



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1525

Date Filmed 12/8/83 Camera No. --- 4

Cameraman JRL

LAW OFFICES OF
EDWARD L. WELCH
216 NORTH MAIN STREET
P. O. BOX 88
EDWARDSVILLE, ILLINOIS 62025

RECEIVED AT THE FEC
OCC #1187
83 NOV 21 P 1: 00

Sm

EDWARD L. WELCH
MARQUA MCGULL-BILLINGSLEY

TELEPHONES:
(618) 271-3510
(618) 256-4744

November 21, 1983

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 1525
Shirley E. Davis

Dear Mr. Gross:

Please find enclosed the check of Shirley E. Davis dated November 16, 1983 in the amount of \$250.00 in connection with the above-styled matter.

Please advise whether or not there is anything else which has to be done in order for Ms. Davis to be in compliance.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY: Edward L. Welch
Edward L. Welch

ELW/nm

Enc.

cc: Ms. Shirley E. Davis

33040441523

DEC 2 10:51

63

SHIRLEY E. DAVIS
4311 - 23RD PARKWAY, APT. 419
HILLCREST HEIGHTS, MD 20748

806

June 16 19*83*

PAY TO THE
ORDER OF

Treasurer of United States
Two Hundred & Fifty \$ *250.00*
00 DOLLARS



BANK OF
MARYLAND

HILLCREST HEIGHTS
MARYLAND 20748

Shirley E. Davis

RECEIPT

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

29611

Mar 15-25

1 Dec 1983
Date

The Federal Election Commission has received \$ *250.00* in cash/check for the purchase of copies of documents on file at the Federal Election Commission, or for other materials made available by the Commission.

Mary Anne [Signature]
Federal Election Commission

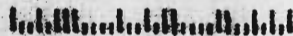
Purchaser understands any information copied from reports and statements shall not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. 2 U.S.C. Section 438

LAW OFFICES OF
EDWARD L. WELCH
216 NORTH MAIN STREET

P. O. BOX 53
HOWARDVILLE, ILLINOIS 62928



Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463



LAW OFFICES OF
EDWARD L. WELCH
216 NORTH MAIN STREET
P. O. BOX 88
EDWARDSVILLE, ILLINOIS 62025

RECEIVED AT THE REC

NOV 25 10:55

600#469

EDWARD L. WELCH
MARQUA MCGULL-BILLINGSLEY

TELEPHONES:
(618) 271-3810
(618) 686-4744

November 21, 1983

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 1525
Eugene A. Brockington

Dear Mr. Gross:

Please find enclosed the check of Eugene A. Brockington dated November 21, 1983 in the amount of \$250.00 in connection with the above-styled matter.

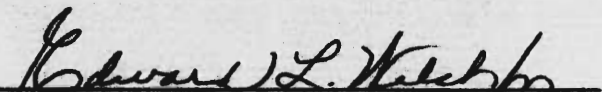
Please advise whether or not there is anything else which has to be done in order for Mr. Brockington to be in compliance.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY:


Edward L. Welch

ELW/nm

Enc.

cc: Mr. Eugene A. Brockington

8304041548

STEIN ROE & FUND
MUTUAL FUND

EUGENE A BROCKINGTON
MABLE O BROCKINGTON JT TEN
11 COLOMA COURT
STERLING VA 22170

8

Nov. 21, 1983

PAY
TO THE
ORDER OF

Treasurer of the United States \$ 250.00

Two Hundred Fifty 00/100

DOLLARS

State Street
Bank Mutual Service and Trust Company
Boston, Massachusetts 02109

NOT VALID FOR LESS THAN \$100.00

SteinRoe
Tax-Exempt Money Fund, Inc.
PLEASE SIGN EXACTLY AS YOUR NAME IS SHOWN.

Eugene A. Brockington

3304044152

29607

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

Nov 15 25

29 Nov 1983
Date

The Federal Election Commission has received \$ 250.00 in cash/check for the purchase of copies of documents on file at the Federal Election Commission, or for other materials made available by the Commission.

Mary Ann Holger
Federal Election Commission

Purchaser understands any information copied from reports and statements shall 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. 2 U.S.C. Section 438

LAW OFFICES OF
EDWARD L. WELCH
216 NORTH MAIN STREET
P. O. BOX 88
EDWARDSVILLE, ILLINOIS 62025

RECEIVED AT THE FEC

88 NOV 25 410

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

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600 # 1143

SM

LAW OFFICES OF
EDWARD L. WELCH
218 NORTH MAIN STREET
P. O. BOX 99
EDWARDSVILLE, ILLINOIS 62025

EDWARD L. WELCH
MARQUA MCGULL-BILLINGSLEY

TELEPHONES:
(312) 271-3510
(312) 690-4744

November 18, 1983

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 1525
Erie R. Doyle

Dear Mr. Gross:

Please find enclosed the check of Erie R. Doyle dated November 17, 1983 in the amount of \$250.00 in connection with the above-styled matter.

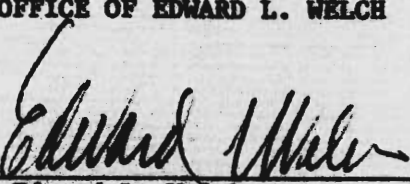
Please advise whether or not there is anything else which has to be done in order for Mr. Doyle to be in compliance.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY:


Edward L. Welch

ELW/nm

Enc.

cc: Mr. Erie R. Doyle

3304041501

NOV 25 10:10

ERIE R. DOYLE
1508 ELKWOOD LANE, N.E.
WASHINGTON, D.C. 20743

NOV. 17, 1983

2461

PAY TO THE ORDER OF THE TREASURER OF THE UNITED STATES

\$ 250.00

TWO HUNDRED FIFTY DOLLARS AND 00/100 DOLLARS

NS&T BANK, N.A.
WASHINGTON, D. C. 20005

FOR

Eric R Doyle

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

Inv # 1525

23 Nov 1983
Date

The Federal Election Commission has received \$ *250.00* in cash/check for the purchase of copies of documents on file at the Federal Election Commission, or for other materials made available by the Commission.

[Signature]
Federal Election Commission

Purchaser understands any information copied from reports and statements shall 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. 2 U.S.C. Section 438

8304041532

29194

72
LAW OFFICES OF
EDWARD L. WELCH
214 NORTH MAIN STREET
P. O. BOX 66

SPRINGFIELD, ILLINOIS 62763



8 3 4 3
Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Alliance of Postal)
and Federal Employees ("NAPFE"))

MUR 1525

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 3, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1525:

1. Accept and sign the conciliation agreements as submitted with the General Counsel's October 31, 1983 Memorandum to the Commission.
2. Close the file in this matter.
3. Approve and send the letters as attached to the October 31, 1983 Memorandum to the Commission.

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

Attest:

11-3-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

10-31-83, 3:16
11- 1-83, 11:00

33040441534



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Mr. Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice
Washington, D.C. 20530

RE: MUR 1525
National Alliance of
Postal and Federal
Employees -
Robert L. White
Eugene A. Brockington
Shirley E. Davis
Jacqueline C. Moore
Erie R. Doyle

Dear Mr. McDowell:

This is in reference to the captioned matter involving the National Alliance of Postal and Federal Employees, et. al., which your office referred to the Commission.

After conducting an investigation of this matter, the Commission determined that there was reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White violated 2 U.S.C. §§ 441b(a) and 441f and that Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore and Erie R. Doyle violated 2 U.S.C. § 441f, provisions of the Federal Election Act of 1971, as amended and has now entered into conciliation agreements with them. Copies of these agreements are enclosed for your information.

We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Federal Election Campaign Act.

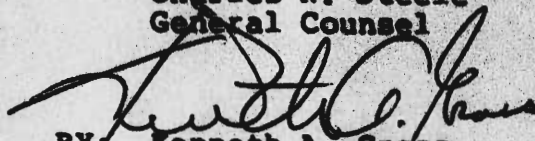
33040441535

Letter to Mr. Gerald E. McDowell
Page 2
MUR 1525

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, 523-4039.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

83040441536



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Jacquelyn C. Moore

Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of Jacquelyn C. Moore and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

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

Enclosure
Conciliation agreement

83040441537



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Jacquelyn C. Moore

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Jacquelyn C. Moore and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

5/10/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Jacquelyn C. Moore, Editor
National Alliance of Postal and
Federal Employees

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MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Jacquelyn C. Moore violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in her own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

93040441539

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check she issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that she knew that her name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

83040441540

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: 

Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


Edward L. Welch

Attorney for Jacquelyn C. Moore


Date

93040441541



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Shirley E. Davis

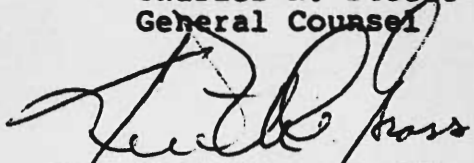
Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of Shirley E. Davis and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

8304041542



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Shirley E. Davis

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Shirley E. Davis and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

8304041543

Stm
11/4/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Shirley E. Davis, Secretary
National Alliance of Postal and Federal
Employees

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MUR 1525

CONCILIATION AGREEMENT

33040441544
This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Shirley E. Davis, violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in her own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check she issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that she knew that her name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

83040441545

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a) (1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

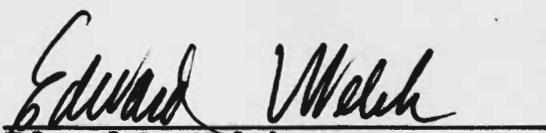
Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


Edward L. Welch
Attorney for Shirley E. Davis


Date

33040441546



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Eugene A. Brockington

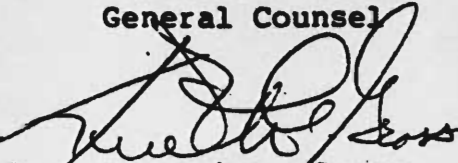
Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of Eugene A. Brockington and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040441547



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Eugene A. Brockington

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Eugene A. Brockington and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040441546

SAW
11/1/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Eugene A. Brockington, Treasurer
National Alliance of Postal and
Federal Employees

)
)
)
)
)

MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Eugene A. Brockington, violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

83040441549

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check he issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

