Full name	Title or position
Ed Cole	1501 So. Center St. Olympia, WA 98501 President
El Phelps	Same as above Secretary-Treasurer

Does this committee plan to stay in existence beyond the current year? ☒ Yes ☐ No
If for how long? ☒ Indefinitely
In the event of dissolution, what disposition will be made of the assets of the Public Employees Council of Washington account of the Retired

List banks or other repositories in which the committee carries any funds or maintains funds:

Name of bank, repository, etc.	Address and ZIP code
Olympia Branch - Seattle-First National Bank	1001 N. Columbia. Olympia, WA 98501

List all election reports required to be filed by this committee with the names, addresses, and positions of the filers of the reports (other than reports filed with Secretaries or Treasurers):

Report title	Dates required	Mailing address and ZIP code
Washington Public Disclosure Commission forms	Monthly (except in specified circumstances)	Washington Public Disclosure Commission 403 Evergreen Plaza Olympia, WA 98504

For additional information on separate continuation sheets appropriate to the above when information is continued on separate page(s), see instructions to the filer of Organization, indicate in the appropriate

I certify that I have examined this Statement and to the best of my knowledge and belief it is true and correct and complete.
Marcel St. Pierre
(Signature of Treasurer)
6-28-77
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the filer to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further information contact:
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

7 0 0 1 0 1 0 1 9 5 1
7 7 0 3 0 5 5 0 1 7 5

ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20036

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

79740101955

ATTACHMENT 4

Report of Receipts and Expenditures
for Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

RECEIVED
FEDERAL ELECTION
COMMISSION

77 JUL 7 PM 1:55

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed

Retired Public Employees Council of Washington

2 Identification Number

(b) Address (number and street)

1501 So. Capitol Way, Rm. 302

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No

(b) If "Yes," for which election?

(general, primary, runoff) on (date)

(c) City, State and ZIP code

Olympia, WA 98501

4 Type of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For (Which report) (c) ☐ July 10 Quarterly Report

(b) ☐ April 10 Quarterly Report

(h) ☐ Tenth day report preceding election on in the State of (primary, general or convention) (date)

(i) ☐ Thirtieth day report following election on in the State of (primary, general or convention) (date)

(e) ☒ January 31 Year End Report 1975

(f) ☐ Monthly Report (Month)

(g) ☐ Termination Report

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1/1/75 Through 12/31/75

Section A - Cash Balance Summary

Column A
This Period

Column B
Calendar Year-To-Date

6 Cash on hand January 1, 1975

\$ 424.76

7 Cash on hand at beginning of reporting period

\$ 424.76

8 Total receipts (from line 19)

\$ 2,664.75

\$ 2,664.75

(a) Subtotal (Add lines 7 and 8)

\$ 3,089.51

\$ 3,089.51

9 Total expenditures (From line 25)

\$ 2,654.75

\$ 2,654.75

10 Cash on hand at close of reporting period (Subtract line 9 from line 8)

\$ 434.76

\$ 434.76

11 Contributed items on hand to be liquidated (attach itemized list) NONE \$ on-going committee

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)

\$

\$

13 Refunds and Rebates (from line 17)

\$

\$

14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)

\$

\$

(b) Expenditures from prior years subject to limitation

\$

\$

(c) Total expenditures subject to limitation (Add lines 14a and 14b)

\$

\$ None

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

Marvel Phelps, Treasurer

Marvel Phelps

6-28-77

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441; (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

action Commission
treet, N.W.
ton, D.C. 20463

Name of Candidate or Committee Retired Public Employees Council of Washington		REPORT COVERING THE PERIOD FROM: 1-1-75 TO: 12-31-75	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ 2,664.75	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions and other income		\$ 2,664.75	\$ 2,664.75
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments received		\$ --	\$ --
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of refunds, rebates, returns		\$ --	\$ --
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$ --	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$ --	
(c) Subtotal of transfers in		\$ --	\$ --
19 Total Receipts		\$ 2,664.75	\$ 2,664.75
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ 104.75	
(c) Subtotal of operating expenditures		\$ 104.75	\$ 104.75
21 Independent Expenditures (use Schedule E)		\$ --	\$ --
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ --	\$ --
23 For Use Only By Presidential Campaigns Receiving Federal Funds: Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of fundraising expenditures		\$ --	\$ --
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$ 2,550.00	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$ --	
(c) Subtotal of transfers out		\$ 2,550.00	\$ 2,550.00
25 Total Expenditures		\$ 2,654.75	\$ 2,654.75
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 2,664.75	
29 Transfers In (from line 18(a))		\$ 2,664.75	
30 Net Receipts (Subtract line 29 from line 28)		\$ --	
31 Total Expenditures (from line 25)		\$ 2,654.75	
32 Transfers out (from line 24(a))		\$ 2,550.00	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 104.75	

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 1 for

LINE NUMBER 24

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington contributions to:

P.E.O.P.L.E.

