



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1687

Date Filmed 1/2/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slips

Deputation (memo)

envelopes

12 Day report/comment sheets

Blue card

Conciliation documents

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

Signed

Martha Romney

date

December 19, 1984

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Amalgamated Clothing and
Textile Workers Union Political
Action Committee and its treasurer,
Jacob Sheinkman

)
)
) MUR 1687
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on December 4,
1984, the Commission decided by a vote of 5-1 to take
the following actions in MUR 1687:

1. Take no further action with
respect to 2 U.S.C. § 441a(a)(2)(A)
against the Amalgamated Clothing
and Textile Workers Union Political
Action Committee ("ACTWU-PAC") and
its treasurer, Jacob Sheinkman.
2. Find reason to believe that the
Amalgamated Clothing and Textiles
Workers Union Political Action
Committee and its treasurer, Jacob
Sheinkman, violated 11 C.F.R.
§ 104.14(d), but take no further
action.
3. Approve and authorize the sending
of the letters attached to the
General Counsel's Report signed
November 29, 1984.
4. Close the file.

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

Attest:

12-5-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

34040493133



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 7, 1984

Arthur M. Goldberg
General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1687
Amalgamated Clothing and
Textile Workers Union

Dear Mr. Goldberg:

On July 10, 1984, the Commission in connection with the above referenced MUR found reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December 4, 1984, the Commission found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, reading "Lee Ann Elliott", is positioned above the typed name and title.

Lee Ann Elliott
Chairman

34040493139



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 7, 1984

Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 I Street, N.W.
Washington, D.C. 20006

RE: MUR 1687
Friends of Jim Sasser

Dear Mr. Nemeroff:

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 Martha Romney, 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
General Counsel's Report

cc: James R. Sasser

34040493190



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 7, 1984

Robert Hart
General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107-4250

Re: MUR 1687
Transportation Political Education
League

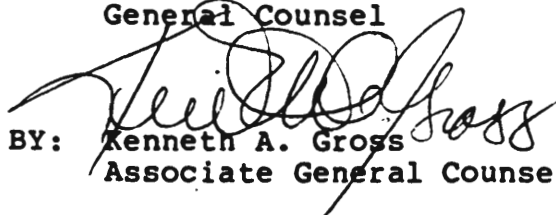
Dear Mr. Hart:

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 Martha Romney, 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
General Counsel's Report

34040493191



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1984

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

RE: MUR 1687

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on April 30, 1984, concerning alleged excessive contributions accepted by Friends of Jim Sasser.

Based on your complaint, the Commission determined there was no reason to believe that Friends of Jim Sasser violated any provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission found there was reason to believe that the Transportation Political Education League and the Amalgamated Clothing and Textile Workers Union Political Action Committee violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. The Commission also found reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee violated 11 C.F.R. § 104.14(d). The Commission conciliated with the Transportation Political Education League. After an investigation concerning the Amalgamated Clothing and Textile Workers Union Political Action Committee was conducted, the Commission concluded on December 4, 1984, to take no further action in this matter. Accordingly, the file in this matter, numbered MUR 1687, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

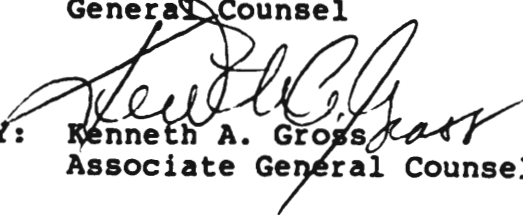
3404093192

Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Page

If you have any questions, please contact Martha
Romney, 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
General Counsel's Report

84040493193



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

TO: Office of the Commission Secretary

FROM: Office of General Counsel *gcl*

DATE: November 30, 1984

SUBJECT: MUR 1687 - 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 [x]
Sensitive [x]
Non-Sensitive []

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

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

84040493194

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
THE FEC
SECRETARY

In the Matter of)
Amalgamated Clothing and)
Textile Workers Union Political)
Action Committee and its)
treasurer Jacob Sheinkman)

84 NOV 30 A 9: 41
MUR 1687

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 30, 1984, James Edward Antosh filed a complaint with the Federal Election Commission alleging that the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to Friends of Jim Sasser (the "Sasser Committee") during the 1982 federal general election.