83040441550

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

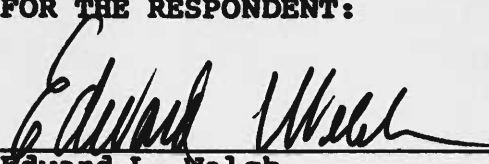
Charles N. Steele
General Counsel

By: 

Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


Edward L. Welch

Attorney for Eugene A. Brockington


Date

83040441551



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Erie R. Doyle

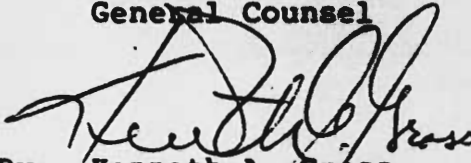
Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of Erie R. Doyle and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040441553



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Erie R. Doyle

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Erie R. Doyle and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Handwritten signature and date:
11/14/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Erie R. Doyle, Presidential Aide
National Alliance of Postal and
Federal Employees

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MUR 1525

CONCILIATION AGREEMENT

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This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Erie R. Doyle violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check he issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

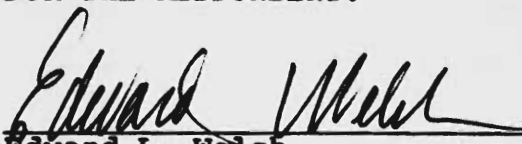
Charles N. Steele
General Counsel

By: 

Kenneth A. Gross
Associate General Counsel


November 7, 1983
Date

FOR THE RESPONDENT:


Edward L. Welch
Attorney for Erie R. Doyle

10/24/83
Date

93040441556



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Robert L. White

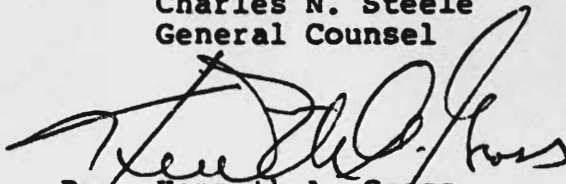
Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of Robert L. White and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040441557



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Robert L. White

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Robert L. White and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

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11/4/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Robert L. White, President
National Alliance of Postal and
Federal Employees

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MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Robert L. White, president of the National Alliance of Postal and Federal Employees ("NAPFE"), violated 2 U.S.C. § 441b(a) by making a union contribution to the DNC. Further, reason to believe was found that Respondent Robert L. White violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from NAPFE.

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is president of NAPFE, a labor organization.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, the Respondent, acting in his capacity as national president, authorized the treasurer of NAPFE to issue a check in the amount of one thousand dollars (\$1,000) to each of the following persons: Robert L. White, Eugene Brockington, Erie R. Doyle, Shirley E. Davis and Jacquelyn C. Moore, as reimbursement for their individual contributions to the 1980 Democratic Victory Fund.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

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VI. Respondent authorized the union to make a prohibited contribution, in violation of 2 U.S.C. § 441b(a).

VII. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of five hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

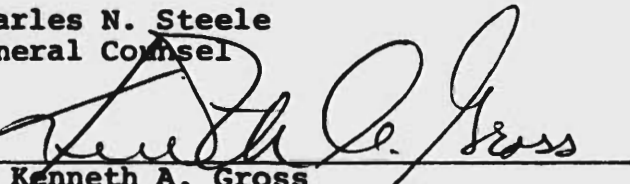
X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

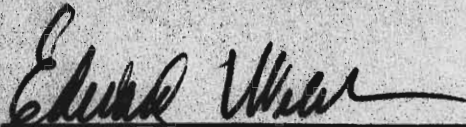
By:


Kenneth A. Gross

Associate General Counsel


Date

FOR THE RESPONDENT:



Edward L. Welch
Attorney for Robert L. White

10/24/83
Date

83040441562



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1983

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
National Alliance of Postal and
Federal Employees

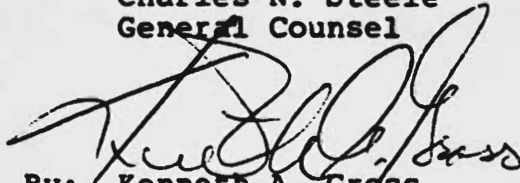
Dear Mr. Welch:

On November 3, 1983, the Commission accepted the conciliation agreement signed by you on behalf of the National Alliance of Postal and Federal Employees (NAPFE) and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
National Alliance of Postal and
Federal Employees

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of the National Alliance of Postal and Federal Employees (NAPFE) and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

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11/14/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Alliance of Postal and Federal
Employees ("NAPFE")

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MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent National Alliance of Postal and Federal Employees ("NAPFE") violated 2 U.S.C. § 441b(a) by making a union contribution to the DNC. Further, reason to believe was found that NAPFE violated 2 U.S.C. § 441f by making contributions to the DNC in the names of five individuals, while in fact, the contributions were from NAPFE.

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter. .

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III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is a labor organization.
2. In September of 1980, Respondent received an invitation from the DNC to the 1980 Democratic Victory Gala held on September 30, 1980.
3. Respondent reimbursed each of four officers and one presidential aide one thousand dollars (\$1,000) for their personal funds which were given to the 1980 Victory Gala held on September 30, 1980.

V. Respondent admits that it made a contribution in connection with an election for federal office, in violation of 2 U.S.C. § 441b.

VI. Respondent admits that it made a contribution in the name of another, in violation of 2 U.S.C. § 441f.

VII. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of twenty-five hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its motion, may review compliance with this

83040441566

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:


Charles N. Steele
General Counsel

By: 

Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


Edward L. Welch
Attorney for NAPFE


Date

83040441567



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: October 31, 1983
SUBJECT: MUR 1525 - Memorandum to The Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []



SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 OCT 31 P 3: 16

October 31, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: - Conciliation Agreements in MUR 1525

On October 28, 1983, the Office of the General Counsel received signed conciliation agreements from each respondent in this matter.

The General Counsel recommends, therefore, that the Commission accept and sign the conciliation agreements as submitted, close the file in this matter and approve and send the attached letters.

Attachments

1. Signed conciliation agreements (pages 1 through 20)
2. Proposed letters (pages 21 through 26)

83040441569

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Alliance of Postal and Federal
Employees ("NAPFE")

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MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent National Alliance of Postal and Federal Employees ("NAPFE") violated 2 U.S.C. § 441b(a) by making a union contribution to the DNC. Further, reason to believe was found that NAPFE violated 2 U.S.C. § 441f by making contributions to the DNC in the names of five individuals, while in fact, the contributions were from NAPFE.

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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83040441570

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is a labor organization.
2. In September of 1980, Respondent received an invitation from the DNC to the 1980 Democratic Victory Gala held on September 30, 1980.
3. Respondent reimbursed each of four officers and one presidential aide one thousand dollars (\$1,000) for their personal funds which were given to the 1980 Victory Gala held on September 30, 1980.

V. Respondent admits that it made a contribution in connection with an election for federal office, in violation of 2 U.S.C. § 441b.

VI. Respondent admits that it made a contribution in the name of another, in violation of 2 U.S.C. § 441f.

VII. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of twenty-five hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its motion, may review compliance with this

83040441571

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agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

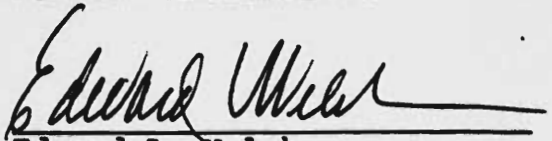
Charles N. Steele
General Counsel

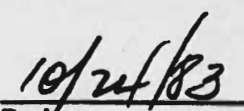
By:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:


Edward L. Welch
Attorney for NAPFE


10/24/83

Date

83040441572

att p4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Robert L. White, President)
National Alliance of Postal and)
Federal Employees)

MUR 1525

CONCILIATION AGREEMENT

83040441573
This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Robert L. White, president of the National Alliance of Postal and Federal Employees ("NAPFE"), violated 2 U.S.C. § 441b(a) by making a union contribution to the DNC. Further, reason to believe was found that Respondent Robert L. White violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from NAPFE.

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

att p5

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is president of NAPFE, a labor organization.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, the Respondent, acting in his capacity as national president, authorized the treasurer of NAPFE to issue a check in the amount of one thousand dollars (\$1,000) to each of the following persons: Robert L. White, Eugene Brockington, Erie R. Doyle, Shirley E. Davis and Jacquelyn C. Moore, as reimbursement for their individual contributions to the 1980 Democratic Victory Fund.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

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83040441574

VI. Respondent authorized the union to make a prohibited contribution, in violation of 2 U.S.C. § 441b(a).

VII. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of five hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: _____
Kenneth A. Gross
Associate General Counsel

_____ Date

att p7

FOR THE RESPONDENT:

Edward L. Welch

Edward L. Welch
Attorney for Robert L. White

10/24/83

Date

83040441576

att p8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Erie R. Doyle, Presidential Aide
National Alliance of Postal and
Federal Employees

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MUR 1525

CONCILIATION AGREEMENT

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This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Erie R. Doyle violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

all p9

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check he issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

am p/o

83040441578

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Eugene A. Brockington, Treasurer)
National Alliance of Postal and)
Federal Employees)

MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Eugene A. Brockington, violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in his own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

att p12

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check he issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that he knew that his name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

att p13

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agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

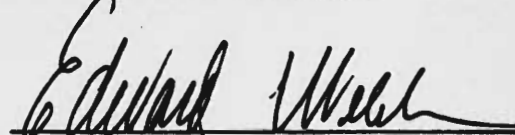
Charles N. Steele
General Counsel

By: _____

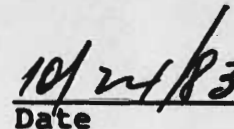
Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:



Edward L. Welch
Attorney for Eugene A. Brockington



Date

att p14

83040441532

83040441533

...

MUR 1525

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Shirley E. Davis, violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in her own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

Att p15

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check she issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
 3. Respondent therefore agrees that she knew that her name would be used by the union to make a contribution.
 4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

add p16

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VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: _____
Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:

Edward L. Welch
Edward L. Welch
Attorney for Shirley E. Davis

10/24/83
Date

att p17

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Jacquelyn C. Moore, Editor
National Alliance of Postal and
Federal Employees

)
)
)
)
)

MUR 1525

CONCILIATION AGREEMENT

This matter was initiated following a referral by the Department of Justice regarding a contribution of \$5,000 made to the 1980 Democratic Victory Fund of the Democratic National Committee ("DNC"). Reason to believe was found that Respondent Jacquelyn C. Moore violated 2 U.S.C. § 441f by contributing one thousand dollars to the DNC in her own name, while in fact, the contribution was from the National Alliance of Postal and Federal Employees ("NAPFE").

