



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1645

Date Filmed 3/18/85 Camera No. --- 3

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# FEDERAL ELECTION COMMISSION

Routing cards and slips ; 12 Day Report and  
Comments; Conciliation reports and correspondence

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

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

Signed

date

George [Signature]  
3/14/85

FEC 9-21-77

85040514638

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1645  
Committee to Re-elect )  
Congressman William D. Ford )  
and Theodore Monolidis, Treasurer, )  
et. al. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 23, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1645:

1. Accept the conciliation agreement with Committee to Re-Elect Congressman William D. Ford and Theodore Monolidis, as treasurer, submitted with the General Counsel's Report signed January 17, 1985.
2. Approve the letters attached to the General Counsel's Report signed January 17, 1985.
3. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

1-23-85  
Date

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

Received in Office of Commission Secretary: 1-17-85, 4:31  
Circulated on 48 hour tally basis: 1-18-85, 2:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire  
Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of Government  
Employees Political Action  
Committee; James Lynch, Jr.,  
Treasurer

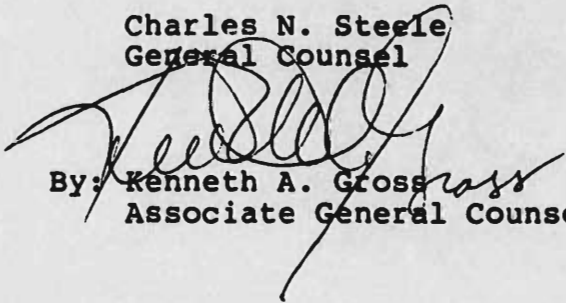
Dear Mr. Notis:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact George Demougeot the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

85040514640





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

January 30, 1985

Michael Ernest Avakian, Esquire  
Martha M. Poindexter, Esquire  
Center on National Labor Policy  
Suite 400  
5211 Port Royal Road  
Springfield, Virginia 22151

RE: MUR 1645

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on March 16, 1984, concerning the Committee to Re-elect Congressman William D. Ford and others.

The Commission determined there was reason to believe that the Committee to Re-elect Congressman William D. Ford had violated 2 U.S.C. § 441a(f), and the American Federation of Government Employees Political Action Committee, and the American Federation of Government Employees Committee on Federal Employees Political Education had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. On January 23, 1985, a conciliation agreement signed by the Committee to Re-elect Congressman William D. Ford was accepted by the Commission, thereby concluding the matter. Copies of these agreements are enclosed for your information.

The file number of this matter is MUR 1645. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreements

85040514641



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 30, 1985

J. Steven Hart, Esquire  
William & Jensen  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 1645  
Committee to Re-elect  
Congressman William D. Ford  
Theodore Monolidis, Treasurer

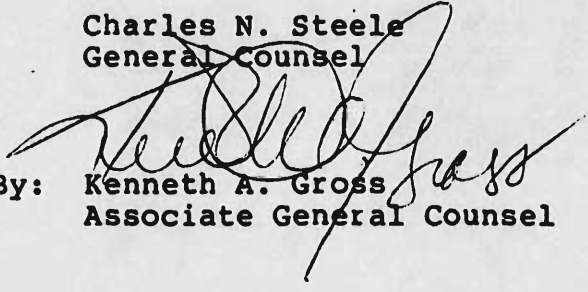
Dear Mr. Hart:

On January 23, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(f), 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

85040514642

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Committee to Re-elect ) MUR 1645  
Congressman William D. Ford )  
Theodore Monolidis, Treasurer )

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis as treasurer ("Respondent") violated 2 U.S.C. § 441a(f) in 1982 by accepting contributions which exceeded \$5,000 for a single election.

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 Committee to Re-elect Congressman William D. Ford was the principal campaign committee of William D. Ford in 1981-1982.

2. Theodore Monolidis is the treasurer of the Committee to Re-elect Congressman William D. Ford.

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3. American Federation of Government Employees Committee on Federal Employee Political Education ("AFGE-COFEPE") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

4. AFGE-COFEPE made a contribution \$2,500 to the Committee to Re-elect Congressman William D. Ford on June 15, 1981.

5. American Federation of Government Employees Political Action Committee ("AFGE-PAC") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

6. AFGE-PAC made contributions of \$3,125 to the Committee to Re-elect Congressman William D. Ford on March 10, and April 8, 1982.

7. The Michigan primary was held on August 3, 1982.

8. Respondent contends that contributions made by AFGE-PAC and AFGE-COFEPE to the committee to Re-elect Congressman William D. Ford did not exceed \$10,000 and were intended by AFGE-PAC and AFGE-COFEPE to be divided between the 1982 primary and 1982 general elections.

9. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

10. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor

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organization, including any parent, subsidiary, branch, division, department, or local unit of such labor organization, are to be considered to have been made by a single committee.

11. Respondent contends that it was unaware of the affiliation between AFGE-PAC and AFGE-COFEPE.

12. Respondent refunded the excess contribution upon notification of complaint and realization that AFGE-PAC and AFGE-COFEPE were affiliated.

13. AFGE-PAC and AFGE-COFEPE in 1982, as affiliated multicandidate committees, shared a \$5,000 contribution limitation per recipient with respect to any election.

14. 2 U.S.C. § 441a(f) prohibits knowing acceptance by a political committee or an officer of a political committee of contributions which exceed the limitations established by 2 U.S.C. § 441a(a)(2)(A).

15. The Committee to Re-elect Congressman William D. Ford received contributions totalling \$5,625 from AFGE-PAC and AFGE-COFEPE. Respondent contends that the \$2,500 contribution it received on April 8, 1982, from AFGE-PAC was to be for the Ford general election campaign. However, AFGE-PAC failed to communicate this designation in writing. Had the contribution been designated in writing for the general election no violation of the Federal Election Campaign Act would have occurred.

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V. By accepting contributions for the 1982 primary election campaign in excess of the \$5,000 limitation established by 2 U.S.C. § 441a(a)(2)(A), the Committee to Re-elect William D. Ford and Theodore Monolidis as treasurer of the Committee to Re-elect William D. Ford, violated 2 U.S.C. § 441a(f).

VI. Respondent contends that it did not knowingly and willfully commit a violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VII. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of One Hundred and Fifty Dollars (\$150), 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 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.

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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.

XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:

  
Kenneth A. Gross  
Associate General Counsel

Date

January 9, 1985

FOR THE RESPONDENT:

  
J. Steven Hart

Date

1/10/85

WILLIAMS & JENSEN, P.C.  
1101 Connecticut Avenue, N. W.  
Suite 500  
Washington, D. C. 20036  
(202) 659-8201

Attorneys for the Respondent

85040514647



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire  
Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of Government  
Employees Political Action  
Committee; James Lynch, Jr.,  
Treasurer

Dear Mr. Notis:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact George Demougeot the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

GD  
1/29/85

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Michael Ernest Avakian, Esquire  
Martha M. Poindexter, Esquire  
Center on National Labor Policy  
Suite 400  
5211 Port Royal Road  
Springfield, Virginia 22151

RE: MUR 1645

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on March 16, 1984, concerning the Committee to Re-elect Congressman William D. Ford and others.

The Commission determined there was reason to believe that the Committee to Re-elect Congressman William D. Ford had violated 2 U.S.C. § 441a(f), and the American Federation of Government Employees Political Action Committee, and the American Federation of Government Employees Committee on Federal Employees Political Education had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. On , 1985, a conciliation agreement signed by the Committee to Re-elect Congressman William D. Ford was accepted by the Commission, thereby concluding the matter. Copies of these agreements are enclosed for your information.

The file number of this matter is MUR 1645. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreements

GD  
1/28/85

85040514649

HCC# 6496

*Committee to Re-Elect*

**CONGRESSMAN WILLIAM D. FORD**

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 981-5870



**THEODORE MONOLIDIS**  
TREASURER

January 15, 1985

Williams & Jensen  
ATTN: J. Steven Hart  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR1645

Dear Steve:

You will please find enclosed our remittance, in the sum of \$150.00, in payment of the penalty owing on the above account.

Very truly yours,

  
THEODORE MONOLIDIS

TM:rs  
Enc.

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5 JAN 23 49:29

5 JAN 23 43:29



PAUL ARNESON  
GEORGE D. BAKER  
WILLIAM T. BRACK  
PAUL T. CLARK  
ANN S. COSTELLO  
WINFIELD P. CRIGLER  
JUNE E. EDMONDSON  
JOHN P. FORD  
ROBERT E. GLENNON  
J. STEVEN HART  
ROBERT E. JENSEN  
JOHN J. McMACKIN, JR.  
GEORGE G. OLSEN  
CLIFTON PETER ROSE  
MARY LYNNE WHALEN  
J. D. WILLIAMS

**WILLIAMS & JENSEN**  
**A PROFESSIONAL CORPORATION**  
LAWYERS

1101 CONNECTICUT AVENUE, N. W.  
WASHINGTON, D. C. 20036

TELEPHONE  
(202) 659-8201

January 22, 1985

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

Dear George:

RE: MUR 1645

Please find enclosed a remittance from the  
Committee to Re-Elect Congressman William D. Ford,  
in the amount of \$150, in payment of the civil  
penalty owing on the above referenced account.  
Please contact me if you have any questions.

Sincerely,

  
J. Steven Hart

JSH/ajb  
Enclosures

*Final!*

85040514651

5 JAN 23 9:29

8 5 0 1 4 5  
MEMORANDUM

TO: CHERYL THOMAS

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 2425 (a copy of which is attached) RELATING  
TO MUR 1645 AND NAME Emte to Re-Elect Congressman William D. Ford  
WAS RECEIVED ON January 23, 1985. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)

/ ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER \_\_\_\_\_

SIGNATURE C. Thomas DATE 1/24/85

8 5 0 4 0 5 1 4 6 5 0

2425

COMMITTEE TO RE-ELECT  
CONGRESSMAN WILLIAM D. FORD  
3476 PENOBSCOT BLDG.  
DETROIT, MICH. 48226

74-207  
724

January 15, 19 85

PAY  
TO THE  
ORDER OF

Federal Election Commission

\$ 150.00

One Hundred, Fifty and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

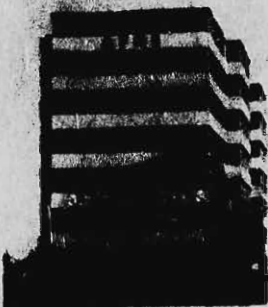
FOR MUR1645 - AFTE Excess Contrib.

