

FEDERAL ELECTION COMMISSION

1000 K STREET, N.W.
WASHINGTON, D.C. 20541

THIS IS THE END OF PUR # 1216

Date Filmed 9/10/80 Camera No. --- 2

Cameraman

SPC

80040304897

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

☐ Show to whom and date delivered.

☐ Show to whom, date, and address of delivery.

☐ **RESTRICTED DELIVERY**
Show to whom and date delivered.

☐ **RESTRICTED DELIVERY**
Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**
Mr. Jack Elgin, Secretary-Treasurer
Detroit and Southeastern Michigan Maritime
Trades Department, Port Council, Attn: 570
570 St. Clair Drive
Riverton, Michigan 48001

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945703	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Mary Richard

4. **DATE OF DELIVERY**
AUG 4 1980

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

1216 - Levin

PSPO

GPO: 1978-272-100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack Bluitt, Secretary-Treasurer
Detroit and Southeastern Michigan
Maritime Trades Department Port
Council, AFL-CIO
520 St. Clair Drive
Algonac, Michigan 48001

Re: MUR 1216

Dear Mr. Bluitt:

On July 29, 1980, the Commission found reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO violated § 441b of the Federal Election Campaign Act of 1971, as amended ("the Act") by making a \$1,000 contribution and a \$500 contribution to the Levin for Senate Committee during the 1978 general election. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that a contribution by a labor organization in connection with an election for federal office is nevertheless a violation of § 441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

JOHN WARREN MCGARRY
Vice-Chairman

Enclosure

Notification of Reason to Believe Finding

3004004809

DATE July 31, 1980

MUR NO. 1214

STAFF MEMBER(S) & TEL. NO.

RESPONDENT Detroit and Southeastern Michigan
Maritime Trades Department Port
Council, AFL-CIO

Levin

202/523-4060

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On March 24, 1980, this matter was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) because of a disclosure by the Levin for Senate Committee ("the Committee") of a \$1,000 contribution on October 15, 1978 from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO ("the Port Council") and a \$500 contribution on October 28, 1978 from the Port Council COPE Contributions fund.

FACTUAL BASIS AND LEGAL ANALYSIS

On March 12, 1979, the Commission wrote the Committee a letter asking it to return the \$1,000 contribution if it came from a labor organization and not a separate segregated fund of a labor organization.

On March 26, 1979, the Committee's Assistant Treasurer responded to the letter stating that the \$1,000 contribution listed as being from the Port Council was actually given through the COPE Contributions Fund and that this information was erroneously omitted from its report. On May 25, RAD received copies of the \$1,000 and \$500 contribution checks. The account name on the checks showed the name of the union plus the words "COPE Contributions Fund."

On July 20, 1979, the Commission sent a letter to the Treasurer of the Port Council informing him that, if he agreed that the organization making the contributions was a political committee, he should submit a Statement of Organization, and that, if he did not wish his organization to be registered as a

political committee, he should request refunds.

In response to this letter, Ms. Linda Whitherspoon, the bookkeeper for the Port Council, stated that the account which transferred the funds was an account maintained separately from the union treasury containing union dues. She stated, however, that the funds in this account consisted of the proceeds of tickets sold for an annual dinner dance and that unions and corporations bought these tickets and bought advertisements in the dance program book. She also stated that purchases were made with union and corporate, not PAC, checks.

In response to instructions from RAD, the Port Council Secretary-Treasurer, Jack Bluitt, wrote a letter to the Committee on July 23, 1979, stating that the Port Council had "learned" from the Commission that the \$1,500 "was drawn from Union Funds" and asked for a refund from the Committee. On August 14, 1979, the Committee made the refund on a check made out to the Port Council, not to the Port Council COPE Contributions Fund.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(a). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contributions Fund (and, therefore, may have been deposited into the dues funds). 2 U.S.C. § 441b(a) prohibits a labor organization from making a contribution in connection with an election for federal office. Contributions from a fund that is simply another account of the union and not a separate segregated fund under § 441b(b) are in violation of 2 U.S.C. § 441b(a).

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO has violated 2 U.S.C. § 441b(a).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John E. S. Scott, Treasurer
Levin for Senate Committee
3327 Dirksen Senate Office Bldg.
Washington, D.C. 20510

Re: MUR 1216

Dear Mr. Scott:

On July 29, 1980, the Commission found reason to believe that the Levin for Senate Committee violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") by receiving a \$700 contribution from the International Union of Operating Engineers, Local 547 and by receiving a \$1,000 contribution and a \$500 contribution from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that receipt by a political committee of a contribution from a labor organization is nevertheless a violation of §-441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 202/523-4060.

Sincerely,


JOHN WARREN MCGARRY
Vice-Chairman

Enclosure

Notification of Reason to Believe Finding

FEDERAL ELECTORAL COMMISSION

NOTIFICATION OF REASON TO BELIEVE VIOLATION

DATE July 31, 1980

MUR NO. 1216
STAFF MEMBER(S) & TEL. NO.
Levin

RESPONDENT Levin for Senate Committee

202/523-4060

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On March 24, 1980, the Levin for Senate Committee ("the Committee") was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) for receipt of contributions from labor organizations in violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

A review of the Committee's 1978 10 Day Pre-General and 30 Day Post-General Reports disclosed that it received a \$700 contribution from the International Union of Operating Engineers, Local 547 ("IUOE") on October 20, 1978, a \$1,000 contribution from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO ("the Port Council") on October 15, 1978, and a \$500 from the Port Council AFL-CIO COPE Contributions Fund on October 28, 1978. The IUOE and the Port Council are labor organizations under 2 U.S.C. § 441b(b)(1).

On March 12, 1979, the Commission sent surface violation letters to the Levin for Senate Committee concerning the listing of four possible union contributions on the 10 Day Pre-General Report, two of which were by the respondents. The Assistant Treasurer of the Committee, Ms. Devera Levin, responded to the Commission on March 26, 1979 with explanations. She stated that the Committee returned the \$700 contribution to the IUOE and she enclosed a copy of the refund check dated March 26, 1979, and a letter to the union with the same date explaining that she had been informed that the contribution did not come from a separate segregated fund.

Ms. Levin also stated to us that the \$1,000 contribution listed as being from the Port Council was actually given through the COPE Contributions Fund and that this information was erroneously omitted from the report. On May 25, RAD received copies of the \$1,000 and \$500 contribution checks. The account name on the checks showed the name of the union plus the words "COPE Contributions Fund."

Ms. Linda Whitherspon, the bookkeeper for the Port Council, stated that the account which transferred the funds was an account maintained separately from the union treasury containing union dues. She stated, however, that the funds in this account consisted of the proceeds of tickets sold for an annual dinner dance and that unions and corporations bought these tickets and bought advertisements in the dance program book. She also stated that the purchases were made with union and corporate, not PAC, checks.

In response to instructions from RAD, the Port Council Secretary-Treasurer, Jack Bluitt, wrote a letter to the Committee on July 23, 1979 stating that the Port Council had "learned" from the Commission that the \$1,500 "was drawn from Union Funds" and asking for a refund from the Committee. On August 14, 1979, the Committee made the refund on a check made out to the Port Council, not to the Port Council COPE Contributions Fund.

2 U.S.C. § 441b(a) prohibits receipt by a political committee of contributions from a labor organization. Accordingly, there is reason to believe that the Committee violated § 441b(a) by accepting a \$700 contribution from the IUOE.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(b). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contributions Fund.

The face of the Port Council's contribution checks showed the printed words "COPS Contributions Fund" as well as the name of the union, and the Committee, therefore, might have assumed that the check came from a separate segregated fund established under the provisions of § 441b(b). However, 11 C.F.R. § 103.3(b)(1), formerly § 103.3(b)(2), provides that, if a contribution appears to be illegal, the "treasurer shall make his or her best efforts to determine the legality of the contribution," and, at this point, the Commission does not know what effort, if any, was made by the Treasurer toward this end. Accordingly, there is reason to believe that the Committee violated 2 U.S.C. § 441b(a) in connection with its receipt of the Port Council's contributions.

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the Levin for Senate Committee violated 2 U.S.C. § 441b(a).

00040204815



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Ross
International Union of
Operating Engineers
Local 547
13020 Puritan
Detroit, Michigan 48227

Re: MUR 1236

Dear Mr. Ross:

On July 29, 1980, the Commission found reason to believe that the International Union of Operating Engineers, Local 547 violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") by making a \$700 contribution to the Levin for Senate Committee during the 1978 general election. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that a contribution by a labor organization in connection with an election for federal office is nevertheless a violation of § 441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 202/523-4060.

Sincerely,


JOHN WARREN MCGARRY
Vice-Chairman

Enclosure

Notification of Reason to Believe Finding

00040304016

NOTIFICATION OF REASON TO BELIEVE FINDER

DATE July 31, 1980

MUR NO. 1216
STAFF MEMBER(S) & TEL. NO.

RESPONDENT International Union of Operating
Engineers, Local 547

Levin
202/523-4060

SOURCE OF MUR: **INTERNALLY GENERATED**

BACKGROUND

On March 24, 1980, this matter was referred to the Office of General Counsel by the Reports Analysis Division because of a disclosure by the Levin for Senate Committee ("the Committee") of a \$700 contribution from the International Union of Operating Engineers, Local 547 ("IUOE").

FACTUAL BASIS AND LEGAL ANALYSIS

A review of the Committee's 1978 10 Day Pre-General Reports disclosed that it received a \$700 contribution from the International Union of Operating Engineers, Local 547 on October 20, 1978. The IUOE is a labor organization under 2 U.S.C. § 441b(b)(1).

On March 12, 1979, the Commission wrote the Committee a surface violation letter asking it to return the contribution if it came from a labor organization and not a separate segregated fund of a labor organization.

On March 26, 1979, the Committee's Assistant Treasurer, Ms. Devera Levin, responded to the letter by stating that it returned the contribution. She also enclosed a copy of the refund check and a copy of a letter to the union explaining that she had been informed that the contribution did not come from a separate segregated fund.

2 U.S.C. § 441b(a) prohibits acceptance by a political committee of contributions from a labor organization.

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the International Union of Operating Engineers, Local 547 violated 2 U.S.C. § 441b(a).

80040304817

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Levin for Senate Committee
International Union of Operating
Engineers, Local 547
Detroit and Southeastern
Michigan Maritime Trades
Department Port Council,
AFL-CIO

MIR 1216

CERTIFICATION

I, Marjorie W. Emons, recording secretary for the Federal Election Commission's executive session on July 29, 1980, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MIR 1216:

1. Find reason to believe that the International Union of Operating Engineers, Local 547 violated 2 U.S.C. §441b(a).
2. Find reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO violated 2 U.S.C. §441b(a).
3. Find reason to believe that the Levin for Senate Committee violated 2 U.S.C. §441b(a).
4. Take no further action.
5. Close the file.

Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan voted affirmatively for the decision; Commissioner Friedersdorf dissented.

Attest:

7/30/80
Date

Marjorie W. Emons
Marjorie W. Emons
Secretary to the Commission

00040204818

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: JULY 25, 1980
SUBJECT: ADDITIONAL OBJECTION TO MUR 1216

Your office was notified on July 24, 1980 of an objection by Commissioner Aikens to the above-named MUR.

An additional objection was received from Commissioner Friedersdorf at 3:30, July 24, 1980.

80040304819

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 25, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Errata - First General Counsel's Report
for MUR 1216

Attached for the Commission's review is the revised page three of the First General Counsel's Report for MUR 1216, transmitted to the Commission on July 22, 1980. At the bottom of the revised page, Recommendation #3 is changed to: "Find reason to believe that the Levin for Senate Committee violated 2 U.S.C. §441b(a)." This was the originally intended recommendation as evidenced by an RTB Notification to the Committee. Please replace the already circulating page three with the revised page three.

Attachment

Revised page three of the First General Counsel's Report

00040201820

2 U.S.C. § 441b(a) contributions from labor organizations in connection with elections for federal office. Therefore, the General Counsel recommends that the Commission find reason to believe that the IUOE violated § 441b(a) in making the \$700 contribution and that the Committee violated § 441b(a) by accepting the contribution.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(b). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contributions Fund (and, therefore, may have been deposited into the dues fund). Therefore, the General Counsel recommends that the Commission find reason to believe that the Port Council violated 2 U.S.C. § 441b(a).

The face of the Port Council's contribution checks showed the printed words "COPE Contributions Fund" as well as the name of the union and the Committee, therefore, might have assumed that the check came from a separate segregated fund established under the provisions of § 441b(b). However, 11 C.F.R. § 103.3(b)(1), formerly § 103.3(b)(2) provides that, if a contribution appears to be illegal, the "treasurer shall make his or her best efforts to determine the legality of the contribution," and, at this point, the Commission does not know what effort, if any, was made by the Treasurer toward this end. Therefore, the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441b(a) in connection with its receipt of the Port Council's contributions.

However, in light of the small amount of the contribution totals involved and in light of the fact that the IUOE's contribution was returned shortly after the Committee was informed of the possible illegality and the Port Council's contributions were returned shortly after it appeared to the respondents that such contributions were illegal, the General Counsel recommends that the Commission take no further action in this matter and close the file.

RECOMMENDATIONS

1. Find reason to believe that the International Union of Operating Engineers, Local 547 violated 2 U.S.C. § 441b(a).
2. Find reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO violated 2 U.S.C. § 441b(a).
3. Find reason to believe that the Levin for Senate Committee violated 2 U.S.C. § 441b(a).

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EDWARDS/MARGARET CHANEY

DATE: JULY 24, 1980

SUBJECT: OBJECTION - MUR 1216 - First General Counsel's
Report Dated 7-22-80; Received in GCS
7-22-80, 11:35

The above-named document was circulated on a 48
hour vote basis at 4:00, July 22, 1980.

Commissioner Atkins submitted an objection at 4:10,
July 23, 1980.

This matter will be placed on the Executive Session
Agenda for Tuesday, July 29, 1980.

In addition, Commissioner Reiche submitted comments
regard MUR 1216. A copy of his vote sheet is attached.



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: TUESDAY, 7-22-80
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE,

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, JULY 24, 1980
4:00

KUR No. 1216 - First General Counsel's Report dated 7-22-80

- ☒ I approve the recommendation
☐ I object to the recommendation

COMMENTS: subject to correction of typographical
error on p. 3, recommendation 3, i.e. finding
reason to believe that the Levinson Senate
Committee violated 2 USC 441(b)(a).

Date: 7/23/80 Signature: Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



WASHINGTON, D.C. 20540
FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL:
BY OGC TO THE COMMISSION

JUL 22 1980

RECEIVED
OFFICE OF
STAFF MEMBER(S)
J. Levin

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME:

Levin for Senate Committee
International Union of Operating Engineers,
Local 547, Detroit and Southeastern Michigan
Maritime Trades Department Port Council, AFL-CIO

RELEVANT STATUTE:

2 U.S.C. § 441b(a)
2 U.S.C. § 441b(b)
11 C.F.R. § 103.3(b)(1), formerly § 103.3(b)(2)

INTERNAL REPORTS CHECKED:

Public Records

FEDERAL AGENCIES CHECKED:

None

SUMMARY OF ALLEGATIONS

On March 24, 1980, the Levin for Senate Committee ("the Committee") was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) for receipt of contributions from labor organizations in violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

A review of the Committee's 1978 10 Day Pre-General and 30 Day Post-General Reports disclosed that it received a \$700 contribution from the International Union of Operating Engineers, Local 547 ("IUOE") on October 20, 1978, a \$1,000 contribution from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO ("the Port Council") on October 15, 1978, and a \$500 from the Port Council AFL-CIO COPE Contributions Fund on October 28, 1978. ^{1/} The IUOE and the Port Council are labor organizations under 2 U.S.C. § 441b(b)(1).

^{1/} For all of the contributions, the Committee had typed in "PAC" in the space designated for "occupation."

On March 12, 1979, the Commission sent surface mail letters to the Levin for Senate Committee concerning the listing of four possible union contributions on the 10 day Pre-General Report, two of which were by the respondents. The Assistant Treasurer of the Committee, Ms. Devera Lewis, responded to the Commission on March 26, 1979, with explanations. She stated that the Committee returned the \$700 contribution to the IUOE and she enclosed a copy of the refund check dated March 26, 1979, and a letter to the union with the same date explaining that the Committee could not accept the contribution because it appeared not to have come from a separate segregated fund. Ms. Levin also stated to us that the \$1,000 contribution listed as being from the Port Council was actually given through the COPE Contributions Fund and that this information was erroneously omitted from the report. On May 25, RAD received copies of the \$1,000 and \$500 contribution checks. The account name on the checks showed the name of the union plus the words "COPE Contributions Fund."

The COPE Contributions Fund was not a registered committee and the Port Council had no separate segregated fund registered with the Commission. On July 20, 1979, the Commission sent a letter to the Treasurer of the Port Council informing him that, if he agreed that the organization making the contributions was a political committee, he should submit a Statement of Organization, and that, if he did not wish his organization to be registered as a political committee, he should request refunds.

In response to this letter, Ms. Linda Whitherspon, the bookkeeper for the Port Council, stated that the account which transferred the funds was an account maintained separately from the union treasury containing union dues. She stated, however, that the funds in this account consisted of the proceeds of tickets sold for an annual dinner dance and that unions and corporations bought these tickets and bought advertisements in the dance program book. She also stated that the purchases were made with union and corporate, not PAC, checks.

In response to instructions from RAD, the Port Council Secretary-Treasurer, Jack Bluitt, wrote a letter to the Committee on July 23, 1979 stating that the Port Council had "learned" from the Commission that the \$1,500 "was drawn from Union Funds" and asked for a refund from the Committee. On August 14, 1979, the Committee made the refund on a check made out to the Port Council, not to the Port Council COPE Contributions Fund.

2 U.S.C. § 441b(a) prohibits contributions from labor organizations in connection with elections for federal offices. Therefore, the General Counsel recommends that the Commission find reason to believe that the IUOE violated § 441b(a) in making the \$700 contribution and that the Committee violated § 441b(a) by accepting the contribution.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(b). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contributions Fund (and, therefore, may have been deposited into the dues fund). Therefore, the General Counsel recommends that the Commission find reason to believe that the Port Council violated 2 U.S.C. § 441b(a).

The face of the Port Council's contribution checks showed the printed words "COPE Contributions Fund" as well as the name of the union and the Committee, therefore, might have assumed that the check came from a separate segregated fund established under the provisions of § 441b(b). However, 11 C.F.R. § 103.3(b) (1), formerly § 103.3(b)(2) provides that, if a contribution appears to be illegal, the "treasurer shall make his or her best efforts to determine the legality of the contribution," and, at this point, the Commission does not know what effort, if any, was made by the Treasurer toward this end. Therefore, the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441b(a) in connection with its receipt of the Port Council's contributions.

However, in light of the small amount of the contribution totals involved and in light of the fact that the IUOE's contribution was returned shortly after the Committee was informed of the possible illegality and the Port Council's contributions were returned shortly after it appeared to the respondents that such contributions were illegal, the General Counsel recommends that the Commission take no further action in this matter and close the file.

RECOMMENDATIONS

1. Find reason to believe that the International Union of Operating Engineers, Local 547 violated 2 U.S.C. § 441b(a).
2. Find reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO violated 2 U.S.C. § 441b(a).
3. Find no reason to believe that the Levin for Senate Committee violated 2 U.S.C. § 441b(a).

4. Take no further action.

5. Close the file.

Attachments

1. Referral from RAD
2. Letter and RTB Notification to the Levin for Senate Committee
3. Letter and RTB Notification to the International Union of Operating Engineers, Local 547
4. Letter and RTB Notification to the Detroit and South-eastern Michigan Maritime Trades Department Port Council, AFL-CIO

80040204828

ATTACHMENT #1

80040204029

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE MARCH 21, 1980

ANALYST Tracy Keefer AK

TO: OGC

TEAM CHIEF Peter Kell Jr. AK

THROUGH: STAFF DIRECTOR AK

COMPLIANCE REVIEW Bowen/Sims

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AK

CANDIDATE/COMMITTEE: Levin For Senate Committee

TREASURER: John E. S. Scott

ADDRESS: 3327 Dirksen Building
Washington, D.C. 20510

AFFILIATE(S):
N/A

ALLEGATION(S):
The committee has accepted
prohibited contributions totaling
\$2200

CITE: 2 U.S.C. 441 b (a)

ATTACHMENT(S)

#2, #6

DATE INITIATED: 3/12/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review-

☐ Other:

☐ Special Project:

ATTACHMENT

#1

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 9/30/78 **TO** 10/23/78

TOTAL RECEIPTS \$ 271180.49 **TOTAL EXPENDITURES** \$ 188271.94

CASH ON HAND \$ 81618.43 **DEBTS** \$ 27389.90

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

— SV sent 3/12/79 for 10 Day Pre-General Report

#2

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon to Lester Scall 5/18/79

#4

Telecon to bookkeeper from Detroit & Southeastern Mich. Maritime
Trades Department Port Council, AFL-CIO (DSMNTDPC) 7/20/79

#7

REASON(S) FOR REFERRAL:

ATTACHMENT

Response rec'd 3/28/79 on 10 Day Pre-General - Adequate Response

#3

Response rec'd 5/25/79 disclosing copies of checks rec'd from DSMNTDPC

#5

Response rec'd 7/23/79 from DSMNTDPC requesting refund from Levin Cmte

#8

Response rec'd 8/22/79 copy of check to refund union contribution

#9

**This matter is being referred because it meets division thresholds

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

Not pertinent to the allegations

OTHER RELEVANT INFORMATION:

ATTACHMENT

SV sent to DSMNTDPC for failure to register 7/18/79

#6

\$1500 refunded to DSMNTDPC

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

N/A

C00088484 LEVIN FOR SENATE

3	N	78/04/12	01	77/12/07-78/03/31	P	00032624	00014629	19	78020013002
3	A	78/05/15	01	78/03/01-78/03/31	P			3	78020013111
3	N	78/07/10	02	78/04/01-78/06/30	P	00124099	00116042	90	78020003107
3	N	78/07/25	02	78/04/01-78/06/30	P			3	780200074021
3	N	78/07/27	10P	78/07/01-78/07/24	P	00053741	00058922	49	78020100197
3	A	78/08/10	10P	78/07/01-78/07/24	P			4	78020101984
3	A	78/08/22	01	78/01/01-78/03/31	P			2	78020102698
3	N	78/09/07	30P	78/07/25-78/08/29	P	00067529	00093749	48	78020113041
3	N	78/10/10	03	78/08/28-78/09/30	P	00123444	00174354	102	78020130408
3	N	78/10/27	108	78/08/30-78/10/23	P	00271180	00180271	124	78020152348
3	A	78/12/04	10P	78/07/01-78/07/24	P	00032741	00088932	7	78020173130
3	A	78/12/07	308	78/10/24-78/11/27	P	00253693	00282748	11	78020180478
3	A	78/12/22	03	78/08/28-78/09/30	P			3	78020190424
3	A	79/01/15	03	78/08/28-78/09/30	P			3	79020010716
3	A	79/01/30	03	78/08/28-78/09/30	P			3	79020013748
3	N	79/01/30	VE	78/11/28-78/12/31	P	00012129	00043010	17	79020013374
3	A	78/12/04	02	78/04/01-78/06/30	P			7	78020172137
3	A	79/03/28	108	78/09/30-78/10/23	P			7	78020002519
3	A	79/05/18	03	78/08/28-78/09/30	P			3	79020031928
3	A	79/05/24	108	78/10/31-78/10/23	P			3	79020034251
3	A	79/07/05	308	78/10/24-78/11/27	P			3	79020040328
3	A	79/08/22	108	78/10/01-78/10/23	P			3	79020051333

ALL REPORTS REVIEWED



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20543

March 12, 1979

John E.S. Scott, Treasurer
Levin for Senate Committee
2155 W. Big Beaver Road
Troy, MI 48064

Dear Mr. Scott:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from unions. Union contributions are prohibited by the Act, unless the contributions are made by separate segregated funds established by the unions. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns of the contributions should be reported immediately by letter and should be reflected as contribution refunds on your next report of receipts and expenditures. If the identification of the sources of these contributions are incomplete or incorrect on the original report, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on these matters. If you have any questions concerning these matters, please do not hesitate to contact Bill Coppel (800) 424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
Form 278
Rev. 3-6-78

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and 18a
of FEC FORM 3

Name of Candidate or Committee in Full		Principal Place of Business	Date received (m, y, year)	Amount of each Receipt this Period
LEVEN FOR SENATE COMMITTEE				
Full Name, Mailing Address and ZIP Code Engineers Political Education Committee 1125 Seventeenth St. N.W. Washington, D.C. 20036		Principal Place of Business 1125 Seventeenth St. Washington, D.C. 20036	10-16-78	\$1,500.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 1,500.00				
Full Name, Mailing Address and ZIP Code Democratic Club of Taylor Comm 23400 Wick Taylor, MI 48010		Principal Place of Business 23400 Wick Taylor, MI 48010	10-13-78	\$500.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 500.00				
Full Name, Mailing Address and ZIP Code Detroit & Southeastern Mich Maritime Trades Depart. Port Council, AFL-CIO Algonac, MI 48001		Principal Place of Business 520 St. Clair River Dr. Algonac, MI 48001	10-15-78	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 1,000.00				
Full Name, Mailing Address and ZIP Code Detroit Fire Fighters' Asscc. Edison Plaza Suite 2134 Detroit, Michigan 48226		Principal Place of Business Edison Plaza- Ste 2134 Detroit, Michigan	10-12-78	\$300.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 300.00				
Full Name, Mailing Address and ZIP Code Detroit Edison Political Action Committee - Federal Detroit Edison Co. 2000 Second Avenue-Detroit, MI		Principal Place of Business 2000 Second Avenue Detroit, MI	10-4-78	\$100.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 100.00				
Full Name, Mailing Address and ZIP Code Chrysler Non-Partisan Political Support Committee P.O. Box 1919 Detroit 48231		Principal Place of Business P. O. Box 1919 Detroit, MI 48231	10-14-78	\$2,500.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 2,500.00				
Full Name, Mailing Address and ZIP Code CMAA-Local 4108 1730 N. Michigan Saginaw, MI		Principal Place of Business 1730 N. Michigan Saginaw, MI 48602	10-13-78	\$50.00
Receipt for: <input checked="" type="checkbox"/> Sample <input type="checkbox"/> Direct <input type="checkbox"/> Other		Contribution PAC		
Aggregate Year-to-Date \$ 50.00				
SUBTOTAL of receipts this page (see line 18a)				\$5950.00
TOTAL of receipts (last page this form plus other sheets)				\$71148.76

000401204834

SCHEDULE A
 REVISED
 January, 1978
 Federal Election Commission
 1100 ...
 Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 12c
 of FEC FORM 3

(See Instructions for
 Filing Schedule A)

Name of Candidate or Committee in Full			
LEVIN FOR SENATE COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Oakland Democratic Campaign Comm. 1283 North Woodward Bloomfield Hills, MI 48013	1383 North Woodward Bloomfield Hills, MI 48013		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-4-78	\$500.00
		10-20-78	\$340.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Detroitbank Corporation Comm. for Responsible Political Act. Fort at Washington Detroit, MI 48226	Fort at Washington Detroit, MI 48226		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-20-78	\$50.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
International Union of Operating Engineers Local 347 13020 Puritan Detroit, Michigan	13020 Puritan Detroit, MI		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-20-78	\$700.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Amalgamated Meat Cutters & Butcher Workmen of North Am. 2800 N. Sheridan Rd. Chicago, Ill 60657	2800 N. Sheridan Road Chicago, Ill 60657		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-20-78	\$1,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Air Line Pilots Assoc. Political Action Comm. 1625 Massachusetts Ave. NW Washington, D.C. 20036	1625 Massachusetts Ave. NW Washington, D.C.		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-20-78	\$,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Maintenance of May Political League 12050 Woodward Ave. Detroit, MI 48203	12050 Woodward Ave. Detroit, MI 48203		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-19-78	\$2,000.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received	Amount of each Receipt
Laborers' Political League 905 16th Street N.W. Washington, D.C. 20006	905 16th Street N.W. Washington, D.C. 20006		
Receipt for:	Occupation		
<input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other	PAC	10-23-79	\$1,000.00
SUBTOTAL of receipts on this page (other than)			\$ 10,590.00
TOTAL this period (last page this form number only)			\$ 71148.76

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

Dear Mr. Coppel:

This letter is in response to the attached letter, received by us, from Mr. Potter.

Four items were involved. They have been resolved as follows:

International Union of Operating Engineers
Local 547, 13020 Puritan, Detroit, Michigan.
\$700. I returned contribution. Copy of letter attached, and copy of check.

CWA-Local 4108; 1730 N. Michigan; Saginaw, MI
\$50.00. They have assured me that the money was indeed given through the properly set-up political account and promised to send a letter to me to verify it.

Millwrights, Conveyor & Machinery Erectors
Local 1102; 23401 Mound Rd., Warren, Michigan
\$500.00. This is o.k. See attached letter.

Detroit & SE Michigan Maritime Trades Dept. Port
Council, AFL-CIO; 520 St. Clair River Drive
520 St. Clair River Drive; Algonac, MI 48001
\$1000. This contribution is also o.k. It was given through COPE Contributions Fund. When it was typed up for the FEC Report, apparently the typist left out the information about COPE, but it is on my record card.

I hope this information satisfies your requirements. Please let me know if you need any further information.

Sincerely,
Devera Levin
Devera Levin
Assistant Treasurer
Levin for Senate Committee

87090042000024285162

March 26, 1979

Mr. Robert Ross
International Union of Oper. Engineers
Local 547
13020 Puritan
Detroit, Michigan 48227

Dear Mr. Ross:

Enclosed is check in the sum of \$700.00
which is sent to you as a refund of your
contribution to the Levin For Senate campaign
which you gave us on October 20, 1978.

We are refunding these funds due to the fact
that we are not permitted, under the rules of
the Federal Election Commission, to accept
funds from unions unless such funds come from
a separate segregated account established by
the union.

I have been advised by John Brown that this
particular contribution did not come from a
separate segregated account, and so we are
herewith returning the contribution.

Sincerely,

Devera Levin

Devera Levin
Assistant Treasurer
Levin for Senate Committee

dl
cc: John Brown

8990200274

LEVIN FOR SENATE COMMITTEE

2155 W. BIG BEAVER ROAD

TROY, MICH. 48064

2554

PAY
TO THE
ORDER OF

International Union of Operating Engineers, Local 5178 700.00

Seven Hundred and 00/100

DOLLARS



DRUMMER BUILDING OFFICE
THE DETROIT BANK-TROY
TROY, MICHIGAN 48064

Steven Levin

⑆072412998⑆ 2411-00187-4⑆

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Bill Coppel to Lester Scall

DATE: 5/18/79

NAME OF COMMITTEE OR CANDIDATE: Concerning the Levin for Senate Committee - possible union contributions.

TELEPHONE:

60040039
I called Lester for advice on a question concerning a SV and referral. The Levin Committee had received a contribution from what appeared on the report to be a union. I sent a SV and the response indicated that the contribution was in fact from AFL CIO COPE. The cmte claimed that due to a typo, COPE was left off. I checked to see how much AFL CIO had thus far contributed to Levin and found that there were two transfers of \$5000. Since this was the limit I checked to see what or how these two committees were related. I checked the reports of both Levin and AFL CIO to verify the transfers. They checked out. I then checked to see if AFL CIO had transferred \$1000 to Detroit & Southeastern Michigan Maritime Trades Dept Port Council, AFL-CIO (DSNNTDPC). The report showed no such transfer. Lester agreed that I had essentially done all I could with in house material. I then asked whether it was all right to confront Levin with this information. He felt that I should determine the relationship of AFL-CIO, COPE, and DSNNTDPC. He said I should tell Levin what I know and what I have checked and see if they could come with the answer. Lester commented that I had a better avenue to ask these questions since when it gets to OGC certain restraints come into play. I explained that rather than refer it to him and then have his hands tied, I wanted to ask the questions first.

