



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1492

Date Filmed 2/15/83 Camera No. --- 2

Camera

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FEDERAL ELECTION COMMISSION

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

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy.                            |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents                         |   |

Signed Nisan T. Donaldson  
 date 1-17-83

FEC 9-21-77

83040374504



**The Center On National Labor Policy, Inc.**

5211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151  
(703) 321-9180

203800

RECEIVED AT THE FEC

Case # 9342

83 JAN 17 P2: 01

January 14, 1983

Certified Mail P 280 585 606

Mr. Kenneth A. Gross  
Associate General Counsel  
Federal Election Commission  
Washington, DC 20463

Dear Mr. Gross:

Re: MURs 1491, 1492, 1493

This letter is to confirm our conversation of January 14, 1983 in which we agreed that I will meet with you in your office on Tuesday, January 18, 1983 at 9:00 a.m. At that time, I will pick up the complete files including, but not limited to, the General Counsel Reports, affidavits, and correspondence on the above-captioned Matters Under Review which you said you will have prepared for me because the records you forwarded to me were incomplete.

I am looking forward to meeting with you and your cooperation in this matter is appreciated.

Sincerely,

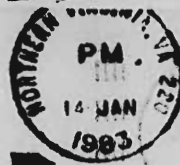
(Mrs.) Jeanette P. Papillo  
Staff Attorney

JPP/cm

83 JAN 17 P3:37

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3040374306  
The Center On National Labor Policy, Inc.  
5211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151



RECEIVED AT  
83 JAN 17

Mr. Kenneth A. Gross  
Associate General Counsel  
Federal Election Commission  
Washington, DC 20463

Return Receipt Requested

CERTIFIED

P 280 585 606

MAIL





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 13, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mrs. Jeanette P. Papillo  
Center on National Labor Policy  
5211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151

RE: MUR 1492

Dear Mrs. Papillo:

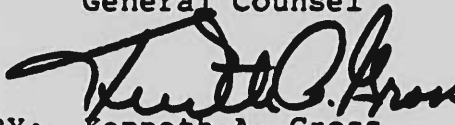
The Federal Election Commission has reviewed the allegations made by your client, Robert J.K. Dornan, on October 21, 1982, and determined that on the basis of the information provided in your client's complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 13, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Michael R. Fanning, Esquire  
International Union of Operating  
Engineers  
1125 Seventeenth Street, N.W.  
Washington, D.C. 20036

RE: MUR 1492

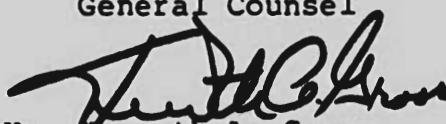
Dear Mr. Fanning:

On October 27, 1982, the Commission notified your clients, the Engineers Political Education Committee and its treasurer, Frank Hanley, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 12, 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 13, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Jayne Zanglein  
EPAC - Local 675  
1551 West Copans Road  
Pompano Beach, Florida 33064

RE: MUR 1492

Dear Ms. Zanglein:

On October 27, 1982, the Commission notified your clients, EPAC Local #675 and its treasurer, Robert Kraft, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 12, 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross".

BY: Kenneth A. Gross  
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 13, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert A. Sugarman, Esquire  
Kaplan, Sicking, Hessen,  
Sugarman, Rosenthal and DeCastro  
P.O. Box 520337  
Miami, Florida 33152

RE: MUR 1492

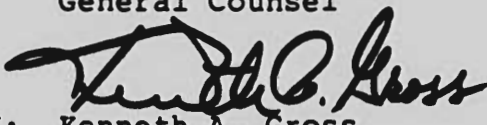
Dear Mr. Sugarman:

On October 27, 1982, the Commission notified your clients, I.U.O.E. Local #487 PAC and its treasurer, Anton Hermes, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 12, 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 13, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Benjamin Betts, Treasurer  
Citizens for Gunter Committee  
P.O. Box 1507  
Miami, Florida 32302

RE: MUR 1492

Dear Mr. Betts:

On October 27, 1982, the Commission notified you, your committee, and Bill Gunter of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 12, 1983, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", is written over the typed name.

BY: Kenneth A. Gross  
Associate General Counsel

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MUR 1492

First General Counsel's Report

Dated January 7, 1983

3. Approve the letters as attached to the First General Counsel's Report dated January 7, 1983.
4. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

1-12-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

1-7-83, 2:56  
1-10-83, 11:00

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January 7, 1983

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Phyllis A. Kayson  
SUBJECT: MUR 1492

Please have the attached First General Counsel's Report distributed to the Commission on a 48 hour tally basis as a sensitive matter. Thank you.

Attachment

cc: Donaldson

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 JAN 7 P2: 56

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION 1-7-83

MUR NO. 1492  
DATE COMPLAINT RECEIVED BY  
OGC October 21, 1982  
DATE OF NOTIFICATION TO  
RESPONDENT October 27, 1982  
STAFF MEMBER  
Susan Donaldson

**SENSITIVE**

COMPLAINANT'S NAME: Robert J.K. Dornan

RESPONDENTS' NAMES: International Union of Operating Engineers  
("I.U.O.E.")  
I.U.O.E. Political Education Committee and  
its treasurer, Frank Hanley  
I.U.O.E. Local #487 PAC and its treasurer,  
Anton J. Hermes  
I.U.O.E. Local #675 PAC and its treasurer,  
Robert Kraft  
Citizens for Bill Gunter Committee and its  
treasurer, Benjamin F. Betts, Jr.  
Bill Gunter

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(2)(A)  
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Citizens for Bill Gunter Committee  
I.U.O.E. Political Education Committee  
I.U.O.E. Local #487 PAC  
I.U.O.E. Local #675 PAC

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

A complaint filed by Robert J.K. Dornan was received at the Commission on October 21, 1982. The complaint alleges that the International Union of Operating Engineers' separate segregated fund, the Engineers' Political Education Committee; and its affiliated separate segregated funds, Local #487 PAC and Local #675 PAC, contributed \$7,000 to the Citizens for Bill

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Gunter Committee in violation of 2 U.S.C. § 441a(a)(2)(A). Mr. Dornan also alleges that the Citizens for Bill Gunter Committee knowingly accepted the excessive contributions in violation of 2 U.S.C. § 441a(f). The complaint names Bill Gunter and the treasurer of each Committee as a respondent, as well.

FACTUAL AND LEGAL ANALYSIS

Form 3 Reports filed by the Respondents reveal that the Engineers' Political Education Committee ("EPEC") contributed \$2,000 to the Citizens for Bill Gunter Committee ("Gunter Committee") on October 1, 1980; PAC #487-I.U.O.E. Local 487 contributed \$1,000 to the Gunter Committee on October 20, 1980; Engineers PAC-Local 675 contributed \$2,000 to the Gunter Committee on October 24, 1980; and EPEC contributed \$2,000 to the Gunter Committee on October 27, 1980. FEC Reports indicate that EPEC and the PACs of Locals #487 and #675 are affiliated. Therefore, it appeared that the Respondents contributed more than \$5,000 to a candidate and his authorized committees in connection with the general election in violation of 2 U.S.C. § 441a(a)(2)(A).

The Respondents were notified of the complaint on October 27, 1982. After being given an extension of time to fully respond to the allegations, the Respondents submitted explanations of the transaction to the Commission. Michael Fanning, counsel for I.U.O.E., Robert Sugarman, counsel for Local #487, and Jayne Zanglein, counsel for Local #675, all stated that the EPEC contribution to the Gunter Committee, given on October 1, 1980, was intended for the run-off election. The run-

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off election in Florida was held on October 7, 1980. The other contributions listed were given after the run-off election and were intended for the November 1980 general election. Frank Hanley, Treasurer of EPEC, filed an amendment to the EPEC reports stating that the October 1, 1980 contribution was designated for the run-off election. Benjamin Betts, Treasurer of the Gunter Committee, also filed an amendment to this effect on November 23, 1982. Based on this information, it does not appear that the Respondents violated 2 U.S.C. § 441a(a)(2)(A).

RECOMMENDATIONS

1. Find no reason to believe the following respondents violated 2 U.S.C. § 441a(a)(2)(A): International Union of Operating Engineers (I.U.O.E.); I.U.O.E. Political Education Committee and its treasurer, Frank Hanley; I.U.O.E. Local #487 PAC and its treasurer, Anton J. Hermes; I.U.O.E. Local #675 PAC and its treasurer, Robert Kraft.
2. Find no reason to believe the following respondents violated 2 U.S.C. § 441a(f): Citizens for Bill Gunter and its treasurer, Benjamin F. Betts, Jr., and Bill Gunter.
3. Approve attached letters.
4. Close the file in this matter.

Charles N. Steele  
General Counsel

January 6, 1983  
Date

BY: Kenneth A. Gross - by KTG  
Kenneth A. Gross  
Associate General Counsel

Attachments

Response from Hanley  
Response from Fanning  
Response from Sugarman  
Response from Zanglein  
Response from Betts  
Proposed letters (5)

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United States  
Federal  
Education  
Committee



December 13, 1982

Mr. Mike Tangney  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463

RE: I. D. No. C00029504  
10/1/-10/15 Pre-Election Report

Dear Mr. Tangney:

The purpose of this letter is to amend certain information contained in my letter of March 17, 1981, addressed to Ms. Penny Harms. which amended EPEC's pre-election report covering the period from October 1, 1980.

The first entry on the March 17th letter amendment listed a \$2,000 contribution to the Bill Gunther Campaign Fund on October 1, 1980. The entry, however, failed to indicate the purpose of the contribution.

Please be advised that the referenced contribution should have been designated for the run-off election of candidate Gunther.

Very truly yours,

*Frank Hanley*  
Frank Hanley  
Treasurer

FH/kmg

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*Domestic*  
**International Union of Operating Engineers**

1125 SEVENTEENTH STREET NORTHWEST • WASHINGTON, D. C. 20036

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

★ OFFICE OF GENERAL PRESIDENT • DISTRICT 7-2560  
★

December 13, 1982

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

Re: MUR 1492

Dear Mr. Steele:

This statement is submitted on behalf of the Engineers Political Education Committee of the International Union of Operating Engineers ("EPEC") and its Treasurer, Frank Hanley, in response to the Complaint filed in the above-captioned matter.

The Complaint alleges that EPEC and its affiliated committees, i.e. PAC #487 I.U.O.E. Local 487 and the Engineers Political Action Committee Local 675, violated 2 U.S.C. 441 a(a)(2)(A) by contributing a total of \$7000 to the Citizens for Gunter Committee ("the Gunter Committee") for the 1980 general election. Complainant rests this allegation on the fact that each of the four contributions listed in Exhibit A of the Complaint, totaling \$7,000, was identified by the Gunter Committee as a general election contribution on the FEC Form 3 reports filed by that committee.