CIVIL PENALTY received

31-0857-01

#002425# 1:072402076:

*Spencer M. Taylor*



# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

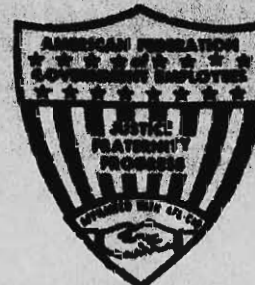
KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005

Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

January 11, 1985

*MUR 1645  
Demougeot*

George Demougeot, Esquire  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

Pursuant to the Conciliation Agreement which was signed by Kenneth A. Gross on January 3, 1985 and which I received just the other day, please find enclosed a check for \$200 payable to the Treasurer of the United States. I assume that our sending this check to you completes our obligation under paragraph VI of the Conciliation Agreement. If somehow this is not correct, please notify me at once.

I have enjoyed working with you and I hope you have had a pleasant holiday.

Very truly yours,

*Mitchell J. Notis*

Mitchell J. Notis  
Deputy General Counsel

Enclosure

cc: NVP Lynch  
J. McMichael  
B. Reid

85040514654



TO:

CHERYL THOMAS

TO:

JOAN HARRIS

FROM:

JOAN HARRIS

FROM:

CHERYL THOMAS

CHECK NO. 175 (a copy of which is attached) RELATING

TO MUR 1645 AND NAME American Federation of Government Employees  
WAS RECEIVED ON January 14, 1985. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

☐ / BUDGET CLEARING ACCOUNT

(#95F3875.16)

☒ CIVIL PENALTIES ACCOUNT

(#95-1099.160)

OTHER \_\_\_\_\_

SIGNATURE

Cheryl R. Thomas

DATE

1/14/85

NS&T BANK





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 November Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Monday, January 7, 1985. Thank you.

COMMENTS:

OK  
GJ  
1/3/84

Attachment

85040514656



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 4, 1985

Mitchell J. Notis, Esquire  
Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of  
Government Employees Political  
Action Committee; James Lynch,  
Jr., Treasurer

Dear Mr. Notis:

On January 2, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. 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 within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

85040514657

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
American Federation of )  
Government Employees ) MUR 1645  
Political Action Committee )  
James Lynch, Jr. as treasurer )

CONCILIATION AGREEMENT

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This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the American Federation of Government Employees Political Action Committee ("AFGE-PAC"), American Federation of Government Employees Committee and Federal Employees Political Education ("AFGE-COFEPE"), and James Lynch, Jr., as treasurer ("Respondent") violated 2 U.S.C. § 441a(a)(2)(A) by making contributions to the Committee to Re-elect Congressman William D. Ford which, when aggregated with contributions to the same committee by committees affiliated with Respondent AFGE-PAC, exceeded \$5,000 for a single election.

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 AFGE-PAC is a separate segregated fund of a labor organization, the American Federation of Government Employees.

2. James Lynch, Jr. is the treasurer of the AFGE-PAC.

3. American Federation of Government Employees Committee on Federal Employee Political Education ("AFGE-COFEPE") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

4. AFGE-COFEPE made a contribution \$2,500 to the Committee to Re-elect Congressman William D. Ford on June 15, 1981.

5. AFGE-PAC made contributions totalling \$3,125 to the Committee to Re-elect Congressman William D. Ford on March 10, 1982 and April 8, 1982.

6. 11 CFR §110.1(a) in part provides that contributions not designated in writing by a contributor for a particular election are attributable to the primary election if made on or before the date of the primary election.

7. AFGE-PAC contends that the \$2,500 contribution it made on April 8, 1982 to the Committee to Re-elect Congressman William Ford, to be for the Ford general election campaign, yet failed to designate this in writing. Had the contribution been designated in writing for the general election no violation of the Federal Election Campaign Act would have occurred.

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8. As neither AFGE-PAC nor AFGE-COFEPE designated the election for which their contributions to the Committee to Re-elect Congressman William Ford were intended, pursuant to 11 C.F.R. § 110.1(a)(2), all of their contributions are considered to have been made for the 1982 primary election.

9. The aggregated contributions made by AFGE-PAC and AFGE-COFEPE to the Committee to Re-elect Congressman William D. Ford for the 1982 primary election totalled \$5,625.

10. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

11. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor organization, including any parent, subsidiary, branch, division, department, or local unit of such labor organization, are to be considered to have been made by a single committee.

12. As affiliated multicandidate committees, AFGE-PAC and AFGE-COFEPE in 1982 shared a \$5,000 contribution limitation.

V. By making contributions to the Committee to Re-elect Congressman William D. Ford which, pursuant to 11 C.F.R. § 110.1(a)(2) are all considered as being for the 1982 primary election (due to AFGE-PAC's failure to check the proper box on

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the Schedule B it filed) and which, when aggregated totalled \$5,625, AFGE-PAC, and James Lynch, Jr., as treasurer of AFGE-PAC, and AFGE-COFEPE violated 2 U.S.C. § 441a(a)(2)(A).

VI. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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.

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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.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

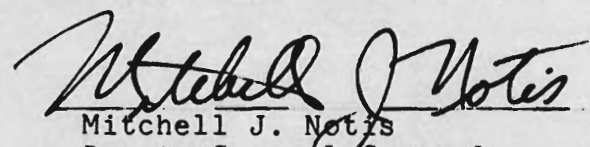
BY:

  
Kenneth A. Gross  
Associate General Counsel

Date

January 3, 1985

FOR THE RESPONDENT:

  
Mitchell J. Norris  
Deputy General Counsel  
Counsel for Respondents  
1325 Mass. Ave., N.W.  
Washington, D.C. 20005  
(202) 737-8700, Ext. 311.

Date

11/16/84

850405146632



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**December 12, 1984**

**MEMORANDUM**

**TO:** CHARLES N. STEELE  
GENERAL COUNSEL

**ATTENTION:** GEORGE DEMOUGEOT

**FROM:** SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 14, 1984. Thank you.

**COMMENTS:**

Attachment

85040514663





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employee's Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: 12 Day Pre-General Report (10/1/84-10/20/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514664



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**December 5, 1984**

**MEMORANDUM**

**TO:** CHARLES N. STEELE  
GENERAL COUNSEL

**ATTENTION:** GEORGE DEMOUGEOT

**FROM:** SHAWN WOODHEAD *AW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 October Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 7, 1984. Thank you.

**COMMENTS:**

Attachment

85040514665



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees' Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

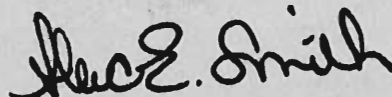
-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040514666

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514667





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *HW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 November Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Monday, January 7, 1985. Thank you.

COMMENTS:

Attachment

85040514663



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employee's Political Action Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: November Monthly Report (10/21/84-10/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514669



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AD*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

OK  
GB  
12/12/84

Attachment

85040514670



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employee's Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: 12 Day Pre-General Report (10/1/84-10/20/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514671





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**December 5, 1984**

**MEMORANDUM**

**TO:** CHARLES N. STEELE  
GENERAL COUNSEL

**ATTENTION:** GEORGE DEMOUGEOT

**FROM:** SHAWN WOODHEAD *AW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1645: AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 October Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 7, 1984. Thank you.

**COMMENTS:**

*OK*  
*12/7/84*

Attachment

85040514672



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees' Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

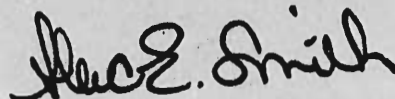
-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040514673

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514674



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 17, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - COMMITTEE TO RE-ELECT CONGRESSMAN  
WILLIAM D. FORD

Please review the attached Request for Additional Information which is to be sent to the Committee to Re-Elect Congressman William D. Ford for the 1984 Amended April Quarterly and July Quarterly Reports. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Tuesday, August 21, 1984. Thank you.

COMMENTS:

OK  
GD 8/20/84

Attachment

85040514675





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 17, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - COMMITTEE TO RE-ELECT CONGRESSMAN  
WILLIAM D. FORD

Please review the attached Request for Additional Information which is to be sent to the Committee to Re-Elect Congressman William D. Ford for the 1984 Amended April Quarterly and July Quarterly Reports. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Tuesday, August 21, 1984. Thank you.

COMMENTS:

Attachment

85040514676



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Theodore Monolidis, Treasurer  
Committee to Re-Elect  
Congressman William D. Ford  
3476 City National Bank Building  
Detroit, MI 48226

Identification Number: C00002063

Reference: April Quarterly Amendment (1/1/84-3/31/84) and July  
Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Monolidis:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration should describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation and a statement that all solicitations request the required information. See 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "Gregory Swanson", is positioned above the typed name.

Gregory Swanson  
Reports Analyst  
Reports Analysis Division

85040514677



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Requests for Additional Information which are to be sent to the AFGE PAC for the 1984 June Monthly Amendment and July Monthly Reports. If no response or an inadequate response are received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Friday, August 17, 1984. Thank you.

COMMENTS:

OK  
GD  
8/17/84

Attachment

85040514678



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Requests for Additional Information which are to be sent to the AFGE PAC for the 1984 June Monthly Amendment and July Monthly Reports. If no response or an inadequate response are received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Friday, August 17, 1984. Thank you.

COMMENTS:

Attachment

35040514679





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees' Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: June Monthly Amendment Report (5/1/84-5/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 22 of the Detailed Summary Page of your original June Monthly report discloses a total of \$3,436.05 in independent expenditures. The sum of the entries itemized on Schedule E of your amended June Monthly report, however, indicates the total to be \$23,741.66. Please amend your report to clarify the discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514680



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**RQ-2**

**James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees' Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005**

**Identification Number: C00009936**

**Reference: July Monthly Report (6/1/84-6/30/84)**

**Dear Mr. Lynch:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule E to support the entry of \$20,305.60 reported on Line 22 of the Detailed Summary Page. Each independent expenditure made by your committee, which aggregates in excess of \$200 in a calendar year to a payee, must be itemized on Schedule E. Additionally, Schedule E must be notarized. 2 U.S.C. §434(b)(6)(B)(iii) and 11 CFR 104.3(b)(3)(vii)(B).

