



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 19, 2010

**MEMORANDUM**

**TO:** Joseph F. Stoltz  
Assistant Staff Director

**FROM:** Christopher Hughey *pch*  
Deputy General Counsel

Lawrence L. Calvert, Jr. *LJC*  
Associate General Counsel

Lorenzo Holloway *LH*  
Assistant General Counsel  
For Public Finance and Audit Advice

Delanie DeWitt Painter *DDP*  
Attorney

**SUBJECT:** Preliminary Audit Report for Chris Dodd for President, Inc. (LRA 744)

The Office of the General Counsel has reviewed the proposed Preliminary Audit Report ("PAR") for Chris Dodd for President, Inc. ("Committee"). Our comments primarily focus on several issues related to Finding 2 -- Receipt of Contributions that Exceed Limits. Your cover memorandum requests comments on one apparent excessive contribution, a recreational vehicle ("RV") provided by a union, and asks several questions about that transaction. We address those questions below, and we also comment on a contribution that was timely redesignated but never transferred. With respect to Finding 1 -- Net Outstanding Campaign Obligations, we reiterate portions of the informal advice we provided about how to present investment accounts on the Statement of Net Outstanding Campaign Obligations ("NOCO Statement") to inform the Commission of these issues, and comment on adjustments to figures related to general election contributions on the NOCO Statement. We concur with the remaining findings not specifically discussed in this memorandum. If you have any questions, please contact Delanie DeWitt Painter, the attorney assigned to this audit.

## **I. RECEIPT OF CONTRIBUTIONS THAT EXCEED LIMITS (FINDING 2)**

### **A. RV Contribution – Factual Background**

You request our comments on issues related to an apparent in-kind contribution to the Committee from the International Association of Firefighters (“IAFF”), a labor organization, and/or its separate segregated fund, IAFF FIREPAC (“FIREPAC”). The possible contribution consists of the rental and decoration of a recreational vehicle or bus that seems to have been used by the Committee for a bus tour. These costs totaled \$32,233. It appears that FIREPAC paid the costs of decorating the vehicle because FIREPAC reported the decoration costs as an independent expenditure on behalf of Senator Dodd. Because FIREPAC did not report the rental cost, the auditors believe that cost may have been paid for by the IAFF or by a non-federal account of FIREPAC.

Although FIREPAC reported the decoration cost as an independent expenditure, the IAFF later billed the Committee for a share of the costs of both renting and decorating the vehicle. According to the invoice letter and attached documents, the Committee “rented the bus from the IAFF for the period of December 17, 2007 through January 4, 2008, for a total of 18 days.” The Iowa caucus was on January 3, 2008, so the 18-day bus rental appears to cover the end of the Iowa campaign. The bus rental cost was \$15,423 and the decorating wrap cost was \$16,810, for a total cost of \$32,233. The invoice states that overall, “between the IAFF and the Dodd campaign we had possession of the bus for a total of 48 days, which brings the daily rate to \$671.53.” The IAFF billed the Committee \$12,087.54 for 18 days of the 48 day total. The invoice, dated February 12, 2008, stated that the Committee should reimburse FIREPAC within 60 days of the Iowa caucus.

A picture and several videos showed the bus entirely covered in a gold and black wrapping decoration that contains a large picture of Senator Dodd, the IAFF emblem, and the statement “IAFF Fire Fighters for Dodd President.” See Attachment; see also <http://www.youtube.com/watch?v=21n2WaPaRY4>. An IAFF press release states that a 20-city eight-day “Firefighters for Dodd” bus trip from November 29, 2007 through December 6, 2007 was a “caucus get-out-the-vote effort” and was the “latest push” by the IAFF for Dodd’s presidential candidacy. *Id.* The press release stated that IAFF members would travel around Iowa in the bus to boost support for Dodd, and at each stop, the union’s general president would meet with fire fighters, “discuss Sen. Dodd’s record of support for working families and their communities” and urge them to participate in the caucus. *Id.* The video showed brief footage of some of these meetings. The press release included a schedule indicating the times and locations of stops. It also stated that Senator Dodd “will meet the bus” at several stops. *Id.* From the schedule it appears the IAFF used the bus during at least 8 of the 30 days it had the bus before the Committee’s 18-day period of bus rental. It is unclear how the bus was used for the other 22 days, or for the 18 days that the invoice charged rental to the Committee. For example, it is not known whether the bus was turned over to the Committee for that 18-day period, or whether the IAFF and/or FIREPAC members continued to tour on the bus with the Committee.