The Complainant may not establish that EPEC and its affiliated committees violated the Act based upon the boxes the Gunter Committee chose to check on its reports. In fact, the October 1, 1980 contribution of \$2,000 made by EPEC was made in connection with the October 7, 1980 run-off election, and not the subsequent general election. EPEC's failure to specifically so designate the contribution on its amended pre-election report

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Dec. 13, 1982

was a technical error which does not constitute a substantive violation of the Act. In order to rectify this technical error, EPEC is, contemporaneously with the submission of this statement, filing an amended report designating the October 1, 1980 contribution of \$2,000 for the run-off election. A copy of that report is attached hereto. (Attachment 1)

With the designation of the October 1 contribution resolved, it is clear that no violation of 2 U.S.C. 441 a(a) (2)(A) has occurred. EPEC and its affiliated committees contributed \$2,000 to the Gunter Committee for the run-off election, and a total of \$5,000 for the general election.

Based upon the foregoing, it is urged that the Commission find no reason to believe the Act has been violated and dismiss the Complaint.

Respectfully submitted,

J. Albert Woll, Esq.  
Michael R. Fanning, Esq.

by Michael R. Fanning  
Michael R. Fanning

aml  
attachment

opeiu#2

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December 7, 1982

Mr. Charles N. Steele  
General Counsel  
Federal Elections Commission  
Washington, D. C. 20463

Re: MUR 1492

Dear Mr. Steele:

This firm represents PAC #487 IUOE Local 487 and its Treasurer Anton J. Hermes. Our clients were named as Respondents in the above-numbered Complaint filed by Robert J.K. Dornan. The following is our response to that Complaint.

PAC #487 made a contribution of \$1,000 on October 20, 1980 for the general election campaign of Bill Gunter, the Democratic candidate for United States Senate. Candidate Gunter also received contributions for the general election of \$2,000 from Engineers Political Action Committee 675 and \$2,000 from the Engineers Political Education Committee.

We have been advised by the Engineers Political Education Committee that their prior contribution of \$2,000 made on October 1, 1980 was reported to the Commission without an indication as to whether that contribution was for the primary, runoff, or general election. We also have been advised that the Engineers Political Education Committee is filing an amended report showing that the \$2,000 contribution made on October 1, 1980 was for the second primary or runoff election held on October 7, 1980. This \$2,000 contribution from EPEC could not reasonably be attributed to the general election since, on the date the contribution was made, the runoff primary election had not yet been held and it was not known whether Candidate Gunter would be running in the general election.

Based upon this correct attribution of the October

ABRAHAM BASSIE

General Counsel

STEVEN BLOOM

General Counsel

ALFRED J. DE CASTRO

General Counsel

FAMELA FLEISCHMANN

General Counsel

JOSEPH H. KAPLAN

General Counsel

ARNOLD D. HESSEN

Federal Election and Wrongful Death

Federal Law

JOSEPH H. KAPLAN

Labor Law

HENRY S. PRETTYMAN

General Counsel

GERALD A. ROSENTHAL

Workers Compensation

RICHARD A. SICKING

General Counsel

Administrative and Governmental Law

ROBERT A. SUGARMAN

Labor Law

HOWARD S. SUSSKIND

Labor Law

## TELEPHONES:

212-691-1100

212-691-1101

212-691-1102

212-691-1103

WEST PALM BEACH OFFICE

1000 N. MILITARY AVE.

WEST PALM BEACH, FLORIDA 33401

TELEPHONE: 407-831-1100

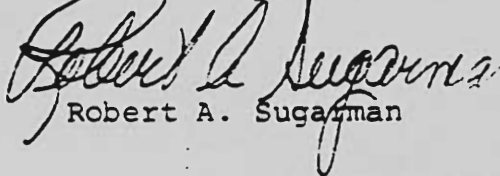
TELEFAX: 407-831-1101

Mr. Charles N. Steele  
December 7, 1982  
Page 2.

1st contribution from EPEC, all funds affiliated with the International Union of Operating Engineers have complied with the applicable campaign contribution limits. Two thousand dollars was contributed for the runoff primary election by EPEC and the limit of \$5,000 was contributed to the general election by the three respondent separate segregated funds.

We therefore respectfully submit that no violation occurred and that the amended report filed by EPEC warrants dismissal of the Complaint.

Yours truly,

  
Robert A. Sugarman

RAS:cw

cc: Jeanette P. Papillo, Staff Attorney  
The Center on National Labor Policy, Inc.

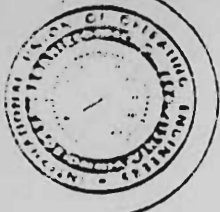
Michael Fanning, House Counsel  
International Union of Operating Engineers

Anton J. Hermes, Treasurer  
PAC #487 IUOE Local 487

Benjamin F. Betts, Jr. Treasurer  
Citizens for Gunter Committee

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ENGINEERS POLITICAL ACTION COMMITTEE  
Local 675

1551 WEST COPANS ROAD

PHONE: 979-1700

POMPAÑO BEACH FLORIDA 33064

December 10, 1982

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1482

Dear Mr. Steele:

As legal counsel for the Engineers Political Action Committee, Local 675 ("EPAC, Local 675"), I hereby file this response on behalf of EPAC Local 675 and Robert Kraft, both individually and in his capacity as treasurer of EPAC Local 675.

On October 24, 1980, EPAC Local 675 contributed \$2,000.00 to Bill Gunter for the 1980 General Election. This was intended for the general election since it was contributed after the run-off election and before the general election. EPAC Local 675 understood that the contributions of EPAC Local 675, Political Action Committee Local 487 and the International Union of Operating Engineers Political Education Committee could not total more than \$5,000.00 toward the 1980 General Election for Bill Gunter.

It is EPAC Local 675's understanding that prior to the run-off election, the International EPEC contributed \$2,000.00 to the Bill Gunter run-off election. Therefore, this \$2,000.00 contribution should not be taken into consideration when determining whether the \$5,000.00 maximum for general election contributions has been exceeded. Neither EPAC Local 675, nor its treasurer, Robert Kraft, willfully or knowingly contributed or conspired to contribute more than the \$5,000.00 maximum contribution allowable under 2 U.S.C. §441a(a)(2)(A).

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Charles N. Steele, Esquire  
December 10, 1982  
Page Two.

For future reference, the current mailing address of EPAC Local 675 is 1551 West Copans Road, Pompano Beach, Florida, 33064.

Please contact me directly if I can provide you with any additional information. An authorization form for Designation of Legal Counsel has been enclosed for your files.

Sincerely,

*Jayne Zanglein*

Jayne Zanglein  
Staff Attorney

cc: Dennis J. Walton  
Robert McMenemy  
Michael Fanning, Esquire

JZ:bml

83040374524

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Jayne E. Zanglein  
ADDRESS: 1551 West Copans Road, Pompano Beach, Florida 33064  
TELEPHONE: (305) 979-1700

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

12-7-82

Date

Signature

*Dennis J. Walton*

NAME: Dennis J. Walton

ADDRESS: 1551 W. Copans Road, Pompano Beach, Florida 33064

HOME PHONE: 764 1094

BUSINESS PHONE: (305) 979-1700

83040374523

March 17, 1981

Mr. Lenny Harms, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Mr. Harms:

Pursuant to your letter of March 4, 1981, to the Engineers  
Political Education Committee (EPIC), the following information  
is being provided.

EPIC's pre-election Report of Receipts and Disbursements  
covering the period from October 1, 1980, through October 15,  
1980, should contain these additional itemized disbursements  
for line No. 21, Schedule B, which were inadvertently omitted  
from the original report:

1. Bill Gunter Campaign Fund  
3802 Leane Drive-  
Tallahassee, Florida 32308  
Candidate Bill Gunter, U.S. Senate, Florida  
10/1/80 - \$2,000.00
2. Young Social Democrats Political Committee  
275 Seventh Avenue  
New York, New York 10001  
10/2/80 \$1,000.00
3. Gary for Senate Committee  
1541 Race Street  
Denver, Colorado 80202  
Senator Gary Hart, U.S. Senate, Colorado  
10/10/80 \$5,000.00

More . . . .

4. Birch Bayh for Senate Committee  
P.O. Box 44491  
Indianapolis, Indiana 46204  
Senator Birch Bayh, U.S. Senate, Indiana  
10/15/80 - \$3,000.00

5. Democratic National Committee  
1625 Massachusetts Avenue, N.W.  
Washington, D.C. 20036  
10/15/80 - \$300.00

83040374527 The above itemized disbursements total \$11,300.00, which when added to the reported Line 21 itemizations of \$52,976.00 amounts to \$64,276.00. This latter figure equals the total Line 21 contributions which were originally reported and, accordingly, the perceived discrepancy should now be resolved.

I trust that this additional information corrects the problem identified in your letter.

Very truly yours,

Frank Hanley  
Treasurer

FH:MEF/jlw



2 NOV 30 4 5: 03

P.O. Box 1507  
Tallahassee, Florida 32302

November 23, 1982

Ms. Suzanne M. Wilson  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

MUR 1492

Dear Ms. Wilson:

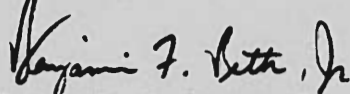
Based on a review of our records, the Citizens for Gunter Committee is amending a designation of receipt on Schedule A - Page 2 of 4 of its Report of Receipts and Disbursements dated October 28, 1980. This receipt was inadvertently and incorrectly designated for the General Election when, in fact, it should have been for the Second Primary. The report should have read as follows:

Engineers Political Education Committee  
1125 17 St. N.W.  
Washington, D.C. 20036

P-2 10/09 2,000.00 2,000.00

Please incorporate this amendment to our report.

Sincerely,

  
Benjamin F. Betts, Jr.  
Treasurer

BFB/asb

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mrs. Jeanette P. Papillo  
Center on National Labor Policy  
5211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151

RE: MUR 1492

Dear Mrs. Papillo:

The Federal Election Commission has reviewed the allegations made by your client, Robert J.K. Dornan, on October 21, 1982, and determined that on the basis of the information provided in your client's complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

83040674529





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Michael R. Fanning, Esquire  
International Union of Operating  
Engineers  
1125 Seventeenth Street, N.W.  
Washington, D.C. 20036

RE: MUR 1492

Dear Mr. Fanning:

On October 27, 1982, the Commission notified your clients, the Engineers Political Education Committee and its treasurer, Frank Hanley, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Jayne Zanglein  
EPAC - Local 675  
1551 West Copans Road  
Pompano Beach, Florida 33064

RE: MUR 1492

Dear Ms. Zanglein:

On October 27, 1982, the Commission notified your clients, EPAC Local #675 and its treasurer, Robert Kraft, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

83040374531



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert A. Sugarman, Esquire  
Kaplan, Sicking, Hessen,  
Sugarman, Rosenthal and DeCastro  
P.O. Box 520337  
Miami, Florida 33152

RE: MUR 1492

Dear Mr. Sugarman:

On October 27, 1982, the Commission notified your clients, I.U.O.E. Local #487 PAC and its treasurer, Anton Hermes, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1983, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Benjamin Betts, Treasurer  
Citizens for Gunter Committee  
P.O. Box 1507  
Miami, Florida 32302

RE: MUR 1492

Dear Mr. Betts:

On October 27, 1982, the Commission notified you, your committee, and Bill Gunter of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1983, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

83040374533

December 1, 1982

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Phyllis A. Kayson  
SUBJECT: MUR 1492

Please have the attached First General Counsel's Report distributed to the Commission on a 24 hour no-objection basis.  
Thank you.