If this financial activity was already disclosed on your previous report, please amend this report by including only the financial transactions that occurred between June 1, 1984 and June 30, 1984.

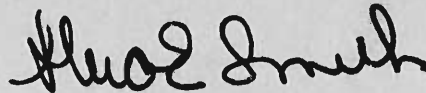
-Line 21 of the Detailed Summary Page of your report discloses a total of \$15,000 in contributions to Federal Candidates and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$14,750. Please amend your report to clarify the discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

85040514681

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

850405146932



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 3, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF STATE, COUNTY AND  
MUNICIPAL EMPLOYEES P.E.O.P.L.E. QUALIFIED (AFSCME  
P.E.O.P.L.E. QUALIFIED)

---

Please review the attached Requests for Additional Information (RFAIs) which are to be sent to AFSCME P.E.O.P.L.E. Qualified for the 1984 February and March Monthly Reports. If no response or an inadequate response is received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6<sup>th</sup>. Thank you.

COMMENTS:

*Cmte is not part of MUR.*

*GD*  
*07/5/84*

Attachments

85040514683





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer  
American Federation of State  
County and Municipal Employees  
P.E.O.P.L.E. Qualified  
525 L Street, NW  
Washington, DC 20036

Identification Number: C00011114

Reference: February Monthly Report (1/1/84-1/31/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

- Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. (2 U.S.C. 434(b)(3)(D))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Mike Tangney  
Reports Analyst  
Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer  
American Federation of State  
County and Municipal Employees  
P.E.O.P.L.E. Qualified  
1625 L Street, NW  
Washington, DC 20036

Identification Number: C00011114

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 CFR 104.3(a)(2))

-The calculations for Schedule B supporting Line 21 appear to be incorrect. FEC calculations disclose the amount of contributions to be \$69,025. Please amend this and any other reports that require corrected totals.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Mike Tangney  
Reports Analyst  
Reports Analysis Division

85040514685



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

July 3, 1984

**MEMORANDUM**

**TO:** CHARLES N. STEELE  
GENERAL COUNSEL

**ATTN:** GEORGE DEMOUGEOT

**FROM:** SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

**SUBJECT:** MUR 1645 - AMERICAN FEDERATION OF STATE, COUNTY AND  
MUNICIPAL EMPLOYEES P.E.O.P.L.E. QUALIFIED (AFSCME  
P.E.O.P.L.E. QUALIFIED)

---

Please review the attached Requests for Additional Information (RFAIs) which are to be sent to AFSCME P.E.O.P.L.E. Qualified for the 1984 February and March Monthly Reports. If no response or an inadequate response is received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6th. Thank you.

**COMMENTS:**

Attachments

85040514636





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer  
American Federation of State  
County and Municipal Employees  
P.E.O.P.L.E. Qualified  
1625 L Street, NW  
Washington, DC 20036

Identification Number: C00011114

Reference: February Monthly Report (1/1/84-1/31/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. (2 U.S.C. 434(b)(3)(D))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Mike Tangney  
Reports Analyst  
Reports Analysis Division

85040514687





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer  
American Federation of State  
County and Municipal Employees  
P.E.O.P.L.E. Qualified  
1625 L Street, NW  
Washington, DC 20036

Identification Number: C00011114

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 CFR 104.3(a)(2))

-The calculations for Schedule B supporting Line 21 appear to be incorrect. FEC calculations disclose the amount of contributions to be \$69,025. Please amend this and any other reports that require corrected totals.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Mike Tangney  
Reports Analyst  
Reports Analysis Division

85040514688



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 4, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES  
POLITICAL ACTION COMMITTEE (AFGE PAC)

---

Please review the attached Request for Additional Information (RAI) which is to be sent to AFGE PAC for the 1984 April Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by the close of business on Wednesday, June 6<sup>th</sup>.  
Thank you.

COMMENTS:

*OK*  
*GD*  
*6/6/84*

Attachment

85040514689



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees Political Action  
Committee  
1325 Massachusetts Avenue, NW  
Washington, DC 20005

Identification Number: C00009936

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your March Monthly report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Your calculations for Line 21 appear to be incorrect. FEC calculations disclose this amount to be \$37,620. Please provide the omitted or corrected total(s) on the Summary and Detailed Summary Pages. (11 CFR 104.3)

-Schedule B of your report discloses a \$5,000 transfer to the Eleanor Roosevelt Fund. Please clarify the nature of this transfer. For future reporting, please provide the full mailing address for each transfer.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely, .

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514690



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 4, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES  
POLITICAL ACTION COMMITTEE (AFGE PAC)

---

Please review the attached Request for Additional Information (RAFI) which is to be sent to AFGE PAC for the 1984 April Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by the close of business on Wednesday, June 6<sup>th</sup>.  
Thank you.

COMMENTS:

Attachment

85040514691





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employees Political Action  
Committee  
1325 Massachusetts Avenue, NW  
Washington, DC 20005

Identification Number: C00009936

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your March Monthly report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Your calculations for Line 21 appear to be incorrect. FEC calculations disclose this amount to be \$37,620. Please provide the omitted or corrected total(s) on the Summary and Detailed Summary Pages. (11 CFR 104.3)

-Schedule B of your report discloses a \$5,000 transfer to the Eleanor Roosevelt Fund. Please clarify the nature of this transfer. For future reporting, please provide the full mailing address for each transfer.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely, .

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514692



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 24, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *HW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEE'S  
POLITICAL ACTION COMMITTEE (AFGE PAC)

---

Please review the attached Informational Notice (IN) which is to be sent to AFGE PAC for the 1984 March Monthly Report. Any comments which you may have should be forwarded to RAD by the close of business on Tuesday, May 29<sup>th</sup>. Thank you.

COMMENTS:

*Typo in address. Should read "Employees"*

*GD 5/25/84*

Attachment

85040514693



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 24, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *HW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEE'S  
POLITICAL ACTION COMMITTEE (AFGE PAC)

---

Please review the attached Informational Notice (IN) which is to be sent to AFGE PAC for the 1984 March Monthly Report. Any comments which you may have should be forwarded to RAD by the close of business on Tuesday, May 29<sup>th</sup>. Thank you.

COMMENTS:

Attachment

85040514694



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

James H. Lynch Jr., Treasurer  
American Federation of Government  
Employee's Political Action  
Committee  
1325 Massachusetts Avenue  
Washington, DC 20005

Identification Number: C00009936

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your February Monthly Amended report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

85040514695





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 24, 1984

Clifton Peter Rose, Esquire  
Williams & Jensen  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 1645  
Congressman William D. Ford;  
Committee to Re-elect  
Congressman William D. Ford  
and its treasurer,  
Theodore Monolidis

Dear Mr. Rose:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 16, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on May 21, 1984, determined that there is reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

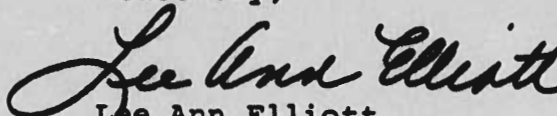
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514696

Clifton Peter Rose, Esquire  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures  
Procedures

85040514697



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Clifton Peter Rose, Esquire  
Williams & Jensen  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 1645  
Congressman William D. Ford;  
Committee to Re-elect  
Congressman William D. Ford  
and its treasurer,  
Theodore Monolidis

Dear Mr. Rose:

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The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514693

Clifton Peter Rose, Esquire  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures

85040514699





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 24, 1984

Mitchell J. Notis, Esquire  
Acting Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of  
Government Employees Political  
Action Committee;  
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on May 21, 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

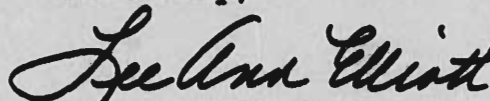
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514700

Mitchell J. Notis, Esquire  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures  
Procedures

85040514701



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire  
Acting Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of  
Government Employees Political  
Action Committee;  
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514702

Mitchell J. Notis, Esquire  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures.

85040514703





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 24, 1984

J.D. Gleason, Treasurer  
American Federation of Government  
Employees' Committee on Federal Employee  
Political Education  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on May 21, 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514704

J.D. Gleason, Treasurer  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures  
Procedures

85040514705



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

J.D. Gleason, Treasurer  
American Federation of Government  
Employees' Committee on Federal Employee  
Political Education  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on [redacted], 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514706

J.D. Gleason, Treasurer  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures

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)

William D. Ford  
Committee to Re-elect Congressman  
William D. Ford and its treasurer,  
Theodore Monolidis, et. al.

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1645:

1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

(Continued)

Certification

MUR 1645

First General Counsel's Report

Dated May 17, 1984

Page 2

4. Approve the letters as attached to the First General Counsel's Report dated May 17, 1984.

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

Attest:

5/22/84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

85040514709

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

5-17-84, 9:42  
5-17-84, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

William D. Ford  
Committee to Re-elect Congressman  
William D. Ford and its treasurer,  
Theodore Monolidis, et. al.

)  
)  
)  
)  
)  
)  
MUR 1645

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1645:

1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

(Continued)

85040514710

Certification

MUR 1645

First General Counsel's Report

Dated May 17, 1984

Page 2

4. Approve the letters as attached to the First General Counsel's Report dated May 17, 1984.

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

Attest:

5/22/84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

85040514711

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

5-17-84, 9:42  
5-17-84, 4:00





# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

## MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *CJ*  
DATE: May 17, 1984  
SUBJECT: MUR 1645 - First General Counsel's Report

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) ☐

85040514712

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

5/17/84-9:45

MUR # 164584 MAY 17 A 9: 42

DATE COMPLAINT RECEIVED

BY OGC 3/16/84

DATE OF NOTIFICATION TO  
RESPONDENT 3/23/84

STAFF MEMBER

GEORGE DEMOUGEOT

COMPLAINANT'S NAME: James Edward Antosh

RESPONDENTS' NAME: William D. Ford

Committee to Re-elect Congressman  
William D. Ford and its treasurer,  
Theodore Monolidis

American Federation of Government  
Employees' Committee on Federal

Employee Political Education and its  
treasurer, J.D. Gleason

American Federation of Government

Employees' Political Action Committee  
and its treasurer, James H. Lynch, Jr.