NOW THEREFORE, the Commission and Respondent having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

QA p18

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is an officer of NAPFE.
2. On or about September 17, 1980, Respondent issued a personal check to the 1980 Democratic Victory Fund for one thousand dollars (\$1,000).
3. On September 17, 1980, Respondent received a check from NAPFE for one thousand dollars (\$1,000) as reimbursement for the check she issued to the 1980 Democratic Victory Gala.

- V. 1. 2 U.S.C. § 441f prohibits a person from knowingly making a contribution in the name of another person.
2. While acting on behalf of the NAPFE, the Respondent made a contribution to a federal committee and received union monies as reimbursement for that contribution.
3. Respondent therefore agrees that she knew that her name would be used by the union to make a contribution.
4. Respondent agrees that the foregoing acts constituted a violation of 2 U.S.C. § 441f by the Respondent.

VI. Respondent agrees to pay a civil penalty to the Treasurer of the United States in the amount of two hundred fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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OH p19

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

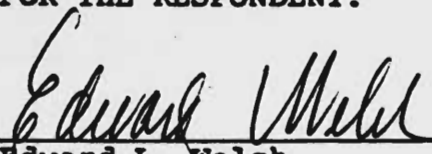
Charles N. Steele
General Counsel

By: _____

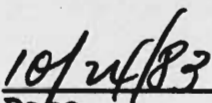
Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:



Edward L. Welch
Attorney for Jacquelyn C. Moore



Date

att p20



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
National Alliance of Postal and
Federal Employees

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of the National Alliance of Postal and Federal Employees (NAPFE) and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p21



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Robert L. White

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Robert L. White and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p22



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Erie R. Doyle

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Erie R. Doyle and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p23



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Eugene A. Brockington

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Eugene A. Brockington and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p24



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Shirley E. Davis

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Shirley E. Davis and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p25



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward L. Welch, Esquire
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525
Jacquelyn C. Moore

Dear Mr. Welch:

On , 1983, the Commission accepted the conciliation agreement signed by you on behalf of Jacquelyn C. Moore and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

att p26

98: 98

THE FEED



FROM

Edward L. Welch

Attorney at Law

216 North Main Street, P.O. Box 93

Edwardsville, IL 62025

TO

Mr. Steve Mims

FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

LAW OFFICE OF
EDWARD L. WELCH

EDWARD L. WELCH
ROBERT L. MERRIWETHER, JR.
SANDRA J. DODS

216 NORTH MAIN STREET
P. O. BOX 93
EDWARDSVILLE, IL 62025

TELEPHONES:
AREA CODE (815)
656-4744
271-3510
271-3511

August 8, 1983

Ms. Deborah H. Felton, Esq.
Office of General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: Federal Election Commission v. National
Alliance of Postal and Federal Employees
MUR 1525

Dear Ms. Felton:

Pursuant to your recent inquiry regarding whether or not the National Alliance of Postal and Federal Employees negotiates with any employer in connection with wages, hours and terms and conditions of employment, this is to advise that the Alliance holds exclusive recognition in eight bargaining units with a total of 673 employees of which less than 400 are members of the National Alliance of Postal and Federal Employees. As a percentage of the Alliance's total membership, I don't know how this works out, however, the information in question is found in the Federal Personnel Manual System No. 711-86 dated June 24, 1982 with attachment thereto. A copy is attached for your information.

Very truly yours,

WELCH & MCGULL-BILLINGSLEY, P.C.

BY: 

Edward L. Welch

ELW/nm

Enc.

bcc: Mr. Robert L. White

COPY

Oct 644

10:31

Federal Personnel Manual System
FPM Bulletin

Bulletin No. 711-86

Washington, D. C. 20415
June 24, 1982**SUBJECT:** Analysis of Data and Report on Union Recognition
in the Federal Service**Heads of Departments and Independent Establishments:**

1. This Bulletin contains charts and tables presenting a summary analysis highlighting statistics on employees covered by exclusive recognitions and negotiated agreements in the Federal Service, and the extent of change from November 1980 to November 1981 under 5 USC 71. This report is based on information furnished to the Office of Personnel Management by Government agencies.
2. Sixty-one percent (1,234,256) of executive branch employees (excluding the Postal Service) are represented by unions holding exclusive recognition rights in Federal agencies. This figure is 15,743 below the 1980 level. The percentage of employees represented has remained constant for the past three years.
3. For the sixth consecutive year, the number of bargaining units in the Federal government dropped, continuing a trend which began with the issuance of Executive Order 11838 in 1975, and carried over into the Labor-Management Relations Statute (5 USC 71). The number of units has now dropped from a peak of 3,608 in 1975 to 2,463 last year, a net reduction of 1,145 units (32%). The latest decline is attributed to consolidations in the Departments of Health and Human Services, Commerce, Interior and the Veterans Administration. The average size of Federal bargaining units has risen to 501 employees, a 50% increase from the 1975 average of 333.
4. Overall, 1,999 or 81 percent of all units are covered by agreements. (Some multi-unit agreements cover more than one recognition). Of the entire non-postal workforce 57 percent were covered by agreements, no change from last year.
5. Non-appropriated Fund activities decreased in recognition units by 66 to 260 as a result of consolidations. The number of employees represented is 67,003, a 9 percent decrease from last year. There are 216 agreements (a decrease of 14 percent) covering 58,793 employees.

Donald J. Devine
Director**Attachments****Inquiries:** Workforce Effectiveness and Development/Office of Labor-Management Relations, Code 202, 63-25406 or ext. 25407**Code:** 711, Labor-Management Relations**Distribution:** FPM**Bulletin Expires:** July 20, 1983

• U.S. GOVERNMENT PRINTING OFFICE: 1982-381-383 1141

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TABLE B (Cont'd) - EXCLUSIVE RECOGNITIONS AND AGREEMENTS BY UNION

Rev. 10/81

UNION		RECOGNITIONS	EMPLOYEES IN EXCLUSIVE UNITS							AGREEMENTS RECOGNITIONS COVERED	EMPLOYEES UNDER AGREEMENT	
			NUMBER	%	WAGE	%	SS	%	PROFIT		NUMBER	%
MEPB-PA	(IND)	1	25	-	-	-	25	-	(25)	-	-	-
MTC	(AFL)	40	61,680	3%	61,682	14%	4,588	-	(376)	40	61,914	3%
NAAS	(IND)	3	1,318	-	15	-	1,304	-	(638)	3	1,318	-
NAATA	(AFL)	1	243	-	441	-	282	-	-	1	243	-
NAATS	(IND)	1	2,699	-	-	-	2,699	-	-	1	2,699	-
NAGE**	(IND)	232	75,635	4%	29,827	7%	45,808	3%	(2,518)	184	75,489	3%
NAPSE	(IND)	1	289	-	10	-	289	-	-	1	289	-
NAB	(IND)	8	1,857	-	488	-	848	-	-	8	1,857	-
NAU	(IND)	1	25	-	-	-	25	-	(25)	-	-	-
NAPSP	(IND)	15	1,632	-	1,638	-	84	-	-	11	1,638	-
NAPPE	(IND)	8	673	-	485	-	288	-	-	8	673	-
NEA	(IND)	5	1,591	-	-	-	1,591	-	(1,591)	5	1,591	-
NFFE	(IND)	423	125,339	7%	29,189	7%	107,150	7%	(16,422)	343	125,339	6%
NLRBP	(IND)	2	289	-	-	-	289	-	(289)	2	289	-
NLRBU	(IND)	4	1,832	-	25	-	1,770	-	(638)	4	1,832	-
NMU	(AFL)	21	5,189	-	4,588	-	289	-	-	18	5,189	-
NTEU	(IND)	28	105,747	5%	1,888	-	105,748	7%	(21,344)	18	105,748	5%
NUCO	(IND)	1	376	-	-	-	376	-	-	1	376	-
OAA	(IND)	4	287	-	-	-	287	-	-	4	287	-
OCAW	(IND)	1	91	-	91	-	-	-	-	1	91	-
OPBU	(AFL)	3	670	-	8	-	684	-	(188)	2	139	-
PADC	(IND)	1	484	-	-	-	484	-	-	1	484	-
PACC	(IND)	1	214	-	-	-	214	-	(214)	1	214	-
PASS	(IND)	11	1,381	-	248	-	1,582	-	-	1	85	-
PBA	(IND)	1	148	-	-	-	148	-	-	1	148	-
PD&DC	(IND)	1	24	-	1	-	23	-	-	-	-	-
PESO	(IND)	1	161	-	-	-	161	-	(161)	-	-	-
PIL	(AFL)	7	318	-	84	-	82	-	-	6	182	-
PINPSEA	(IND)	1	888	-	888	-	-	-	-	-	-	-
POPA	(IND)	1	1,871	-	-	-	1,871	-	(1,871)	1	1,871	-
PPDSE	(AFL)	3	188	-	188	-	-	-	-	2	188	-
PPF	(AFL)	5	288	-	288	-	-	-	-	5	288	-
RWDSU	(AFL)	1	214	-	-	-	214	-	(214)	-	-	-
SBU	(AFL)	14	12,689	1%	4,884	1%	8,885	1%	84	13	12,616	1%
SB	(AFL)	9	2,482	-	2,172	-	289	-	(188)	9	2,482	-
SBW	(AFL)	2	24	-	24	-	-	-	-	-	-	-
TRSOC	(IND)	1	88	-	-	-	88	-	(88)	1	88	-
TSA	(IND)	1	82	-	48	-	8	-	-	1	82	-
UPSA	(IND)	1	24	-	-	-	24	-	-	1	24	-
UPWC	(IND)	1	1,148	-	888	-	248	-	-	-	-	-
USBU	(AFL)	1	48	-	48	-	-	-	-	1	48	-
UTU	(AFL)	1	133	-	133	-	-	-	-	1	133	-
UTW	(AFL)	4	118	-	88	-	82	-	-	4	118	-
WCE	(IND)	2	471	-	-	-	471	-	(471)	2	471	-
WFSCU	(IND)	1	9	-	9	-	-	-	-	-	-	-
TOTAL		2,483	1,234,288	61%	284,288	68%	848,388	64%	(125,257)	1,988	1,182,888	57%

**Teach for NAGE includes GPO, PASTA

33040441598

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Alliance of Postal and) MUR 1525
Federal Employees ("NAPFE"))

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on August 9, 1983, do hereby certify that the Commission decided by a vote of 4-2 to approve and send the proposed conciliation agreements and letter attached to the General Counsel's report dated August 2, 1983.