Attachment

cc: Donaldson

8304067453

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

82 DEC 1 AIO: 31

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION 12-1-82

MUR NO. 1492  
DATE COMPLAINT RECEIVED BY  
OGC October 21, 1982  
DATE OF NOTIFICATION TO  
RESPONDENT October 27,  
1982/November 9, 1982  
STAFF MEMBER  
Susan Donaldson

COMPLAINANT'S NAME: Robert J.K. Dornan

RESPONDENTS' NAMES: International Union of Operating Engineers  
("I.U.O.E.")  
I.U.O.E. Political Education Committee  
I.U.O.E. Local #487  
I.U.O.E. Local #675  
Citizens for Bill Gunter Committee

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(2)(A) and  
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Citizens for Bill Gunter Committee  
I.U.O.E. Local #487  
I.U.O.E. Local #675

FEDERAL AGENCIES CHECKED: None

**SUMMARY OF ALLEGATIONS**

A complaint filed by Robert J.K. Dornan was received at the Commission on October 21, 1982. The complaint alleges that the International Union of Operating Engineers' separate segregated fund, the Engineers' Political Education Committee; and its affiliated separate segregated funds, Local #487 and Local #675, contributed \$7,000 to the Citizens for Bill Gunter Committee in violation of 2 U.S.C. § 441a(a)(2)(A). Mr. Dornan also alleges

8304037453E

that the Citizens for Bill Gunter Committee knowingly accepted the excessive contributions in violation of 2 U.S.C. § 441a(f).

**FACTUAL AND LEGAL ANALYSIS**

FEC reports indicate that the Engineers' Political Education Committee, and Local #487 and Local #675 are affiliated. The respondents of this complaint were notified on October 27, 1982.

The Local #675 had changed address so the notice was remailed on November 9, 1982. Michael Fanning, counsel for the I.U.O.E., requested an extension of time to respond to the complaint in a letter dated November 4, 1982. The extension was granted until December 13, 1982.

A report will be submitted to the Commission upon receipt of the respondents' replies.

Charles N. Steele  
General Counsel

Nov. 30, 1982  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

Complaint  
Letter from Fanning  
Letter to Fanning

83040374536



203587

60049117

# ENGINEERS POLITICAL ACTION COMMITTEE 20

## Local 675

1551 WEST COPANS ROAD

PHONE: 979-1700

POMPANO BEACH, FLORIDA 33064

PG: 45

December 10, 1982

33040674567

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1482

Dear Mr. Steele:

As legal counsel for the Engineers Political Action Committee, Local 675 ("EPAC, Local 675"), I hereby file this response on behalf of EPAC Local 675 and Robert Kraft, both individually and in his capacity as treasurer of EPAC Local 675.

On October 24, 1980, EPAC Local 675 contributed \$2,000.00 to Bill Gunter for the 1980 General Election. This was intended for the general election since it was contributed after the run-off election and before the general election. EPAC Local 675 understood that the contributions of EPAC Local 675, Political Action Committee Local 487 and the International Union of Operating Engineers Political Education Committee could not total more than \$5,000.00 toward the 1980 General Election for Bill Gunter.

It is EPAC Local 675's understanding that prior to the run-off election, the International EPEC contributed \$2,000.00 to the Bill Gunter run-off election. Therefore, this \$2,000.00 contribution should not be taken into consideration when determining whether the \$5,000.00 maximum for general election contributions has been exceeded. Neither EPAC Local 675, nor its treasurer, Robert Kraft, willfully or knowingly contributed or conspired to contribute more than the \$5,000.00 maximum contribution allowable under 2 U.S.C. §441a(a)(2)(A).

Charles N. Steele, Esquire  
December 10, 1982  
Page Two.

For future reference, the current mailing address of EPAC Local 675 is 1551 West Copans Road, Pompano Beach, Florida, 33064.

Please contact me directly if I can provide you with any additional information. An authorization form for Designation of Legal Counsel has been enclosed for your files.

Sincerely,

*Jayne Zanglein*

Jayne Zanglein  
Staff Attorney

cc: Dennis J. Walton  
Robert McMenemy  
Michael Fanning, Esquire

JZ:bml

83040674538



STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Jayne E. Zanglein  
ADDRESS: 1551 West Copans Road, Pompano Beach, Florida 33064  
TELEPHONE: (305) 979-1700

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

12-7-82

Date

Signature

*Dennis J. Walton*

NAME: Dennis J. Walton

ADDRESS: 1551 W. Copans Road, Pompano Beach, Florida 33064

HOME PHONE:

764 1094

BUSINESS PHONE: (305) 979-1700

33040574539

**LAW OFFICES**

**KAPLAN, SICKING, HESSEN, SUGARMAN, ROSENTHAL & DE CASTRO**  
PROFESSIONAL ASSOCIATION

1951 NORTHWEST 17th AVENUE  
MIAMI, FLORIDA

MAILING ADDRESS  
P.O. DRAWER 520337  
MIAMI, FLORIDA 33152

**ABRAHAM BASSIE**  
General Practice

**STEVEN BLOOM**  
Labor Law

**ALFREDO F. DE CASTRO**  
General Practice

**PAMELA FLEISCHMANN**  
General Practice

**PATRICK O. HELM**  
General Practice

**ARNOLD D. HESSEN**  
Personal Injury and Wrongful Death  
Family Law

**JOSEPH H. KAPLAN**  
Labor Law

**HENRY S. PRETTYMAN**  
Criminal Law

**GERALD A. ROSENTHAL**  
Worker's Compensation

**RICHARD A. SICKING**  
Worker's Compensation  
Administrative and Governmental Law

**ROBERT A. SUGARMAN**  
Labor Law

**HOWARD S. SUSSKIND**  
Labor Law

**TELEPHONES:**

(305) 325-1661  
FROM BROWARD DIAL 9208159  
FROM PALM BEACH DIAL 659-2262

**WEST PALM BEACH OFFICE**

SUITE 107 • FORUM III  
100 S. PALM BEACH LAKES BOULEVARD  
WEST PALM BEACH, FLORIDA 33411  
Tel. No. (305) 62-5440

December 7, 1982

Mr. Charles N. Steele  
General Counsel  
Federal Elections Commission  
Washington, D. C. 20463

Re: MUR 1492

Dear Mr. Steele:

This firm represents PAC #487 IUOE Local 487 and its Treasurer Anton J. Hermes. Our clients were named as Respondents in the above-numbered Complaint filed by Robert J.K. Dornan. The following is our response to that Complaint.

PAC #487 made a contribution of \$1,000 on October 20, 1980 for the general election campaign of Bill Gunter, the Democratic candidate for United States Senate. Candidate Gunter also received contributions for the general election of \$2,000 from Engineers Political Action Committee 675 and \$2,000 from the Engineers Political Education Committee.

We have been advised by the Engineers Political Education Committee that their prior contribution of \$2,000 made on October 1, 1980 was reported to the Commission without an indication as to whether that contribution was for the primary, runoff, or general election. We also have been advised that the Engineers Political Education Committee is filing an amended report showing that the \$2,000 contribution made on October 1, 1980 was for the second primary or runoff election held on October 7, 1980. This \$2,000 contribution from EPEC could not reasonably be attributed to the general election since, on the date the contribution was made, the runoff primary election had not yet been held and it was not known whether Candidate Gunter would be running in the general election.

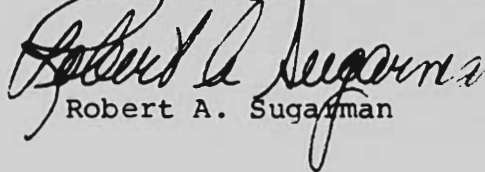
Based upon this correct attribution of the October

Mr. Charles N. Steele  
December 7, 1982  
Page 2.

1st contribution from EPEC, all funds affiliated with the International Union of Operating Engineers have complied with the applicable campaign contribution limits. Two thousand dollars was contributed for the runoff primary election by EPEC and the limit of \$5,000 was contributed to the general election by the three respondent separate segregated funds.

We therefore respectfully submit that no violation occurred and that the amended report filed by EPEC warrants dismissal of the Complaint.

Yours truly,



Robert A. Sugarman

RAS:cw

cc: Jeanette P. Papillo, Staff Attorney  
The Center on National Labor Policy, Inc.

Michael Fanning, House Counsel  
International Union of Operating Engineers

Anton J. Hermes, Treasurer  
PAC #487 IUOE Local 487

Benjamin F. Betts, Jr. Treasurer  
Citizens for Gunter Committee

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LAW OFFICES

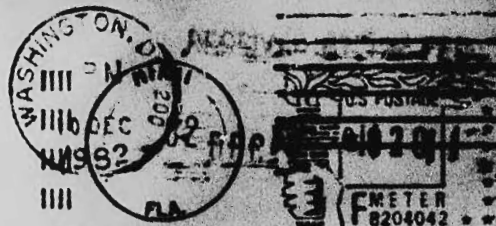
KAPLAN, SICKING,

HESSEN, SUGARMAN

- ROSENTHAL & DE CASTRO

PROFESSIONAL ASSOCIATION

DRAWER 520137  
MIAMI FLORIDA 33152



Mr. Charles N. Steele  
General Counsel  
Federal Elections Commission  
Washington, D. C. 20463

6cc# 1492



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# International Union of Operating Engineers

1125 SEVENTEENTH STREET NORTHWEST ★ WASHINGTON, D. C. 20036

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

★ OFFICE OF GENERAL PRESIDENT • DISTRICT 7-8560  
★

December 13, 1982

DEC 13 2 5:03



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

Re: MUR 1492

Dear Mr. Steele:

This statement is submitted on behalf of the Engineers Political Education Committee of the International Union of Operating Engineers ("EPEC") and its Treasurer, Frank Hanley, in response to the Complaint filed in the above-captioned matter.

The Complaint alleges that EPEC and its affiliated committees, i.e. PAC #487 I.U.O.E. Local 487 and the Engineers Political Action Committee Local 675, violated 2 U.S.C. 441 a(a)(2)(A) by contributing a total of \$7000 to the Citizens for Gunter Committee ("the Gunter Committee") for the 1980 general election. Complainant rests this allegation on the fact that each of the four contributions listed in Exhibit A of the Complaint, totaling \$7,000, was identified by the Gunter Committee as a general election contribution on the FEC Form 3 reports filed by that committee.