**SENSITIVE**

RELEVANT STATUTE:

2 U.S.C. § 441a(a)(2)(A)

2 U.S.C. § 441a(f)

11 C.F.R. § 104.14(d)

11 C.F.R. § 110.1(a)(2)(ii)(A)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

FACTUAL AND LEGAL ANALYSIS

Complainant alleges that the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees' Political Action Committee ("AFGE's PAC") violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election. Complainant further alleges that Congressman William D. Ford, the Committee

85040514713

to Re-elect Congressman William D. Ford ("the Ford Committee") and its treasurer violated 2 U.S.C. § 441a(f) for receipt of contributions in excess of limitations at 2 U.S.C. §441a(a)(2)(A) from AFGE's COFEPE and AFGE's PAC. Those contributions were made in the following manner:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>
6/25/81	\$2,500	AFGEs' COFEPE
3/18/82	\$ 625	AFGEs' PAC
6/22/82	<u>\$2,500</u>	AFGEs' PAC
Total =		\$5,625

Complainant states that FEC reports show that AFGE's COFEPE and AFGE's PAC failed to designate whether the contributions were intended for the primary or general election. Since the contributions were made well in advance of the August 3, 1982, primary election, the complainant contends that the contributions were attributable to the primary election. 11 C.F.R. § 110.1(a)(2)(ii)(A).

Counsel for the respondents all counter that the excessive contribution was unintentional and due to an inadvertent error in not checking off the appropriate box on the Schedule B. Neither the primary or general election designation box was checked by the Ford Committee when it reported receipt of the June 25, 1981, \$2,500 contribution. The Ford Committee checked the primary box designation when reporting the March 18, 1982, \$625 contribution and the June 22, 1982, \$2,500 contribution. Neither AFGE's COFEPE nor AFGE's PAC deny that they are affiliated political

85040514714

committees pursuant to 2 U.S.C. § 441a(a)(5). Upon notification of the complaint, the treasurer for the Ford Committee refunded the \$625 in question to AFGE's PAC.

Inasmuch as the contributions were not designated for a particular election by AFGE's COFEPE or by AFGE's PAC, but were made prior to the primary election they are attributable to the primary election. Accordingly, it is recommended that the Commission find reason to believe that AFGE's COFEPE and AFGE's PAC violated 2 U.S.C. § 441a(a)(2)(A) and that the Ford Committee violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

85040514713

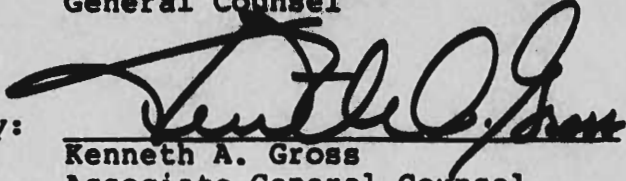


4. Approve the attached letters.

May 16, 1984  
Date

Charles N. Steele  
General Counsel

By:

  
Kenneth A. Gross  
Associate General Counsel

Attachments

- I. Proposed letters (3)
- II. Response to complaint from AFGE's PAC
- III. Response to complaint from the Committee to Re-elect William D. Ford
- IV. Response to complaint from Congressman William D. Ford

85040514716



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Clifton Peter Rose, Esquire  
Williams & Jensen  
1101 Connecticut Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 1645  
Congressman William D. Ford;  
Committee to Re-elect  
Congressman William D. Ford  
and its treasurer,  
Theodore Monolidis

Dear Mr. Rose:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 16, 1984.

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The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I  
Page 1

85040514717

Clifton Peter Rose, Esquire  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures

85040514718

Attachment I  
Page 2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

J.D. Gleason, Treasurer  
American Federation of Government  
Employees' Committee on Federal Employee  
Political Education  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on , 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I  
Page 3



J.D. Gleason, Treasurer  
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures

85040514720

Attachment I  
Page 4



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire  
Acting Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645  
American Federation of  
Government Employees Political  
Action Committee;  
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I  
Page 5

85040514721

Mitchell J. Notis, Esquire  
Page 2

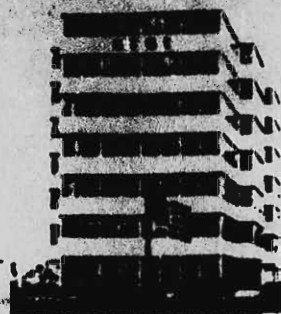
This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures  
Procedures

85040514722

Attachment I  
Page 6



J. F. GRINER BUILDING

# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

*MUR 1645  
Demougeot*

George Demougeot, Esquire  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

This response is submitted on behalf of the American Federation of Government Employees - PAC [AFGE-PAC], and James H. Lynch, Jr., the Treasurer of AFGE-PAC, respondents in the above referenced MUR. The MUR alleges that AFGE-PAC contributed \$625 above the limits set in 11 CFR Section 110.2, to the election committee of Congressman William Ford.

As you know, the AFGE-PAC is entitled to contribute, to committees such as the Ford Committee, \$10,000 per election cycle (\$5,000 for a primary election and \$5,000 for a general election). 11 CFR Section 110.2. If these limitations were violated at all in this case, the technical violation is due solely to the failure of AFGE-PAC to check the correct box on the Schedule B submitted in relation to the Ford contributions.

The following contributions were made in relation to Congressman Ford's reelection in the 1981-1982 election cycle:

- (1) 6/15/81 - \$2,500
- (2) 3/10/82 - \$ 625
- (3) 4/8/82 - \$2,500.

Although the total is greater than \$5,000, it is substantially less than the \$10,000 limitation set for the general election cycle.

*Attachment II  
Page 7*

85040514725



George Demougeot, Esquire  
April 25, 1984  
Page Two

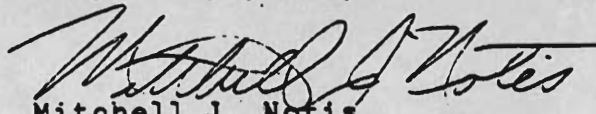
125 P1:49

Due to apparent inadvertant error none of the boxes on Schedule B indicating which election these contributions were for (primary or general election) were checked off. If AFGE-PAC had simply checked the correct box on Schedule B, indicating its intention to divide the contributions between the primary and general elections, this matter would not have arisen. As I have stated, this technical violation was unintentional, and, we claim, de minimis.

I would also note that even though none of the respondents in this matter believe that any violation has occurred, the Ford Committee has chosen to refund to AFGE-PAC the amount alleged to be in excess of legal contribution limits. A copy of this letter and check is enclosed.

For all of the foresaid reasons, respondents AFGE-PAC and James Lynch, Jr. urge you to dismiss the pending Complaint.

Very truly yours,

  
Mitchell J. Notis  
Acting Deputy General Counsel

85040514724

Attachment II  
Page 8

Committee to Re-Elect  
CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5370

THEODORE MONOLIDIS  
TREASURER

659-8201  
Lawyer

APR 25 PM 1:49

April 2, 1984

AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES-PAC  
1325 Massachusetts Ave., N.W., #703  
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

COMMITTEE TO RE-ELECT  
CONGRESSMAN WILLIAM D. FORD  
3476 PENOBSCOT BLDG.  
DETROIT, MICH. 48226

1753

April 2, 1984

74-207  
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00  
Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

For reimbursement of excess funds received in 1982

Attachment #  
Page 9

Committee to Re-Elect  
**CONGRESSMAN WILLIAM D. FORD**

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5370



THEODORE MONOLIDIS  
TREASURER

April 2, 1984

Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1645

Gentlemen:

This letter constitutes the response, of this Committee, to the above captioned Complaint filed with your office.

Prior to the filing of the Complaint we were unaware that more than the allowable amount had been received from the American Federation of Government Employees PAC. The Complaint correctly identifies the contributions received, resulting in the receipt of \$625.00 in excess of the allowable limit.

Reimbursement of the excess amount has been forwarded to said committee and a copy of our forwarding letter and check are attached hereto.

The acceptance of the excessive amount was not made knowingly or with any intent to violate the Federal Election Campaign Act of 1971, as amended, but was due through inadvertence.

The sum of \$2,500.00 received on 6/25/81 was entered in our records as COFEPE. The other two contributions dated 3/18/82 and 6/22/82, totalling \$3,125.00, were entered in our records as being received from AFGE-PAC. We were inadvertently recording these as separate organizations, but now realize that they are one and the same organization.

We believe that under the circumstances herein recited, and reimbursement having been made, that no further action should be taken against this Committee.

Respectfully submitted,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

Subscribed and sworn to before me  
this 2nd day of April, 1984.

My Commission expires: 8-25-84

Attachment III

Page 10

85040514726

CCF 2038  
34 APR 5 12:24  
MUR 1645  
Democrat  
85040514726

Committee to Re-Elect

COPY

# CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5870

THEODORE MONOLIDIS  
TREASURER

April 2, 1984

American Federation of Government  
Employees-PAC  
1325 Massachusetts Ave., N.W., #703  
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

COMMITTEE TO RE-ELECT  
CONGRESSMAN WILLIAM D. FORD  
3476 PENOBSCOT BLDG.  
DETROIT, MICH. 48226

1753

April 2, 19 84

74-207  
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

For reimbursement of excess funds  
received in 1982

001753 0724070761

31085700

Attachment III

Page 11

*Theodore Monolidis*



WILLIAMS & JENSEN  
A PROFESSIONAL CORPORATION  
LAWYERS

1101 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D. C. 20036

April 16, 1984

TELEPHONE  
(202) 692-2201

PAUL ARNESON  
GEORGE D. BAKER  
WILLIAM T. BRACK  
WILLIAM H. CABLE  
PAUL T. CLARK  
ANN S. COSTELLO  
WINFIELD P. CRIGLER  
JUNE E. EDMONDSON  
JOHN P. FORD  
ROBERT E. GLENNON  
J. STEVEN HART  
ROBERT E. JENSEN  
JOHN J. MACKIN, JR.  
GEORGE G. OLSEN  
CLIFTON PETER ROSE  
MARY LYNN WHALEN  
J. D. WILLIAMS

16 F4:14

MUR 1645  
Demougeot

George Demougeot, Esq.  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

Re: MUR 1645

Dear George:

I am submitting this response on behalf of Congressman William Ford, his campaign committee and treasurer. They have been named as Respondents in the above MUR.