A review of the reports on file with the Federal Election Commission reveals that the following contributions were made to the Sasser Committee:

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTOR</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
ACTWU-PAC	\$ 500	5-20-81 (tickets)	General	5-20-81	Primary
ACTWU-PAC	\$5,000	10-7-82	General	11-3-82	General

The Tennessee 1982 primary election was held on August 5, 1982.

In response to the complaint, the Assistant General Counsel for ACTWU-PAC states that the "apparent illegal contribution was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements." Counsel asserts that the May 20 \$500 contribution although reported for the general election, represents a contribution for the primary election. The May 20 contribution was contributed prior to the August 5, 1982, primary election.

On July 10, 1984, the Federal Election Commission found reason to believe that ACTWU-PAC and its treasurer, Jacob Sheinkman violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Sasser Committee. ACTWU-PAC filed a response to the reason to believe finding on August 23, 1984. ACTWU-PAC stated that the apparent excessive contribution was a consequence of a clerical error misidentifying a \$500 contribution to the primary election as a contribution to the general election and that a Report of Receipts and Disbursements for May 1981 correcting the clerical error was filed. The contribution in question was made for tickets to a fund raising dinner for Senator Sasser. The check was made payable to Friends of Jim Sasser and specifically designated for "tickets" in the margin.

Elizabeth M. Smith, Director of ACTWU's Legislative and Political Education Department submitted a notarized statement. She stated that in May 1981, she requested that ACTWU-PAC make a \$500 contribution for tickets to a fund raising dinner for Senator Sasser. She stated that the check was specifically designated for tickets in the margin. The affidavit further asserts that the contemporaneous writing accompanying the check was a response card which provided no place to indicate whether the contribution was for the primary or the general election. Ms. Smith contends that she fully intended this first contribution to the Sasser primary campaign to be used for the primary election and treated it as a primary contribution in monitoring all subsequent contributions to the Friends of Jim

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Sasser. A statement of Michael Nemeroff, treasurer of the Sasser Committee was submitted by ACTWU-PAC indicating that an understanding existed between ACTWU-PAC and the Sasser Committee that the contributions to purchase tickets for the fund raising dinner on May 1981 (scheduled over a year before the 1982 primary election) were to be used for the primary expenses of the Sasser Committee.

Thus, even though the \$500 contribution was designated in the report of ACTWU-PAC as for the general election, the Respondent has now produced contemporaneous evidence that the contribution was intended for the primary election. Thus, it appears that ACTWU-PAC did not make an excessive contribution to the Sasser Committee. Accordingly, the Office of General Counsel recommends that the Commission take no further action against ACTWU-PAC with respect to 2 U.S.C. § 441a(a)(2)(A).

However, ACTWU-PAC checked the wrong box by marking the general election box for a primary contribution. The incorrect checking has now been corrected. Thus, we recommend that the Commission find reason to believe that ACTWU-PAC violated 11 C.F.R. § 104.14(d), but take no further action.

II. RECOMMENDATIONS

1. Take no further action with respect to 2 U.S.C. § 441a(a)(2)(A) against the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") and its treasurer, Jacob Sheinkman.

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2. Find reason to believe that the Amalgamated Clothing and Textiles Workers Union Political Action Committee and its treasurer, Jacob Sheinkman, violated 11 C.F.R. § 104.14(d), but take no further action.

3. Approve and authorize the sending of the attached letters.

4. Close the file.

Charles N. Steele
General Counsel

Nov. 24, 1984
Date

By:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from ACTWU-PAC
2. Letter

34040493193

6007473

RECEIVED AT THE FEC



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT THOMAS
Executive Vice President

84 AUG 27 8:09

August 27 1984

GENERAL COUNSEL

Express Mail #B 38663387

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

Re: MUR 1687 Amalgamated Clothing and Textile Workers Union
Political Action Committee

Dear Mr. Steele:

This letter responds to the notification on July 18, 1984 that the Federal Election Commission ("FEC") determined there was reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act"), as alleged in the Complaint filed by James Edward Antosh in MUR 1687.

The Complaint alleges that ACTWU-PAC made a contribution to James R. Sasser, Friends of Jim Sasser, for the general election of 1982 which was \$500.00 in excess of the statutory maximum contribution limits. ACTWU-PAC submitted an initial response to the allegations on May 29, 1984, explaining that the apparent excessive contribution was a consequence of a clerical error misidentifying a \$500.00 contribution to the primary election as a contribution to the general election. ACTWU-PAC submitted an Amended Report of Receipts and Disbursements for May 1981 with its initial response correcting this clerical error. The Amended Report is now on file with the FEC.