Notwithstanding both its earlier reporting of the decoration costs as an independent expenditure and IAFF's invoice to the committee for only 18/48th of the combined rental and decoration costs, FIREPAC reported the full \$32,233 cost of the bus as a debt owed by the Committee in its March 2008 disclosure report. FIREPAC continued to report the debt as outstanding until its December 2009 disclosure report, on which it reported the debt as having been paid in full by the Committee in October, 2009.<sup>2</sup> Similarly, the Committee reported the same amount as a debt owed to FIREPAC beginning with its March 2008 report and continuing until it reported paying the debt as of October 2009. After the auditors discussed this issue with the Committee at the exit conference on May 7, 2009, the Committee provided a copy of a non-negotiated reimbursement check to FIREPAC, dated October 21, 2009, for the combined \$32,233 cost of both rental and decoration of the bus, rather than the lower invoiced amount. But the auditors' review of FIREPAC's reports from June 2007 through November 2009 indicates that FIREPAC has never reported paying for the RV rental cost, and the auditors have been unable to determine who initially paid for the rental portion of the RV – the union itself or FIREPAC.

The auditors' review of FIREPAC's reports also revealed a number of other reported independent expenditures on behalf of Dodd beginning in August 2007 and totaling \$373,609 for expenses including various types of signs (billboards, banners, rally, yard, 4x8, podium), estimated travel costs, newspaper advertising, web site costs, bumper stickers, mugs, musical and entertainment services, catering, food for events and beverages, facility fee, tents, invitations, and portable lavatories. Many of these expenses appear to be related to rallies or other events. The "estimated travel costs" for several individuals were reported as paid on the same day the Committee's period of bus rental began according to the invoice.

#### **B. The RV Rental and Wrapping Costs Appear to Have Been Contributions to the Committee**

The audit of the Committee has not yet produced information sufficient to explain all of the facts surrounding the RV transaction. For instance, we do not yet know why the parties apparently characterized the transaction in three different ways at three different times. Nor do we know whether IAFF, FIREPAC, or some other actor paid for the original cost of renting the RV from a commercial vendor. Nevertheless, based on the information to date, it appears most likely that the costs of both renting and decorating the RV were either excessive or prohibited contributions to the Committee. It appears that the IAFF and FIREPAC may have initially contemplated that the costs of decorating the bus would be an independent expenditure by FIREPAC on behalf of Senator Dodd's candidacy. See 11 C.F.R. § 100.16(c). Certainly, FIREPAC reported the decoration costs that way. Ultimately, though, it appears that the parties decided that this transaction was not an independent expenditure, but was either a transaction in which IAFF and/or FIREPAC rendered goods and services to the Committee for hire (or for reimbursement pursuant to 11 C.F.R. 100.93), or a situation in which the Committee determined that it needed to reimburse IAFF or FIREPAC for prohibited or excessive contributions. This conclusion is supported by the fact that the Committee apparently paid the full cost of both renting and decorating the vehicle to FIREPAC,

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<sup>2</sup> On its December 2009 disclosure report, FIREPAC also noted that it had inadvertently deposited the Committee check into its non-federal account. FIREPAC stated it would report a transfer on its 2009 year-end report.

and the Committee and FIREPAC both disclosed the full amount on their reports as a debt the Committee owed for a long period and eventually paid in 2009.

Had the Committee timely made reimbursement to IAFF or FIREPAC, whoever was the appropriate party, for the cost of renting the RV, the rental cost would not have been a contribution. The Committee could have properly paid the cost of the bus rental, as an “other means of transportation” not operated for commercial passenger service, at the normal and usual charge for a comparable commercial conveyance within 30 days of receipt of the invoice or 60 days after the travel began. *See* 11 C.F.R. § 100.93(d). But the Committee untimely reimbursed the bus costs, more than a year after the travel occurred. Failure to make timely reimbursement under Section 100.93 results in an in-kind contribution. *See* 11 C.F.R. § 100.93 (b)(2). Because the reimbursement was not made properly under section 100.93, the bus cost is a contribution.