Full Name, mailing address and ZIP code Public Employees Organized for Political & Legislative Equality P.E.O.P.L.E. 1625 L Street, N. W. Washington, D. C. 20036	Purpose of Expenditure Contribution	Date (month, day, year) 1-10-75	Amount of each expendi- ture this period \$300.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 4-23-75	Amount of each expendi- ture this period \$500.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (Same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 7-25-75	Amount of each expendi- ture this period \$1,000.00
Full Name, mailing address and ZIP code P.E.O.P.L.E. (Same as above)	Purpose of Expenditure Contribution	Date (month, day, year) 12-4-75	Amount of each expendi- ture this period \$750.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Subtotal of expenditures this page (optional). ▶			\$ 2,550.00
Total this period (last page this line number only). ▶			\$ 2,550.00

3 9 0 3 0 5 3 6 9 5 3

ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20036

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

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ATTACHMENT 5

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

RECEIVED
FEDERAL ELECTION
COMMISSION

Federal Election Commission
Washington, D.C. 20463

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington		2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Room 302		3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No
(c) City, State and ZIP code Olympia, WA 98501		(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)
4 Type of Report (Check appropriate box and complete, if applicable)		(e) ☒ January 31 Year End Report 1976
(a) ☐ Amendment For _____ (Which report)		(f) ☐ Monthly Report _____ (Month)
(b) ☐ April 10 Quarterly Report		(g) ☐ Termination Report
(c) ☐ July 10 Quarterly Report		
(d) ☐ October 10 Quarterly Report		
(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **1-1-76** Through **12-31-76**

Section A - Cash Balance Summary

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 76		\$ 434.76
7 Cash on hand at beginning of reporting period	\$ 434.76	
8 Total receipts (from line 19)	\$ 3,824.00	\$ 3,824.00
(a) Subtotal (Add lines 7 and 8)	\$ 4,258.76	\$ 4,258.76
9 Total expenditures (From line 25)	\$ 2,034.48	\$ 2,034.48
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 2,224.28	\$ 2,224.28
11 Contributed items on hand to be liquidated (attach itemized list)	\$ --	

**Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)**

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ --

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

Marvel Phelps, Treas.

(Typed Name of Treasurer or Candidate)

Marvel Phelps
(Signature of Treasurer or Candidate)

6/28/77

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441. (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee Retired Public Employees Council of Washington		REPORT COVERING THE PERIOD FROM: 1-1-76 TO: 12-31-76	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ 500.00	
(b) Unitemized		\$ 3,324.00	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions and other income		\$ 3,824.00	\$ 3,824.00
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$ --	\$ --
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$ --	\$ --
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$ --	\$ --
19 Total Receipts		\$ 3,824.00	\$ 3,824.00
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$ 34.48	
(c) Subtotal of operating expenditures		\$ 34.48	\$ 34.48
21 Independent Expenditures (use Schedule E)		\$ --	\$ --
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ --	\$ --
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$ --	\$ --
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$ 2,000.00	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$ 2,000.00	\$ 2,000.00
25 Total Expenditures		\$ 2,034.48	\$ 2,034.48
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 3,824.00	
29 Transfers In (from line 18(c))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$ 3,824.00	
31 Total Expenditures (from line 25)		\$ 2,034.48	
32 Transfers out (from line 24(a))		\$ 2,000.00	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 34.48	

**Premized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 15(a)

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code

Retired Public Employees Chapter No. 2, Olympia Area
5714 S.E. 7th Ave.
Lacey, WA 98503

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Olympia, WA

Occupation

Not a Union

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

9-29-76

\$500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$ 500.00

Total this period (last page this line number only) ▶ \$ 500.00

Unitemized 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 1 for

LINE NUMBER 24 (a)

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Public Employees Organized for Political & Legislative Equality (P.E.O.P.L.E.) 1625 L St., N. W. Washington, D. C. 20036	Contribution	2/2/76	\$500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
P.E.O.P.L.E. 1625 L Street, N. W. Washington, D. C. 20036	Contribution	4/1/76	\$1,500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$ 2,000.00
Total this period (last page this line number only)			\$ 2,000.00

77003105501965

ZWERDLING and MAURER
1211 Connecticut Ave., N.W.
Washington, D. C. 20036



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

SS: 1 101 2 700 11.