ACTWU-PAC will again review the relevant facts presented in its initial response to MUR 1687 to demonstrate that the \$500.00 contribution was intended for the primary election and that ACTWU-PAC made best efforts to comply with the statutory maximum contribution limits. Significantly, all the parties treated the \$500.00 as a contribution to the primary election, with the exception of the ACTWU-PAC's clerical error misidentifying the contribution. As stated above, this clerical error has been corrected by the Amended Report filed with the FEC. Moreover, with the \$500.00 correctly identified as a contribution to the primary election, ACTWU-PAC's total contributions are within the \$5,000.00 maximum statutory limits for each of the primary and general elections in 1982.

VICE PRESIDENTS
JOHN AL. PRIZO
SAMUEL J. AZONARO
ALONSO CALAN
JES CALDER
FRANK CALECA
CHARLES BUT CLARK

ED CLARK
JEAN MART COULTURE
OLGA DIAZ
JAMES DILLON
HENRY DIPPIN
BRUCE DUNTON
GARRY FERRARI
JOHN FOX

SAM FOX
ANGELO G. GEORGAN
HARRY GORDON
MARION E. GHOCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUGHES
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEVI
RICHARD MAFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLER
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

Attachment 1
①

34040493126

Elizabeth M. Smith, Director of ACTWU's Legislative and Political Education Department, is responsible for initiating requests for contributions from ACTWU-PAC. In May 1981, Ms. Smith requested that ACTWU-PAC make a \$500.00 contribution for tickets to a fund raising dinner for Senator James Sasser. The check was made payable to Friends of Jim Sasser and specifically designated for tickets in the margin. (An affidavit of Elizabeth M. Smith is annexed hereto as Attachment A with copies of the check and the response card marked as Exhibits 1a and 1b respectively.)^{1/} As noted in Ms. Smith's affidavit, the contemporaneous writing accompanying the check was a response card which provided no place to indicate whether the contribution was for the primary or the general election. Ms. Smith fully intended this first contribution to the Sasser primary campaign to be used for the primary election. The FEC's own regulations provide that a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the primary. 11 CFR § 110.1(2)(ii)(A). The May 1981 contribution for tickets to the fund raising dinner was well in advance of the Tennessee primary election on August 5, 1982 and was not designated in writing for any particular election. The \$500.00 should be properly deemed a contribution to the primary election.

Ms. Smith intended the \$500.00 contribution for tickets to the fund raising dinner as a primary contribution and treated it as a primary contribution in monitoring all other contributions to the Friends of Jim Sasser.^{2/} The subsequent contribution to the primary on October 6, 1981, was limited to \$4,500.00 to comply with the \$5,000.00 ceiling on election contributions. ACTWU-PAC's combined contributions to the Friends of Jim Sasser for the primary election on August 5, 1982 totalled the maximum \$5,000.00. ACTWU-PAC again contributed the maximum \$5,000.00 to the Friends of Sasser for the general election in a check dated October 7, 1982, shortly before the general election on November 2, 1982, .

James R. Sasser, Friends of Jim Sasser correctly reported the contribution as a contribution to the primary election. The understanding that the contributions to purchase tickets for the fund raising dinner in May 1981 were to be used for the primary expenses of the Sasser Campaign is confirmed by the attached statement of Michael A. Nemeroff, Treasurer of Friends of Jim Sasser. (A copy of the letter of Treasurer Michael A. Nemeroff is annexed hereto as Attachment B.) Treasurer Nemeroff states that the \$500.00 contribution was for the purpose of purchasing tickets to a fund raising dinner which occurred over a year before the 1982 primary election, and he believes that the contribution was used in connection with primary expenses.

^{1/} Copies of the response card and the \$500.00 check for tickets to the fund raising dinner were previously submitted as Exhibit #2 to ACTWU-PAC's initial response.

^{2/} A complete listing of ACTWU-PAC's contributions to the Friends of Jim Sasser is set forth in paragraph 6 of the Affidavit of Elizabeth Smith, Attachment A.