While the rental cost of the bus itself reflects the bus’ function as a means of transportation, and is thus plausibly subject to the section 100.93 travel rules, the bus also served as a type of rolling billboard. Therefore, the bus decoration cost is essentially a communication expense. If that communication was not independent -- and the parties appear to have decided it was not -- then it was necessarily coordinated and thus a contribution from FIREPAC to the Committee. *See* 11 C.F.R. §§ 100.16(c); 109.20; 109.21. FIREPAC had already contributed \$5,000 to the Committee for the primary election. Under these circumstances, the parties may have decided that the entire decoration cost was an excessive contribution from FIREPAC to the Committee that needed to be refunded, but was not for some time. Alternatively, if the parties simply treated the decoration as a service provided for hire, it would still appear to be an excessive contribution, as FIREPAC extended credit to the Committee and does not appear to be in the commercial business of decorating buses with advertising messages. Moreover, even if the decorating cost were considered part of the total bus travel cost -- and we do not believe it should be -- it was not timely reimbursed under section 100.93, as discussed above, and thus, was an excessive contribution.

Therefore, the RV bus rental and wrapping expenses appear to have been contributions. Because it appears that FIREPAC paid for the wrapping cost, this wrapping cost appears to have been an untimely resolved excessive contribution from FIREPAC. Because FIREPAC never reported paying the RV rental cost, it is possible the IAFF or FIREPAC’s non-federal account paid that cost. Depending on who paid for it, the rental cost may have been a prohibited contribution from IAFF or a non-federal account of FIREPAC. It is also possible that the rental cost was an additional excessive contribution from FIREPAC that was not properly reported. We recommend that the proposed PAR be revised consistent with this legal analysis.

A related question you raise is whether, if FIREPAC did not pay the rental cost, the Committee’s reimbursement of that portion of the cost to FIREPAC might be an excessive contribution to FIREPAC. Arguably, the Committee did not make any contribution to FIREPAC. A contribution is a gift, subscription, loan, advance, or deposit of money or anything of value made “for the purpose of influencing” a federal election. 2 U.S.C. § 431(8)(A)(i); 11 C.F.R. § 100.52(a). The statute prohibits a candidate or political committee from “knowingly” making an expenditure in violation of the contribution and expenditure limitations. 2 U.S.C. § 441a(f). There is no

indication that the Committee had any knowledge or intent that by reimbursing FIREPAC instead of IAFF for the bus rental cost, it would have been making a contribution. The Committee's apparent intent, based on what we know so far, was either to resolve an excessive contribution it had received, or to pay a debt. The invoice instructed the Committee to reimburse FIREPAC and the Committee did so. There is no available information indicating that the Committee knew or should have known who actually paid for the rental portion of the RV. Indeed, it remains unclear who actually paid that cost.

Another question you ask is whether the RV transaction raises questions about the numerous other independent expenditures FIREPAC made on behalf of Dodd. In our view, the RV transaction in and of itself, in the absence of any other information, does not automatically call into question the independence of other FIREPAC independent expenditures that were unrelated to the RV transaction. Under the current coordination rules, the coordination of one communication does not automatically imply the coordination of others. The multi-part conduct and content tests for coordination must be applied to each particular communication. See 11 C.F.R. §§ 100.16(c); 109.20; 109.21. Section 109.21 strongly implies that the coordination tests should be applied to each particular communication because it sets forth the requirements for determining whether "a communication" is coordinated, and does not refer to more than one communication. While FIREPAC's reporting those expenditures as independent expenditures would indicate that the content of those communications included express advocacy of Senator Dodd's election as president, you have not indicated that you have any other information at this time regarding the application of the conduct test to those expenditures. Of course, it is possible that you will develop such information in the course of obtaining further information about the RV transaction. We note, however, that the other independent expenditures began earlier, in August 2007, and the types of expenses included signs, web expenses and event-related expenses.