United States Department of Justice

MAY 25 1979

MEMORANDUM DELIVERED

Dear Bill:

Enclosed is the information you requested.

Let me know if you need any further backup.

Deane

S 2489

L MI DEM C957

79 MAY 24 PM 12:23

FEDERAL ELECTION COMMISSION

PAY TO THE ORDER OF

CARL LEVIN FOR SENATE
Five Hundred Dollars

DOLLARS

THE ALGONAC SAVINGS BANK
ALGONAC, MICH.

Jack Blum
Mrs. Stewart

⑆0724-0545⑆ 35-012-344P

DETROIT & SOUTHEASTERN MICHIGAN MARITIME
TRADES DEPARTMENT PORT COUNCIL, AFL-CIO

COPE CONTRIBUTIONS FUND

580 ST. CLAIR RIVER DRIVE
ALGONAC, MICH. 48001

October 3, 1978 1011

PAY TO THE ORDER OF

The Carl Levin for Senate Committee

\$ 1000.00

One Thousand Dollars

XX
XX

DOLLARS

THE ALGONAC SAVINGS BANK
ALGONAC, MICH.

Mrs. Stewart
Jack Blum

⑆0724-0545⑆ 35-012-344P





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 18, 1979

Treasurer
Detroit & Southeastern Michigan
Maritime Trades Department
Port Council, AFL-CIO
520 St. Clair River Drive
Algonac, Michigan 48001

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Levin for Senate indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8/09/04 30 17:30 34 08 74 225

Please notify the [illegible] of any change in
date on this letter. If you have any
questions, please contact the [illegible]
at (800) 424-2500. The [illegible]

Charles R. Porter

Charles R. Porter
Staff Director

Enclosure
Certified Mail
Return Receipt Requested

6 2 7 0 4 3 1 3 4 0 4 2 6

ITEMIZED RECEIPTS

Contributions, Transfers, Contributions to Fund,
Other Income, Loans, Refunds

Supplementing Lines 14a, 15a, 15b, 16a, 17a, and/or 18a
of FEC FORM 3

Name of Candidate or Committee in Full

LEVIN FOR SENATE COMMITTEE

Full Name, Mailing Address and ZIP Code

Engineers Political Education
Committee
1125 Seventeenth St. N.W.
Washington, D.C. 20036

Principal Place of Business

1125 Seventeenth St.
Washington, D.C. 20036

Date received,
day, month, year

10-16-78

Amount of each item
this Period

\$1,500.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 1,500.00

Full Name, Mailing Address and ZIP Code

Democratic Club of Taylor Comm
23400 Wick
Taylor, MI 48010

Principal Place of Business

23400 Wick
Taylor, MI 48010

Date received,
day, month, year

10-13-78

Amount of each item
this Period

\$500.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 2,000.00

Full Name, Mailing Address and ZIP Code

Detroit & Southeastern Mich
Maritime Trade Depart.
Port Council, AFL-CIO
Algonac, MI 48001

Principal Place of Business

520 St. Clair River Dr.
Algonac, MI 48001

Date received,
day, month, year

10-15-78

Amount of each item
this Period

\$1,000.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 3,500.00

Full Name, Mailing Address and ZIP Code

Detroit Fire Fighters' Asscc.
Edison Plaza
Suite 2134
Detroit, Michigan 48226

Principal Place of Business

Edison Plaza- Ste 2134
Detroit, Michigan

Date received,
day, month, year

10-12-78

Amount of each item
this Period

\$300.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 4,000.00

Full Name, Mailing Address and ZIP Code

Detroit Edison Political Action
Committee - Federal
Detroit Edison Co.
2000 Second Avenue-Detroit, MI

Principal Place of Business

2000 Second Avenue
Detroit, MI

Date received,
day, month, year

10-4-78

Amount of each item
this Period

\$100.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 5,500.00

Full Name, Mailing Address and ZIP Code

Chrysler Non-Partisan Political
Support Committee
P.O. Box 1919
Detroit 48231

Principal Place of Business

P. O. Box 1919
Detroit, MI 48231

Date received,
day, month, year

10-14-78

Amount of each item
this Period

\$2,500.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 7,500.00

Full Name, Mailing Address and ZIP Code

CRA-Local 4108
1730 N. Michigan
Saginaw, MI

Principal Place of Business

1730 N. Michigan
Saginaw, MI 48602

Date received,
day, month, year

10-13-78

Amount of each item
this Period

\$50.00

Received for:

☒ Primary

☒ General

☐ Other

☒ Check ☐ Cash ☐ Money Order ☐ Other

Aggregate Year-To-Date \$ 7,550.00

SUB-TOTAL of items on this page (see line 1)

\$7,550.00

TOTAL for all items on this page (see line 1)

\$7,114.76

OPTIONAL &
REVISED
January, 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20005

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions to Fund,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Use this form to report receipts for
the campaign of a candidate for
federal office, or for the campaign
of a political party, committee, or
other authorized group.

Name of Candidate or Committee in Full			
LEVIN FOR SENATE COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Safe Energy Political Committee 311 10th St., NE Washington, DC 20002	311 10th St., NE Washington, DC 20002	11-4-78	\$1,000.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 1,000.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Mich. Credit Union Legislative Action Fund 5286 Timberland East Lansing, MI 48823	5286 Timberland East Lansing, MI 48823	11-17-78	\$125.00
Occupation POLITICAL ACTION COMMITTEE		10-24-78	50.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		10-25-78	25.00
<input type="checkbox"/> Check if Contributor is self-employed		Aggregate Year-To-Date . . . \$ 500.00	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Sheet Metal Workers' International Assoc. Political Action League 1750 New York Ave., NW Washington, DC 20006	1750 New York Ave., NW Washington, DC 20006	11-7-78	\$400.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 400.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
St. Clair Shores Democratic Voters League 21230 Twelve Mile Rd. St. Clair Shores, MI 48081	21230 Twelve Mile Rd. St. Clair Shores, MI 48081	10-28-78	\$50.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 50.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Detroit & Southeastern Mich. Maritime Trades Dept. Port Council AFL-CIO COPE Contributions Fund	520 St. Clair River Drive Algonac, MI 48001	10-28-78	\$500.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 1,500.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
United Paper Workers International Union Political Education Program Voluntary Fund Flushing, New York 11365	163-03 Horace Harding Expressway Flushing, New York 11365	11-3-78	\$1,000.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 1,500.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Kalamazoo Democrats '78 202 North Kalamazoo Mall Kalamazoo, MI 49007	202 North Kalamazoo Mall Kalamazoo, MI 49007	10-24-78	\$500.00
Occupation POLITICAL ACTION COMMITTEE			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 500.00			
SUBTOTAL of receipts this page (optional)			\$ 3650.00
TOTAL this period (last page this line number only)			\$ 6,011.50

7 7 0 2 0 1 0 7 2 6

10040204045

COMMITTEE: DETROIT & SOUTHEASTERN MICHIGAN MARITIME TRADES DEPARTMENT
PORT COUNCIL, AFL-CIO

COMMITTEE CONTACT: LINDA WHITHERSPON, BOOKKEEPER

ANALYST: BEVERLY BROWN

DATE/TIME: 7/20/79 11:00

RE: SURFACE VIOLATION 79-48 - TRANSFER IN EXCESS OF \$1000 TO LEVIN FOR SENATE
FROM ABOVE UNREGISTERED COMMITTEE. CONVERSATION REVEALING THAT CORPORATE
AND LABOR FUNDS WERE TRANSFERRED TO LEVIN IN 1978.

Today

Background: In their 10 Day Pre-General reports of receipts and expenditures, the Levin for Senate Committee discloses total receipts of \$1,500 from the Detroit & Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO. In response to Commission inquiry the Levin for Senate Committee stated that the funds were actually given through AFL-CIO COPE PCC, however, erroneously reported as having come from Detroit & Southeastern Michigan... A review of AFL-CIO COPE PCC's reports disclosed a single transfer of \$5000 to the Levin for Senate Committee. No transfer was made in the amounts of \$500 and \$1000.

On 7/18/79 a Surface Violation Notice was sent to the Detroit & Southeastern Michigan Maritime Trades Department. This notice served to advise the committee that they were in violation of 2 U.S.C. 433 & 434 for failure to register and submit timely reports.

TODAY: Ms. Linda Whitherspon called this day in response to the Commissions Surface Violation notice to Detroit and Southeastern Maritime trades Department Port Council, AFL-CIO. During the course of conversation the following was revealed:

Once a year the Council has a dinner dance. Tickets are sold to Unions and Corporations throughout the Detroit Area. In addition, unions and corporations may expend funds for program book ads. These programs are distributed to all persons attending the dance. Funds raised through the sale of tickets and ads are placed in a separate account. Since these funds were held separate from the Councils union treasury (containing union dues), the Council was under the impression that such funds are permissible.

After Ms. Whitherspon revealed that funds are transmitted on corporate and union checks --- not PAC checks, I informed her that the council could not permissibly forward these funds to federal candidates or political action committees which support candidates for federal office. I asked Ms. Whitherspon to review Sections 114, 110, 100 of the Commission's Regulations as well as 2 U.S.C. 433, 434, 441a & 441b. (Analyst's should be aware of Advisory opinions 1976-65 and 1978-46).

CC. Beth Pollard: Analyst reviewing Levin For Senate committee

ARND STEWART
President
1001 W. Warren
Detroit 48226
Telephone: 554-0820

ARND STEWART
President

Secretary-Treasurer
Telephone: 794-4775

July 23, 1979

Senator Carl Levin
United States Senate
Washington, D.C. 20510

Dear Senator Levin:

Please be advised that we have just learned from the
Federal Election Commission that we inadvertently contributed
to your campaign \$1,300.00 that was drawn from Union Funds.

We regret to advise we must request these funds to be re-
turned. Under the Federal Election Campaign Act, we are prohibited
to use these funds for Federal Campaign.