The Complainant may not establish that EPEC and its affiliated committees violated the Act based upon the boxes the Gunter Committee chose to check on its reports. In fact, the October 1, 1980 contribution of \$2,000 made by EPEC was made in connection with the October 7, 1980 run-off election, and not the subsequent general election. EPEC's failure to specifically so designate the contribution on its amended pre-election report

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Dec. 13, 1982

was a technical error which does not constitute a substantive violation of the Act. In order to rectify this technical error, EPEC is, contemporaneously with the submission of this statement, filing an amended report designating the October 1, 1980 contribution of \$2,000 for the run-off election. A copy of that report is attached hereto. (Attachment 1)

With the designation of the October 1 contribution resolved, it is clear that no violation of 2 U.S.C. 441 a(a) (2)(A) has occurred. EPEC and its affiliated committees contributed \$2,000 to the Gunter Committee for the run-off election, and a total of \$5,000 for the general election.

Based upon the foregoing, it is urged that the Commission find no reason to believe the Act has been violated and dismiss the Complaint.

Respectfully submitted,

J. Albert Woll, Esq.  
Michael R. Fanning, Esq.

by Michael R. Fanning  
Michael R. Fanning

aml  
attachment

opeiu#2

830440374544

J. G. TURNER  
Chairman

FRANK HANLEY  
Treasurer

1125 Seventeenth Street, N.W.  
Washington, D.C. 20036  
202-429-9100

# Engineers Political Education Committee

Attachment 1



December 13, 1982

Mr. Mike Tangney  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463

RE: I. D. No. C00029504  
10/1/-10/15 Pre-Election Report

Dear Mr. Tangney:

The purpose of this letter is to amend certain information contained in my letter of March 17, 1981, addressed to Ms. Penny Harms. which amended EPEC's pre-election report covering the period from October 1, 1980.

The first entry on the March 17th letter amendment listed a \$2,000 contribution to the Bill Gunther Campaign Fund on October 1, 1980. The entry, however, failed to indicate the purpose of the contribution.

Please be advised that the referenced contribution should have been designated for the run-off election of candidate Gunther.

Very truly yours,

*Frank Hanley*  
Frank Hanley  
Treasurer

FH/kmg

83040374545

March 17, 1981

Ms. Penny Harms, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Ms. Harms:

Pursuant to your letter of March 4, 1981, to the Engineers Political Education Committee (EPEC), the following information is being provided.

EPEC's pre-election Report of Receipts and Disbursements covering the period from October 1, 1980, through October 15, 1980, should contain these additional itemized disbursements for Line No. 21, Schedule B, which were inadvertently omitted from the original report:

1. Bill Gunter Campaign Fund  
3802 Leane Drive  
Tallahassee, Florida 32308  
Candidate Bill Gunter, U.S. Senate, Florida  
10/1/80 - \$2,000.00
2. Young Social Democrats Political Committee  
275 Seventh Avenue  
New York, New York 10001  
10/2/80 - \$1,000.00
3. Hart for Senate Committee  
1540 Pace Street  
Denver, Colorado 80206  
Senator Gary Hart, U.S. Senate, Colorado  
10/15/80 - \$5,000.00

More . . . .

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4. Birch Bayh for Senate Committee  
P.O. Box 44491  
Indianapolis, Indiana 46204  
Senator Birch Bayh, U.S. Senate, Indiana  
10/15/80 - \$3,000.00
5. Democratic National Committee  
1625 Massachusetts Avenue, N.W.  
Washington, D.C. 20036  
10/15/80 - \$300.00

The above itemized disbursements total \$11,300.00, which when added to the reported Line 21 itemizations of \$52,976.00 amounts to \$64,276.00. This latter figure equals the total Line 21 contributions which were originally reported and, accordingly, the perceived discrepancy should now be resolved.

I trust that this additional information corrects the problem identified in your letter.

Very truly yours,

Frank Hanley  
Treasurer

PH:HRF/jlw

83040374547

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**INTERNATIONAL UNION OF OPERATING ENGINEERS**

**1125 SEVENTEENTH STREET, N.W.  
WASHINGTON, D. C. 20036**



**INTERNATIONAL UNION OF OPERATING ENGINEERS  
1125 Seventeenth St., N.W., Washington, D.C. 20036**

ADDRESS CORRECTION REQUESTED



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

**FIRST CLASS**

Cc# 8979

STATEMENT OF DESIGNATION OF COUNSEL

CASE NO. MUR 1492

NAME OF COUNSEL: Robert A. Sugarman, Kaplan, Sicking, Hessen, Sugarman,  
Rosenthal & De Castro, P.A.

ADDRESS: P.O. Drawer 520337  
Miami, Florida 33152

TELEPHONE: (305) 325-1661

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

Nov. 15, 1982  
Date

Inton J. A. Amos  
Signature CHAIRMAN

NAME: PAC 487 - IUOE Local 487

ADDRESS: 1425 N. W. 36th Street  
Miami, Florida 33142

HOME PHONE: (305) 983-6420

BUSINESS PHONE: (305) 634-3419

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LAW OFFICES

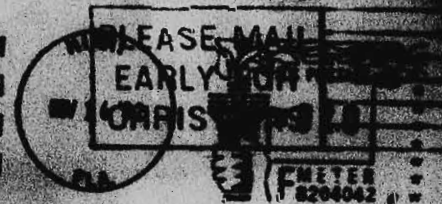
KAPLAN, SICKING,

HESSEN, SUGARMAN

ROSENTHAL & DE CASTRO

PROFESSIONAL ASSOCIATION

P.O. DRAWER 520337  
MIAMI, FLORIDA 33152



Federal Election Commission

1325 "K" Street, N. W.

Washington, D. C. 20463

82 NOV 19 A10:42



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

November 17, 1982

Michael R. Fanning, Counsel  
International Union of Operating  
Engineers  
1125 Seventeenth Street, N.W.  
Washington, D.C. 20036

RE: MUR 1492

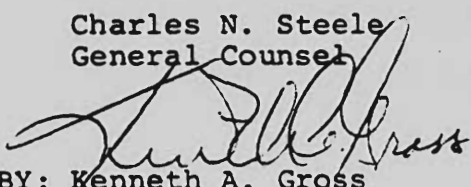
Dear Mr. Fanning:

In response to your letter dated November 4, 1982, an extension of time is granted for you to appropriately and fully respond to the allegations made in connection with the International Union of Operating Engineers, Engineers Political Education Committee, I.U.O.E. Local #675 and I.U.O.E. Local #487. Your response should be received at the Commission no later than December 13, 1982.

For your information, the notification letter to I.U.O.E. Local #675 was resent from this office on November 8, 1982. It was returned to this office due to no forwarding address.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

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664 8887  
NOV 8 1982  
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# International Union of Operating Engineers

1125 SEVENTEENTH STREET NORTHWEST \* WASHINGTON, D. C. 20036

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

OFFICE OF GENERAL PRESIDENT • (202) 347-8860

November 4, 1982

Ms. Susan Donaldson  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1492

Dear Ms. Donaldson:

I have been authorized by the respondents named in paragraph 2(d) through (i) of the Complaint in the above captioned matter to request an extension of time within which to file written responses to the Complaint. While the International Union of Operating Engineers, Engineers Political Education Committee received a copy of the Complaint on October 29, service upon the other respondents has not been completed as of this date. Accordingly, in order to allow sufficient time for appropriate and fully informed responses to be prepared, an extension of time for all referenced respondents is requested until Monday, December 13.

Enclosed are duly executed Designation of Counsel forms, filed on behalf of IUOE-EPEC and its Treasurer, Frank Hanley.

Please advise this office concerning the requested extension of time and I will inform all other respondents upon whose behalf it is requested.

Very truly yours,

*Michael R. Fanning*  
Michael R. Fanning  
House Counsel

MRF/jlw  
Enclosures

cc: All referenced respondents

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Michael R. Fanning, Esq. and J. Albert Woll, Esq.

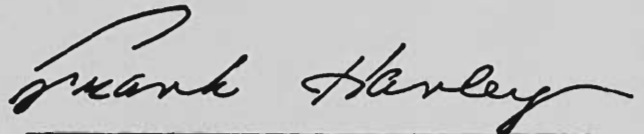
ADDRESS: 1125 - 17th Street, N.W., Washington, D.C. 20036

TELEPHONE: (202) 429-9100

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

November 4, 1982

Date



Signature

NAME: Frank Hanley, Treasurer, Engineers Political Education  
Committee, International Union of Operating Engineers

ADDRESS: 1125 - 17th Street, N.W., Washington, D.C. 20036

HOME PHONE: ---

BUSINESS PHONE: (202) 429-9100

83040374533

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Michael R. Fanning, Esq. and J. Albert Woll, Esq.

ADDRESS: 1125 - 17th Street, N.W., Washington, D.C. 20036

TELEPHONE: (202) 429-9100

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and  
other communications from the Commission and to act on my  
behalf before the Commission.

November 4, 1982

Date



Signature

NAME: Frank Hanley, Treasurer, Engineers Political Education  
Committee, International Union of Operating Engineers

ADDRESS: 1125 - 17th Street, N.W., Washington, D.C. 20036

HOME PHONE: ---

BUSINESS PHONE: (202) 429-9100

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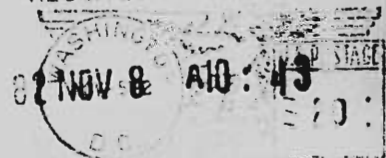
★  
★ OFFICE OF GENERAL PRESIDENT

★  
★ *International Union of Operating Engineers*

★ 1125 SEVENTEENTH STREET NORTHWEST ★ WASHINGTON, D.C. 20036  
★

Ms. Susan Donaldson  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED THE FEC



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203565  
GCC 9093  
DEC 13 11:04

## The Center On National Labor Policy, Inc.

5211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151  
(703) 321-9180

December 8, 1982

Mr. Kenneth A. Gross  
Associate General Counsel  
Federal Election Commission  
1325 "K" Street, Northwest  
Washington, D.C. 20463

Dear Mr. Gross:

Re: Robert K. Dornan v. Bill Gunter and  
International Union of Operating Engineers -  
Engineers' Political Education Committee

Enclosed is the above-referenced Complainant's "Notice of Designation of Representative As Agent For Service of Documents." Please forward to me written communications relating to this proceeding and advise me of the Matter Under Review number assigned to this case.

If I can be of any assistance, please do not hesitate to contact me.

Sincerely,

(Mrs.) Jeanette P. Papillo  
Staff Attorney

JPP/jh

Enclosure

8304067436

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

RECEIVED BY THE FEC  
82 DEC 13 AM 104

Robert J. K. Dornan,  
1101 Tetterton Drive  
Vienna, Virginia 22180,

Complainant,

v.

Bill Gunter and International  
Union of Operating Engineers-  
Engineers' Political Education  
Committee,

Respondents.