Commissioners Aikens, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioners Elliott and Harris dissented.

Attest:

8-10-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040441599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cit*
DATE: August 2, 1983
SUBJECT: MUR 1525 - Memorandum to Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐

Closed MUR Letters ☐

Status Sheets ☐

Advisory Opinions ☐

Other (see distribution
below) ☐

83040441600



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *ger*
DATE: AUGUST 3, 1983
SUBJECT: OBJECTION - MUR 1525 Memorandum to the
Commission dated August 2, 1983

The above-named document was circulated to the
Commission on Tuesday, August 2, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____X_____
Commissioner Harris	_____X_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, August 9, 1983.

83040441601



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 AUG 2 AM: 48

August 2, 1983

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: Pre-probable cause conciliation in MUR 1525 -
National Alliance of Postal and Federal
Employees ("NAPFE"), Robert L. White,
President; Eugene A. Brockington, Treasurer;
Shirley E. Davis, Secretary; Jacquelyn C.
Moore, Editor; and Erie R. Doyle,
Presidential Aide

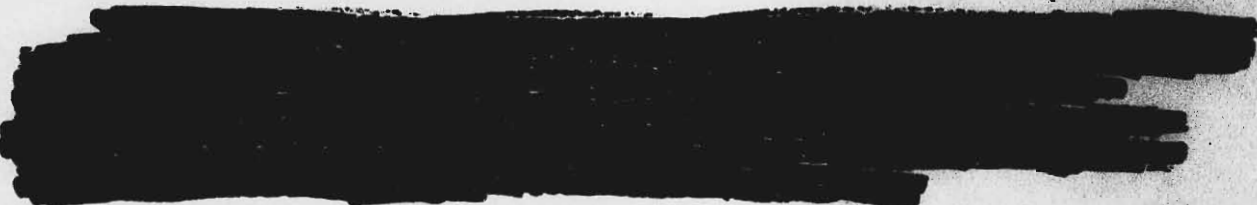
On February 8, 1983, the Commission found reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White violated 2 U.S.C. § 441b(a). The Commission also found reason to believe that NAPFE, Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore and Erie R. Doyle violated 2 U.S.C. § 441f.

On March 14, 1983, counsel for the respondents submitted a written request for pre-probable cause conciliation. Further, on April 1, 1983, counsel for the respondents submitted answers to the questions sent by this Office with the notification of the reason to believe finding. Based on the answers to the questions presented and the extensive information received when this complaint was referred to the Federal Election Commission by the Department of Justice, no additional information would be sought by this Office were we to proceed to a probable cause finding.

On July 6, 1983, the Commission voted to return the June 22, 1983, report on MUR 1525 to the Office of General Counsel in order to attain additional information regarding NAPFE's legal status.

83040441602

According to Dan Sobrio, Chief of Union-Management Relations at the Office of Personnel Management, NAPFE represents 700 employees in eight different bargaining units. The attorney for Respondents also indicated that NAPFE represents employees in collective bargaining agreements at GSA. In addition, NAPFE has been incorporated since November 12, 1925.



The Office of General Counsel recommends that the Commission grant respondents' requests for pre-probable cause conciliation, and submit to respondents the attached proposed conciliation agreements.

Recommendation

Approve and send the attached proposed conciliation agreements and letter.

Attachments

- I - Letter to Attorney Welch
- II - Conciliation Agreement, NAPFE
- III - Conciliation Agreement, White
- IV - Conciliation Agreement, Davis
- V - Conciliation Agreement, Brockington
- VI - Conciliation Agreement, Moore
- VII - Conciliation Agreement, Doyle

83040441603

LAW OFFICE OF
EDWARD L. WELCH
216 NORTH MAIN STREET

P.O. BOX 83
EDWARDSVILLE, ILLINOIS 62025



Ms. Deborah M. Felton, Esq.
Office of General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463



330404416



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 14, 1983

Edward L. Welch, Esq.
216 N. Main Street
P.O. Box 93
Edwardsville, Illinois 62025

Re: MUR 1525

Dear Mr. Welch:

On February 8, 1983, the Commission found reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White violated 2 U.S.C. §§ 441b(a) and 441f, and that Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore, and Erie R. Doyle violated 2 U.S.C. § 441f. We are in receipt of your letter dated March 14, 1983, requesting pre-probable conciliation.

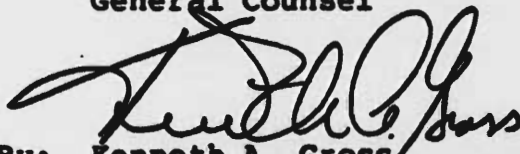
In connection with its investigation in this matter, the Commission requests that you answer the enclosed questions. Please respond within ten days so that we may proceed with your request for pre-probable conciliation.

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

If you have any questions, please contact Deborah Felton, the attorney assigned to this matter at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

5
1
6
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3
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5

Questions to Mr. Welch, Attorney for the National Alliance of Postal and Federal Employees, ("NAPFE") Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore, and Erie R. Doyle.

1. Does NAPFE represent employees concerning grievances? If so, in what capacity?
2. Does NAPFE represent employees concerning labor disputes? If so, in what capacity?
3. Does NAPFE represent employees with regard to wages, rates of pay, hours of employment or conditions of work? If so, in what capacity?

83040441606

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Alliance of Postal and Federal)
Employees ("NAPFE"))

MUR 1525

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on July 6, 1983, do hereby certify that the Commission decided by a vote of 5-0 to return the June 22, 1983 report on MUR 1525 to the Office of General Counsel in order to obtain additional information.

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

Attest:

7/7/83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040441607



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*
DATE: JUNE 23, 1983
SUBJECT: OBJECTION - MUR 1525 Memorandum to the
Commission dated June 22, 1983

The above-named document was circulated to the
Commission on Wednesday, June 22, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	<u> X </u> (comments attached)

This matter will be placed on the Executive Session
agenda for Wednesday, July 6, 1983.

83040441608



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: June 22, 1983
SUBJECT: MUR 1525 - Memo to Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

83040441609



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *DM*
DATE: April 1, 1983
SUBJECT: MUR 1525 - Comp Inv Rpt #1

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance []

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)

National Alliance of Postal
and Federal Employees ("NAPFE"),)
Robert L. White, President;)
Eugene A. Brockington, Treasurer;)
Shirley E. Davis, Secretary;)
Jacquelyn C. Moore, Editor; and)
Erie R. Doyle, Presidential Aide)

83 APR 1 P3:13

MUR 1525

COMPREHENSIVE INVESTIGATIVE REPORT #1

On February 8, 1983, the Commission found reason to believe that NAPFE and Robert L. White violated 2 U.S.C. § 441b(a) and reason to believe that NAPFE, Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore and Erie R. Doyle violated 2 U.S.C. § 441f.

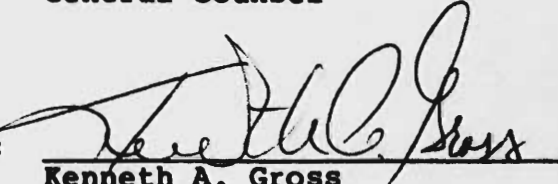
On March 3, Edward Welch, counsel for the respondents met with the staff attorney assigned to this case. Consequently, on March 14, 1983, this office received a request from Mr. Welch for pre-probable cause conciliation. Mr. Welch has forwarded answers to the interrogatories to this office. As soon as these documents are received, a memorandum requesting pre-probable conciliation will be forwarded to the Commission.

Date

March 31, 1983

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

GCC # 9864

LAW OFFICE OF
EDWARD L. WELCH

EDWARD L. WELCH
ROBERT L. MERRIWETHER, JR.
SANDRA J. DODS

216 NORTH MAIN STREET
P. O. BOX 23
EDWARDSVILLE, IL 62025

TELEPHONES:
AREA CODE: (618)
656-4744
271-3510
271-3511

April 1, 1983

Mr. Robert L. White
National President
NATIONAL ALLIANCE OF POSTAL
AND FEDERAL EMPLOYEES
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: Federal Election Commission Matter
(1980 Presidential Election)

Dear President White:

Enclosed are the answers to the interrogatories which should be completed by each of the five individuals who attended the affair in question. Make sure that these answers are accurate as they were based upon information I gained from discussions with the individuals, including yourself. Once they have been completed, and I would urge that action be taken to complete them immediately, each individual should mail his/her answers to: Ms. Deborah Felton, Office of General Counsel, Federal Election Commission, Washington, D.C. 20463. Also, please complete the enclosed Statement of Designation of Counsel on behalf of the union, and have Gene Brockington complete the Statement of Designation of Counsel on behalf of himself. Send both to Ms. Felton along with the interrogatories.

Finally, please find enclosed the letter that I wrote to Ms. Felton concerning this situation. Once she has received the interrogatories and designation of representatives from you she will make a recommendation to the Commission which will dispose of this matter.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY:

Edward L. Welch
Edward L. Welch, Attorney

ELW/nm

Encs.

83040441612

13 APR 15 11:03

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Attorney Edward L. Welch
ADDRESS: _____
TELEPHONE: _____

33 APR 15 11:03

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.

4 0 4 4 1 6
Date 4-11-83

Robert Z. White, Pres.
Signature

3
NAME: National Alliance of Postal & Federal Employees
ADDRESS: 1644-11th St. N. W.

HOME PHONE: 202-(529-9351)

BUSINESS PHONE: 202-(332-4313)

QUESTIONS TO: Robert L. White

SEP 15 11:03

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

I paid \$1,000 to Democratic National Committee in connection with Invitation to Join the President and First Lady and the Vice President and his wife.

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

See Attached Invitations.

I attended the event in question.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

NAPFE reimbursed me for the expenditure referred to in questions 1 and 2

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

Reimbursed by check - NAPFE paid - NAPFE receive the check for \$1,000 Jan or about the time of the event.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

No

3304044161

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

N.A.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

No (The question is misleading. NAFPE's only action was to pay \$5,000 — ~~to~~ five \$1,000 to five individuals — in connection with that invitation to join the President and first lady

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

N.A.