Very truly yours,

Jack Bluitt
Jack Bluitt
Secretary-Treasurer

CC: Orlando B. Potter
Staff Director
Federal Election Commission

Re: 25V1/79-48

Certified Mail
Return Receipt Requested 138485

JB/law

AFFILIATES

Brotherhood of Painters, Decorators and Painters of America, District Council #22
Brotherhood of Painters, Decorators and Paperhangers of America, Local #675
Greater Detroit Building Trades Council
Hotel, Restaurant Employees' & Bartenders' Local No. 34
Industrial Union of Marine and Shipbuilding Workers of America, Local #46
Intend Boatmen's Union - SIU
International Association of Bridge and Structural Iron Workers, Local #25
International Association of Bridge and Structural Iron Workers, Local #426
(Reinforced Iron Workers)
International Association of Bridge and Structural Iron Workers, Local #426
International Association of Bridge and Structural Iron Workers, Local #575
(Riggers)
International Association of Fire Fighters, Local #344
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths,
Forgers and Helpers, Local #166
International Brotherhood of Electrical Workers, Local #88
International Brotherhood of Firemen and Oilers, Local #32
International Union of Operating Engineers, Local #23

International Union of Operating Engineers, Local #324
International Union of Operating Engineers, Local #547
Laborers' International Union of North America, Local 334
Metropolitan District Council No. 23
Marine Engineers Beneficial Association, A.M.O. District No. 2
Retail Clerk's International Association, Local #878
Seafarers' International Union of North America, Great Lakes District
Seafarers' International Union of North America, A.G.L.I.W.D.
Service Employees International Union, Local #79
Sheet Metal Workers, Local #58
United Brotherhood of Carpenters & Joiners of America, District Council
United Brotherhood of Carpenters & Joiners of America, Local #19
United Brotherhood of Carpenters & Joiners of America, Local #26
United Brotherhood of Carpenters & Joiners of America, Local #95
United Brotherhood of Carpenters & Joiners of America, Local #337
United Brotherhood of Carpenters & Joiners of America, Local #582
United Brotherhood of Carpenters & Joiners of America, Local #1067
United Brotherhood of Carpenters & Joiners of America, Local #1102

8709004301330341874180

Mr. Jack Bluit
Secretary-Treasurer
Detroit and Southeastern Michigan
Maritime Trades Port Council, AFL-CIO
Maritime Trades Department
520 St. Clair Drive
P.O. Box 452
Algonac, Michigan 48001

Dear Jack:

Thanks for your letter of July 23. I understand the problem and am happy to return to you a check for the amount indicated.

I also want to take this opportunity to express again my appreciation for your support during the campaign. The form may have been wrong -- but I know that the motive was pure.

Sincerely,

Carl Levin

CL/np

cc: Federal Election Commission

52489

MI:CMC 957

1989 AUG 23 AM 11:03

HAND DELIVERED ☐

SENATOR CARL LEVIN OFFICE ACCOUNT

TRULS 401

U. S. SENATE

WASHINGTON, D.C. 20510

August 14

1979

PAID TO THE ORDER OF

Detroit & S.E. Mich. Maritime Trades Port Council, AFL-CIO

\$1,500.00

FIFTEEN HUNDRED AND 00/100

Dollars

THE RIGGS NATIONAL BANK

OF WASHINGTON, D.C.

WATERGATE OFFICE

2600 VIRGINIA AVENUE, N.W.

Refund-Campaign-Contribution

Devero Poin

⑆00000184⑆ ⑆05⑆000030⑆ 17⑆08⑆17278⑆

709042

6

ATTACHMENT #2

80040004051

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20510

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John E. S. Scott, Treasurer
Levin for Senate Committee
3327 Dirksen Senate Office Bldg.
Washington, D.C. 20510

Re: MUR 1216

Dear Mr. Scott:

On , 1980, the Commission found reason to believe that the Levin for Senate Committee violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") by receiving a \$700 contribution from the International Union of Operating Engineers, Local 547 and by receiving a \$1,000 contribution and a \$500 contribution from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that receipt by a political committee of a contribution from a labor organization is nevertheless a violation of § 441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure

Notification of Reason to Believe Finding

FEDERAL ELECTORAL COMMISSION

NOTIFICATION OF REFUSE TO BELIEVE FUNDING

DATE _____

MUR NO. 1216
STAFF MEMBER(S) & TEL. NO.
Levin

RESPONDENT Levin for Senate Committee

202/523-4060

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On March 24, 1980, the Levin for Senate Committee ("the Committee") was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) for receipt of contributions from labor organizations in violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

A review of the Committee's 1978 10 Day Pre-General and 30 Day Post-General Reports disclosed that it received a \$700 contribution from the International Union of Operating Engineers, Local 547 ("IUOE") on October 20, 1978, a \$1,000 contribution from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO ("the Port Council") on October 15, 1978, and a \$500 from the Port Council AFL-CIO COPE Contributions Fund on October 28, 1978. The IUOE and the Port Council are labor organizations under 2 U.S.C. § 441b(b)(1).

On March 12, 1979, the Commission sent surface violation letters to the Levin for Senate Committee concerning the listing of four possible union contributions on the 10 Day Pre-General Report, two of which were by the respondents. The Assistant Treasurer of the Committee, Ms. Devera Levin, responded to the Commission on March 26, 1979 with explanations. She stated that the Committee returned the \$700 contribution to the IUOE and she enclosed a copy of the refund check dated March 26, 1979, and a letter to the union with the same date explaining that she had been informed that the contribution did not come from a separate segregated fund.

Ms. Levin also stated to us that the \$1,000 contribution listed as being from the Port Council was actually given through the COPE Contributions Fund and that this information was erroneously omitted from the report. On May 25, RAD received copies of the \$1,000 and \$500 contribution checks. The account name on the checks showed the name of the union plus the words "COPE Contributions Fund."

Ms. Linda Whitherspon, the bookkeeper for the Port Council, stated that the account which transferred the funds was an account maintained separately from the union treasury containing union dues. She stated, however, that the funds in this account consisted of the proceeds of tickets sold for an annual dinner dance and that unions and corporations bought these tickets and bought advertisements in the dance program book. She also stated that the purchases were made with union and corporate, not PAC, checks.

In response to instructions from RAD, the Port Council, Secretary-Treasurer, Jack Bluitt, wrote a letter to the Committee on July 23, 1979 stating that the Port Council had "learned" from the Commission that the \$1,500 "was drawn from Union Funds" and asking for a refund from the Committee. On August 14, 1979, the Committee made the refund on a check made out to the Port Council, not to the Port Council COPE Contributions Fund.

2 U.S.C. § 441b(a) prohibits receipt by a political committee of contributions from a labor organization. Accordingly, there is reason to believe that the Committee violated § 441b(a) by accepting a \$700 contribution from the IUOE.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(b). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contributions Fund.

The face of the Port Council's contribution checks showed the printed words "COPE Contributions Fund" as well as the name of the union and the Committee, therefore, might have appeared that the check came from a separate segregated fund established under the provisions of § 441b(b). However, 11 C.F.R. § 103.3(b)(1), formerly § 103.3(b)(2) provides that, if a contribution appears to be illegal, the "treasurer shall make his or her best efforts to determine the legality of the contribution," and, at this point, the Commission does not know what effort, if any, was made by the Treasurer toward this end. Accordingly, there is reason to believe that the Committee violated 2 U.S.C. § 441b(a) in connection with its receipt of the Port Council's contributions.

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the Levin for Senate Committee violated 2 U.S.C. § 441b(a).

8004020485

80040204856

ATTACHMENT #3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Robert Ross
International Union of
Operating Engineers
Local 547
13020 Puritan
Detroit, Michigan 48227

Re: MUR 1216

Dear Mr. Ross:

On , 1980, the Commission found reason to believe that the International Union of Operating Engineers, Local 547 violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") by making a \$700 contribution to the Levin for Senate Committee during the 1978 general election. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that a contribution by a labor organization in connection with an election for federal office is nevertheless a violation of § 441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 523-4060.

Sincerely,

Enclosure

Notification of Reason to Believe Finding

NOTIFICATION OF VIOLATION OF FEDERAL ELECTION LAWS

DATE _____

FILE NO. 1215
STAFF MEMBER(S) & TEL. NO.
Levin
702/522-4060

RESPONDENT International Union of Operating Engineers, Local 547

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On March 24, 1980, the Levin for Senate Committee ("the Committee") was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) for receipt of contributions from a labor organization in violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

A review of the Committee's 1978 10 Day Pre-General Reports disclosed that it received a \$700 contribution from the International Union of Operating Engineers Local 547 ("IUOE") on October 20, 1978. The IUOE is a labor organization under 2 U.S.C. § 441b(b)(1).

On March 12, 1979, the Commission wrote the Committee a surface violation letter asking it to return the contribution if it came from a labor organization and not a separate segregated fund of a labor organization.

On March 26, 1979, the Committee's Assistant Treasurer, Ms. Devera Levin, responded to the letter by stating that it returned the contribution. She also enclosed a copy of the refund check and a copy of a letter to the union explaining that she had been informed that the contribution did not come from a separate segregated fund.

2 U.S.C. § 441b(a) prohibits acceptance by a political committee of contributions from a labor organization.

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the Levin for Senate Committee violated 2 U.S.C. § 441b(a).

80040204059

ATTACHMENT 04



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack Bluitt, Secretary-Treasurer
Detroit and Southeastern Michigan
Maritime Trades Department Port
Council, AFL-CIO
520 St. Clair Drive
Algonac, Michigan 48001

Re: MUR 1216

Dear Mr. Bluitt:

On , 1980, the Commission found reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO violated § 441b of the Federal Election Campaign Act of 1971, as amended ("the Act") by making a \$1,000 contribution and a \$500 contribution to the Levin for Senate Committee during the 1978 general election. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file in this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that a contribution by a labor organization in connection with an election for federal office is nevertheless a violation of § 441b(a) of the Act and you should take immediate steps to insure that this activity does not occur in the future.

A report on the Commission's finding is attached for your information.

If you have any questions, please direct them to Jonathan Levin, the staff member assigned to this matter, at 202/523-4060.

Sincerely,

Enclosure

Notification of Reason to Believe Finding

FEDERAL BUREAU OF INVESTIGATION

NOTIFICATION OF RECEIPT OF CONTRIBUTION

DATE _____ REP NO. 1218
STAFF MEMBER(S) & TEL. NO. _____
RESPONDENT Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO Levin
202/573-4060

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On March 24, 1980, this matter was referred to the Office of General Counsel (OGC) by the Reports Analysis Division (RAD) because of a disclosure by the Levin for Senate Committee ("the Committee") of a \$1,000 contribution on October 15, 1978 from the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO ("the Port Council") and a \$500 contribution on October 28, 1978 from the Port Council COPE Contributions fund.

FACTUAL BASIS AND LEGAL ANALYSIS

On March 12, 1979, the Commission wrote the Committee a letter asking it to return the \$1,000 contribution if it came from a labor organization and not a separate segregated fund of a labor organization.