MUR No. \_\_\_\_\_

Notice of Designation of Representative  
As Agent For Service of Documents

I, Robert J. K. Dornan, hereby designate as my representative and agent Mrs. Jeanette P. Papillo, Center on National Labor Policy, 5211 Port Royal Road, Suite 400, North Springfield, Virginia 22151, (703) 321-9180. She is to receive exclusive service of all documents and written communications relating to this proceeding including decisions and orders.

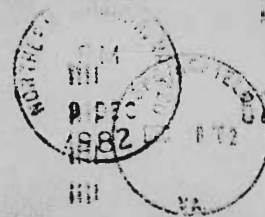
This designation shall remain valid until a written revocation of it, signed by me, is filed with the Federal Election Commission.

  
Robert J. K. Dornan

December 7, 1982  
Date 

83040374567

The Center On National Labor Policy, Inc.  
2211 Port Royal Road, Suite 400  
North Springfield, Virginia 22151



Mr. Kenneth A. Gross  
Associate General Counsel  
Federal Election Commission  
1325 "K" Street, Northwest  
Washington, D.C. 20463

830403741

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MEMORANDUM TO: *D. Donaldson*

FROM: Steve Barndollar  
Docket Clerk

SUBJECT: Returned Letters

DATE: *11/2/92*

The following letter MUR/492 was returned. Please write a memo to the file and advise on what to do. If you wish to resend the letter, please have the envelope(s) and green card(s) made.

Thanks *[Signature]*

*He can  
resend to  
this address* →

83040374519

CTION COMMISSION

TON, DC 20463

AL BUSINESS

PRIVATE USE, \$300

8 3 0 4 0 5 7 4 5 6 0

FIRST CLASS  
POSTAGE &  
FEE  
WASHING  
PERMIT

*MAILED 122*  
*NOV 10 1967*  
*U.S. MAIL*

MOVED  
NOT FORWARDABLE

Mr. Bill Gunter

~~1020 East Lafayette, #208~~

~~Tallahassee, FL 32301~~

*40 Citizens for Gunter Committee*  
*P.O. Box 1507*  
*Tallahassee, Florida*  
*32302*

CERTIFIED

*438416*

83040374561

FIRST CLASS MAIL  
POSTAGE & FEES PAID

FEC

WASHINGTON, D.C.  
PERMIT NO. G-31

*Handwritten:* 122  
*Stamp:* [illegible]  
*Text:* 122

MOVED  
NOT FORWARDABLE

Mr. Bill Gunter  
1020 Fast Lafayette, #208  
Tallahassee, FL 32301

CERTIFIED

*Handwritten:* 438416

83040374562

RETURN TO  
SENDER  
NOT FORWARDABLE

NOTE  
12/27/74

Mr. Benjamin F. Betts, Jr.  
Citizens for Bill Gunter Committee  
1020 East Lafayette St., #208  
Tallahassee, FL 32301

CERT  
43



Mr. Benjamin F. Betts, Jr.  
Citizens for Bill Gunter Committee  
1020 East Lafayette St., #208  
Tallahassee, FL 32301

*Handwritten:* Mr. W. H. ...  
*Stamp:* [Illegible]

Bill Gunter

RECEIVED AT THE FEC

82 NOV 30 4 9: 03

P.O. Box 1507  
Tallahassee, Florida 32302

November 23, 1982

Ms. Suzanne M. Wilson  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

MUR 1492

Dear Ms. Wilson:

Based on a review of our records, the Citizens for Gunter Committee is amending a designation of receipt on Schedule A - Page 2 of 4 of its Report of Receipts and Disbursements dated October 28, 1980. This receipt was inadvertently and incorrectly designated for the General Election when, in fact, it should have been for the Second Primary. The report should have read as follows:

Engineers Political Education Committee  
1125 17 St. N.W.  
Washington, D.C. 20036

P-2 10/09 2,000.00 2,000.00

Please incorporate this amendment to our report.

Sincerely,

*Benjamin F. Betts, Jr.*

Benjamin F. Betts, Jr.  
Treasurer

BFB/asb

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MEMORANDUM TO: *D. Donaldson*

FROM: Steve Barndollar  
Docket Clerk

SUBJECT: Returned Letters

DATE: *11/3/82*

The following letter MUR *1492* was returned. Please write a memo to the file and advise on what to do. If you wish to resend the letter, please have the envelope(s) and green card(s) made.

Thanks *JB*

83040374  
Please send to  
Local #675  
1551 W Copans Rd  
Pompano Beach, Florida  
33069  
Thank

8 3 0 4 0 7 4 3 6 4

FEC  
WASHINGTON, D.C.  
PERMIT NO. G-31

CHECK

NOV 15 1982

NOV 15 1982

NOV 15 1982

NOV 15 1982

NOV 15 1982

NOV 15 1982

NOV 15 1982

Mr. Robert Kraft, Treasurer  
Local 675  
3101 SW 8th Avenue  
Ft. Lauderdale, FL 33315

*FWD EXP*  
*Nov 15/84*  
*10-30-82*

**CERTIFIED**

*6738408*

NOV 15 1982

NOV 15 1982

WASHINGTON, D.C. 20545

OFFICIAL BUSINESS

Penalty for Private Use, \$300

83040374567

CAUTION  
TO  
SERVICES  
UNITED STATES  
FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D.C. 20535  
FBI  
DO NOT REMOVE  
FBI  
FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D.C. 20535

Ford EXP  
Rm 1514

Mr. Robert Kraft, Treasurer  
Local 675  
3101 SW 8th Avenue  
Ft. Lauderdale, FL 33315

CERTIFIED

NO CHECK  
NO

HOLD

DATE

1ST NOTICE

2ND NOTICE

RETURN

Detached from  
PS Form 3849-A  
Oct 1980



WASHINGTON, D.C. 20428

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE, \$300

CLAIM CHECK  
NO

DATE

DATE

1ST NOTICE

2ND NOTICE

RETURN

Detached from  
Form 3848-A  
1 1980



MOVED, LEFT NO ADDRESS  
FT. LAUDERDALE, FLA. 33315

Rem 1574  
Fwd EXP 10-30-82

Mr. Robert Kraft, Treasurer  
Local 675  
3101 SW 8th Avenue  
Ft. Lauderdale, FL 33315

Respondents - 1492

Bill Gunter

1020 East Lafayette St, #208  
Tallahassee, Florida 32301

you

✓  
Citizens for Bill  
Gunter Committee

Benjamin F Batte, Jr., Treasurer  
1020 East Lafayette St, #208  
Tallahassee, Florida 32301

~~Citizens for Bill Gunter Committee~~  
~~1020 East Lafayette St~~  
~~Tallahassee, Florida 32301~~

✓ Arton J Hermes, Treasurer  
PAC #487, I.U.O.E. Local 487  
1425 NW 36<sup>th</sup> St,  
Miami, Florida 33142

~~PAC #487 I.U.O.E.~~  
~~1425 NW 36<sup>th</sup> St~~  
~~Miami, Florida 33142~~

✓ Robert Kraft, Treasurer  
Local 675  
3101 SW 8<sup>th</sup> Ave  
Ft, Lauderdale, Florida 33315

✓ Frank Hanley, Treasurer  
Engineers Political Education Committee  
1125 17<sup>th</sup> St, NW  
Wash, DC 20036



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

Mr. Robert J. K. Dornan  
1101 Tetterton Drive  
Vienna, VA 22180

Dear Mr. Dornan:

This letter is to acknowledge receipt of your complaint of October 21, 1982, against Mr. Bill Gunter, Mr. Benjamin F. Betts, Jr., Citizens for Bill Gunter Committee, Mr. Anton J. Hermes, PAC #487, Mr. Robert Kraft, Engineers PAC #657, Mr. Frank Hanley, and International Union of Operating Engineers which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name.

By Kenneth A. Gross  
Associate General Counsel

Enclosure

83040374570





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Benjamin F. Betts, Jr.  
Citizens for Bill Gunter Committee  
1020 East Lafayette St., #208  
Tallahassee, FL 32301

Re: MUR 1492

Dear Mr. Betts:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

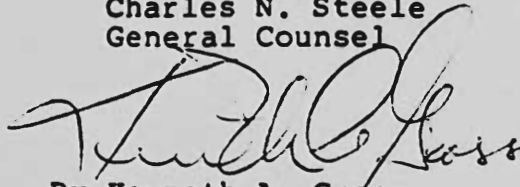
83040374371

- 2 -

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

33040374572



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Anton J. Hermes, Treasurer  
PAC #487, I.V.O.E. Local 487  
1425 NW 36th Street  
Miami, FL 33142

Re: MUR 1492

Dear Mr. Hermes:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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03040374573

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

*[Handwritten Signature]*

By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

492 1029

U.S. MAIL PERMIT NO. 1000 WASHINGTON, D.C. 20540

ADD YOUR ADDRESS AND ZIP SPACE ON REVERSE

(CONSULT POSTMASTER FOR POSTAGE)

1. The following service is requested (check one)

☐ Show to whom and date delivered \_\_\_\_\_

☐ Show to whom, date, and address of delivery \_\_\_\_\_

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee)

TOTAL \$ \_\_\_\_\_

3. ARTICLE ASSIGNED TO:  
Anton Hennes  
Miami, FL 33142

4. TYPE OF SERVICE

☐ REGISTERED ☐ REGISTERED MAIL  
☐ CERTIFIED ☐ COD  
☐ EXPRESS MAIL

5. ARTICLE NUMBER  
438413

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY  
NOV 1 1982

6. ADDRESSEE'S ADDRESS (City & State)

7. UNABLE TO DELIVER REASON

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert Kraft, Treasurer  
Local 675  
3101 SW 8th Avenue  
Ft. Lauderdale, FL 33315

Re: MUR 1492

Dear Mr. Kraft:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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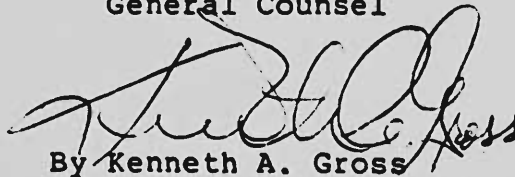
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

- 2 -

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

83040374576



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Frank Hanley, Treasurer  
Engineers Political Education Committee  
1125 17th Street, NW  
Washington, D.C. 20036

Re: MUR 1492

Dear Mr. Hanley:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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3604074577

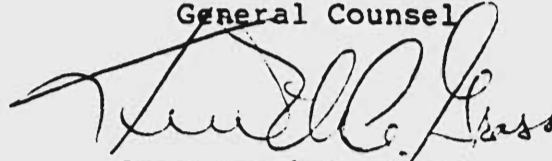


- 2 -

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1492 860

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

☐ Show to whom and date delivered \_\_\_\_\_

☐ Show to whom, date, and address of delivery \_\_\_\_\_

2. ☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

3. ARTICLE ADDRESSED TO:  
Frank Hanley  
Washington, D.C. - 20036


4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COD ☐ RETURN RECEIPT

ARTICLE NUMBER: 438415

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE:  ADDRESS: AUTHORIZED AGENT: ☐