Attachment I
②

ACTWU-PAC's contribution activity demonstrates that it was aware of the statutory limits and made good faith efforts to comply with the Act. All of the parties consistently treated the first contribution to the Friends of Jim Sasser in May 1981 as a primary contribution. The inadvertent clerical error misidentifying this \$500.00 as a general, rather than primary contribution, should not be dispositive of the designation of the contribution, where the conduct of the parties and the FEC's own regulations require that it be considered a contribution to the primary election.

A reasonable analysis of the contribution history of ACTWU-PAC described above, and the conduct of all parties involved demonstrates that there has essentially been no violation of the maximum contribution limits provided for in § 441a(a)(2)(A) of the Act. In fact, \$5,000.00 was intended and used for Sasser's campaign in the primary election of 1982, and \$5,000.00 was intended and used for Sasser's campaign in the general election of 1982. If any harm is found, it is only a de minimus violation attributable to an inadvertent clerical error. This clerical error misidentifying the \$500.00, did not taint the subsequent contributions since all parties properly treated the \$500.00 as a primary contribution in assuring that the maximum \$5,000.00 contribution limits were adhered to. In addition, this clerical error has since been corrected by the Amended Report filed with the FEC.

For the foregoing reasons, ACTWU-PAC respectfully requests that no further action be taken on this matter and that the Complaint be dismissed.

Respectfully submitted,

Arthur M. Goldberg/jc/

Arthur M. Goldberg
General Counsel

Joan Ruby

Joan Ruby
Assistant General Counsel

cc: Thomas E. Harris, Vice Chairman
Martha Romney, Esq.
George Solomons
Elizabeth M. Smith

Attachment I
(3)

84040493201

AFFIDAVIT

City of Washington)
 ss.:
District of Columbia)

I, Elizabeth M. Smith, being duly sworn, depose and state as follows:

1. I am the Director of the Legislative and Political Education Department of Amalgamated Clothing and Textile Workers Union, and am responsible for initiating requests for contributions from the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC").

2. I am submitting this affidavit in opposition to the Complaint numbered MUR 1687, filed on April 30, 1984 with the Federal Election Commission ("FEC") by James Edward Antosh which alleges that ACTWU-PAC violated 2 U.S.C. § 441a (a)(2)(A) of the Federal Election Campaign Act (the "Act").

3. In early May 1981, I requested that ACTWU-PAC prepare a check for five hundred dollars (\$500.00) made payable to Friends of Jim Sasser for tickets to a dinner to raise funds for the primary election on August 5, 1982. The response card prepared by Friends of Jim Sasser provided no place to indicate whether the contribution was for the primary or general election. I was aware that under FEC regulations a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the date of the primary (11 CFR § 110.1(2)(ii)(A)), and I fully intended the contribution to be used for the primary election. (Copies of the check made payable to Friends of Jim Sasser, designated for "tickets", and the response card are attached hereto as Exhibits 1(a) and (b)).

4. Although ACTWU-PAC did not generally contribute the maximum statutory limits for any senatorial campaign in 1981, ACTWU Vice-President Emma Dameron, a constituent of Senator James Sasser, recommended that the maximum contributions be made to Senator Sasser's campaign.

5. Thereafter, I continued my best efforts to comply with the Act and acted in good faith to assure that all requests for contributions from ACTWU-PAC

ATTACHMENT A

Attachment I
(4)

84040493202

complied with the statutory limits of \$5,000.00 for each federal election pursuant to 2 U.S.C. § 441a (a)(2)(A) of the Act.

6. The timing and the amounts of contributions to Friends of Jim Sasser confirm the good faith attempts to comply with the statutory maximum contribution limits. The full listing of ACTWU-PAC's contribution to Friends of Jim Sasser campaigns in the 1982 elections are as follows:^{1/}

DATE OF THE
PRIMARY ELECTION

August 5, 1982

DATE OF THE
CONTRIBUTION

May 20, 1981 \$ 500.00
October 6, 1981 \$4,500.00

TOTAL \$5,000.00

DATE OF THE
GENERAL ELECTION

November 2, 1982

DATE OF THE
CONTRIBUTION

October 7, 1982 \$5,000.00

TOTAL \$5,000.00

7. The clerical error misidentifying the \$500.00 contribution in May 1981 as a general contribution was contrary to my instructions, and all subsequent contribution activity by myself and ACTWU-PAC demonstrates that the intent was to treat the \$500.00 check dated May 20, 1981 as a contribution for the primary election of August 1982.