33040441615

QUESTIONS TO: Shirley E. Davis

RECEIVED
GENERAL INVESTIGATIVE
DIVISION
FBI
23 APR 15 AM 11:03

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

I paid \$4,000.00 to the Democratic National Committee in connection with an invitation to join the President & First Lady and the Vice President and his wife.

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

I attended the event in question

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

Cancel check not available at this time, I can obtain a copy at a later date.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee? *Yes*

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

The National Alliance of Postal & Federal Employees issued me a check for \$1,000.00 about the time of the event

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

NO

33040441616

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

Not applicable

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

No - the question is mis-leading. The NAFPE's only action was to pay \$5,000.00 - five \$1,000.00 to five individuals - in connection with the invitation to join the President & 1st Lady on Sept. 30, 1980

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

Not Applicable

Shirley Davis

8304044167

QUESTIONS TO: **Brie R. Doyle**

RECEIVED
GENERAL COUNSEL

33 APR 15 AM 11:03

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

I made \$1,000.00 to the Democratic National Committee in connection with an invitation to join the President and First Lady and the Vice President and his wife.

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

I attended the event in question.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

not available at this time.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

yes

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

The National Alliance of Postal and Federal Employees issued the check for \$1,000.00 to me at about the time of the event.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

no

83040441618

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

not applicable

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made? *no, the question is misleading. The National*

alliance of Postal and Federal Employees' only action was to pay \$5,000.00 - five \$1,000.00 to five individuals - in connection with the investigation to join the President and First Lady on September 30, 1980

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

not applicable,

8304044162

QUESTIONS TO: Jacquelyn C. Moore

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

I paid \$1,000.00 to the Democratic National Committee in connection with an imitation of John President and Frank Lady and the three bars and his wife.

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

I attended the event in question.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

Not available at this time.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

yes.

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

The National Alliance of Postal and Federal Employees reimbursed me for \$1,000.00 to me at about the time of the event.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

No.

83040441620

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

Not applicable

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

No. The question is misleading. The National Alliance of Postal and Federal Employees only action was to pay 5,000.00 - plus 2,000.00 to individuals in connection with the invitation to join the Nat. and red badge on Sept. 30, 1980.

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

Not applicable

Jacquelyn C. Moore

83040441621

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Edward L. Welch

ADDRESS: P. O. Box 93
Edwardsville, Illinois 62025

TELEPHONE: (618) 656-4744

03 APR 15 AM 11:04

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.

April 14, 1983

Date

Eugene A. Brockington
Signature

NAME: Eugene A. Brockington, Treasurer
National Alliance of Postal & Federal Employees
ADDRESS: 1644 11th Street, N. W.
Washington, D. C. 20001

HOME PHONE: (703) 430-3927

BUSINESS PHONE: (202) 332-4313

3040441622

QUESTIONS TO: Eugene A. Brockington

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980? I paid \$1,000.00 to the Democratic National Committee in connection with an invitation to join the President and First Lady and the Vice-President and his wife.

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.
See attached invitation. I attended the event in question.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

See attached.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

The National Alliance of Postal and Federal Employees reimbursed me for the expenditure referred to in Questions 1 and 2.

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

The National Alliance of Postal and Federal Employees issued the check for \$1,000.00 to me at about the time of the event.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

No.

3304041622

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

Not applicable.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made? No - The question is misleading. The National Alliance of Postal and Federal Employees' only action was to pay \$5,000.00 - five \$1,000.00 to five individuals - in connection with the invitation to join the President and First Lady on September 30, 1980.

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

Not applicable.

83040441624

83040441625

EUGENE A. BROCKINGTON

1644 - 11TH ST., NW.
WASHINGTON, D.C. 20001

214

9/23/

1980

18-419

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ORDER OF

The 1980 Democratic Victory Fund

1,000.00

One Thousand Dollars.....00/100

DOLLARS

1ST AMERICAN
FIRST AMERICAN BANK, NA, WASHINGTON, DC

Eugene A. Brockington

⑈0000100000⑈

8 3 0 4 0 4 4 1 6 2 6

FOR DEPOSIT ONLY
ACCOUNT #1442-440
DEMOCRATIC NATIONAL COMMITTEE
80 Dr. Vic Fund

SEP 26
PAY ANY BANK
THE BANK OF AMERICA
WASHINGTON D.C.

8 3 0 4 0 4 4 1 6 2 7



National Alliance of Postal & Federal Employees

1644 - 11th St., N.W. Washington, D.C. 20001

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Ms. Deborah Felton
Office of General Counsel
Federal Election Commission
Washington, DC 20463

EDWARD L. WELCH
ROBERT L. MERRIWETHER, Jr.
SANDRA J. DODS

LAW OFFICE OF
EDWARD L. WELCH

204462
RECEIVED BY THE FEC
GCC#9784
83 APR 1 8:11
216 NORTH MAIN STREET
P. O. BOX 83
EDWARDSVILLE, IL 62025
TELEPHONES:
AREA CODE: (618)
656-4744
271-3510
271-3511

March 31, 1983

Ms. Deborah M. Felton, Esq.
Office of General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: Federal Election Commission v. National
Alliance of Postal and Federal Employees
MUR 1525

Dear Ms. Felton:

As a follow-up to my letter of March 14, 1983, this is to advise that our office has concluded its investigation into the matters raised by Chairman McDonald in his letter of February 10, 1983 addressed to President Robert L. White of the National Alliance of Postal and Federal Employees, and the Summary of Allegations attached thereto.

It appears that one Wesley Young, a defeated former Vice-President of the National Alliance of Postal and Federal Employees, made an allegation concerning the legality of the Alliance taking certain action with respect to \$5,000.00 which Young contends was given to former President Carter's campaign, and that this was in addition to \$5,000.00 given the campaign by the Alliance.

Our investigation revealed that Mr. Young is incorrect in his allegation, both with respect to what was given and the intent of what was given. Our conclusion is that there has been no violation of the Federal Election Code, or in any event no intentional violation of the Federal Election Code.

There is a separate entity known as the National Alliance of Political Action (NAPA) which, as your investigation report shows, indeed reported a \$5,000.00 contribution to the 1980 Democratic Victory Club. This is all that was donated by that particular entity. Our investigation shows, as does yours, that that \$5,000.00 contribution was reported by NAPA.

With respect to the \$5,000.00 item in dispute, it appears that in late August or early September, 1980 the Alliance received an invitation

83040441628

83 MAR 1 P2:40

Ms. Deborah Felton
March 31, 1983
Page Two

from the Democratic National Committee to join President and Mrs. Carter and Vice President and Mrs. Walter Mondale at a dinner on September 30, 1980. It was to be a black tie affair. In order to understand the thinking behind those people who responded to this invitation, it is important to note the following brief history about the National Alliance of Postal and Federal Employees.

The Alliance came into existence in 1913 in Chattanooga, Tennessee in an effort to overcome racial discrimination in the United States Postal Service. Throughout the years it has been in the forefront of fighting employment discrimination in the postal and federal sectors. It was the first union to open its doors to all postal and federal employees without regard to race or sex.

When President Kennedy signed the Executive Order which granted representation rights to federal sector labor organizations, including postal service organizations, the Alliance vigorously represented employees in the postal service. (The bulk of the Alliance membership comes from the postal service.)

Since the enactment of the Postal Reorganization Act in 1971, the Alliance has been wrongfully deprived of its right to represent employees in the postal grievance procedure, and as a result has had to resort to representation of veterans before the Merit Systems Protection Board, and the employees by means of equal employment opportunity complaints and unfair labor practices. In addition, the Alliance has attempted to enhance the awareness of the importance of labor education by making a grant to Howard University of Washington, D.C. for establishment of an Institute of Labor-Management Relations. This grant exceeds \$1,000,000.00.

It is because of this extreme social consciousness that the Alliance felt it was selected to join with the President and Vice-President on September 30, 1980, and the Alliance considered it a privilege to attend.

Our investigation failed to reveal that there was any indication on the invitation itself that the Alliance could not make a contribution, or that information concerning contributors had to be supplied in accordance with Federal Election Commission rules and regulations.

Enclosed for your comparison are a copy of the invitation for the September 30, 1980 occasion and a copy of the invitation we recently received from Senator John Glenn which obviously the Alliance could not respond.

In this context, Alliance National President Robert L. White ascertained those individuals who would meet with President and Mrs. Carter and each of those individuals paid \$1,000.00 which was reimbursed by the Alliance. As shown on the enclosed copy of the invitation, President White okayed the payment of \$5,000.00 and administratively this was reimbursed to the five individual who attended the affair.

83040441629

Ms. Deborah Felton
March 31, 1983
Page Three

Our investigation further revealed that this occasion was regarded as part of the ongoing effort of the Alliance to publicize its plight by meeting and dealing with those people who can do something about it.

Obviously the law is clear, contributions by unions and corporations to political fund raising dinners are prohibited. However, our investigation failed to reveal that the Alliance regarded the invitation for the September 30, 1980 affair to be "political" in the sense that it was within the realm of prohibited contributions.

In our letter of March 14, 1983, it was indicated to you that the Alliance desired pre-complaint conciliation. Notwithstanding what has been written in this letter, the Alliance is willing to make a reasonable settlement, given the expense which will be required in my coming to Washington to litigate what is obviously an ambiguous situation.

The Interrogatories you submitted are being forwarded under separate cover by the individuals in Washington.

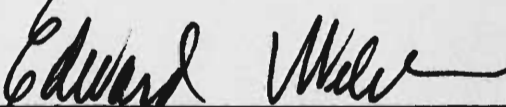
In arriving at what you would consider to be appropriate in this case, we would urge you to take into account the results of our investigation.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY:



Edward L. Welch, Attorney

ELW/nm

- Encs: 1. Invitation for September 30, 1980 event.
2. Fund raising notice for Senator John Glenn,
March 23, 1983.