### **C. Other Excessive Contributions Issues**

The proposed PAR also addresses other excessive contributions, including one \$4,000 excessive contribution that the auditors consider unresolved because the Committee received a timely completed redesignation letter, but never actually transferred the funds at issue to the candidate's Senate committee or refunded them to the contributors. We note that, as we stated in our comments on the Biden PAR, "there is no legal authority that requires a committee to move redesignated funds from one campaign to another within the 60 day period." Memorandum to Joseph F. Stoltz, "Preliminary Report of the Audit Division on Biden for President, Inc." at 8 (Mar. 17, 2009). The regulations only require that a committee receive the redesignation letters from contributors within that timeframe. 11 C.F.R. § 110.1(b)(5)(ii)(A)(2). We noted that redesignated funds ultimately must be moved to another committee in order to practically effectuate the redesignation, and the Biden Committee transferred the funds "within a reasonable amount of time albeit not within the 60 day period required under 11 C.F.R. § 110.1(b)(5)(ii)(A)(2)." *Id.* We

suggest that the proposed PAR recommendation be revised to make clear that a transfer of the redesignated funds will resolve this contribution.

## II. NOCO STATEMENT (Finding 1)

### A. Presentation of General Election Investment Account on NOCO Statement

The NOCO Statement in the proposed PAR presents transactions related to an investment account for general election receipts (“General Account”) as assets and liabilities. Since, however, this is an audit of the primary campaign, there is a question whether the assets and liabilities from the General Account should be included on the NOCO Statement. We conclude that the Audit Division can either include the General Account, as it has done, or exclude it from the NOCO Statement because nothing legally requires or prohibits its inclusion.

The General Account only comprised general election contributions. The Committee accepted general election contributions during the primary election period under the conditions set forth in AO 2007-03 (Obama). *See* AO 2008-04 (Dodd). After Senator Dodd withdrew from the primary race on January 3, 2008, he was no longer a potential general election candidate. The Committee, therefore, was required to refund or redesignate the general election contributions.<sup>3</sup> *See* 11 C.F.R. § 102.9(e)(3); AO 2008-04; AO 2007-03; AO 2003-18 (Srdin).

There is nothing that legally either requires or prohibits the inclusion of the General Account and related transactions such as general election contributions, refunds, and redesignations in the NOCO Statement.<sup>4</sup> *See* 11 C.F.R. § 9034.5. Thus, we conclude that the Audit Division may take either approach, provided that, if the General Account transactions are included in the NOCO Statement, they net each other out as assets (cash on hand) and liabilities (accounts payable).

In our opinion, however, it appears that excluding the General Account from the NOCO Statement is the approach most consistent with both the purpose of the NOCO Statement and two recent Commission advisory opinions addressing the receipt of general election contributions by Presidential primary candidates. The General Account is related to the general election, not to the candidate’s publicly-funded primary campaign for the nomination. The purpose of a NOCO Statement is to determine a candidate’s financial status and entitlement to matching funds after the date of ineligibility with respect to that candidate’s participation in the primary election under the Presidential Matching Payment Account Act (“Matching Payment Program”). *See* 11 C.F.R. § 9034.5; Explanation and Justification for 11 C.F.R. § 9034.5, 44 Fed. Reg. 20,336, 20,340 (Apr. 4, 1979).

<sup>3</sup> The Committee requested an advisory opinion about resolving these contributions. AO 2008-04.

<sup>4</sup> This applies both to NOCO Statements submitted by committees after their dates of ineligibility (“DOI”) in support of their requests for matching funds, and to the NOCO Statements as adjusted by the Audit Division that are included in its audit report of any publicly financed presidential primary committee.

Although section 9034.5 does not explicitly exclude general election funds from what should be included on the NOCO Statement, an account containing only contributions designated for the general election but received during the primary election period should not affect a candidate's financial status or entitlement to matching funds with respect to the primary election. Once a candidate fails to qualify for the general election or, in the case of presidential candidates, elects to receive public financing for the general election campaign, the general election contributions become impermissible funds that must be refunded, redesignated, or disgorged. 11 C.F.R. § 102.9; AO 2008-04; AO 2007-03; AO 2003-18. For this reason, candidates must use an acceptable accounting method to distinguish between contributions designated for the primary and contributions designated for the general election; must limit access to the general election funds; and may not use those funds for any purpose. See 11 C.F.R. § 102.9(e); AO 2008-04; AO 2007-03. In the case of a committee such as the Dodd Committee that does not qualify for the general election, if one assumes that the committee has adequately segregated general election contributions from its primary election funds, the amount of general election contributions received should exactly equal the obligation to make refunds, obtain redesignations or make disgorgement payments. Accordingly, if such a candidate has participated in the Matching Payment Program, the general election contributions and the refund obligation should net to zero and thus should neither increase nor decrease the amount of post-DOI matching funds to which a committee may otherwise be entitled. Because the general election accounts should have no impact on post-DOI matching fund entitlement, we believe they should not be included on a committee's NOCO statement as a matter of policy.<sup>5</sup>