While I cannot help but harbor a grudging admiration for the dogged thoroughness with which the attorneys for the Center on National Labor Policy have digested Congressman Ford's FEC reports, I cannot discern any violation of the Federal Election Campaign Act from their research. AFGE was entitled to contribute \$10,000 to Congressman Ford in the 1981-1982 election cycle. They contributed \$5625 in total. Their only failing was apparently not indicating in their FEC reports which amounts were intended for the primary election and which amounts were intended for the general. Moreover, the treasurer of Congressman Ford's principal campaign committee has, in perhaps a superabundance of caution, refunded \$625 to AFGE.

The Commission cannot predicate a finding of a violation on the mere failure to check a box on the Itemized Schedules of Contributions and Receipts in view of the unquestionable legality of the total amounts contributed. We respectfully urge that the Complaint be dismissed.

Sincerely,

*Peter Rose*

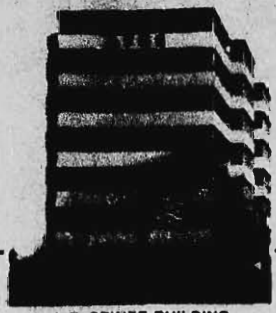
Clifton Peter Rose

/cds

Attachment II  
Page 12

85040514728

BCC # 2264



J. F. GRINER BUILDING

# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.



1325 MASSACHUSETTS AVE., N.W. WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700

IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

*MUR 1645  
Demougeot*

George Demougeot, Esquire  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

This response is submitted on behalf of the American Federation of Government Employees - PAC [AFGE-PAC], and James H. Lynch, Jr., the Treasurer of AFGE-PAC, respondents in the above referenced MUR. The MUR alleges that AFGE-PAC contributed \$625 above the limits set in 11 CFR Section 110.2, to the election committee of Congressman William Ford.

As you know, the AFGE-PAC is entitled to contribute, to committees such as the Ford Committee, \$10,000 per election cycle (\$5,000 for a primary election and \$5,000 for a general election). 11 CFR Section 110.2. If these limitations were violated at all in this case, the technical violation is due solely to the failure of AFGE-PAC to check the correct box on the Schedule B submitted in relation to the Ford contributions.

The following contributions were made in relation to Congressman Ford's reelection in the 1981-1982 election cycle:

- (1) 6/15/81 - \$2,500
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- (3) 4/8/82 - \$2,500.

Although the total is greater than \$5,000, it is substantially less than the \$10,000 limitation set for the general election cycle.

85040514729

4/25/84  
p 1:4

George Demougeot, Esquire  
April 25, 1984  
Page Two

RECEIVED  
CENTRAL COUNSEL

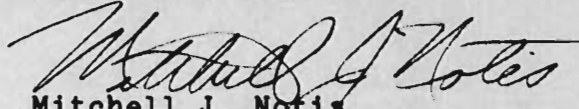
4 APR 25 P 1:49

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I would also note that even though none of the respondents in this matter believe that any violation has occurred, the Ford Committee has chosen to refund to AFGE-PAC the amount alleged to be in excess of legal contribution limits. A copy of this letter and check is enclosed.

For all of the foresaid reasons, respondents AFGE-PAC and James Lynch, Jr. urge you to dismiss the pending Complaint.

Very truly yours,

  
Mitchell J. Notis  
Acting Deputy General Counsel

85040514730

Committee to Re-Elect

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 861-6878

THEODORE MONOLIDIS  
TREASURER

Peter Rose  
659-8201  
Lawyer

APR 25 11:49

April 2, 1984

American Federation of Government  
Employees-PAC  
1325 Massachusetts Ave., N.W., #703  
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

COMMITTEE TO RE-ELECT  
CONGRESSMAN WILLIAM D. FORD  
3476 PENOBSCOT BLDG.  
DETROIT, MICH. 48226

1753

April 2, 1984

74-207  
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00  
Six Hundred, Twenty-Five and 00/100-----DOLLARS



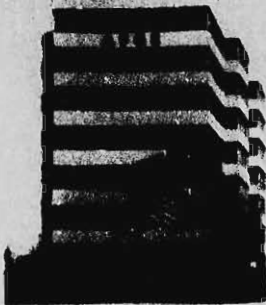
TAYLOR, MICHIGAN 48160

For reimbursement of excess funds  
received in 1982

0001753 010724020761

*Theodore Monolidis*  
31085700





J. P. GRINER BUILDING

# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC.-TREAS.

1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

George Demougeot, Esquire  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

Although I have been authorized by James H. Lynch in his capacity as treasurer of AFGE-PAC to represent him and AFGE-PAC, respondents in the above referenced MUR, Mr. Lynch is presently out of the country and will not return for perhaps several weeks. As soon as he returns I will have him execute the "Statement of Designation of Counsel" which you have sent us.

If there is anyone else here at AFGE who could execute the designation or if you have a problem with our inability to reach Mr. Lynch, please contact me as soon as possible.

Thank you for your cooperation in this matter.

Very truly yours,

*Mitchell J. Novis*  
Mitchell J. Novis  
Acting Deputy General Counsel

8n/PAC

85040514732

85040514733

**AMERICAN FEDERATION  
OF GOVERNMENT EMPLOYEES**

1325 Massachusetts Ave., N.W. • Washington, D. C. 20005



George Demougeot, Esquire  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

GCC# 2149

**WILLIAMS & JENSEN**

**A PROFESSIONAL CORPORATION**

**LAWYERS**

1101 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20036

TELEPHONE

(202) 698-8201

April 16, 1984

MUR 1645  
Demougeot

PAUL ARNESON  
GEORGE D. BAKER  
WILLIAM T. BRACK  
WILLIAM H. CABLE  
PAUL T. CLARK  
ANN B. COSTELLO  
WINFIELD P. CRIGLER  
JUNE E. EDMONDSON  
JOHN P. FORD  
ROBERT E. GLENNON  
J. STEVEN HART  
ROBERT E. JENSEN  
JOHN J. MCMACKIN, JR.  
GEORGE G. OLSEN  
CLIFTON PETER ROSE  
MARY LYNNE WHALEN  
J. D. WILLIAMS

George Demougeot, Esq.  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

Re: MUR 1645

Dear George:

I am submitting this response on behalf of Congressman William Ford, his campaign committee and treasurer. They have been named as Respondents in the above MUR.

While I cannot help but harbor a grudging admiration for the dogged thoroughness with which the attorneys for the Center on National Labor Policy have digested Congressman Ford's FEC reports, I cannot discern any violation of the Federal Election Campaign Act from their research. AFGE was entitled to contribute \$10,000 to Congressman Ford in the 1981-1982 election cycle. They contributed \$5625 in total. Their only failing was apparently not indicating in their FEC reports which amounts were intended for the primary election and which amounts were intended for the general. Moreover, the treasurer of Congressman Ford's principal campaign committee has, in perhaps a superabundance of caution, refunded \$625 to AFGE.

The Commission cannot predicate a finding of a violation on the mere failure to check a box on the Itemized Schedules of Contributions and Receipts in view of the unquestionable legality of the total amounts contributed. We respectfully urge that the Complaint be dismissed.

Sincerely,



Clifton Peter Rose

/cds

85040514734

**WILLIAMS & JENSEN**  
**A PROFESSIONAL CORPORATION**

**LAWYERS**

**101 CONNECTICUT AVENUE, N.W.**  
**WASHINGTON, D.C. 20036**

**George Demougeot, Esq.**  
**Office of the General Counsel**  
**Federal Election Commission**  
**1325 K Street, NW**  
**Washington, DC 20463**

85040514735



Committee to Re-Elect

RECEIVED AT THE FEC

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5570



THEODORE MONOLIDIS  
TREASURER

April 2, 1984

*MUR 1645  
Demougeot*

Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1645

Gentlemen:

This letter constitutes the response, of this Committee, to the above captioned Complaint filed with your office.

Prior to the filing of the Complaint we were unaware that more than the allowable amount had been received from the American Federation of Government Employees PAC. The Complaint correctly identifies the contributions received, resulting in the receipt of \$625.00 in excess of the allowable limit.

Reimbursement of the excess amount has been forwarded to said committee and a copy of our forwarding letter and check are attached hereto.

The acceptance of the excessive amount was not made knowingly or with any intent to violate the Federal Election Campaign Act of 1971, as amended, but was due through inadvertence.

The sum of \$2,500.00 received on 6/25/81 was entered in our records as COFEPE. The other two contributions dated 3/18/82 and 6/22/82, totalling \$3,125.00, were entered in our records as being received from AFGE-PAC. We were inadvertently recording these as separate organizations, but now realize that they are one and the same organization.

We believe that under the circumstances herein recited, and reimbursement having been made, that no further action should be taken against this Committee.

Respectfully submitted,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

Subscribed and sworn to before me  
this 2nd day of April, 1984.

*Rita C. Sanchez*  
Rita C. Sanchez

My Commission expires: 8-25-84

85040514736

Committee to Re-Elect

COPY

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 861-5570

THEODORE MONOLIDIS  
TREASURER

April 2, 1984

American Federation of Government  
Employees-PAC  
1325 Massachusetts Ave., N.W., #703  
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

*Theodore Monolidis*  
THEODORE MONOLIDIS  
Treasurer

COMMITTEE TO RE-ELECT  
CONGRESSMAN WILLIAM D. FORD  
3476 PENOBSCOT BLDG.  
DETROIT, MICH. 48226

1753

April 2, 1984

74-207  
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48160

FOR reimbursement of excess funds  
received in 1982

⑈001753⑈ ⑆072602076⑆

31⑈0857⑈0⑈

*Committee to Re-Elect*

**ressman William D. Ford**

478 CITY NATIONAL BANK BUILDING  
DETROIT, MICHIGAN 48226

850405147



Federal Election Commission  
Washington, D.C. 20463



RECEIVED AT THE

84 APR 5 P12:00



**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 1645

NAME OF COUNSEL: Clifton Peter Rose

ADDRESS: Williams and Jensen

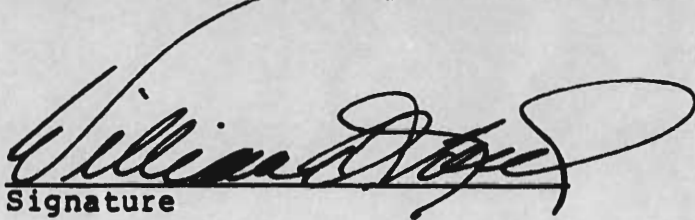
1101 Connecticut Avenue

Washington, D. C. 20036

TELEPHONE: 659-8201

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
and on behalf of the Committee to Re-elect Congressman William D. Ford  
communications from the Commission and to act on my behalf/before  
the Commission.