5. DATE OF DELIVERY: 10/29/82

6. ADDRESSEE'S SIGNATURE (if required)

7. UNABLE TO DELIVER REASON: NO DELIVERY

OCT 29 1982





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Bill Gunter  
1020 East Lafayette, # 208  
Tallahassee, FL 32301

Re: MUR 1492

Dear Mr. Gunter:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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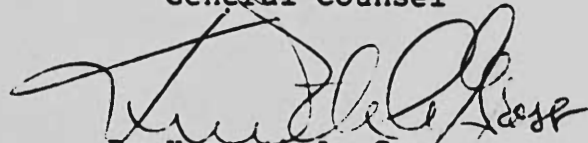
83040674579

- 2 -

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

83040374530



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Benjamin F. Betts, Jr.  
Citizens for Bill Gunter Committee  
1020 East Lafayette St., #208  
Tallahassee, FL 32301

Re: MUR 1492

Dear Mr. Betts:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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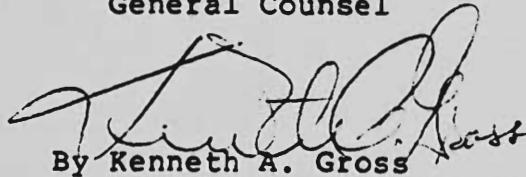
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- 2 -

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel



By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

B 3 0 4 0 3 7 4 5 3 2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Anton J. Hermes, Treasurer  
PAC #487, I.V.O.E. Local 487  
1425 NW 36th Street  
Miami, FL 33142

Re: MUR 1492

Dear Mr. Hermes:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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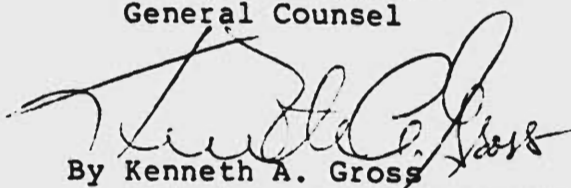
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If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1192 10/28

SENDER: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.


(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one):  
☐ Show to whom and date delivered  
☐ Show to whom, date, and address of delivery  
☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

2. ARTICLE ADDRESSED TO:  
Anton Hermes  
Miami, FL 33142

3. TYPE OF SERVICE:  
☐ Registered ☐ Certified ☐ Insured ☐ Registered Mail  
☐ Certified Mail ☐ Registered Mail ☐ Insured Mail

4. ARTICLE NUMBER:  
01h88h

(Always obtain signature of addressee or agent)  
I have received the article described above.  
SIGNATURE:  AUTHORIZED AGENT: ☐

5. DATE OF DELIVERY:  
NOV 1 1982

6. ADDRESSEE'S ADDRESS (Only if required):

7. INABLE TO DELIVER BECAUSE:

NOV 1 1982



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert Kraft, Treasurer  
Local 675  
3101 SW 8th Avenue  
Ft. Lauderdale, FL 33315

Re: MUR 1492

Dear Mr. Kraft:

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

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30407453



If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By Kenneth A. Gross  
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1492 11/8

U.S. MAIL SERVICE

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

☐ Show to whom and date delivered \_\_\_\_\_

☐ Show to whom, date, and address of delivery \_\_\_\_\_


☐ RESTRICTED DELIVERY  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

2. ARTICLE ASSIGNED TO:  
Local # 175  
Pompano Beach, FL

3. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED  
☐ CERTIFIED ☐ COD  
☐ REGISTERED MAIL

4. SIGNATURE: 

5. DATE OF DELIVERY: 11/12/82

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER REASON:

8. RETURN RECEIPT: REGISTERED, INSURED AND CERTIFIED MAIL

NOV 12 1982



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 27, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Frank Hanley, Treasurer  
Engineers Political Education Committee  
1125 17th Street, NW  
Washington, D.C. 20036

Re: MUR 1492

Dear Mr. Hanley :

This letter is to notify you that on October 21, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1492. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

## Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

Charles N. Steele  
General Counsel

By Kenneth A. Gross

**Associate General Counsel**

1492 6268

① **SENDER:** Complete Name & Address  
Add your address in the "Return to" space on reverse.

**(CONSULT POSTMASTER FOR FEES)**

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

☐ Show to whom and date delivered \_\_\_\_\_

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

2. ☐ **RESTRICTED DELIVERY** \_\_\_\_\_  
(The restricted delivery fee is charged in addition to the return receipt fee.)

**TOTAL \$** \_\_\_\_\_

3. **ARTICLE ADDRESSED TO:**  
Frank Harvey  
Washington, D.C.

4. **TYPE OF SERVICE:**

☐ REGISTERED ☐ INSURED

☐ CERTIFIED ☐ COD

☐ EXPRESS MAIL

**ARTICLE NUMBER**  
60485h

(Always obtain signature of addressee or agent)

I have received the article described above.

**SIGNATURE** ☐ Addressee ☐ Authorized agent  
D. DeAlmeida

**DATE OF DELIVERY**  
10/29/82

5. **ADDRESSEE'S RECEIPT (only if requested)**

6. **MAILING AND DELIVERY INFORMATION**

7. **POSTAGE AND FEE DETAILS**

RETURN RECEIPT, REGISTERED MAIL, INSURED AND CERTIFIED MAIL.

200121 P12:43

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

Robert J. K. Dornan,  
1101 Tetterton Drive  
Vienna, Virginia 22180,

Complainant,

v.

Bill Gunter and International  
Union of Operating Engineers-  
Engineers' Political Education  
Committee,

Respondents.

Complaint  
MUR No. \_\_\_\_\_

## I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) Robert J.K. Dornan brings this complaint against candidate for federal public office, Bill Gunter; the Citizens for Bill Gunter Committee; the International Union of Operating Engineers' separate segregated funds, the Engineers' Political Education Committee, "E.P.E.C."; and its affiliated separate segregated funds "SSFs", Local 478, PAC #487; Engineers Political Action Committee, Local 675; and all the committees' treasurers individually and in their capacities as treasurers for the making and receiving of excessive contributions in violation of 2 U.S.C. §441(a)(f) and 2 U.S.C. §441a(a)(2)(A).

## II. PARTIES

2. Complainant is Robert J. K. Dornan who resides at 1101 Tetterton Drive, Vienna, Virginia 22180. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of California.

### Respondents are:

- a. Bill Gunter, #208, 1020 East Lafayette Street, Tallahassee, Florida 32301.
- b. Benjamin F. Betts, Jr., individually and in his capacity as treasurer of Citizens for Bill Gunter Committee, #208, 1020 East Lafayette Street, Tallahassee, Florida 32301.
- c. Citizens for Bill Gunter Committee, #208, 1020 East Lafayette Street, Tallahassee, Florida 32301.
- d. Anton J. Hermes, individually and in his capacity as treasurer of PAC #487 I.U.O.E. Local 487, 1425 NW 36th Street, Miami, Florida 33142
- e. PAC #487 I.U.O.E. Local 487, 1425 NW 36th Street, Miami, Florida 33142
- f. Robert Kraft, individually and in his capacity as treasurer of Engineers Political Action Committee, Local 675, 3101 SW 8th Avenue, Fort Lauderdale, Florida 33315
- g. Engineers Political Action Committee, Local 675, 3101 SW 8th Avenue, Fort Lauderdale, Florida 33315
- h. Frank Hanley, individually and in his capacity as

8 3 0 4 0 3 7 4 5 9 1

treasurer of Engineers Political Education Committee,  
International Union of Operating Engineers, 1125 - 17th  
Street, NW, Washington, DC 20036,

- i. International Union of Operating Engineers, 1125 - 17th  
Street, NW, Washington, DC 20036,

### III. LIABILITY

3. Liability may be imposed upon the candidate, Bill Gunter, the Citizens for Bill Gunter Committee, E.P.E.C. and its affiliated SSFs pursuant to 2 U.S.C. §441a, which establishes the \$5,000.00 (FIVE THOUSAND DOLLAR) maximum campaign contribution and 2 U.S.C. §441a(f), which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

4. Liability may be imposed on the treasurers, personally and in their capacities as treasurers pursuant to 11 C.F.R. §104.14(d).

5. For purposes of this complaint, contributions made by E.P.E.C. and its affiliated SSFs are treated as contributions made from a single committee in accordance with 2 U.S.C. §441a(a) (5) as implemented through 11 C.F.R. §100.5(g) (i) (b).

### IV. OVERVIEW

6. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1980 federal general election in which Bill Gunter was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission's Forms 3 and 3X, Schedules "A" and "B" and applicable amendments which Bill Gunter, the Citizens for Bill Gunter Committee, E.P.E.C. and its affiliated SSFs filed for the 1980 federal general election which cover the October 1, 1980 to the January 30, 1981 time frame.



7. These unlawful contributions constitute a violation of the Federal Election Campaign Act, 2 U.S.C. §441a(a) (2) (A), which provides that a multicandidate political committee may not contribute more than \$5,000.00 (FIVE THOUSAND DOLLARS) to any candidate and his authorized political committee with respect to any election for federal office and §441a(f) which prohibits a candidate from receiving illegal contributions.

V. SUPPORTIVE DOCUMENTATION

8. Complainant bases his beliefs on research of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents submitted to the Commission.

9. A succinct compilation of this research may be found in Exhibit "A" of the appendix. Also submitted are the pertinent sections of the above-referenced reports.

10. Exhibit "A" lists the contributors and the designated election to which the contribution is to be applied. Where the contributors' and the Citizens for Bill Gunter Committee reports concur as to the designated election, the letter "P" or "G" indicating "Primary" or "General" stands alone. Where there is a discrepancy between the contributor and recipient, the election indicated on their respective reports has been indicated. If no election is indicated the letters "NI" (Not Indicated) have been used.

11. The exhibit also indicates the amount contributed and received, the dates the contributions were made and received, and the dates and pages of the reports in which the data was located which are on file with the Federal Election Commission.



8 8 7 4 0 5 7 1 5 9

VI. CITIZENS FOR BILL GUNTER COMMITTEE  
1980 FEDERAL GENERAL ELECTION  
EXHIBIT "A" AND SUPPORTING DOCUMENTS

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Bill Gunter, the Citizens for Bill Gunter Committee and its treasurer, in violation of 2 U.S.C. §441a(a)(2)(A) and 2 U.S.C. § 441a(f) knowingly accepted contributions for the 1980 general primary election from E.P.E.C. and its affiliated SSFs in the amount of \$7,000.00 (SEVEN THOUSAND DOLLARS).

13. Candidate Bill Gunter, the Citizens for Bill Gunter Committee and its treasurer, for the 1980 general primary election, accepted contributions from E.P.E.C. and its affiliated SSFs in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>
10/9/80	\$2,000.00	E.P.E.C.
10/27/80	\$1,000.00	PAC-487
10/25/80	\$2,000.00	PAC-Local 675
11/3/80	\$2,000.00	E.P.E.C.