In this case, however, there are some additional relevant facts: specifically, the Committee placed the general election contributions in an investment account, and the account lost \$43,830 by the time of the Committee's DOI. These facts do not change our conclusion regarding the advisability of including the general election funds in the NOCO statement. In this case, to ensure that the general election contributions net out against the obligation to refund those contributions, the auditors adjusted the NOCO Statement to offset the loss that the Committee incurred when it invested the general election contributions. The proposed PAR includes a footnote explaining that the adjustment to the payable was to "ensure that general election contributions had no impact on matching fund entitlement," and stating that the "general election loss may not influence the primary campaign's entitlement to matching funds." The necessity for this adjustment and its accompanying footnote is another reason why we believe it would be a better practice not to include general election account transactions on the NOCO statement in the first place. However, should the Audit Division determine to include these transactions on the NOCO statement, we agree with the adjustment. Adjustment in this manner prevents investment losses related to a privately funded general election campaign from possibly increasing a candidate's post-DOI

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<sup>5</sup> We recognize that one disadvantage to this approach is that it fails to provide an accurate "overall" picture of the Committee's financial status. However, the Audit Division could address this concern by adding an accompanying footnote to the NOCO Statement that explains the existence of the General Account and transactions related to general election funds. Moreover, the general election funds will be reflected on the Committee's disclosure reports.

entitlement to public funds related to the *primary* election. It is our understanding, however, that in this instance, the candidate would not have received any additional matching funds.

Again, however, there is nothing that legally prevents the Audit Division from including the General Account and transactions in the NOCO Statement. See 11 C.F.R. § 9034.5. Accordingly, the Audit Division may elect to include the General Account and related transactions in the NOCO Statement, as it did in this proposed PAR, so long as the amount of general election contributions and the obligations to make general election refunds, redesignations or disgorgement payments net each other out as assets and liabilities.

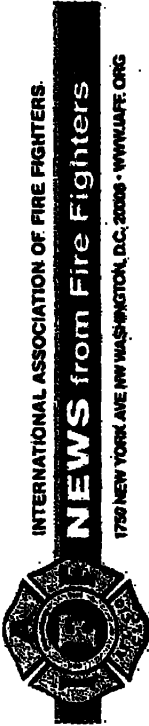
#### **B. Presentation of Investment Gains and Losses on NOCO Statement**

If the General Account (or any other investment account) is presented on the NOCO Statement, we recommend that it be presented as part of the Committee's cash on hand, and valued at fair market value as of the close of business on the Committee's last day of eligibility. 11 C.F.R. § 9034.5(a)(2)(i). The regulation explicitly states that "any other committee investments" should be included in cash on hand "at fair market value." *Id.* This result would differ from the reporting of investment accounts on disclosure reports, which this Office addressed in our comments on the Weiner audit. See Memorandum to Wanda J. Thomas, Audit Report on Friends of Weiner (Mar. 4, 2009) at 3. In that case, this Office concluded that as long as assets remain investments that are not transferred or converted, "there is no requirement to report unrealized gains or losses that reflect no more than fluctuations in current fair market value." *Id.* However, while section 104.3(a)(1) states that committee investments should be "valued at cost" on disclosure reports, section 9034.5(a)(2)(i) states investments should be included in cash on hand on NOCO Statements at "fair market value."