79040101966

ATTACHMENT 6

LAW OFFICES
ZWERDLING AND MAURER
1211 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 223-6374

77 JUL 14
FEDERAL ELECTION
COMMISSION

A. L. ZWERDLING **
GEORGE M. MAURER, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. MAHN *
JOHN C. DEMPSEY *
MICHAEL T. LEIDIO *
RONALD H. JANETZKE *
GEORGE B. WASHINGTON **
JAMES M. O'REILLY *
KENNETH W. HALLS *
JUDITH A. SCOTT **

* D. C. * MICH. * OHIO * VA.
* MASS. * ILL. * NY.

MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 965-7090
OHIO OFFICE
5101 S. KETTERING BLVD.
DAYTON, OHIO 45428
(513) 294-0080

July 13, 1977

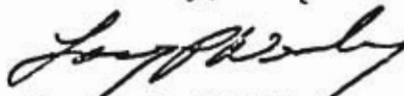
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

Enclosed please find the July 10, 1977 report of the above-named Committee. The report covers all activities since the beginning of this calendar year. The report does not contain the Committee's identification number since the Committee has not yet been advised by the Commission of the number being issued to it.

Sincerely,


Larry P. Weinberg

LPW:j

Enclosure

cc: Esther Stohl

797101957

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

FEDERAL ELECTION
COMMISSION

77 JUL 14 10:20

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed Retired Public Employees Council of Washington		2 Identification Number
(b) Address (number and street) 1501 So. Capitol Way, Room 302		3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No
(c) City, State and ZIP code Olympia, WA 98501		(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) ☐ Amendment For _____ (Which report)		(e) ☐ January 31 Year End Report
(b) ☐ April 10 Quarterly Report		(f) ☐ Monthly Report _____ (Month)
(c) ☒ July 10 Quarterly Report		(g) ☐ Termination Report
(d) ☐ October 10 Quarterly Report		
(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1-1-77 Through 6-30-77

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		\$ 2,224.28
7 Cash on hand at beginning of reporting period	\$ 2,224.28	
8 Total receipts (from line 19)	\$ 3,500.50	\$ 3,500.50
(a) Subtotal (Add lines 7 and 8)	\$ 5,724.78	\$ 5,724.78
9 Total expenditures (From line 25)	\$ 544.72	\$ 544.72
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 5,180.06	\$ 5,180.06
11 Contributed items on hand to be liquidated (attach itemized list)	\$ ---	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ ---

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

Marvel Phelps, Treas.

(Typed Name of Treasurer or Candidate)

Marvel Phelps

(Signature of Treasurer or Candidate)

7-5-77

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further
information
Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee		REPORT COVERING THE PERIOD FROM: 1-1-77 TO: 6-30-77	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ 1,500.00	
(b) Unitemized		\$ 2,000.50	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ --)			
(d) Subtotal of contributions and other income		\$ 3,500.50	\$ 3,500.50
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments received		\$ --	\$ --
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of refunds, rebates, returns		\$ --	\$ --
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$ --	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$ --	
(c) Subtotal of transfers in		\$ --	\$ --
19 Total Receipts		\$ 3,500.50	\$ 3,500.50
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ 544.72	
(c) Subtotal of operating expenditures		\$ 544.72	\$ 544.72
21 Independent Expenditures (use Schedule E)		\$ --	\$ --
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ --	\$ --
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$ --	
(b) Unitemized		\$ --	
(c) Subtotal of fundraising expenditures		\$ --	\$ --
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$ --	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$ --	
(c) Subtotal of transfers out		\$ --	\$ --
25 Total Expenditures		\$ 544.72	\$ 544.72
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 3,500.50	
29 Transfers In (from line 18(a))		\$ --	
30 Net Receipts (Subtract line 29 from line 28)		\$ 3,500.50	
31 Total Expenditures (from line 25)		\$ 544.72	
32 Transfers out (from line 24(a))		\$ --	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 544.72	

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 15 (a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Retired Public Employees Chapter No. 10, Ft. Steilacoom Area 9542 DeKoven Dr., S.W. Tacoma, WA 98499		1-27-77	\$500.00
Principal place of business	Occupation		
Tacoma, Washington	Not a Union ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Retired Public Employees Chapter No. 2, Olympia Area 5714 S.E. 7th Ave. Lacey, WA 98503		2-28-77	\$1,000.00
Principal place of business	Occupation		
Olympia, Washington	Not a Union ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶ \$ 1,500.00	
Total this period (last page this line number only)		▶ \$ 1,500.00	