83040441630

The 1980 Democratic Victory Gala
1025 Massachusetts Avenue, N.W.
Washington, D.C. 20040

83040441631

The Democratic National Committee
invites you to join
President and Mrs. Jimmy Carter
Vice President and Mrs. Walter Mondale
and

The Democratic Leadership
of the Ninety-sixth Congress
at

The 1980 Democratic Victory Gala
Tuesday, the thirtieth of September
Nineteen hundred and eighty

Cocktails at seven o'clock
Dinner at eight o'clock

RSVP
Card Enclosed

Bullroom
Washington Hilton Hotel

Black Tie
202 797 5900

OK.
5,000
R.D. White, Pres

HOST COMMITTEE

Leonard J. Aronson
Thomas Ludlow Ashley
Charles M. Atkins
Thomas Hale Boggs, Jr.
Robert L. Brock
J. J. Cafaro
James C. Calaway, Sr.
Joseph F. Chapman, III
Richard C. Darling
Agnes Davis
William T. Dentzer, Jr.
Evan S. Dobelle
Dr. Ronald Dozoretz
Hon. Angier Biddle Duke
William C. Foster
Martin H. Gold

Stuart J. Gordon
Stanley Harrison
William Hotes
Robert E. Jensen
Robert J. Keefe
John W. Kessler
John G. Kesler
Louis Lambert
Alan E. Lewis
John F. Lewis
Chris J. Lund
James A. McDivitt
Manuel D. Medina
Andrew J. Miller
Lynda M. Murphy
Paul J. Plishner

Byron Radaker
Molly M. Raiser
Bernard Budd Rand
William B. Risman
James Roncaglione
Fred Rzepka
Karen Dolmaich Shaw
Maurice Sonnenberg
Robert A. Staub
Jack Stephens
Hon. Marvin H. Warner
Vernon Weaver
Dr. Allan Weingold
William R. White
Lionel B. Wilde
Hon. Milton A. Wolf

Join us in honoring
John and Annie Glenn
at a
Gala Washington Fundraiser
(Wednesday, March 23, 1983
six to eight p.m.
Grand Ballroom
The Mayflower Hotel

RSVP card enclosed

Contributor \$ 250
Sponsor \$ 1000
PAC Patron \$ 5000

83040441632

☐ Yes, I will attend the Washington Rally on Wednesday, March 23rd. Enclosed is my contribution for \$ _____

☐ Contributor ☐ Sponsor ☐ PAC patron (see reverse side)

☐ I regret that I will be unable to attend, but enclosed is my contribution for \$ _____

Make checks payable to:
John Glenn Presidential Committee, Inc.
Post Office Box 1984, Washington, D.C. 20044

Information Required by the Federal Election Commission (Please type or print)

Name _____ Res. Tel. () _____

Residence Address _____

City/State _____ Zip _____

Title or Position _____ Self-employed (check box) ☐

Employer (or Firm) _____

Business Address _____ Bus. Tel. () _____

City and State _____ Zip _____

Contribution through the efforts of: _____

According to law, corporate checks cannot be accepted.

Authorized and paid for by John Glenn Presidential Committee, Inc. -C-

83040441633

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Mr. Kenneth R. Feltman, Asst.
Office of General Counsel
Federal Bureau of Investigation
Washington, D.C. 20535

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TO MAKE IT ALL BACK HERE

204295

RECEIVED BY THE FEC
GCC # 9687
03 MAR 16 4:11:58

EDWARD L. WELCH
ROBERT L. MERRIWETHER, JR.
SANDRA J. DODS

LAW OFFICE OF
EDWARD L. WELCH

216 NORTH MAIN STREET
P. O. BOX 93
EDWARDSVILLE, IL 62025
TELEPHONES:
AREA CODE: (618)
656-4744
271-2810
271-2811

March 14, 1983

Ms. Deborah Felton, Esq.
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: Federal Election Commission v. National
Alliance of Postal & Federal Employees

MUR 1525

Dear Ms. Felton:

Please be advised that on behalf of the National Alliance of Postal and Federal Employees and the individuals named in connection therewith, we will be seeking pre-complaint conciliation.

I only recently obtained a copy of the invitation which led to the disbursement in question and as a result I am in the process of completing our presentation to you.

Please excuse the delay.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY: Edward L. Welch
EDWARD L. WELCH, Attorney

ELW/nm

83040441635

03 MAR 16 4:11:58
RECEIVED BY THE FEC
GCC # 9687

LAW OFFICE OF
EDWARD L. WELCH
210 MAIN STREET
P. O. BOX 63
SPRINGFIELD, ILLINOIS 62765



RECEIVED

83 MAR 18 411

83040411

Ms. Deborah Felton, Req.
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

GCC#9609
MUR 1525

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Edward L Welch
ADDRESS: P.O. Box 93
Edwardsville, IL 62025
TELEPHONE: 618-656-4744

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.

February 22, 1983
Date

Shirley E Davis
Signature

NAME: Mrs Shirley E Davis
ADDRESS: 1644-11th Street, NW
Washington, D.C. 20001
HOME PHONE: 899-6525
BUSINESS PHONE: 332-4313

MUR1525

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: *Edward L. Welch*
ADDRESS: *P.O. Box 93*
TELEPHONE: *618-656-4744*

13 MAR 3 1983 P 2:33

GENERAL INVESTIGATIVE

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.

3040441

Feb. 23, 1983
Date

Robert L. White
Signature

NAME: *Robert L. White*
ADDRESS: *1644-11th St N.W.*
Wash. D.C. 20001
HOME PHONE: *526-4719*
BUSINESS PHONE: *352-4313*

nu21525

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Edward L. Welch

ADDRESS: P. O. BOX 93
Edwardsville, IL 62025

TELEPHONE: 618-656-4744

13 MAR 3 12:33

GENERAL COUNCIL

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.

3040441

February 22, 1983

Date

Erie R. Doyle
Signature

NAME: Mr. Erie R. Doyle

ADDRESS: 1644 11th Street, N.W.
Washington, D. C. 20001

HOME PHONE: 301-773-8106

BUSINESS PHONE: 202-332-4313

MURIS 25

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Edward L. Welch
ADDRESS: P.O. Box 93
TELEPHONE: Edwardsville, IL 62025
618-656-4744

13 MAR 3 12:33

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.

3040441640
Date February 22, 1983

Signature Jacquelyn C. Moore

NAME: Mrs. Jacquelyn C. Moore

ADDRESS: 1644 11th St NW
Wash D.C. 20001

HOME PHONE: 829-8673

BUSINESS PHONE: 332-4313



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1983

**Eugene A. Brockington, Treasurer
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001**

Re: MUR 1525

Dear Mr. Brockington:

On February 8, 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

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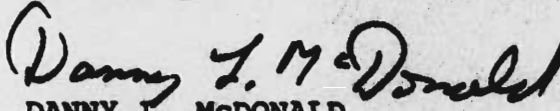
Letter to Eugene A. Brockington
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

83040441642

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1525
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

3304044164
In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

83040441643
*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

QUESTIONS TO: Eugene A. Brockington

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

83040441646

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441647



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1983

**Ms. Shirley E. Davis, Secretary
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001**

Re: MUR 1525

Dear Ms. Davis:

On February 8, 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

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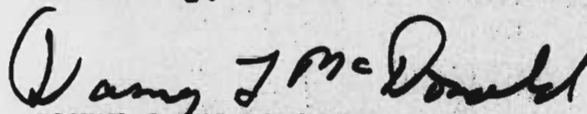
Letter to Shirley E. Davis
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,



DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

83040441649

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1525
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

83040441650

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

83040441651
In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

83040441652
*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

QUESTIONS TO: Shirley E. Davis

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

83040441652

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441654



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1983

**Erie R. Doyle, Presidential Aide
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001**

Re: MUR 1525

Dear Mr. Doyle:

On February 8, 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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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

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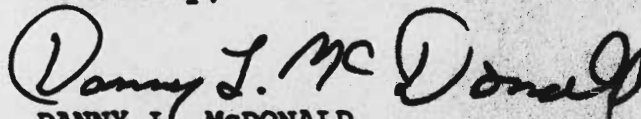
Letter to Erie R. Doyle
Page 2

notifications and other communications from the Commission.

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Sincerely,



DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

83040441656

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1525
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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FACTUAL AND LEGAL ANALYSIS

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8304044163
In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

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*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

QUESTIONS TO: Erie R. Doyle

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

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7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1983

Jacquelyn C. Moore, Editor
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR 1525

Dear Ms. Moore:

On February 8, 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

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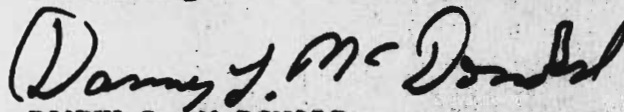
Letter to Jacquelyn C. Moore
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

83040441663

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1525
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

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FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

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consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

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*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

QUESTIONS TO: Jacquelyn C. Moore

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

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7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1983

Robert L. White, President
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR 1525

Dear Mr. White:

On February 8, 1983, the Federal Election Commission determined that there is reason to believe the National Alliance of Postal and Federal Employees violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, by making a contribution in 1980 to the Democratic National Committee in the names of five union officials. The Commission also found reason to believe that you violated 2 U.S.C. §§ 441b(a) and 441f by consenting to the making of a prohibited union contribution and by knowingly permitting your name to be used to effect such contribution. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and NAPFE. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you and the union, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

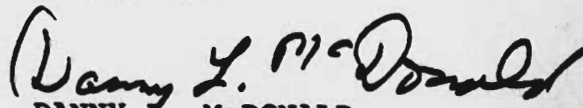
Letter to Robert L. White
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

83040441670

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1525
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

8 3 0 4 0 4 4 1 6 7 1
The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

83040441672
In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

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*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

QUESTIONS TO: Robert L. White

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

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7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

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February 3, 1983

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: PremUR 102

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: Felton

83040441676

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Alliance of Postal and)
Federal Employees ("NAPFE"),)
Robert L. White, President;)
Eugene A. Brockington, Treasurer;)
Shirley E. Davis, Secretary;)
Jacquelyn C. Moore, Editor;)
and Erie R. Doyle, Presidential)
Aide)

Pre-MUR 102

MUR 1525

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 8, 1983, the Commission decided by a vote of 6-0 to take the following actions in Pre-MUR 102:

1. Open a MUR.
2. Find reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White violated 2 U.S.C. § 441b(a).
3. Find reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore and Erie R. Doyle violated 2 U.S.C. § 441f.
4. Approve letters with questions as attached to the First General Counsel's Report dated February 3, 1983.