4/6/84  
Date

  
Signature

RESPONDENT'S NAME: William D. Ford

ADDRESS: 309 Cannon House Office Building

Washington, D.C. 20515

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: 225-6261

CLIFTON PETER ROSE  
ATTORNEY AT LAW

WILLIAMS & JENSEN  
A PROFESSIONAL CORPORATION  
1101 CONNECTICUT AVENUE, N. W.  
WASHINGTON, D. C. 20036

(202) 659-8201

85040514739





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Clifton Peter Rose, Esquire  
Williams & Jensen  
1101-Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR 1645

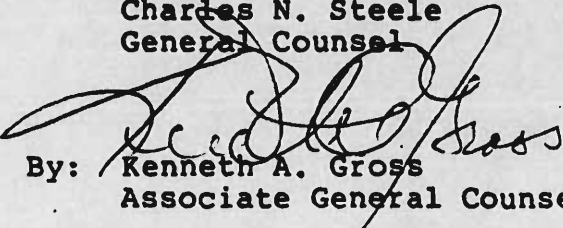
Dear Mr. Rose:

Your letter of April 9, 1984, has been received. In this letter you have requested an extension of time of one week in which to respond to the complaint filed in above-cited matter.

Due to the circumstances cited in your letter, you have been granted the extension, making your response due on or before April 16, 1984.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

85040514740

Conf 2065

WILLIAMS & JENSEN  
A PROFESSIONAL CORPORATION  
LAWYERS

1101 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036

TELEPHONE  
(202) 680-8201

PAUL ARNESON  
GEORGE D. BAKER  
WILLIAM T. BRACK  
WILLIAM H. CABLE  
PAUL T. CLARK  
ANN S. COSTELLO  
WINFIELD P. CRIGLER  
JUNE E. EDMONDSON  
JOHN R. FORD  
ROBERT E. GLENNON  
J. STEVEN HART  
ROBERT E. JENSEN  
JOHN J. McMACKIN, JR.  
GEORGE G. OLSEN  
CLIFTON PETER ROSE  
MARY LYNNE WHALEN  
J. D. WILLIAMS

April 9, 1984

APR 9 AM 11:17

MUR 1645  
Demougeot

George Demougeot, Esq.  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR 1645

Dear Mr. Demougeot:

I enclosed an original executed Statement of Designation of Counsel in the above MUR. I will be representing both Congressman Ford and the campaign committee.

Because I only received the pertinent papers on Friday, I would like a week extension in which to file my reply on behalf of both respondents. I will respond on or before April 16, 1984.

If you have any questions, please do not hesitate to call.

Sincerely,

*Clifton Peter Rose*  
Clifton Peter Rose

/tls

Enclosure

85040514741

Conf 2065

**WILLIAMS & JENSEN**  
**A PROFESSIONAL CORPORATION**  
 LAWYERS  
 1101 CONNECTICUT AVENUE, N.W.  
 WASHINGTON, D.C. 20036

PAUL ARNESON  
 GEORGE D. BAKER  
 WILLIAM T. BRACK  
 WILLIAM H. CABLE  
 PAUL T. CLARK  
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 WINFIELD P. CRIGLER  
 JUNE E. EDMONDSON  
 JOHN P. FORD  
 ROBERT E. GLENNON  
 J. STEVEN HART  
 ROBERT E. JENSEN  
 JOHN J. McMACKIN, JR.  
 GEORGE G. OLSEN  
 CLIFTON PETER ROSE  
 MARY LYNNE WHALEN  
 J. D. WILLIAMS

TELEPHONE  
 (202) 638-8201

APR 9 AM 11:17

April 9, 1984

*MUR 1645  
 Demougeot*

George Demougeot, Esq.  
 Office of the General Counsel  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

RE: MUR 1645

Dear Mr. Demougeot:

I enclosed an original executed Statement of Designation of Counsel in the above MUR. I will be representing both Congressman Ford and the campaign committee.

Because I only received the pertinent papers on Friday, I would like a week extension in which to file my reply on behalf of both respondents. I will respond on or before April 16, 1984.

If you have any questions, please do not hesitate to call.

Sincerely,  
*Clifton Peter Rose*  
 Clifton Peter Rose

/tls  
 Enclosure

85040514742

WILLIAMS & JENSEN  
A PROFESSIONAL CORPORATION

LAWYERS

1101 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

George Demougeot, Esq.  
Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

85040514





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 9, 1984

Mitchell J. Notis, Esquire  
Acting Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 1645

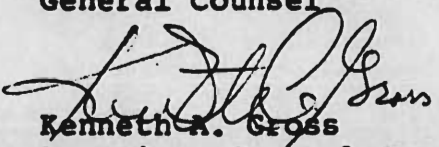
Dear Mr. Notis:

Your letter of April 4, 1984, has been received. In this letter you have requested an extension of time of two weeks in which to respond to the complaint filed in the above-cited matter.

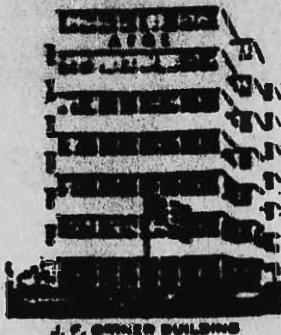
Under our procedures, your response to the complaint would be due on April 11, 1984. In light, however, of the matters outlined in your letter, you have been granted the extension, making your response due on or before April 25, 1984.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Cross  
Associate General Counsel

85040514744



# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN H. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

HAND DELIVERED

8n/FEC

April 4, 1984

MUR 1645  
Demougeot

George Demougeot, Esquire  
Federal Election Commission  
Office of the General Counsel  
1325 K Street, N.W.  
Seventh Floor  
Washington, D.C. 20463

Re: MUR 1645

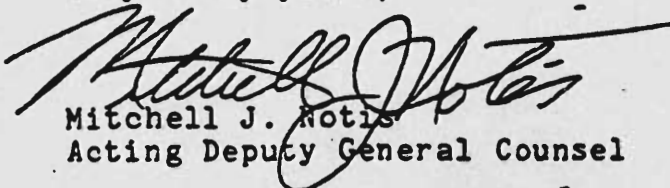
Dear Mr. Demougeot:

As I informed you in our telephone conversation today, I am representing James Lynch, Jr. and the AFGE PAC in the above-captioned action. In the week since I received the letter from Mr. Gross of your office informing me of the complaint in this case, I have been extremely busy with various cases of mine which are pending in federal court. Specifically, virtually all of my time last week was spent in attempting to obtain a temporary restraining order in the case of AFGE, et al. v. O'Connor, (D.D.C., Case No. 84-0972). My litigation workload and various aspects of the AFGE, et al. v. O'Connor case make it likely that I will be exceedingly busy for the next ten days.

AFGE PAC's response to your letter of March 23, 1984 is currently due on approximately April 11, 1984. Due to the current heavy workload described above, I respectfully request that you grant AFGE PAC an extension of time of two weeks in which to file such a response (i.e. on or before April 25, 1984).

Your telephonic response to this request for extension of time would be appreciated. Thank you for your prompt attention to this matter.

Very truly yours,

  
Mitchell J. Notis  
Acting Deputy General Counsel

85040514745



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**Mitchell J. Notis, Esquire  
Acting Deputy General Counsel  
American Federation of Government Employees  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005**

**RE: MUR 1645**

**Dear Mr. Notis:**

Your letter of April 4, 1984, has been received. In this letter you have requested an extension of time of two weeks in which to respond to the complaint filed in the above-cited matter.

Under our procedures, your response to the complaint would be due on April 11, 1984. In light, however, of the matters outlined in your letter, you have been granted the extension, making your response due on or before April 25, 1984.

**Sincerely,**

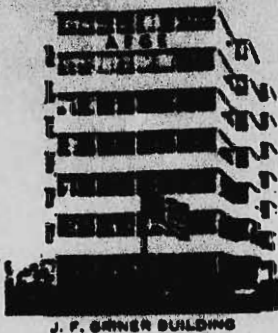
**Charles N. Steele  
General Counsel**

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

GD 4/6/84

85040514746

BCC #2018



# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. SLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.



1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700

IN REPLY PLEASE REFER TO:

HAND DELIVERED

8n/FEC

April 4, 1984

*MUR 1645  
Demougeot*

George Demougeot, Esquire  
Federal Election Commission  
Office of the General Counsel  
1325 K Street, N.W.  
Seventh Floor  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

As I informed you in our telephone conversation today, I am representing James Lynch, Jr. and the AFGE PAC in the above-captioned action. In the week since I received the letter from Mr. Gross of your office informing me of the complaint in this case, I have been extremely busy with various cases of mine which are pending in federal court. Specifically, virtually all of my time last week was spent in attempting to obtain a temporary restraining order in the case of AFGE, et al. v. O'Connor, (D.D.C., Case No. 84-0972). My litigation workload and various aspects of the AFGE, et al. v. O'Connor case make it likely that I will be exceedingly busy for the next ten days.

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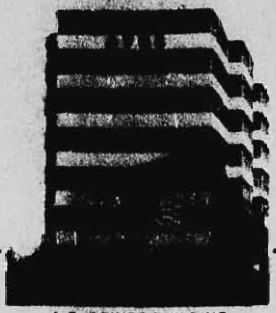
Very truly yours,

*Mitchell J. Notis*  
Mitchell J. Notis  
Acting Deputy General Counsel

85040514747



BCC #2018



J. P. GRINER BUILDING

# AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK  
NATIONAL PRESIDENT

JOHN N. STURDIVANT  
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN  
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005  
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

HAND DELIVERED

8n/FEC

April 4, 1984

*MUR 1645  
Demougeot*

George Demougeot, Esquire  
Federal Election Commission  
Office of the General Counsel  
1325 K Street, N.W.  
Seventh Floor  
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

As I informed you in our telephone conversation today, I am representing James Lynch, Jr. and the AFGE PAC in the above-captioned action. In the week since I received the letter from Mr. Gross of your office informing me of the complaint in this case, I have been extremely busy with various cases of mine which are pending in federal court. Specifically, virtually all of my time last week was spent in attempting to obtain a temporary restraining order in the case of AFGE, et al. v. O'Connor, (D.D.C., Case No. 84-0972). My litigation workload and various aspects of the AFGE, et al. v. O'Connor case make it likely that I will be exceedingly busy for the next ten days.