#### **Attachment**

"Fire Fighters for Dodd Bus Tour Rolls through Iowa Nov. 29-Dec-6," <http://www.iaff.org/Comm/Press/DODDbustour.htm> (visited Feb. 18, 2010) and "Fire Fighters for Dodd: Bus tour rolls through Iowa Nov. 29- Dec.6." (Nov. 27, 2007 press release) at <http://www.gwu.edu/~action/2008/dodd/iaff112707pr.html> (visited Jan. 26, 2010)





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**Media Advisory**  
 November 27, 2007  
 Contact: Amber Moore  
 (703)276-2772 ext. 17  
 Bill Glanz  
 (202) 824-1566  
 (202) 329-5856 (cell)

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- Press Room
- IAFF
- Charities
- IAFF-MDA
- LODDS
- Member Benefits
- IAFF Store

**Fire Fighters For Dodd Bus Tour Rolls Through Iowa Nov. 29 - Dec. 6**

**Goal: Caucus Mobilization**

**Tour schedule attached and available online: [www.firefightersfordodd.com/bustour](http://www.firefightersfordodd.com/bustour)**

**Media Note: President Schaitberger and Iowa fire fighters will be available at each stop to talk with reporters. Reporters are welcome to ride on the bus for extended access.**

**Council Bluffs, Iowa - The largest caucus get-out-the-vote effort by a labor union this year gets rolling in Iowa this week as the "Fire Fighters For Dodd" 20-city, eight-day bus trip through the state hits the road here Thursday, Nov. 29. It is the latest push by the International Association of Fire Fighters (IAFF) for underdog Democratic presidential candidate Sen. Chris Dodd.**

**Known as the hardest campaigners, the Fire Fighters will travel the state in a 42-foot gold-and-black RV with the "Fire Fighters for Dodd" wrap. Starting in Council Bluffs and ending in Des Moines on Dec. 6, Iowa fire fighters will seek to boost support for Dodd from Iowa's farm communities to its urban centers.**

ATTACHMENT 1  
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<http://www.iaff.org/Comm/Press/DODDBustour.htm>

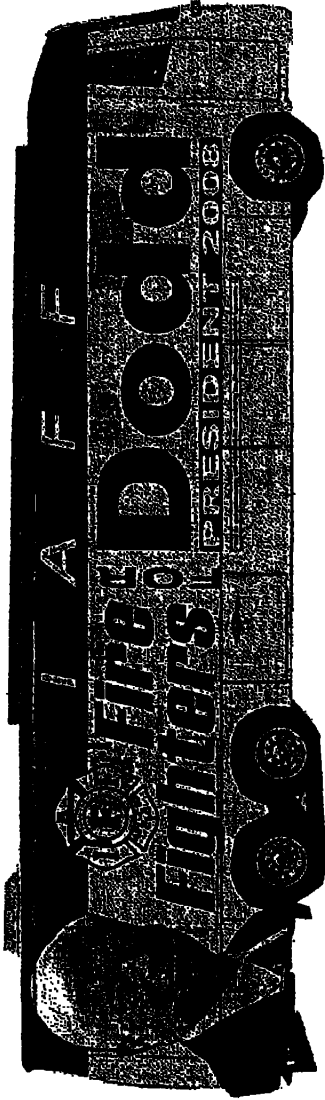
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At each stop, IAFF General President Harold Schaitberger will join presidents of Iowa IAFF locals and fire fighters to discuss Sen. Dodd's record of support for working families and their communities, particularly in providing resources for emergency response. Schaitberger also will urge fire fighters to participate in the Jan. 3 caucus so they can have an impact in the elections as they did in 2004 when fire fighters mobilized to ensure Sen. John Kerry's surprise caucus victory.

"We need a president who can get things done and has the experience to lead, and Chris Dodd clearly has a record of accomplishment and a legacy of diplomacy that makes him the obvious choice," Schaitberger said.



Photos and video will be available at: [www.firefightersfordodd.com/bustour](http://www.firefightersfordodd.com/bustour)

Sen. Dodd wrote two laws - the Staffing for Adequate Fire and Emergency Response (SAFER) Act and Assistance to Firefighters Grant Program (FIRE Act) - that provide funding to hire additional fire fighters and money for equipment and training. Those programs have resulted in direct federal aid to Iowa of nearly \$64 million since 2001.

In addition, Sen. Dodd authored the Family Medical Leave Act (FMLA) and fought for seven years and through two presidential vetoes until it finally became law in 1993. An estimated 50 million workers have taken advantage of FMLA.