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

Attest:

2/8/83
Date

Marjorie W. Emmons
Marjorie W. Emmons, Secretary of the
Commission

83040441677

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 FEB 3 P4: 02

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC THE COMMISSION 2-3-83

Pre-MUR # 102
STAFF MEMBER
Deborah Felton

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: National Alliance of Postal and Federal
Employees ("NAPFE") Robert L. White,
President; Eugene A. Brockington, Treasurer;
Shirley E. Davis, Secretary; Jacquelyn C.
Moore, Editor; and Erie R. Doyle,
Presidential Aide

RELEVANT STATUTE: 2 U.S.C. § 441b(a), 2 U.S.C. § 441f

INTERNAL REPORTS CHECKED: October 1980 Quarterly Report for
PAC - National Alliance for Political
Action

FEDERAL AGENCIES CHECKED: Department of Labor, Labor-Management
Services Administration

GENERATION OF MATTER

This matter was originally referred to the Department of
Justice, Criminal Division by the Labor-Management Services
Administration (LMSA) regarding a contribution of \$5,000 made to
the Democratic National Committee (DNC) by NAPFE through five of
its officers. The Criminal Division decided not to prosecute due
to the small sum of money involved. Accordingly, the case was
referred to the FEC by the Department of Justice for further
consideration.

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SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection

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with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to

*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

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effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

Based upon the foregoing analysis, there appears to be a basis for proceeding against NAPFE, Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore and Erie R. Doyle. The General Counsel recommends that the Commission find reason to believe that the union violated 2 U.S.C. § 441b(a) and that the union and the above-named officials violated 2 U.S.C. § 441f.

Recommendation

1. Open a MUR;
2. Find reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White violated 2 U.S.C. § 441b(a);
3. Find reason to believe that the National Alliance of Postal and Federal Employees and Robert L. White, Eugene A. Brockington, Shirley E. Davis, Jacquelyn C. Moore, and Erie R. Doyle violated 2 U.S.C. § 441f; and

83040441691

4. Approve attached letters with questions.

February 2, 1983
Date

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - referral
- 2 - proposed letters (5)

83040441682

GEMCD:NSS:p
186-16-NEW

82 DEC 21

PJ2: 07

Washington, D.C. 20530

17 DEC 1982

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

Re: Robert L. White; National Alliance
of Postal and Federal Employees

Dear Mr. Steele:

Enclosed is a copy of correspondence from the U.S. Department of Labor to this office regarding a \$5,000 contribution which the National Alliance of Postal and Federal Employees appears to have made to the Democratic National Committee through five of the union's officers.

We have reviewed this matter, and have determined that in light of the small sums involved, criminal prosecution under 2 U.S.C. §441b and §441f is not warranted. -We are accordingly referring this matter to you for whatever action the Commission considers appropriate under 2 U.S.C. §437g(a).

If you have any questions, please feel free to call me (724-6896) or William Toole, the Department of Labor investigator who handled this matter.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By: *Nancy S. Stewart*
Nancy S. Stewart, Attorney
Public Integrity Section

Enclosure

U.S. Department of Labor
202-254-6514

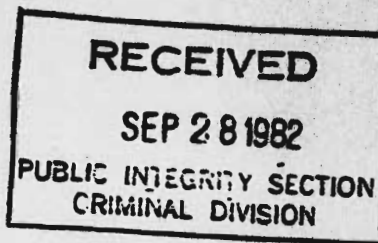
Labor-Management Services Administration
Suite 558 - Riddell Building
1730 K Street N.W.
Washington, D.C. 20006



Reply to the Attention of:

September 27, 1982

Mr. Craig Donsanto
Director Election Crimes Branch
Public Integrity Unit
P.O. Box 50168
F Street Station
Washington, D.C. 20004



Dear Mr. Donsanto:

This letter will serve to confirm your telephone conversation of September 24, 1982 with Investigator William Toole, concerning contributions of \$5,000.00 made to the National Democratic Party by the National Alliance of Postal and Federal Employees (NAPFE), 1644 11th Street N.W., Washington, D.C. in 1980.

During a recent examination of the financial books and records of the National Alliance of Postal and Federal Employees, an expenditure in the amount of \$5,000.00, made on September 17, 1980, was brought to our attention. A memorandum of the National President of NAPFE, Robert L. White, addressed to the National Secretary, Shirley Davis and to the National Treasurer Eugene Brockington, dated September 17, 1980, granted authorization of payment of NAPFE funds of \$1,000.00 each to the following National Officers and employees, "For the purpose of participating in a special project in connection with the Public Relations Program of our union:"

Robert L. White, President
Shirley E. Davis, Secretary
Eugene A. Brockington, Treasurer
Jacquelyn C. Moore, Editor
Erie R. Doyle, Aide

NAPFE records indicate that on September 17, 1980, checks numbered 08036, 08037, 08038, 08039, and 08040 were issued payable to Robert L. White, Eugene A. Brockington, Erie R. Doyle, Shirley E. Davis, and Jacquelyn C. Moore, respectively in the amount of \$1,000.00 each.

Attachment I, page 2 of 3

When interviewed on September 22, 1982, Shirley E. Davis, Secretary, advised that the authorization of \$5,000.00 for a special project on September 17, 1980 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000.00 each to attend a dinner for the National Democratic Party held at the Washington, D.C. Hilton Hotel in 1980. She requested and received reimbursement from NAPFE Funds for the \$1,000.00 as did the other individuals involved.

Arrangements to review our files concerning this matter may be made by contacting Investigator William A. Toole at the above number.

Sincerely yours,

for Larry F. Yud
Larry F. Yud
Area Administrator
Washington Area Office

8304044168



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Eugene A. Brockington, Treasurer
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR

Dear Mr. Brockington:

On , 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

Attachment II page 1 of 7

Letter to Eugene A. Brockington
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

83040441687
AH 2, page 2 of 7

QUESTIONS TO: Eugene A. Brockington

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441699

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

83040441691
In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

83040441692
*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ms. Shirley E. Davis, Secretary
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR

Dear Ms. Davis:

On , 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

Attachment 3, page 1 of 7

Letter to Shirley E. Davis
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

83040441694
AH 3, page 2 of 7

QUESTIONS TO: Shirley E. Davis

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441696

Att. 3, page 4 of 7

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

Att. 3, pg 6 of 7

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

83040441699



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert L. White, President
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR

Dear Mr. White:

On , 1983, the Federal Election Commission determined that there is reason to believe the National Alliance of Postal and Federal Employees violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, by making a contribution in 1980 to the Democratic National Committee in the names of five union officials. The Commission also found reason to believe that you violated 2 U.S.C. §§ 441b(a) and 441f by consenting to the making of a prohibited union contribution and by knowingly permitting your name to be used to effect such contribution. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and NAPFE. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you and the union, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

Attachment 4, page 1 of 7

Letter to Robert L. White
Page 2

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

83040441701

Att. 4, page 2 of 7

QUESTIONS TO: Robert L. White

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

83040441702

Att. 4, page 3 of 7

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441703

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

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According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

83040441706

Att #, page 7 of 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jacquelyn C. Moore, Editor
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001

Re: MUR

Dear Ms. Moore:

On , 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

Attachment 5, pg 1 of 7

Letter to Jacquelyn C. Moore
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Pelton, the attorney assigned to this matter, at 523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

83040441708
AH.5, page 2 of 7

QUESTIONS TO: Jacquelyn C. Moore

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

33040441710

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

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consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

B 3 0 4 0 4 4 1 7 1 3

AH 5, pg 7 of 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**Erie R. Doyle, Presidential Aide
National Alliance of Postal and
Federal Employees
1644 - 11th Street, N.W.
Washington, D.C. 20001**

Re: MUR

Dear Mr. Doyle:

On , 1983, the Federal Election Commission determined that there is reason to believe that you, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, by permitting your name to be used to effect a prohibited contribution. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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

Attachment 6, page 1 of 7

Letter to Eric R. Doyle
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Felton, the attorney assigned to this matter, at 523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

8304044171E

Att 6, page 2 of 7

QUESTIONS TO: Erie R. Doyle

1. Did you make a contribution to the Democratic National Committee or any other political committee on or about September 17, 1980?

2. If the answer to question 1 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, and how you delivered the contribution. Also, please state whether the contribution was for a particular fundraising event, when and where the event was held, and whether you attended such an event.

3. If the answer to question 1 is yes, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

4. Were you ever reimbursed by the National Alliance of Postal and Federal Employees for any contribution you had made or were going to make to the Democratic National Committee or any other political committee?

5. If the answer to question 4 is yes, please state the date you were reimbursed, in what form you were reimbursed (e.g., cash, check, or money order), and how the reimbursement was delivered to you. Also, please state what persons you discussed this with and what was stated in such discussions.

6. Did you make a contribution to the 1980 presidential campaign of Jimmy Carter for which you received reimbursement from the National Alliance of Postal and Federal Employees?

83040441716

Page 2
Questions

7. If the answer to question 6 is yes, please state the date you made the contribution, in what form you made the contribution, the amount of the contribution, how you delivered the contribution, whether the contribution was for a particular fundraising event, when and where the event was held, whether you attended the event, the date you were reimbursed, in what form you were reimbursed, how the reimbursement was delivered to you, what persons you discussed this with, and what was stated in such discussions. Also, please provide a copy (both sides) of the check, money order, or other instrument used to make the contribution.

8. Did the National Alliance for Postal and Federal Employees make any contributions to the 1980 presidential campaign of Jimmy Carter other than by reimbursing union officials for contributions they made?

9. If the answer to question 8 is yes, please state when, how, and how much was involved.

83040441717

Att. 6, page 4 of 7

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER & TEL. NO.
Deborah M. Felton
(202) 523-4060

RESPONDENTS National Alliance of Postal and
Federal Employees ("NAPFE")
Robert L. White, President; Eugene
A. Brockington, Treasurer;
Shirley E. Davis, Secretary;
Jacquelyn C. Moore, Editor;
and Erie R. Doyle, Presidential Aide

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The National Alliance of Postal and Federal Employees (NAPFE) was under investigation by the Labor-Management Services Administration (LMSA) of the Department of Labor regarding possible violations of the Landrum-Griffin Act. In the course of LMSA's investigation a \$5,000 expenditure made on September 17, 1980, was discovered. The financial records indicated that five checks were issued payable to five officials of the union in the amount of \$1,000 each. When the secretary of NAPFE was interviewed by the LMSA investigator, she informed him that the authorization of \$5,000 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000 each to attend a National Democratic Party dinner in 1980.