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Your telephonic response to this request for extension of time would be appreciated. Thank you for your prompt attention to this matter.

Very truly yours,

*Mitchell J. Notis*  
Mitchell J. Notis  
Acting Deputy General Counsel

85040514748

**AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES**

**AFFILIATED WITH THE AFL-CIO**



**1325 Massachusetts Avenue, N.W.**

**Washington, D. C. 20005**

21

8 5 0 4 0 5 1

George DeMougeot, Esquire  
Federal Election Commission  
Office of the General Counsel  
1325 K Street, N.W.  
Seventh Floor  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 23, 1984

Michael Ernest Avakian  
Martha M. Poindexter  
Center on National Labor Policy  
Suite 400  
5211 Port Royal Road  
Springfield, VA 22151

Dear Mr. Avakian & Ms. Poindexter:

This letter is to acknowledge receipt of your client's complaint which we received on March 16, 1984, against Congressman William D. Ford, Theodore Monolidis, Committee to Re-elect Congressman William D. Ford, J. D. Gleason, American Federation of Government Employees' Committee on Federal Employee Political Education, James H. Lynch, Jr. and American Federation of Government Employees' Political Action Committee which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

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

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosure

85040514750

85040514751

PS Form 3811, July 1982

MAIL 11/45 DESTROYED

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

**(CONSULT POSTMASTER FOR FEES)**

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

**TOTAL \$** .....

3. **ARTICLE ADDRESSED TO:**  
 Michael Ernest Avallian  
 Martha M. Pinderster  
 Ctr on Natl Labor Policy  
 Suite 440  
 6211 Port Royal Rd Springfield Va 22151

4. **TYPE OF SERVICE:** ☐ REGISTERED ☐ INSURED  
☒ CERTIFIED ☐ COD  
☐ EXPRESS MAIL

**ARTICLE NUMBER**  
 943127

(Always obtain signature of addressee or agent)

I have received the article described above.  
**SIGNATURE** ☐ Addressee ☒ Authorized agent  
*[Signature]*

5. **DATE OF DELIVERY**  
 3/26/84

6. **ADDRESSEE'S ADDRESS (Only if requested)**

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**

3/26/84

• GPO: 1982-370-593





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

The Honorable William D. Ford  
239 Cannon House Office Building  
Washington, D.C. 20515

Re: MUR 1645

Dear Congressman Ford:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

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

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

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

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

85040514752

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosures

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

85040514753



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Theodore Monolidis, Treasurer  
Committee to Re-elect Congressman  
William D. Ford  
3476 CNB Building  
Detroit, Michigan 48226

Re: MUR 1645

Dear Mr. Monolidis:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

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

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

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

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

85040514754

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

*Kenneth A. Gross*

By Kenneth A. Gross  
Associate General Counsel

85040514753

Enclosures

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

Postmaster

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

(CONSULT POSTMASTER FOR FEES)

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

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

TOTAL \$ .....

3. ARTICLE ADDRESSED TO: Theodore Manalidis, Jr.  
Comm. Hec. to Re-Elect Congressman Wm  
3476 CNB Bldg  
Detroit, Michigan 48226

4. TYPE OF SERVICE:  
☐ REGISTERED ☐ INSURED  
☒ CERTIFIED ☐ COG  
☐ EXPRESS MAIL

ARTICLE NUMBER  
943137

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE ☐ Addressee ☒ Addressee's agent  
*Kenneth A. Gross*

5. DATE OF DELIVERY  
3-14-74

6. ADDRESSEE'S ADDRESS (Only if required)  
3476 Ren...  
DETROIT, MI 48226

7. UNABLE TO DELIVER BECAUSE:  
.....

8. EMPLOYEE'S INITIALS  
.....

3/23/74 mul 1645 • GPC: 1000-070-000





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. D. Gleason, Treasurer  
American Federation of Government  
Employees' Committee on Federal  
Employee Political Education  
1325 Massachusetts Avenue N.W.  
Washington, D.C. 20005

Re: MUR 1645

Dear Mr. Gleason:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

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

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

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

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

85040514756

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosures

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

85040514757

MUR 11.45 Demougeot

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

(CONSULT POSTMASTER FOR FEES)

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

TOTAL \$ ..

3. ARTICLE ADDRESSED TO: J. D. Gleason, Jr.  
American Federation of Government  
Employees' Committee on Federal Employee  
Political Education  
1305 Mass Ave NW # 703  
Washington, DC 20005

4. TYPE OF SERVICE:  
☐ REGISTERED ☐ INSURED  
☒ CERTIFIED ☐ COO  
☐ EXPRESS MAIL

ARTICLE NUMBER  
943136

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE ☐ Addressee ☒ Authorized agent  
*George Demougeot*

5. DATE OF DELIVERY  
3-27-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS  
MAR 29 1984

RETURN RECEIPT

• GPO: 1982-578-503



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James H. Lynch, Jr., Treasurer  
American Federation of Government  
Employees' Political Action  
Committee  
1325 Massachusetts Avenue N.W.  
Washington, D.C. 20005

Re: MUR 1645

Dear Mr. Lynch:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

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

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

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

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

85040514758



If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

*Kenneth A. Gross*

By Kenneth A. Gross  
Associate General Counsel

Enclosures

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

MUR 1645 Demougeot

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

☐ Show to whom and date delivered .....

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

2. ☒ RESTRICTED DELIVERY .....

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

TOTAL \$ .....

3. ARTICLE ADDRESSED TO:

JAMES H. LUNCH, Jr., Tr.  
American Federation of Government  
Employees Political Action Committee  
1705 MONTGOMERY AVE. N.W.  
WASHINGTON, DC 20005

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED

☒ CERTIFIED ☐ COD

☐ EXPRESS MAIL

ARTICLE NUMBER

943135

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Address ☐ Signature and

*George Demougeot*

5. DATE OF DELIVERY

3-28-84

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC 20005

U.S. MAIL

POSTMARK

(only to be used with)

WASHINGTON, DC 20005

U.S. MAIL

POSTAL

1000000000

85040514759



GCC#1579

34 MAR 16 AM 10

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

James Edward Antosh )  
13 Gilpin )  
Shawnee, Oklahoma 74801, )  
Complainant, )

v. )

Complaint  
MUR No. 1645

William D. Ford; Committee to )  
Re-elect Congressman William D. )  
Ford; the separate segregated )  
funds of the American Federation )  
of Government Employees, the )  
American Federation of )  
Government Employees' Committee )  
on Federal Employee Political )  
Education and the American )  
Federation of Government )  
Employees' - Political Action )  
Committee; and all the )  
Committees' treasurers, )  
Respondents. )

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## I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against candidate for federal public office, William D. Ford, Committee to Re-elect Congressman William D. Ford, the separate segregated funds ("SSFs") of the American Federation of Government Employees ("AFGE"), the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees'- Political Action Committee ("AFGE-PAC"), and all the Committees' treasurers individually and in their capacities as treasurers for the making and receiving of excessive contributions in violation of 2 U.S.C. §441a(f) and 2 U.S.C. §441a(a)(2)(A).

## II. PARTIES

2. Complainant is James Edward Antosh who resides at 13 Gilpin, Shawnee, Oklahoma 74801. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

Respondents are:

- a. William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.
- b. Theodore Monolidis, individually and in his capacity as treasurer of Committee to Re-elect Congressman William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.

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- c. Committee to Re-elect Congressman William D. Ford,
  - 3476 CNB Building, Detroit, Michigan 48226.
  - 3476 Penobscot Building, Detroit, Michigan 48226
  - 1919 Pennsylvania Avenue, N.W., Suite 800  
Washington, D.C. 20006.
- d. J. D. Gleason, individually and in his capacity as treasurer of the American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.
- e. The American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.
- f. James H. Lynch Jr. individually and in his capacity as treasurer of the American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, Washington, D.C. 20005.
- g. The American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, N.W., Washington, D.C. 20005.

### III. LIABILITY

- 3. Liability may be imposed upon the candidate, William D. Ford, Committee to Re-elect Congressman William D. Ford, AFGE's

COFEPE and AFGE-PAC, pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. §441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

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

5. For purposes of this complaint, contributions made by the SSFs of AFGE, AFGE's COFEPE and AFGE-PAC, are treated as contributions made from a single committee in accordance with 2 U.S.C. §441a(a)(5) as implemented through 11 C.F.R. §100.5(g)(1)(B).

#### IV. OVERVIEW

6. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal primary election in which William D. Ford was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which William D. Ford; Committee to Re-elect Congressman William D. Ford and its treasurer; AFGE's COFEPE and its treasurer; and AFGE-PAC and its treasurer filed for the 1982 federal primary election.



7. For the 1982 federal primary election, excessive funds were contributed to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer by AFGE's COFEPE and its treasurer and AFGE-PAC and its treasurer. The 1982 Michigan Congressional primary election was held on August 3, 1982.