On March 26, 1979, the Committee's Assistant Treasurer responded to the letter stating that the \$1,000 contribution listed as being from the Port Council was actually given through the COPE Contributions Fund and that this information was erroneously omitted from its report. On May 25, RAD received copies of the \$1,000 and \$500 contribution checks. The account name on the checks showed the name of the union plus the words "COPE Contributors Fund."

On July 20, 1979, the Commission sent a letter to the Treasurer of the Port Council informing him that, if he agreed that the organization making the contributions was a political committee, he should submit a Statement of Organization, and that, if he did not wish his organization to be registered as a

political committee, he should request refunds.

In response to this letter, Ms. Linda Whitherspoon, the bookkeeper for the Port Council, stated that the account into which she transferred the funds was an account maintained separately from the union treasury containing union dues. She stated, however, that the funds in this account consisted of the proceeds of tickets sold for an annual dinner dance and that unions and corporations bought these tickets and bought advertisements in the dance program book. She also stated that purchases were made with union and corporate, not PAC, checks.

In response to instructions from RAD, the Port Council Secretary-Treasurer, Jack Bluitt, wrote a letter to the Committee on July 23, 1979 stating that the Port Council had "learned" from the Commission that the \$1,500 "was drawn from Union Funds" and asked for a refund from the Committee. On August 14, 1979, the Committee made the refund on a check made out to the Port Council, not to the Port Council COPE Contributions Fund.

While the bookkeeper of the Port Council states that the Committee received funds from a dinner dance account separate from the union's dues account, it is questionable that the dinner dance account, an account freely accepting union and corporate transfers, is a separate segregated fund established under the provisions of § 441b(b). At this point, it appears only to be another account of the union. This appearance is bolstered by the fact that the refund check from the Committee was made out to the labor organization and not to the COPE Contribution Fund (and, therefore, may have been deposited into the dues funds). 2 U.S.C. § 441b(a) prohibits a labor organization from making a contribution in connection with an election for federal office. Contributions from a fund that is simply another account of the union and not a separate segregated fund under § 441b(b) are in violation of 2 U.S.C. § 441b(a).

Based on the foregoing analysis, the Federal Election Commission has:

Found reason to believe that the Detroit and Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO has violated 2 U.S.C. § 441b(a).

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE March 24, 1980 ANALYST Tracy Keefer AK
TO: OGC TEAM CHIEF Peter Kell Jr. GNS
THROUGH: STAFF DIRECTOR SPC COMPLIANCE REVIEW Rosen/Sims CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AK

CANDIDATE/COMMITTEE: Levin For Senate Committee

TREASURER: John E. S. Scott

ADDRESS: 3327 Dirksen Building
Washington, D.C. 20510

AFFILIATE(S):
N/A

ALLEGATION(S):

The committee has accepted
prohibited contributions totaling
\$2200

CITE: 2 U.S.C.441 b (a)

ATTACHMENT(S)

#2, #6

DATE INITIATED: 3/12/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

#1

REPORTS: All reports shall be done based upon the attached initial basic review. For all reports
reviewed, see Attachment 1.

PERIOD COVERED FROM 5/30/78 TO 10/23/78

TOTAL RECEIPTS \$ 27189.49 TOTAL EXPENDITURES \$ 188271.94

CASH ON HAND \$ 61618.43 DEBTS \$ 27389.90

HISTORY:

RESULTS OF REVIEW:

SV sent 3/12/79 for 10 Day Pre-General Report

ATTACHMENT

#2

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon to Lester Scall 5/18/79

Telecon to bookkeeper from Detroit & Southeastern Mich. Maritime
Trades Department Port Council, AFL-CIO (DSMTDPC) 7/20/79

ATTACHMENT

#4

#7

REASON(S) FOR REFERRAL:

Response rec'd 3/28/79 on 10 Day Pre-General - Adequate Response

Response rec'd 5/25/79 disclosing copies of checks rec'd from DSMTDPC

Response rec'd 7/23/79 from DSMTDPC requesting refund from Levin Cmte

Response rec'd 8/22/79 copy of check to refund union contribution

**This matter is being referred because it meets division thresholds.

ATTACHMENT

#3

#5

#8

#9

OTHER PENDING ACTIONS INITIATED BY RAD:

Not pertinent to the allegations

ATTACHMENT

OTHER RELEVANT INFORMATION:

SV sent to DSMTDPC for failure to register 7/18/79
\$1500 refunded to DSMTDPC

ATTACHMENT

#6

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

N/A

00040004865

C00088494 LEVIN FOR SENATE

N	78/04/12	01	77/12/07-78/03/31	P	00032624	00014629	17	78020032002
A	78/05/15	01	78/01/01-78/03/31	P			3	78020051311
N	78/07/10	02	78/04/01-78/06/30	P	00124099	00116062	90	78020082107
A	78/07/25	02	78/04/01-78/06/30	P			3	78020091021
N	78/07/27	10P	78/07/01-78/07/24	P	00059741	00059932	49	78020100197
A	78/08/10	10P	78/07/01-78/07/24	P			4	78020101954
A	78/08/22	01	78/01/01-78/03/31	P			2	78020102679
N	78/09/07	30P	78/07/25-78/08/26	P	00067529	00092749	48	78020113041
N	78/10/10	03	78/08/28-78/09/30	G	00173444	00174354	102	78020130985
N	78/10/27	108	78/09/30-78/10/23	G	00271180	00186271	124	78020152145
A	78/12/04	10P	78/07/01-78/07/24	P	00059741	00059932	7	78020172150
N	78/12/07	308	78/10/24-78/11/27	G	00253693	00282768	147	78020180478
A	78/12/22	03	78/08/28-78/09/30	G			3	78020190634
A	79/01/15	03	78/08/28-78/09/30	G			3	79020010718
A	79/01/30	03	78/08/28-78/09/30	G			3	79020012745
N	79/01/30	YE	78/11/28-78/12/31	G	00012129	00042010	17	79020013374
A	78/12/04	02	78/04/01-78/06/30	P			3	78020172137
A	79/03/28	108	78/09/30-78/10/23	G			7	79020022512
A	79/05/18	03	78/08/28-78/09/30	G			3	79020033758
A	79/05/24	108	78/10/01-78/10/23	G			3	79020034251
A	79/07/05	308	78/10/24-78/11/27	G			3	79020040338
A	79/08/22	108	78/10/01-78/10/23	G			3	79020051432

ALL REPORTS REVIEWED

In reply please refer to 55V1/20-27



FEDERAL ELECTION COMMISSION

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

March 12, 1979

John E.S. Scott, Treasurer
Levin for Senate Committee
2155 W. Big Beaver Road
Troy, MI 48064

Dear Mr. Scott:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from unions. Union contributions are prohibited by the Act, unless the contributions are made by separate segregated funds established by the unions. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns of the contributions should be reported immediately by letter and should be reflected as contribution refunds on your next report of receipts and expenditures. If the identification of the sources of these contributions are incomplete or incorrect on the original report, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on these matters. If you have any questions concerning these matters, please do not hesitate to contact Bill Coppel(800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Orlando B. Potter".

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

**SCHEDULE A
REVISED**

January, 1978
Form 1000
Printed on Commission
Street, N.W.
Washington, D.C. 20043

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Line Number _____
Name of Business (if any) _____

Name of Candidate or Committee in Full

LEVIN FOR SENATE COMMITTEE

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
Engineers Political Education Committee 1125 Seventeenth St. N.W. Washington, D.C. 20036 COCO 1504	1125 Seventeenth St. Washington, D.C. 20036 Contribution PAC	10-16-78	\$1,500.00
Democratic Club of Taylor Comm 23400 Wick Taylor, MI 48010 18U	23400 Wick Taylor, MI 48010 Contribution PAC	10-13-78	\$500.00
Detroit & Southeastern Mich Marie-Louise Trades Depart. Port Council, AFL-CIO Algonac, MI 48001 18U	520 St. Clair River Dr. Algonac, MI 48001 Contribution PAC	10-15-78 10	\$1,000.00
Detroit Fire Fighters' Assoc. Edison Plaza Suite 2134 Detroit, Michigan 48226 18U	Edison Plaza- Ste 2134 Detroit, Michigan Contribution PAC	10-12-78	\$300.00
Detroit Edison Political Action Committee - Federal Detroit Edison Co. 2000 Second Avenue-Detroit, MI COCO 81547 18K	2000 Second Avenue Detroit, MI Contribution PAC	10-4-78	\$100.00
Chrysler Non-Partisan Political Support Committee P.O. Box 1919 Detroit 48231 COCO 43687 18K	P.O. Box 1919 Detroit, MI 48231 Contribution PAC	10-14-78	\$2,500.00
CWA-Local 4105 1730 N. Michigan Saginaw, MI. 18U	1730 N. Michigan Saginaw, MI 48602 Contribution PAC	10-13-78	\$50.00

\$5950.00

100401004867

SCHEDULE A
REVISED
January, 1979
Federal Election Commission
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 12a
of FEC FORM 3

Page 1 of 10
Line Number _____
Date Received Separately for
each numbered line

Name of Candidate or Committee in Full			
LEVIN FOR SENATE COMMITTEE			
Full Name, Mailing Address and ZIP Code Oakland Democratic Campaign Comm. 1383 North Woodward Bloomfield Hills, MI 48013	Principal Place of Business 1383 North Woodward Bloomfield Hills, MI 48013	Date (month, day, year) 10-4-78	Amount of each Receipt the Period 5500.00
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-20-78	Amount of each Receipt the Period 5340.00
Full Name, Mailing Address and ZIP Code Detroitbank Corporation Comm. for Responsible Political Action Fort at Washington Detroit, MI 48226 (000035501)		Principal Place of Business Fort at Washington Detroit, MI 48226	Date (month, day, year) 10-20-78
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-20-78	Amount of each Receipt the Period 550.00
Full Name, Mailing Address and ZIP Code International Union of Operating Engineers Local 347 13020 Puritan Detroit, Michigan (180)		Principal Place of Business 13020 Puritan Detroit, MI	Date (month, day, year) 10-20-78
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-20-78	Amount of each Receipt the Period 5700.00
Full Name, Mailing Address and ZIP Code Amalgamated Meat Cutters & Butcher Workmen of North Am. 2300 N. Sheridan Rd. Chicago, Ill 60657 (000022996)		Principal Place of Business 2300 N. Sheridan Road Chicago, Ill 60657	Date (month, day, year) 10-20-78
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-20-78	Amount of each Receipt the Period 51,000.00
Full Name, Mailing Address and ZIP Code Air Line Pilots Assoc. Political Action Comm. 1625 Massachusetts Ave. Washington, D.C. 20036 (18K 500035451)		Principal Place of Business 1625 Massachusetts Ave. NW Washington, D.C.	Date (month, day, year) 10-20-78
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-20-78	Amount of each Receipt the Period 5,000.00
Full Name, Mailing Address and ZIP Code Maintenance of Kay Political League 12050 Woodward Ave. Detroit, MI 48203 (00000372)		Principal Place of Business 12050 Woodward Ave. Detroit, MI 48203	Date (month, day, year) 10-19-78
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-19-78	Amount of each Receipt the Period 52,000.00
Full Name, Mailing Address and ZIP Code Laborers' Political League 905 16th Street, N.W. Washington, D.C. 20006 (18K 00007912)		Principal Place of Business 905 16th Street N.W. Washington, D.C. 20006	Date (month, day, year) 10-23-79
Receipt for: <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Other <input type="checkbox"/> Other Occupation PAC		Date (month, day, year) 10-23-79	Amount of each Receipt the Period 51,000.00
SUBTOTAL of receipts on this page (continued)			\$ 10,590.00
TOTAL on this page (last page this form number only)			\$ 71146.70

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

Dear Mr. Coppel:

This letter is in response to the attached letter, received by us, from Mr. Potter.