FACTUAL AND LEGAL ANALYSIS

According to section 441b(a) of Title 2, United States Code, a labor union is prohibited from making a contribution or expenditure to any political party or organization in connection with any federal election, and it is unlawful for any officer of a labor organization to consent to any such prohibited contribution or expenditure.

In the investigation conducted by the LMSA, Robert L. White, President of NAPFE, responded to interrogatories stating that the expenditure at issue was for the purpose of promoting the interests of the union and was a special project in connection with the Public Relations program of the union. He stated that the checks were charged to Special Projects in the Research and Development area. An examination of copies of the checks indicate that they were drawn from the union's general fund. The evidence thus suggests that the union made a prohibited contribution.

According to a memorandum dated September 17, 1980, Mr. White personally authorized the five \$1,000 checks to be issued to the five officials of NAPFE for participating in "a special project." As previously noted, this money appears to have been a reimbursement to the five union officials for out of pocket contributions they each made to a DNC fundraising dinner in 1980. Accordingly, Mr. White appears to have violated § 441b(a) by

consenting to a prohibited union contribution. */

Furthermore, NAPFE and each of the officials who received the \$1,000 reimbursement appear to have violated 2 U.S.C. § 441f. Under 2 U.S.C. § 441f, a person shall not make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. In the instant case, each of the individual respondents contributed to the DNC in their own names, while in fact, these contributions were from NAPFE.

*/ LMSA also obtained information from Wesley Young, First Vice President of NAPFE. He stated in an interview that union funds in the amount of \$5,000 were given to former President Carter's campaign and that this was in addition to a \$5,000 contribution to the Carter campaign by the union's "Political Action Fund." It may be that the \$5,000 union disbursement Mr. Young referred to is actually the \$5,000 union disbursement for the DNC fundraiser. Our investigation would seek to clarify the matter. We do note that NAPFE's separate segregated fund, National Alliance for Political Action, reported a \$5,000 contribution to the 1980 Democratic Victory Club.

83040441720

GEMCD:NSS:pr2 DEC 21 1986-16-NEW

P12: 07

Washington, D.C. 20530

17 DEC 1982

3:00

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

Re: Robert L. White; National Alliance
of Postal and Federal Employees

Dear Mr. Steele:

Enclosed is a copy of correspondence from the U.S. Department of Labor to this office regarding a \$5,000 contribution which the National Alliance of Postal and Federal Employees appears to have made to the Democratic National Committee through five of the union's officers.

We have reviewed this matter, and have determined that in light of the small sums involved, criminal prosecution under 2 U.S.C. §441b and §441f is not warranted. We are accordingly referring this matter to you for whatever action the Commission considers appropriate under 2 U.S.C. §437g(a).

If you have any questions, please feel free to call me (724-6896) or William Toole, the Department of Labor investigator who handled this matter.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By: *Nancy S. Stewart*
Nancy S. Stewart, Attorney
Public Integrity Section

Enclosure

83040441721

U.S. Department of Labor
202-254-6514

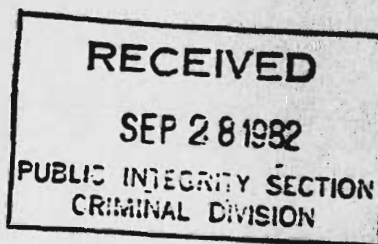
Labor-Management Services Administration
Suite 558 - Riddell Building
1730 K Street N.W.
Washington, D.C. 20006

Reply to the Attention of:



September 27, 1982

Mr. Craig Donsanto
Director Election Crimes Branch
Public Integrity Unit
P.O. Box 50168
F Street Station
Washington, D.C. 20004



Dear Mr. Donsanto:

This letter will serve to confirm your telephone conversation of September 24, 1982 with Investigator William Toole, concerning contributions of \$5,000.00 made to the National Democratic Party by the National Alliance of Postal and Federal Employees (NAPFE), 1644 11th Street N.W., Washington, D.C. in 1980.

During a recent examination of the financial books and records of the National Alliance of Postal and Federal Employees, an expenditure in the amount of \$5,000.00, made on September 17, 1980, was brought to our attention. A memorandum of the National President of NAPFE, Robert L. White, addressed to the National Secretary, Shirley Davis and to the National Treasurer Eugene Brockington, dated September 17, 1980, granted authorization of payment of NAPFE funds of \$1,000.00 each to the following National Officers and employees, "For the purpose of participating in a special project in connection with the Public Relations Program of our union:"

Robert L. White, President
Shirley E. Davis, Secretary
Eugene A. Brockington, Treasurer
Jacquelyn C. Moore, Editor
Erie R. Doyle, Aide

NAPFE records indicate that on September 17, 1980, checks numbered 08036, 08037, 08038, 08039, and 08040 were issued payable to Robert L. White, Eugene A. Brockington, Erie R. Doyle, Shirley E. Davis, and Jacquelyn C. Moore, respectively in the amount of \$1,000.00 each.

83040441722

When interviewed on September 22, 1982, Shirley E. Davis, Secretary, advised that the authorization of \$5,000.00 for a special project on September 17, 1980 was made to reimburse her and other officials of NAPFE for purchasing tickets at a cost of \$1,000.00 each to attend a dinner for the National Democratic Party held at the Washington, D.C. Hilton Hotel in 1980. She requested and received reimbursement from NAPFE Funds for the \$1,000.00 as did the other individuals involved.

Arrangements to review our files concerning this matter may be made by contacting Investigator William A. Toole at the above number.

Sincerely yours,

for Larry F. Yud
Larry F. Yud
Area Administrator
Washington Area Office

83040441723



U.S. Department of Justice RECEIVED AT THE FEC

GEMCD:NSS:p 82 DEC 21 186-16-NEW

6657 9168

12:02

00:00

Washington, D.C. 20530

17 DEC 1982

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General Counsel
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1325 K Street, N.W.
Washington, D.C. 20463

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Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By: *Nancy S. Stewart*
Nancy S. Stewart, Attorney
Public Integrity Section

Enclosure

B 3 0 4 0 4 1 7 2 4

U.S. Department of Labor
202-254-6514

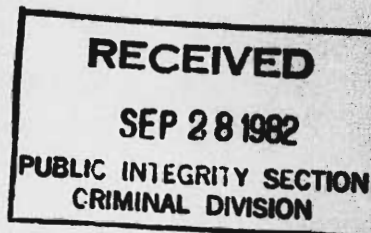
Labor-Management Services Administration
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Washington, D.C. 20006

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83040441723

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Arrangements to review our files concerning this matter may be made by contacting Investigator William A. Toole at the above number.

Sincerely yours,

for Larry F. Yud

Larry F. Yud
Area Administrator
Washington Area Office

83040441726

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

TCM/PIS

83040411

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

POSTAGE AND FEES PAID
U. S. DEPARTMENT OF JUSTICE
J19-431



82 DEC 21 PM 12:07



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF FUR # 1525

Date Filmed 12/8/83 Camera No. --- 4

Cameraman JRL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1525

84040443070

LAW OFFICES OF
EDWARD L. WELCH
216 NORTH MAIN STREET
P. O. BOX 93
EDWARDSVILLE, ILLINOIS 62025

RECEIVED AT THE PCO
Guth 1347
84 JAN 3 PM 12:23
MUR 1525
Rime

EDWARD L. WELCH
MARQUA MCGULL-BILLINGSLEY

TELEPHONES:
(618) 271-3510
(618) 686-4744

December 29, 1983

P 4:43

Mr. Kenneth A. Gross
Associate General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: NAPFE, Robert L. White and Jacqueline Moore
MUR 1525

Dear Mr. Gross:

Please find enclosed the checks of ^{NAPFE,} Robert L. White and
Jacqueline Moore in connection with the above-styled matter.

Please advise whether or not there is anything else which
has to be done in order for ^{NAPFE,} Mr. White and Ms. Moore to be in
compliance.

Thank you.

Very truly yours,

LAW OFFICE OF EDWARD L. WELCH

BY: 

Edward L. Welch, Attorney

ELW:bw

64040443071

NATIONAL ALLIANCE OF POSTAL AND FEDERAL EMPLOYEES—WASHINGTON, D.C.

INVOICE DATE	INVOICE NO	WARRANT NO	GROSS		DISCOUNT		NET INVOICE
111483	121383	EX-6808	2,500.00				2,500.00
CHECK NO.	CHECK DATE		TOTAL GROSS		TOTAL DISC.		NET CHECK
05122	12-13-83		2,500.00				2,500.00



**National Alliance of Postal & Federal
Employees—Operating Fund**
1628 11th STREET, N.W., WASHINGTON, D.C. 20001

NO. 05122

15-150
540

Dec. 13, 1983

WARRANT NO.

EX-6808

Two Thousand Five Hundred Dollars and 00/100 Cents
UNITED NATIONAL BANK OF WASHINGTON
WASHINGTON, D.C.

PAY TO THE ORDER OF

THE TREASURER OF THE
UNITED STATES

VOID AFTER 90 DAYS

AMOUNT

***2,500.00**

Eugene A. Brochert
AUTHORIZED SIGNATURE
Robert L. White
AUTHORIZED SIGNATURE

3401307

ROBERT L. WHITE
1814 JACKSON STREET, N. E.
WASHINGTON, D.C. 20018

Dec. 14 19*83* 1218

15-52/540

Pay to the
order of

Treasurer, United States \$ *500.00*
Five Hundred and *00* Dollars

NS&T BANK NA
WASHINGTON, D.C. 20005

Memo

Robert L. White

⑆054000522⑆ 076⑈1225614⑈ 91218

84040443073

BANK MONEY ORDER

79981

REMITTER

Jacqueline C. Moore

DEC 30 88

70-407/819

PAY TO THE
ORDER OF United States Treasury

\$ 250.00

THE BANK OF EDWARDSVILLE **250000**

DOLLARS

TheBANK
of Edwardsville
Edwardsville, Illinois 62025

Richard L. Watson
VICE PRESIDENT & CASHIER

⑈079981⑈ ⑈081904073⑈ 01 17488870⑈

8404044307



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # ^{Additional} 1525

Date Filmed 2/10/84 Camera No. --- 4

Cameraman JRL