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

**V. VIOLATIONS OF THE F.E.C.A.  
BY  
COMMITTEE TO RE-ELECT CONGRESSMAN WILLIAM D. FORD  
IN THE  
1982 FEDERAL PRIMARY ELECTION**

9. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFGE's COFEPE and AFGE-PAC in the amount of \$5,625.00 (FIVE

THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

10. Candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, for the 1982 federal primary election, accepted contributions from AFGE's COFEPE and AFGE-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
6/25/81	\$2,500.00	AFGE' COFEPE	#82012141941
3/18/82	\$ 625.00	AFGE-PAC	#81012020656
6/22/82	<u>\$2,500.00</u>	AFGE-PAC	#82012201209
Total =	\$5,625.00		

11. A running total of contributions from AFGE's COFEPE and AFGE-PAC would have put on notice William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer that they had received \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) on March 18, 1982. On that date, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer were only permitted to accept an additional contribution of \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS). In violation of 2 U.S.C. §441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

**VI. VIOLATIONS OF THE F.E.C.A.  
BY  
AFGE'S COFEPE and AFGE-PAC  
IN THE  
1982 FEDERAL PRIMARY ELECTION**

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFGE's COFEPE and AFGE-PAC for the 1982 federal primary election contributed to candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer a total of \$5,625.00 (FIVE THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

13. AFGE's COFEPE and AFGE-PAC contributed the following amounts:

- a. On June 15, 1981, AFGE's COFEPE contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #81032004062.)
- b. On March 10, 1982, AFGE-PAC contributed \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS). (See F.E.C. Microfilm #82032294271.)
- c. On April 8, 1982, AFGE-PAC contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #82032313870.)

14. A running total of contributions made to William D. Ford,

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Committee to Re-elect Congressman William D. Ford and its treasurer would have put on notice AFGE's COFEPE and AFGE-PAC that as of March 10, 1982, they had contributed \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) and that they could only contribute an additional \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS) if they wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution was made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. This amount exceeded the statutory monetary ceiling by \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS).

15. AFGE's COFEPE and its treasurer failed to accurately report the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of June 15, 1981 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE's COFEPE and its treasurer failed to designate whether the contribution was intended for the primary or the general election. (See F.E.C. Microfilm #81032004062.)

However, the contribution was made more than thirteen months before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of July 15, 1981 was intended by AFGE's COFEPE for the primary election.

16. AFGE-PAC and its treasurer failed to accurately report



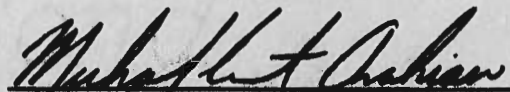
the \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS) contribution of March 10, 1982 and the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of April 8, 1982 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE-PAC and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 82032294271 and 82032313870.) However, the contributions were made approximately four and five months respectively before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the contributions were intended by AFGE-PAC for the primary election.

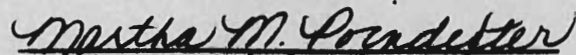
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VII. CONCLUSION

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

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

  
Michael Ernest Avakian  
Center on National Labor Policy

  
Martha M. Poindexter  
Center on National Labor Policy  
5211 Port Royal Road, Suite 400  
North Springfield, VA 22151  
(703) 321-9180

Attorneys for Complainant

March 16, 1984

VERIFICATION OF CITIZEN COMPLAINANT

Shawnee )

State of Oklahoma )

ss.

Pursuant to 2 U.S.C. §437g(a)(1), I, James Edward Antosh, being first duly sworn, say that I have read the foregoing complaint and know the contents thereof, and that the same is true on information and belief. This complaint was not filed at the request or suggestion of any candidate. I am a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

James Edward Antosh

Subscribed and sworn to before me this 29<sup>th</sup> day of February 1984.

Denise K. Almon  
Notary Public

My Commission expires:

Sept. 17, 1986

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DESIGNATION OF COUNSEL

I, James Edward Antosh, a complainant to the attached complaint designate the attorney(s) identified below as complainant's attorney(s) of record. The Federal Election Commission shall direct all written and oral communications in connection with this matter to my designated counsel.

Date

Feb. 29, 1984

James Edward Antosh  
Complainant

DESIGNATED COUNSEL

Michael Ernest Avakian  
Martha M. Poindexter  
Center on National Labor Policy  
Suite 400  
5211 Port Royal Road  
Springfield, Virginia 22151

85040514771



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

James Edward Antosh )  
13 Gilpin )  
Shawnee, Oklahoma 74801, )  
Complainant, )

v. )

William D. Ford; Committee to )  
Re-elect Congressman William D. )  
Ford; the separate segregated )  
funds of the American Federation )  
of Government Employees, the )  
American Federation of )  
Government Employees' Committee )  
on Federal Employee Political )  
Education and the American )  
Federation of Government )  
Employees' - Political Action )  
Committee; and all the )  
Committees' treasurers, )

Respondents. )

Complaint  
MUR No. 1645

85040514772

## I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against candidate for federal public office, William D. Ford, Committee to Re-elect Congressman William D. Ford, the separate segregated funds ("SSFs") of the American Federation of Government Employees ("AFGE"), the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees'- Political Action Committee ("AFGE-PAC"), and all the Committees' treasurers individually and in their capacities as treasurers for the making and receiving of excessive contributions in violation of 2 U.S.C. §441a(f) and 2 U.S.C. §441a(a)(2)(A).

## II. PARTIES

2. Complainant is James Edward Antosh who resides at 13 Gilpin, Shawnee, Oklahoma 74801. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

Respondents are:

- a. William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.
- b. Theodore Monolidis, individually and in his capacity as treasurer of Committee to Re-elect Congressman William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.

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- c. Committee to Re-elect Congressman William D. Ford,
  - 3476 CNB Building, Detroit, Michigan 48226.
  - 3476 Penobscot Building, Detroit, Michigan 48226
  - 1919 Pennsylvania Avenue, N.W., Suite 800  
Washington, D.C. 20006.
- d. J. D. Gleason, individually and in his capacity as treasurer of the American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.
- e. The American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.
- f. James H. Lynch Jr. individually and in his capacity as treasurer of the American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, Washington, D.C. 20005.
- g. The American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, N.W., Washington, D.C. 20005.

### III. LIABILITY

- 3. Liability may be imposed upon the candidate, William D. Ford, Committee to Re-elect Congressman William D. Ford, AFGE's



COFEPE and AFGE-PAC, pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. §441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

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

5. For purposes of this complaint, contributions made by the SSFs of AFGE, AFGE's COFEPE and AFGE-PAC, are treated as contributions made from a single committee in accordance with 2 U.S.C. §441a(a)(5) as implemented through 11 C.F.R. §100.5(g)(1)(B).

#### IV. OVERVIEW

6. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal primary election in which William D. Ford was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which William D. Ford; Committee to Re-elect Congressman William D. Ford and its treasurer; AFGE's COFEPE and its treasurer; and AFGE-PAC and its treasurer filed for the 1982 federal primary election.



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

V. VIOLATIONS OF THE F.E.C.A.  
BY  
COMMITTEE TO RE-ELECT CONGRESSMAN WILLIAM D. FORD  
IN THE  
1982 FEDERAL PRIMARY ELECTION

9. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFGE's COFEPE and AFGE-PAC in the amount of \$5,625.00 (FIVE

THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

10. Candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, for the 1982 federal primary election, accepted contributions from AFGE's COFEPE and AFGE-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
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6/22/82	<u>\$2,500.00</u>	AFGE-PAC	#82012201209
Total =	\$5,625.00		

11. A running total of contributions from AFGE's COFEPE and AFGE-PAC would have put on notice William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer that they had received \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) on March 18, 1982. On that date, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer were only permitted to accept an additional contribution of \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS). In violation of 2 U.S.C. §441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

VI. VIOLATIONS OF THE F.E.C.A.  
BY  
AFGE'S COFEPE and AFGE-PAC  
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1982 FEDERAL PRIMARY ELECTION

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFGE's COFEPE and AFGE-PAC for the 1982 federal primary election contributed to candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer a total of \$5,625.00 (FIVE THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

13. AFGE's COFEPE and AFGE-PAC contributed the following amounts:

- a. On June 15, 1981, AFGE's COFEPE contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #81032004062.)
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14. A running total of contributions made to William D. Ford,



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Committee to Re-elect Congressman William D. Ford and its treasurer would have put on notice AFGE's COFEPE and AFGE-PAC that as of March 10, 1982, they had contributed \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) and that they could only contribute an additional \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS) if they wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution was made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. This amount exceeded the statutory monetary ceiling by \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS).

15. AFGE's COFEPE and its treasurer failed to accurately report the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of June 15, 1981 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE's COFEPE and its treasurer failed to designate whether the contribution was intended for the primary or the general election. (See F.E.C. Microfilm #81032004062.)

However, the contribution was made more than thirteen months before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of July 15, 1981 was intended by AFGE's COFEPE for the primary election.

16. AFGE-PAC and its treasurer failed to accurately report



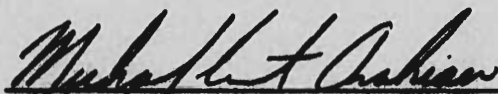
the \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS) contribution of March 10, 1982 and the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of April 8, 1982 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE-PAC and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 82032294271 and 82032313870.) However, the contributions were made approximately four and five months respectively before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the contributions were intended by AFGE-PAC for the primary election.

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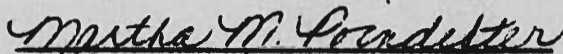
VII. CONCLUSION

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

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



Michael Ernest Avakian  
Center on National Labor Policy



Martha M. Poindexter  
Center on National Labor Policy  
5211 Port Royal Road, Suite 400  
North Springfield, VA 22151  
(703) 321-9180

Attorneys for Complainant

March 16, 1984

85040514781

VERIFICATION OF CITIZEN COMPLAINANT

Shawnee )

State of Oklahoma )

ss.

Pursuant to 2 U.S.C. §437g(a)(1), I, James Edward Antosh, being first duly sworn, say that I have read the foregoing complaint and know the contents thereof, and that the same is true on information and belief. This complaint was not filed at the request or suggestion of any candidate. I am a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

James Edward Antosh

Subscribed and sworn to before me this 29<sup>th</sup> day of February 1984.

Denise K. Almon  
Notary Public

My Commission expires:

Sept. 17, 1986

85040514782

DESIGNATION OF COUNSEL

I, James Edward Antosh, a complainant to the attached complaint designate the attorney(s) identified below as complainant's attorney(s) of record. The Federal Election Commission shall direct all written and oral communications in connection with this matter to my designated counsel.

Feb. 29, 1984  
Date

James Edward Antosh  
Complainant

DESIGNATED COUNSEL

Michael Ernest Avakian  
Martha M. Poindexter  
Center on National Labor Policy  
Suite 400  
5211 Port Royal Road  
Springfield, Virginia 22151

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1645

Date Filmed 3/18/85 Camera No. --- 3

Cameraman JRL