Stops include Council Bluffs, Sioux City, Ft. Dodge, Ames, Boone, Nevada, Marshalltown, Mason City, Waterloo, Cedar Rapids, Iowa City, Ottumwa, Keokuk, Burlington, Muscatine, Davenport, Clinton, Dubuque, West Des Moines and Des Moines.

*The International Association of Fire Fighters, headquartered in Washington, DC, represents more than 287,000 full-time professional fire fighters and paramedics who protect 80 percent of the nation's population. More information is available at [www.iaff.org](http://www.iaff.org).*

**[Click here for IAFF Press Releases and Archives](#)**

<http://www.iaff.org/Comm/Press/DODDbustour.htm>

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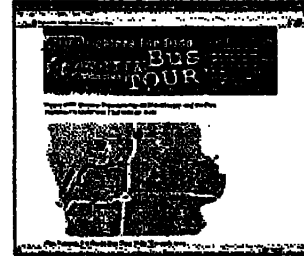
PRESS RELEASE from International Association of Fire Fighters via IowaPolitics.com  
November 27, 2007

**Fire Fighters For Dodd: Bus tour rolls through Iowa  
Nov. 29 - Dec. 6**

**Goal: Caucus Mobilization**

**Tour schedule attached and available online:  
<http://www.firefightersfordodd.com/bustour>**

**Contact: Amber Moore 703/276-2772 x17 Bill Glanz 202/824-1566**



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Photos and video will be available at: <http://www.firefightersfordodd.com/bustour>

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\*\*\* See schedule below.\*\*\*

Sen. Dodd wrote two laws the Staffing for Adequate Fire and Emergency Response (SAFER) Act and Assistance to Firefighters Grant Program (FIRE Act) that provide funding to hire additional fire fighters and money for equipment and training. Those programs have resulted in direct federal aid to Iowa of nearly \$64 million since 2001.

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through two presidential vetoes until it finally became law in 1993. An estimated 50 million workers have taken advantage of FMLA.

The International Association of Fire Fighters, headquartered in Washington, DC, represents more than 287,000 full-time professional fire fighters and paramedics who protect 80 percent of the nation's population. More information is available at <http://www.iaff.org>.

**Fire Fighters for Dodd Iowa Bus Schedule: Nov. 29-Dec.6**

As of 11/27/07

Times and locations may shift

Thursday, Nov. 29  
Council Bluffs 9:00am  
Local 15 Union Hall  
1827 South 8th St.

Sioux City 5:30pm  
Famous Dave's  
201 Pierce St.

Friday, Nov. 30  
Ft. Dodge 9:00am  
Ft. Dodge Fire Station  
1515 Central Ave.

Boone 2:15pm  
Location TBD

Ames 4:00pm  
American Legion Hall  
225 Main St.  
Meeting with other unions

Nevada 6:00pm  
Gates Memorial Hall  
825 15th St.

Saturday, Dec. 1

\*Marshalltown 8:00am  
Location TBD  
Senator Dodd will meet the bus

Mason City 2:00pm  
Location TBD

Waterloo 7:00pm  
Sullivan Brothers Convention Center

205 West 4th St.

Sunday, Dec. 2

Cedar Rapids 12:00pm  
P3 Union Hall (old UFCW)  
116 14th Ave SE

Iowa City 5:00pm  
Fire House #1  
410 E. Washington St.

Monday, Dec. 3

\*Ottumwa 9:00am  
Ottumwa Hotel Parkview Plaza  
107 2nd Street  
Senator Dodd will meet the bus

Keokuk 1:30pm  
Keokuk Labor Temple  
301 Blondeau St.

Burlington 6:00pm  
Catfish Bend Casino  
3001 Winegard Dr.

Tuesday, Dec. 4

Muscatine 9:00am  
Location TBD

Davenport 5:00pm  
Location TBD

Wednesday, Dec. 5

Clinton 9:00am  
Best Western Frontier Motor Inn  
2300 Lincoln Way

Dubuque 7:00pm  
Happy's Place  
2323 Rockdale Rd.

Thursday, Dec. 6

West Des Moines 12:00pm  
Location TBD

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\*Des Moines 5:00pm  
Location TBD  
Senator Dodd will meet the bus

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