LAW OFFICES
ZWERDLING AND MAURER
1211 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036
(202) 223-6374

77 JUL 21 PM
FEDERAL ELECTION
COMMISSION

A. L. ZWERDLING **
GEORGE M. MAURER, JR. **
LARRY P. WEINBERG **
JANET KOHN *
WENDY L. KAHN *
JOHN C. DEMPNEY *
MICHAEL T. LEIDIG *
RONALD E. JANETZKE **
GEORGE D. WASHINGTON **
JAMES M. O'HEILLY *
KENNETH W. KALLS *
JUDITH A. SCOTT **

MICHIGAN OFFICE
FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226
(313) 908-7080
OHIO OFFICE
2801 E. KETTERING BLVD.
DAYTON, OHIO 45424
(513) 224-0055

July 19, 1977

* D. C. * MICH. * OHIO * VA.
- MASS. - ILL. - NY.

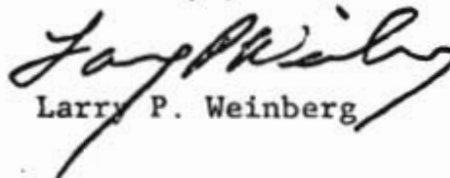
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Retired Public Employees
Council of Washington

Gentlemen:

When we transmitted the July 10, 1977, report of the above-named Committee, we inadvertantly omitted Schedule B, itemizing the expenditures shown on line 20 of the report. Enclosed, please find a completed Schedule B setting forth the information as to the expenditures in question, none of which were made in connection with federal elections.

Sincerely yours,


Larry P. Weinberg

LPW:j

Enclosure

Identified expenditures
Campaign Raising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 1 of 1 for

LINE NUMBER 20

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

Name of Candidate or Committee in full

Retired Public Employees Council of Washington

Full Name, mailing address and ZIP code

Senior Citizens Lobby
1501 So. Capitol Way, Rm. 302
Olympia, WA 98501

Purpose of Expenditure

Contribution - for
operation of Lobby
during 1977 Wash.
State Legislature.

Date (month,
day, year)

1-27-77

Amount of each expenditure this period

\$500.00

Full Name, mailing address and ZIP code

Roy J. Carpenter
5513 Englewood Hill Drive
Yakima, WA 98908

Purpose of Expenditure

Expenses to attend
State Legislative
Com. Hearing.

Date (month,
day, year)

5-20-77

Amount of each expenditure this period

44.72

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶

\$ 544.72

Total this period (last page this line number only). ▶

\$ 544.72

79710101971

ATTACHMENT 7



FEDERAL ELECTION COMMISSION

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

October 31, 1977

7 9 0 1 0 1 9 7 4
It has come to the attention of the Federal Election Commission that you may have failed to file an October 10 Quarterly Report of Receipts and Expenditures as required by the Federal Election Campaign Act.

Your apparent failure to file the October 10 Report gives the Commission reason to believe you are in possible violation of 2 U.S.C. §134.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within ten (10) days of receipt of this notice with the Federal Election Commission, 1325 K Street, N.W., Washington, DC, 20463. However, if you have filed the above mentioned report or if you require additional information, please contact our Disclosure Division on the Toll Free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris
Chairman



7 9 7 1 0 1 0 1 9 7 ;

ATTACHMENT 8



TELECON FOR THE FILES

11/01/77

RETIRED PUBLIC EMPLOYEES OF WASHINGTON - C00078444

Off. 206-352-8262
352-2885

From: Bruce Shelton

Home 352-4772

Subj: Failure to File a Q3 Report

Mrs. Mildred Cole, chairman of the Retired Public Employees of Washington, contacted the Commission about the failure to file notice. She said her committee has had very little activity and she had not supported any federal candidates.

An additional note: This committee registered recently as a result of a compliance action (transfers in to P.E.O.P.L.E.'s committee) and has disclosed activity for 1975, 1976 and through 6/30/77.

Mrs. Cole thought the necessary filing was completed so I advised her of the filing obligations and the necessary steps to terminate should they decide to do so.

Later in the conversation, she mentioned disbursing very few funds and when asked about receipts, she mentioned collection of dues. We talked further and she indicated all the money in their account consisted of dues money and those funds forwarded to P.E.O.P.L.E. was also dues money. The individual members new nothing about any portion of their monthly assesment being applied for political contributions. She also said in the forwarding of these funds to P.E.O.P.L.E., the committee provided no specific instructions as to the use of money.