14. A running total of contributions from E.P.E.C. and its affiliated SSFs would have put on notice Bill Gunter, the Citizens for Bill Gunter Committee and its treasurer that they had received the \$5,000.00 (FIVE THOUSAND DOLLARS) in contributions on October 25, 1980. On that date they accepted the maximum lawful amount of contributions from E.P.E.C. and its affiliated SSFs. In violation of 2 U.S.C. §441a(f) Bill Gunter, the Citizens for Bill Gunter Committee and its treasurer knowingly accepted an additional \$2,000.00 (TWO THOUSAND DOLLARS).

15. In violation of 2 U.S.C. §432(i), the treasurer of the

Citizens for Bill Gunter Committee failed to use "his best efforts" to ascertain the legality of E.P.E.C.'s \$2,000.00 (TWO THOUSAND DOLLAR) contribution of November 3, 1980. He could have readily done so by reviewing the total funds contributed by E.P.E.C. and its affiliated SSFs.

VIII. E.P.E.C. AND AFFILIATED SSFs  
1980 FEDERAL GENERAL ELECTION  
(EXHIBIT "A" AND SUPPORTING DOCUMENTS)

16. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that E.P.E.C. and its affiliated SSFs for the 1980 federal general election contributed to candidate Bill Howard, to the Citizens for Bill Gunter Committee and its treasurer a total of \$7,000.00 (SEVEN THOUSAND DOLLARS).

17. E.P.E.C. and its affiliated SSFs contributed the following amounts:

a) On October 1, 1980 E.P.E.C. contributed \$2,000.00 (TWO THOUSAND DOLLARS).

b) On October 20, 1980 PAC 487-Local 487 contributed \$1,000.00 (ONE THOUSAND DOLLARS).

c) On October 24, 1980 Engineers PAC-Local 675 contributed \$2,000.00 (TWO THOUSAND DOLLARS).

d) On October 27, 1980 E.P.E.C. contributed \$2,000.00 (TWO THOUSAND DOLLARS).

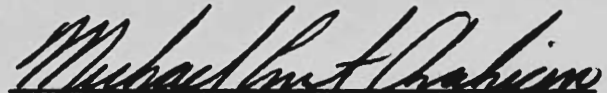
18. A running total of the amount contributed by E.P.E.C. and its affiliated SSFs would have put them on notice that as of October 24, 1980 they had contributed \$5,000.00 (FIVE THOUSAND


DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), E.P.E.C. and its affiliated SSFs made a \$2,000.00 (TWO THOUSAND DOLLAR) contribution on October 27, 1980 which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$2,000.00 (TWO THOUSAND DOLLARS).

#### CONCLUSION

19. As documented above, Respondents have violated the spirit and letter of the Federal Election Campaign Act.

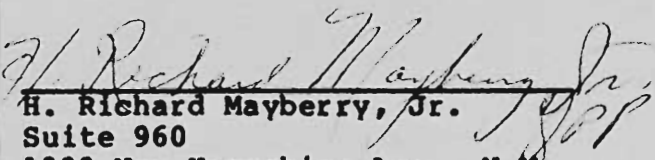
20. Complainant requests that an investigation into this complaint be undertaken and that Respondents be ordered to return the accepted excess contributions and that civil sanctions be imposed on the Respondents.

  
Michael Ernest Avakian  
Center on National Labor Policy

  
Jeanette P. Papillo  
Center on National Labor Policy  
5211 Port Royal Road, Suite 400  
North Springfield, VA 22151  
(703) 321-9180

Attorneys for Complainant

Of Counsel:

  
H. Richard Mayberry, Jr.  
Suite 960  
1333 New Hampshire Ave., N.W.  
Washington, DC 20036  
(202) 822-9622

Complainant, Robert J. K. Dornan, address 1101 Tetterton Drive, Vienna, Virginia 22180, being first duly sworn, says that he has read the foregoing complaint and knows the contents thereof, and that the same is true on information and belief.

Robert J. K. Dornan  
Complainant

Subscribed and sworn to before me this 21<sup>st</sup> day  
of October, 1982. My commission expires 30<sup>th</sup> day  
of June, 1987.

Michael Henry J.  
Notary Public

CONTRIBUTIONS  
BY  
INTERNATIONAL UNION OF ENGINEERS--AFFILIATED SEPARATE SEGREGATED FUNDS (SSFs)  
TO  
CITIZENS FOR BILL GUNTER  
1980 ELECTION -- GENERAL

**EXHIBIT A**

SSF CONTRIBUTOR	AMOUNT CONTRIBUTED BY SSFs AND RECEIVED BY CANDIDATE'S COMMITTEE	DESIGNATED ELECTION "P" = PRIMARY "G" = GENERAL	DATE OF SSFs' CONTRIBUTION	SSFs' REPORT ON F.E.C. FORM 3X SCHEDULE "B" DATE/PAGE	DATE CONTRIBUTION RECEIVED BY CANDIDATE'S COMMITTEE	CANDIDATE'S COMMITTEE'S REPORT ON F.E.C. FORM 3 SCHEDULE "A" DATE/PAGE
I.U.O.E. Engineers Political Education Committee	\$2000.00	N/I*--G*	10/1/80	3/17/81 Amendment	10/9/80	10/28/80 2 of 4
PAC 487 -- I.U.O.E. Local 487	\$1000.00	G	10/20/80	1/30/81 (Page not designated)	10/27/80	12/24/80 10 of 19
I.U.O.E. Engineers PAC Local 675	\$2000.00	N/I--G	10/24/80	12/8/80 1 of 1	10/25/80	12/24/80 7 of 19
I.U.O.E. Engineers Political Education Committee	\$2000.00	G	10/27/80	12/4/80 2 of 6	11/3/80	12/24/80 7 of 19

\* -- Indicates that while the multi-candidate committee reported the former, the candidates committee reported the latter.  
\*\* -- Means not indicated

8340674577

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For an Authorized Committee

**Y S2885 FL DEM C387** (Summary Page)

1. Name of Committee (in full)  
**Citizens for Bill Gunter Committee**

2. FEC Identification Number  
**000123456789** **AR:05**

3. Is this Report for a Candidate?  
**NO** ☐ **YES** ☐ **MAND DELIVERED** ☐

Address (Number and Street)  
**1208, 1020 E. Lafayette St.**

City, State and ZIP Code  
**Tallahassee, FL 32301**

☐ Check if address is different than previously reported

4. TYPE OF REPORT

☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)

☒ Twelfth day report preceding General (Type of election)  
election on 11/4/80 in the State of Florida

☐ Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

This report contains activity for: ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>Oct. 1</u> Through <u>Oct. 15, 1980</u>		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e)	\$ 187,914.73	\$1,380,900.63	
(b) Total Contribution Refunds (from Line 20a)	\$ 3,700.00	\$ 20,334.00	
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	\$ 184,214.73	\$1,360,566.63	
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 13)	\$ 237,128.14	\$1,427,911.74	
(b) Total Offsets to Operating Expenditures (from Line 14)	\$ 141.32	\$ 1,831.32	
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	\$ 236,986.82	\$1,426,080.42	
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$ 11,953.45		
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 80,000.00		

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

For further information, contact:  
Federal Election Commission  
Toll Free 800-424-9520  
Local 202-633-4000

**Benjamin F. Betts, Jr.**  
Type of Print Name of Treasurer

*Benjamin F. Betts, Jr.*  
SIGNATURE OF TREASURER

October 28, 1980  
DATE

NOTE: Submit this Report to the Federal Election Commission or to the State or local authority having jurisdiction over the subject of this Report to the penalties of 2 U.S.C. § 437g.

Electro P.A.C.-323  
927 Belvedere Rd.  
W. Palm Beach, Florida 33405

Gen 10/04 05000.00 05000.

Engineers Political Education Committee  
1125 17 St. N.W.  
Washington, D.C. 20036

Gen 10/09 02000.00 02000.

FEA-Tiger United PAC  
208 W. Pensacola St.  
Tallahassee, Florida 32301

Gen 10/08 00150.00 00550.

F.E.A. United P.A.C.  
208 W. Pensacola St.  
Tallahassee, Florida 32301

Gen 10/02 00400.00 00550.

Florida Funeral Directors P.A.C.  
P.O. Box 6009  
Tallahassee, Florida 32301

Gen 10/02 00300.00 00300.

Laborer's Political League  
905-16th St. N.W.  
Washington, D.C. 20006

Gen 10/12 02000.00 02000.



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For an Authorized Committee

RECEIVED  
SECRETARY OF THE SENATE  
JAN -5 AM 8:47

L 52183 / FL DEM C987 (Summary Page)

1. Name of Committee (in full) <b>Citizens for Gunter Committee</b>	2. FEC Identification Number <b>000123463</b>
Address (Number and Street) <b>P.O. Box 1507</b>	3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and ZIP Code <b>Tallahassee, FL 32302</b>	

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	
<input type="checkbox"/> October 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> January 31 Year End Report	<input checked="" type="checkbox"/> Thirtieth day report following the General Election
<input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	on <u>Nov. 4, 1980</u> in the State of <u>Florida</u>
	<input type="checkbox"/> Termination Report

This report contains activity for - ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>Oct 16</u> Through <u>Nov 24, 1980</u>		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e) .....		\$ 590,019.22	\$ 1,970,919.85
(b) Total Contribution Refunds (from Line 20d) .....		\$ 17,500.00	\$ 37,834.00
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a) ...		\$ 575,519.22	\$ 1,933,085.85
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17) .....		\$ 608,545.74	\$ 2,036,457.48
(b) Total Offsets to Operating Expenditures (from Line 14) .....		\$ 22,557.10	\$ 24,388.42
(c) Net Operating Expenditures (Subtract Line 7b from 7a) .....		\$ 585,988.64	\$ 2,012,069.06
8. Cash on Hand at Close of Reporting Period (from Line 27) .....		\$ 4,003.21	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....		\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....		\$ 145,352.30	

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

For further information, contact:

Benjamin F. Betts, Jr.

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4000

Type or Print Name of Treasurer

December 24, 1980

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (1/80)

Eastern Airlines PAC  
1030 15th St. N.W.  
Washington, D.C. 20005

SCHEDULE A: Itemized Receipts  
Citizens for Gunter Committee

Page 7 of 19  
for line 11(c).

Gen 11/03 01000.00 01000.00

Engineers Political Ed. Comm.  
1125 17th St. N.W.  
Washington, DC 20036

Gen 11/03 02000.00 04000.00

Engineers PAC Local 675  
3000 S.W. 9 Ave.  
Ft. Lauderdale, FL 33315

Gen. 10/25 02000.00 02000.00

Esmark, Inc. PAC  
55 E. Monroe St.  
Chicago, Illinois 60603

Gen. 10/27 00500.00 00500.00

Exchange Good Govt. Fund  
Federal Exchange Bank Bldg. Ste. 2112  
Tampa, Florida 33601

Gen. 10/22 00500.00 00600.00

Family Lines System PAC  
500 Water St. Pk. 1509  
Jacksonville, FL 32202

Gen. 10/24 00500.00 00500.00

I.B.E.W.-C.O.P.E.  
1125 15th St. N.W.  
Washington, D.C. 20005

SCHEDULE A: Itemized Receipts  
Citizens for Gunter Committee

Page 10 of 19  
for line 11(c).