Four items were involved. They have been resolved as follows:

International Union of Operating Engineers
Local 547, 13020 Puritan, Detroit, Michigan.
\$700. I returned contribution. Copy of letter attached, and copy of check.

CWA-Local 4108; 1730 N. Michigan; Saginaw, MI
\$50.00. They have assured me that the money was indeed given through the properly set-up political account and promised to send a letter to me to verify it.

Millwrights, Conveyor & Machinery Erectors
Local 1102; 23401 Mound Rd., Warren, Michigan
\$500.00. This is o.k. See attached letter.

Detroit & SE Michigan Maritime Trades Dept. Port
Council, AFL-CIO; 520 St. Clair River Drive
520 St. Clair River Drive; Algonac, MI 48001
\$1000. This contribution is also o.k. It was given through COPE Contributions Fund. When it was typed up for the FEC Report, apparently the typist left out the information about COPE, but it is on my record card.

I hope this information satisfies your requirements. Please let me know if you need any further information.

Sincerely,
Devera Levin
Devera Levin
Assistant Treasurer
Levin for Senate Committee

6709042000243512

In reply please refer to 55V1/78-27



FEDERAL ELECTION COMMISSION

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

MAR 29 10 28 AM '79

March 12, 1979

John E.S. Scott, Treasurer
Levin for Senate Committee
2155 W. Big Beaver Road
Troy, MI 48064

Dear Mr. Scott:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from unions. Union contributions are prohibited by the Act, unless the contributions are made by separate segregated funds established by the unions. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns of the contributions should be reported immediately by letter and should be reflected as contribution refunds on your next report of receipts and expenditures. If the identification of the sources of these contributions are incomplete or incorrect on the original report, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on these matters. If you have any questions concerning these matters, please do not hesitate to contact Bill Coppel(800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

67090420.002363

March 25, 1979

Mr. Robert Ross
International Union of Oper. Engineers
Local 547
13020 Puritan
Detroit, Michigan 48227

Dear Mr. Ross:

Enclosed is check in the sum of \$700.00
which is sent to you as a refund of your
contribution to the Levin For Senate campaign
which you gave us on October 20, 1978.

We are refunding these funds due to the fact
that we are not permitted, under the rules of
the Federal Election Commission, to accept
funds from unions unless such funds come from
a separate segregated account established by
the union.

I have been advised by John Brown that this
particular contribution did not come from a
separate segregated account, and so we are
herewith returning the contribution.

Sincerely,

Devera Levin

Devera Levin
Assistant Treasurer
Levin for Senate Committee

dl
cc: John Brown

670942002114

LEVIN FOR SENATE COMMITTEE
2155 W. BIG BEAVER ROAD
TROY, MICH. 48065

2554

PAY
TO THE
ORDER OF

International Union of Operating Engineers, Local 5478 *700.00*

Seven Hundred and 00/100

DOLLARS



DRUMMER BUILDING OFFICE
THE DETROIT BANK-TROY
TROY, MICHIGAN 48064

Steven Levin

⑆072412998⑆ 241100187⑆L⑆

UNITED STATES DEPARTMENT OF JUSTICE

25-01 WOUND ROAD

TELEPHONE: 432-1111

March 21, 1979

Senator Carl Levin
3327 Dirksen Senate Building
Washington, D. C. 20510

ATTENTION: D. Levin

Pursuant to your telephone call of March 20, 1979,
this is to say that the money contributed to CARL LEVIN,
Levin for Senate Committee, 2155 West Big Beaver Rd.,
Troy, Michigan, was from the Political Education Committee,
and not paid from the funds of Millwrights Local Union
#1102.

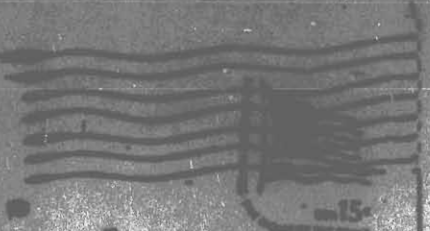
Sincerely,

Donald J. Maness
Donald J. Maness
Financial Secretary &
Business Manager

DJM/l
opeiu #10
afl/cio

27- *Sen. Bill*
ed States Senate

WASHINGTON, D.C. 20540
OFFICIAL BUSINESS



Mr. Bill Coppel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

79 MAR 28 PM 1:38

RECEIVED
FEDERAL ELECTION
COMMISSION

07090042000000242857147

NOTICE

THE POSTMARK ON THE PRECEDING ENVELOPE IS 3-27-79

REGISTERED _____ CERTIFIED _____

67 09 00 42 00 00 02 12 05 71 58

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Bill Coppel to Lester Scall

DATE: 5/18/79

NAME OF COMMITTEE OR CANDIDATE: Concerning the Levin for Senate Committee - possible union contributions.

TELEPHONE:

60040004876
I called Lester for advice on a question concerning a SV and referral. The Levin Committee had received a contribution from what appeared on the report to be a union. I sent a SV and the response indicated that the contribution was in fact from AFL CIO COPE. The cmte claimed that due to a typo, COPE was left off. I checked to see how much AFL CIO had thus far contributed to Levin and found that there were two transfers of \$5000. Since this was the limit I checked to see what or how these two committees were related. I checked the reports of both Levin and AFL CIO to verify the transfers. They checked out. I then checked to see if AFL CIO had transferred \$1000 to Detroit & Southeastern Michigan Maritime Trades Dept Port Council, AFL-CIO (DSNNTDPC). The report showed no such transfer. Lester agreed that I had essentially done all I could with in house material. I then asked whether it was all right to confront Levin with this information. He felt that I should determine the relationship of AFL-CIO, COPE, and DSNNTDPC. He said I should tell Levin what I know and what I have checked and see if they could come with the answer. Lester commented that I had a better avenue to ask these questions since when it gets to OGC certain restraints come into play. I explained that rather than refer it to him and then have his hands tied, I wanted to ask the questions first.

United States Senate

SENATE
MAY 25 1962

MEMORANDUM DELIVERED ☐

Dear Bill:

Enclosed is the information you requested.

Let me know if you need any further backup.

Shenard

S 2489

MI DEM C957

79 MAY 24 PM 12:23

FEDERAL ELECTION COMMISSION

DETROIT & SOUTHEASTERN MICHIGAN MARITIME
TRADES DEPARTMENT PORT COUNCIL, AFL-CIO
COPE CONTRIBUTIONS FUND
520 ST. CLAIR RIVER DRIVE
ALGONAC, MICH. 48001

PAY TO THE ORDER OF CARL LEVIN FOR SENATE \$ 500.00
Five Hundred Dollars DOLLARS

THE ALGONAC SAVINGS BANK
ALGONAC, MICH.

Jack Blum
Amos Stewart

⑆0724⑉0545⑆ 35⑉012⑉344⑆

DETROIT & SOUTHEASTERN MICHIGAN MARITIME
TRADES DEPARTMENT PORT COUNCIL, AFL-CIO
COPE CONTRIBUTIONS FUND
520 ST. CLAIR RIVER DRIVE
ALGONAC, MICH. 48001

PAY TO THE ORDER OF The Carl Levin for Senate Committee \$ 1000.00
One Thousand Dollars DOLLARS

THE ALGONAC SAVINGS BANK
ALGONAC, MICH.

Amos Stewart
Jack Blum

⑆0724⑉0545⑆ 35⑉012⑉344⑆



United States Senate

WASHINGTON, D.C. 20540
OFFICIAL BUSINESS

Carl Levin
U.S.S.

Mr. Bill Coppel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Receipts Analysis

RECEIVED
FEDERAL ELECTION
COMMISSION

9 MAY 24 PM 12:23

1





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 18, 1979

Treasurer
Detroit & Southeastern Michigan
Maritime Trades Department
Port Council, AFL-CIO
520 St. Clair River Drive
Algonac, Michigan 48001

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Levin for Senate indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

8'0'0'0'4'3'0'1'3'0'3'4'0'8'0'2'0'2'

ॐ नमो भगवते वासुदेवाय

Enclosure
Certified Mail: .
Return Receipt Requested

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1

Line Number

Use Separate Section for
each numbered line

Name of Candidate or Committee in Full

LEVIN FOR SENATE COMMITTEE

Full Name, Mailing Address and ZIP Code

Engineers Political Education
Committee
1125 Seventeenth St. N.W.
Washington, D.C. 20036

Principal Place of Business

1125 Seventeenth St.
Washington, D.C. 20036

Date (month,
day, year)

10-16-78

Amount of each item
this Period

\$1,500.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 1,500.00

Full Name, Mailing Address and ZIP Code

Democratic Club of Taylor Comm
23400 Wick
Taylor, MI 48010

Principal Place of Business

23400 Wick
Taylor, MI 48010

Date (month,
day, year)

10-13-78

Amount of each item
this Period

\$500.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 2,000.00

Full Name, Mailing Address and ZIP Code

Detroit & Southeastern Mich
Maritime Trades Depart.
Port Council, AFL-CIO
Algonac, MI 48001

Principal Place of Business

520 So. Clair River Dr.
Algonac, MI 48001

Date (month,
day, year)

10-15-78

Amount of each item
this Period

\$1,000.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 3,000.00

Full Name, Mailing Address and ZIP Code

Detroit Fire Fighters' Assoc.
Edison Plaza
Suite 2134
Detroit, Michigan 48226

Principal Place of Business

Edison Plaza- Ste 2134
Detroit, Michigan

Date (month,
day, year)

10-12-78

Amount of each item
this Period

\$300.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 3,300.00

Full Name, Mailing Address and ZIP Code

Detroit Edison Political Action
Committee - Federal
Detroit Edison Co.
2000 Second Avenue-Detroit, MI

Principal Place of Business

2000 Second Avenue
Detroit, MI

Date (month,
day, year)