The nature of the problem with this committee goes beyond the question of non-filing and deals with illegal contributions. If all of the funds transfered to political committees have been union dues, this organization should not be registered and the illegal funds must be refunded.

Separate compliance action will follow

P.E.O.P.L.E. Attorney Larry Weinburg

79040101977

ATTACHMENT 9



**RETIRED PUBLIC EMPLOYEES COUNCIL
OF WASHINGTON**

1501 So. Capitol Way, Room 302
Olympia, Washington 98501
Phone: (206) 352-2885

Post: 000 78 444
FEL
NOV 10 AM 1:33
November 7, 1977

Federal Election Commission

1325 K St N.W.

Washington, D.C. 20463

Attn: Bruce Shelton, Reports Analyst

Dear Mr Shelton:

This letter will confirm our telephone discussion of November 4, 1977 relative to the reports the Retired Public Employees Council has been filing with your Commission.

Our Constitution provides for Chapters in various geographical locations throughout the state and members, upon joining, sign an application card, the lower half of which, if they choose this option,

Authorized the Washington State Department
of Retirement Systems to deduct \$1.00 per month
from the retirement benefit as a dues payment.
Persons not wishing the deduction pay
cash to the Secretary-Treasurer or Treasurer
of each Chapter.

50¢ of each dues dollar is retained
by the Chapter or the Council depend-
ing on who collects the money. The other
50¢ belongs to the Chapter. Of the
50¢ retained by the Council, 25¢
is put into a general, or operating
fund and 25¢ is deposited in a
separate account, called Legisla-
tive and Political Action and it was
from this fund that the contributions
to the PEOPLE program were made.
We are no longer making contribu-
tions to the PEOPLE program and
this fact prompted my request to
you that we, as a Council, be relieved
of the necessity of reporting.

77033604973

79010101930
77030614274
In September 1977, we amended our Constitution and split the office of Secretary-Treasurer into two (2) separate positions. The person who held the combined position remains as Secretary and a new Treasurer was elected. They are Marlene Phelps and Aileen Youngblood, respectively.

We are completing the reporting forms for the quarter ending September 30 and will forward them to Aileen Youngblood, Treasurer for her signature and she will, in turn send them on to your office.

I hope this information will enable you to decide we no longer need to file these reports. If I can give you any other information, please contact me.

Sincerely,
Meredith Cole,
President

7 0 0 1 0 1 0 1 9 3 1

Retired Public Employees Council
Of Washington

1501 South Capitol Way, Room 302
Olympia, Washington 98501



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

20463

Attn: Bruce Shelton

70010101931

ATTACHMENT 10

Election Commission
Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

FEDERAL ELECTION
COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed <i>Retired Public Employees</i>	2 Identification Number <i>000078444</i>
(b) Address (number and street) <i>1501 St. Capital Way NE 202</i>	3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☐ No
(c) City, State and ZIP code <i>Olympia, Wa 98501</i>	(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)

4 Type of Report (Check appropriate box and complete, if applicable)	(e) ☐ January 31 Year End Report
(a) ☐ Amendment For _____ (Which report)	(f) ☐ Monthly Report _____ (Month)
(c) ☐ July 10 Quarterly Report	(g) ☒ Termination Report
(d) ☐ October 10 Quarterly Report	
(b) ☐ April 10 Quarterly Report	
(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)	
(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From *1-1-77* Through *12-31-77*

Section A - Cash Balance Summary

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1977		\$
7 Cash on hand at beginning of reporting period	\$	
8 Total receipts (from line 19)	\$	\$
(a) Subtotal (Add lines 7 and 8)	\$	\$
9 Total expenditures (From line 25)	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$	\$ <i>977</i>
11 Contributed items on hand to be liquidated (attach itemized list)	\$	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

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

Marvel Phelps

(Typed Name of Treasurer or Candidate)

Marvel Phelps

(Signature of Treasurer or Candidate)

Feb. 13 1978

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further
information
Contact:



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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Section Commission
District, N.W.
Washington, D.C. 20463

Name of Candidate or Committee		REPORT COVERING THE PERIOD	
		FROM:	TO:
PART I - RECEIPTS		Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and Collections Included Above:			
List by event on memo Schedule D (\$			
(d) Subtotal of contributions and other income		\$	\$
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$	\$
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21 Independent Expenditures (use Schedule E)		\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$	\$
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 666

Date Filmed 2/14/79 Camera No. --- 2

Cameraman GPC