Gen. 10/28 01000.00 01000.00

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ILGWU Campaign Committee  
1710 Broadway  
New York, NY 10019

Gen. 10/27 02500.00 02500.00

---

Intnt'l. Minerals & Chemical Corp PAC  
2315 Sanders Rd.  
Northbrook, Illinois 60062

Gen. 10/31 01000.00 01000.00

---

Int. Union-United Plant Guard Wrkrs of Amer.  
25510 Kelly Rd.  
Roseville, MI 48066

Gen. 10/20 00200.00 00200.00

---

PAC 487-IUOE local 487-Operating Engineers  
1425 N.W. 36 St.  
Miami, FL 33142

Gen. 10/27 01000.00 01000.00

---

Jerrico PAC  
P.O. Box 11988  
Lexington, Kentucky 40579

Gen. 10/23 00300.00 00300.00

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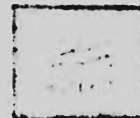
Pre Gene /  
4925.  
↓  
J C TURNER  
Chairman

FRANK MANLEY  
Treasurer

1125 Seventeenth Street, N.W.  
Washington, D.C. 20036  
202-347-8960

HAND DELIVERED

# Engineers Political Education Committee



March 17, 1981

Ms. Penny Harms, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Ms. Harms:

Pursuant to your letter of March 4, 1981, to the Engineers Political Education Committee (EPEC), the following information is being provided.

EPEC's pre-election "Report of Receipts and Disbursements" covering the period from October 1, 1980, through October 15, 1980, should contain these additional itemized disbursements for Line No. 21, Schedule B, which were inadvertently omitted from the original report:

1. Bill Gunter Campaign Fund  
3802 Leane Drive  
Tallahassee, Florida 32308  
Candidate Bill Gunter, U.S. Senate, Florida  
10/1/80 - \$2,000.00
2. Young Social Democrats Political Committee  
275 Seventh Avenue  
New York, New York 10001  
10/9/80 - \$1,000.00
3. Hart for Senate Committee  
1540 Pace Street  
Denver, Colorado 80206  
Senator Gary Hart, U.S. Senate, Colorado  
10/15/80 - \$5,000.00

More . . . .

B3040-37460-4

- Silene*

I trust that this additional information covers the problem identified in your letter.

Frank H. H. H.  
Treasurer

PH: MRS/ELW



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

00 DEC 15 P12:28

<b>1. Name of Committee (in Full)</b> Engineers Political Action Committee Local 675 <hr/> <b>Address (Number and Street)</b> 3101 S.W. 8th Avenue <hr/> <b>City, State and ZIP Code</b> Ft. Lauderdale, FL 33315 <hr/> <input type="checkbox"/> Check if address is different than previously reported.	<b>4. TYPE OF REPORT (check appropriate boxes)</b> (a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ <div style="text-align: right; font-size: small;">(Type of Election)</div> election on _____ in the State of _____ <input checked="" type="checkbox"/> Thirtieth day report following the General Election on <u>11/4/80</u> in the State of <u>Florida</u> <input type="checkbox"/> Termination Report (b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO
<b>2. FEC Identification Number</b> C00132258	
<b>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</b>	

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
<b>5. Covering Period</b> <u>10/16/80</u> Through <u>11/24/80</u>			
<b>6. (a) Cash on Hand January 1, 19_____</b>			\$ 13,776.29
<b>(b) Cash on Hand at Beginning of Reporting Period</b>	\$ 3,505.64		
<b>(c) Total Receipts (from Line 18)</b>	\$ 9,998.00		\$ 30,485.80
<b>(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)</b>	\$ 13,503.64		\$ 44,262.09
<b>7. Total Disbursements (from Line 28)</b>	\$ 6,839.12		\$ 37,597.52
<b>8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))</b>	\$ 6,664.52		\$ 6,664.52
<b>9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)</b>	\$		
<b>10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)</b>	\$		

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

For further information, contact:

**Robert Kraft**  
Type of Print Name of Treasurer

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

*Robert Kraft*  
SIGNATURE OF TREASURER

12/8/80  
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (12/80)

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
LINE NUMBER 21  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
Engineers Political Action Committee Local 675			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Causeway Lumber Company P. O. BOX 21088 Ft. Lauderdale, FL 33335	Lumber & Supplies	11/11/80	\$919.61
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Gunter 1020 E. LaFayette St. Tallahassee, FL 32301	Contribution	10/24/80	\$2,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WAXY Radio 1975 E. Sunrise Blvd Ft. Lauderdale, FL 33304	In Kind Contribution for Carter/Mondale Campaign	10/30/80	\$ 230.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WFTL Radio P. O. BOX 5333 Ft. Lauderdale, FL 33310	In Kind Contribution for Carter/Mondale Campaign	10/29/80	\$ 875.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			\$ 4,024.62
TOTAL This Period (last page; this line number only)			



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

**HAND DELIVERED**

(Summary Page)

RECEIVED

DATED 4-14-81

<p><b>1. Name of Committee (In Full)</b> Engineers Political Education Committee (EPEC)/International Union of Operating Engineers (IUOE)</p> <hr/> <p><b>Address (Number and Street)</b> 1125 - 17th Street, N.W.</p> <hr/> <p><b>City, State and ZIP Code</b> Washington, D.C. 20036</p> <hr/> <p><input type="checkbox"/> Check, if address is different than previously reported.</p> <p><b>2. FEC Identification Number</b> C-00029504</p> <p><b>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</b></p>	<p><b>4. TYPE OF REPORT (check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report  <input type="checkbox"/> July 15 Quarterly Report  <input type="checkbox"/> October 15 Quarterly Report  <input type="checkbox"/> January 31 Year End Report  <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)  <input type="checkbox"/> Monthly Report for _____  <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____  <input checked="" type="checkbox"/> Thirtieth day report following the General Election on <u>11/4/80</u> in the State of _____  <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?  <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
<b>5. Covering Period</b> <u>10/16/80</u> Through <u>11/24/80</u>			
<b>6. (a) Cash on Hand January 1, 19<u>80</u></b> .....			\$30,794.94
<b>(b) Cash on Hand at Beginning of Reporting Period</b> .....	\$21,990.20		
<b>(c) Total Receipts (from Line 18)</b> .....	\$39,111.83		\$33,847.94
<b>(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)</b> .....	\$61,102.03		\$364,642.88
<b>7. Total Disbursements (from Line 28)</b> .....	\$25,273.00		\$328,813.85
<b>8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))</b> ..	\$35,829.03		\$ 35,829.03
<b>9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)</b> .....	\$ 0		
<b>10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)</b> .....	\$ 0		

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

For further information, contact:

Federal Election Commission  
Toll Free: 800-471-1414  
Local: 202-523-4608

Frank Hanley

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

12/4/80

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 2439.

All previous versions of FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used.

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FEC FORM 3, MAR 80

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Part 2 of 2 for  
 (Use separate schedule for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**Engineers Political Education Committee (EPEC)/International Union of Operating Engineers (IUOE)**

<b>A. Full Name, Mailing Address and ZIP Code</b> Citizens for Gunther 1020 East LaFayette Street Tallahassee, Florida 32301	<b>Purpose of Disbursement</b> Candidate Bill Gunther (D), Florida - U.S. Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/27/80	<b>Amount of Each Disbursement This Period</b> 2,000.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Davis for Congress Committee 3274 Northeast Main Street College Park, Georgia 30337	<b>Purpose of Disbursement</b> Candidate Dock H. Davis (D), 6th C.D., Georgia Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/29/80	<b>Amount of Each Disbursement This Period</b> 300.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Citizens Committee for A. B. Won Pat P.O. Box 3549 Agaña, Guam 96910	<b>Purpose of Disbursement</b> Cong. A. B. Won Pat Guam - Delegate at large Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/30/80	<b>Amount of Each Disbursement This Period</b> 500.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Gene Graves Campaign Committee P.O. Box 5122 Springfield, Illinois 62705	<b>Purpose of Disbursement</b> Candidate Gene H. Graves (D), Illinois, State Representative Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/27/80	<b>Amount of Each Disbursement This Period</b> 250.00
<b>E. Full Name, Mailing Address and ZIP Code</b> James Rupp Committee 137 W. Main St., P.O. Box 1262 Decatur, Illinois 62525	<b>Purpose of Disbursement</b> Candidate James Rupp (R), 51st C.D., Illinois State Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/30/80	<b>Amount of Each Disbursement This Period</b> 500.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Voelz for Congress Committee 921 Lincoln Charleston, Illinois 61920	<b>Purpose of Disbursement</b> Candidate Pete Voelz (D), 22nd C.D., Illinois Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/22/80	<b>Amount of Each Disbursement This Period</b> 250.00
<b>G. Full Name, Mailing Address and ZIP Code</b> Yates for Congress Committee 421 West Melrose Chicago, Illinois 60657	<b>Purpose of Disbursement</b> Cong. Sidney R. Yates (D), 9th C.D., Illinois Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/29/80	<b>Amount of Each Disbursement This Period</b> 500.00
<b>H. Full Name, Mailing Address and ZIP Code</b> Birch Bayh for Senate Committee P.O. Box 44491 Indianapolis, Indiana 46204	<b>Purpose of Disbursement</b> Senator Birch Bayh (D), Indiana Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/28/80	<b>Amount of Each Disbursement This Period</b> 421.00
<b>I. Full Name, Mailing Address and ZIP Code</b> Birch Bayh for Senate Committee P.O. Box 44491 Indianapolis, Indiana 46204	<b>Purpose of Disbursement</b> Senator Birch Bayh (D), Indiana Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10/20/80	<b>Amount of Each Disbursement This Period</b> 2,020.00
<b>SUBTOTAL of Disbursements This Page (optional)</b>			
<b>TOTAL This Period (last page this line number only)</b>			

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**(Summary Page)**

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	Oct. 1, 1980 Through Dec. 31, 1980		
6. (a) Cash on Hand January 1, 1980			\$ None
(b) Cash on Hand at Beginning of Reporting Period		\$ 6,765.00	
(c) Total Receipts (from Line 18)		\$ 13,044.00	\$ 19,809.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 19,809.00	\$ 19,809.00
7. Total Disbursements (from Line 28)		\$ 1,237.60	\$ 1,237.60
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 18,571.40	\$ 18,571.40
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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FEC FORM 3X (3-80)



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page \_\_\_\_ of \_\_\_\_ for  
 LINE NUMBER \_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
 PAC 487 - IUOE Local 487

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Gunter Campaign Tallahassee, Florida	Election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/20/80	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$1,000.00

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

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Date Filmed

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