10-4-78

Amount of each item
this Period

\$100.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 3,400.00

Full Name, Mailing Address and ZIP Code

Chrysler Non-Partisan Political
Support Committee
P.O. Box 1919
Detroit 48231

Principal Place of Business

P. O. Box 1919
Detroit, MI 48231

Date (month,
day, year)

10-14-78

Amount of each item
this Period

\$2,500.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 5,900.00

Full Name, Mailing Address and ZIP Code

CMA-Local 4108
1730 N. Michigan
Saginaw, MI

Principal Place of Business

1730 N. Michigan
Saginaw, MI 48602

Date (month,
day, year)

10-13-78

Amount of each item
this Period

\$50.00

Receipt for

☒ Cash ☐ Check ☐ Other

Aggregate Year-To-Date \$ 5,950.00

SUBTOTAL of these receipts (do not include)

\$ 5,950.00

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 1225 K Street, N.W.
 Washington, D.C. 20005

ITEMIZED RECEIPTS
 (Contributions, Transfers, Contribution to Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 4 of 4
 Line Number _____
 Date Receipt Schedule for
 each reporting period

Name of Candidate or Committee to Full			
LEVIN FOR SENATE COMMITTEE			
Full Name, Mailing Address and ZIP Code Safe Energy Political Committee 311 10th St. NE Washington, DC 20002	Principal Place of Business 311 10th St., NE Washington, DC 20002	Date (month, day, year) 11-8-78	Amount of each Rec this Period \$1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 4,000.00	
Full Name, Mailing Address and ZIP Code Mich. Credit Union Legislative Action Fund 5286 Timberland East Lansing, MI 48823	Principal Place of Business 5286 Timberland East Lansing, MI 48823	Date (month, day, year) 11-17-78	Amount of each Rec this Period \$125.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 50.00	
Full Name, Mailing Address and ZIP Code Sheet Metal Workers' International Assoc. Political Action League 1750 New York Ave., NW Washington, DC 20006	Principal Place of Business 1750 New York Ave., NW Washington, DC 20006	Date (month, day, year) 11-7-78	Amount of each Rec this Period \$400.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 400.00	
Full Name, Mailing Address and ZIP Code St. Clair Shores Democratic Voters League 21230 Twelve Mile Rd. St. Clair Shores, MI 48081	Principal Place of Business 21230 Twelve Mile Rd. St. Clair Shores, MI 48081	Date (month, day, year) 10-28-75	Amount of each Rec this Period \$50.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 50.00	
Full Name, Mailing Address and ZIP Code Detroit & Southeastern Mich. Maritime Trades Dept. Port Council AFL-CIO COPE Contributions Fund	Principal Place of Business 520 St. Clair River Drive Algonac, MI 48001	Date (month, day, year) 10-28-78	Amount of each Rec this Period \$500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,500.00	
Full Name, Mailing Address and ZIP Code United Paper Workers International Union Political Education Program Voluntary Fund Flushing, New York 11365	Principal Place of Business 163-03 Horace Harding Expressway Flushing, New York 11365	Date (month, day, year) 11-3-78	Amount of each Rec this Period \$1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,500.00	
Full Name, Mailing Address and ZIP Code Kalamazoo Democrats '78 202 North Kalamazoo Mall Kalamazoo, MI 49007	Principal Place of Business 202 North Kalamazoo Mall Kalamazoo, MI 49007	Date (month, day, year) 10-24-78	Amount of each Rec this Period \$500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation POLITICAL ACTION COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00	
SUBTOTAL of receipts this page (optional)			\$ 3,550.00
TOTAL this period (list page this line number only)			\$ 6,011.54

7903115726
 00040104003

TELECON:

COMMITTEE: DETROIT & SOUTHEASTERN MICHIGAN MARITIME TRADES DEPARTMENT
PORT COUNCIL, AFL-CIO

COMMITTEE CONTACT: LINDA WHITHERSPON, BOOKKEEPER

ANALYST: BEVERLY BROWN

DATE/TIME: 7/20/79 11:00

RE: SURFACE VIOLATION 79-48 - TRANSFER IN EXCESS OF \$1000 TO LEVIN FOR SENATE
FROM ABOVE UNREGISTERED COMMITTEE. CONVERSATION REVEALING THAT CORPORATE
AND LABOR FUNDS WERE TRANSFERRED TO LEVIN IN 1978.

30040204884
↓ Today
Background: In their 10 Day Pre-General reports of receipts and expenditures, the Levin for Senate Committee discloses total receipts of \$1,500 from the Detroit & Southeastern Michigan Maritime Trades Department Port Council, AFL-CIO. In response to Commission inquiry the Levin for Senate Committee stated that the funds were actually given through AFL-CIO COPE PCC, however, erroneously reported as having come from Detroit & Southeastern Michigan... A review of AFL-CIO COPE PCC's reports disclosed a single transfer of \$5000 to the Levin for Senate Committee. No transfer was made in the amounts of \$500 and \$1000.

On 7/18/79 a Surface Violation Notice was sent to the Detroit & Southeastern Michigan Maritime Trades Department. This notice served to advise the committee that they were in violation of 2 U.S.C. 433 & 434 for failure to register and submit timely reports.

TODAY: Ms. Linda Whitherspon called this day in response to the Commissions Surface Violation notice to Detroit and Southeastern Maritime trades Department Port Council, AFL-CIO. During the course of conversation the following was revealed:

Once a year the Council has a dinner dance. Tickets are sold to Unions and Corporations throughout the Detroit Area. In addition, unions and corporations may expend funds for program book ads. These programs are distributed to all persons attending the dance. Funds raised through the sale of tickets and ads are placed in a separate account. Since these funds were held separate from the Councils union treasury (containing union dues), the Council was under the impression that such funds are permissible.

After Ms. Whitherspon revealed that funds are transmitted on corporate and union checks --- not PAC checks, I informed her that the council could not permissibly forward these funds to federal candidates or political action committees which support candidates for federal office. I asked Ms. Whitherspon to review Sections 114, 110, 100 of the Commission's Regulations as well as 2 U.S.C. 433, 434, 441a & 441b. (Analyst's should be aware of Advisory opinions 1976-65 and 1978-46).

It is the policy of the Council to review all requests for
admission to the Council. The Council is currently reviewing
the request for admission of the applicant. The Council will
be required to submit a report to the Council on the request.
The Council will also be required to submit a report to the
Council on the request. A copy of the Council's letter should be forwarded to the Council
as soon as possible.

Ms. Witherspoon stated that she would review the appropriate sections of
the Act & Regulations and respond accordingly.

60040004005

CC. Beth Pollard: Analyst reviewing Levin For Senate committee

AMOS STEWART
President
3627 W. Warren
Detroit 48226
Telephone: 554-6826

ALBION, MICHIGAN 48201

Secretary-Treasurer
Telephone: 794-496

July 23, 1979

Senator Carl Levin
United States Senate
Washington, D.C. 20510

Dear Senator Levin:

Please be advised that we have just learned from the
Federal Election Commission that we inadvertently contributed
to your campaign \$1,500.00 that was drawn from Union Funds.

We regret to advise we must request these funds to be re-
turned. Under the Federal Election Campaign Act, we are prohibited
to use these funds for Federal Campaign.

Very truly yours,

Jack Bluit
Jack Bluit
Secretary-Treasurer

CC: Orlando B. Potter
Staff Director
Federal Election Commission

Re: 2SV1/79-48

Certified Mail
Return Receipt Requested 138485

JB/law

AFFILIATES

Brotherhood of Painters, Decorators and Painters of America, District Council #22
Brotherhood of Painters, Decorators and Paperhangers of America, Local #675
Greater Detroit Building Trades Council
Hotel Restaurant Employees' & Bartenders' Local No. 24
Industrial Union of Marine and Shipbuilding Workers of America, Local #46
Inland Boatmen's Union - SIU
International Association of Bridge and Structural Iron Workers, Local #25
International Association of Bridge and Structural Iron Workers, Local #426
(Reinforced Iron Workers)
International Association of Bridge and Structural Iron Workers, Local #428
International Association of Bridge and Structural Iron Workers, Local #575
(Riggers)
International Association of Fire Fighters, Local #344
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths,

International Union of Operating Engineers, Local #324
International Union of Operating Engineers, Local #547
Laborers' International Union of North America, Local #334
Metropolitan District Council No. 23
Marine Engineers Beneficial Association, A.M.O. District No. 2
Retail Clerks International Association, Local #876
Seafarers' International Union of North America, Great Lakes District
Seafarers' International Union of North America, A.G.L.I.W.D.
Service Employees International Union, Local #79
Sheet Metal Workers, Local #50
United Brotherhood of Carpenters & Joiners of America, District Council
United Brotherhood of Carpenters & Joiners of America, Local #19
United Brotherhood of Carpenters & Joiners of America, Local #26
United Brotherhood of Carpenters & Joiners of America, Local #95
United Brotherhood of Carpenters & Joiners of America, Local #202

870900420000541868372

TO: Mr. Jack Blufft
JUL 22 1971
HAND DELIVERED

Mr. Jack Blufft
Secretary-Treasurer
Detroit and Southeastern Michigan
Maritime Trades Port Council, AFL-CTO
Maritime Trades Department
520 St. Clair Drive
P.O. Box 452
Algonac, Michigan 48001

Dear Jack:

Thanks for your letter of July 23. I understand the problem and am happy to return to you a check for the amount indicated.

I also want to take this opportunity to express again my appreciation for your support during the campaign. The form may have been wrong -- but I know that the motive was pure.

Sincerely,

Carl Levin

CL/np

cc: Federal Election Commission

SEP 23 AM 11:03

HAND DELIVERED ☐

SENATOR CARL LEVIN OFFICE ACCOUNT		184
TRULS-100		
U. S. SENATE		
WASHINGTON, D.C. 20510		August 14 1979
PAY TO THE ORDER OF	Detroit & S.E. Mich. Maritime Trades Port Council, AFL-CIO	\$1,500.00
FIFTEEN HUNDRED AND 00/100		DOLLARS
The RIGGS NATIONAL BANK		
WASHINGTON, D.C.		
WATERGATE OFFICE		
2600 VIRGINIA AVENUE, N.W.		
Refund-Campaign-Contribution		
<i>Deveria Poin</i>		
⑈00000184⑈ ⑆05⑆000030⑆ ⑆12⑈08⑆17278⑈		

070900121

79 AUG 20 PM 3:36

RECEIVED
FEBRUARY 11 1964
U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C.

0004200041889



FEDERAL ELECTION COMMISSION

1200 E STREET NW
WASHINGTON, DC 20001

THIS IS THE BEGINNING OF FUR # 1214

Date Filmed 9/10/80 Camera No. --- 2

Camerman SAC