8. I have at all times made my best efforts to assure that ACTWU-PAC contributions to federal election campaigns were within the statutory contribution limits.

Elizabeth M. Smith
Elizabeth M. Smith

Subscribed and sworn to before me
this 14th day of AUGUST, 1984.

Howard L. Holman
Notary Public

My Commission Expires February 28, 1989.

^{1/} Copies of ACTWU-PAC's Amended Report of Receipts and Disbursements for May 1981, Report of Receipts and Disbursements for October 1981, and the Twelfth Day Report Preceding General Election on 11/1/82 are on file with the Federal Election Commission.

Attachment I
5

84040493203

023456789

EXHIBIT # 1 a

ACTWU POLITICAL CONTRIBUTION COMMITTEE

250

IS UNION SQUARE

NEW YORK, N. Y. DOÖS

1-800-222-1111

May 20, 1981

AY
TO THE
Friends of Jim Sasser

500.00

Five hundred and two dollars

DOLLARS

~~Five hundred~~

...and California.

The Amalgamated Bank of New York

11-15 UNION SQUARE NEW YORK, NEW YORK 10003

K. Lombino

010260003371 0100842710

“0000500000”

84040493205

Friends of Jim Sasser

116 South 12th Street

Nashville, Tennessee 37206

☒ Yes, I will attend the Reception and Dinner, May 9, 1981. Enclosed is a check for 500.00 tickets. (\$500 per couple)

☐ Yes, I will attend the Dinner, May 9, 1981. Enclosed is a check for _____ tickets. (\$125 per person, Table of twelve \$1500)

☐ I will not attend the Dinner, but enclosed is my contribution of \$_____.

Make checks payable to: Friends of Jim Sasser

Name Ms. ELIZABETH SMITH

Residence Address 815 16th St, NW Please type or print Dist. Ct. (202) 628-0214

WASHINGTON Street DC 20006

City and State DIRECTOR, LEGISLATIVE POLITICAL EDUCATION Zip Code

Business Address ACQUA, 15 UNION SQUARE

New York Street NY 10003

City and State Zip Code

Paid for by Friends of Jim Sasser Committee

Attachment I

Exhibit # 1 b

7

AUG 15 1984

August 13, 1984

REFER TO
A.C.T.W.U.

Joan Ruby, Esq.
Amalgamated Clothing and
Textile Workers Union PAC
Legal Department
15 Union Square West
New York, New York 10003

Dear Ms. Ruby:

At your request, we have reviewed our files and have determined that the Union's PAC made a contribution to Friends of Jim Sasser dated May 20, 1981, in the amount of \$500.00. The contribution was for the purpose of purchasing tickets to a fundraising dinner held in Tennessee on May 9, 1981. This dinner occurred over a year before the 1982 primary election and, although the Committee cannot trace the exact use of the funds received, we believe that your contribution was used in connection with our primary expenses.

If you require any additional information, please do not hesitate to contact me.

Very truly yours,

Michael A. Nemeroff

Michael A. Nemeroff
Treasurer

ATTACHMENT B

Attachment I

(8)

84040493205



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Arthur M. Goldberg
General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1687
Amalgamated Clothing and
Textile Workers Union

Dear Mr. Goldberg:

On July 10, 1984, the Commission in connection with the above referenced MUR found reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December , 1984, the Commission found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Attachment II
(9)

34040493207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert Hart
General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107-4250

Re: MUR 1687
Transportation Political Education
League

Dear Mr. Hart:

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 Martha Romney, 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
General Counsel's Report

Attachment II
(10)

8400493208



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 I Street, N.W.
Washington, D.C. 20006

RE: MUR 1687
Friends of Jim Sasser

Dear Mr. Nemeroff:

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 Martha Romney, 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
General Counsel's Report

cc: James R. Sasser

Attachment II
(11)

84040493209



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 1687.

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on April 30, 1984, concerning alleged excessive contributions accepted by Friends of Jim Sasser.

Based on your complaint, the Commission determined there was no reason to believe that Friends of Jim Sasser violated any provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission found there was reason to believe that the Transportation Political Education League and the Amalgamated Clothing and Textile Workers Union Political Action Committee violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. The Commission also found reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee violated 11 C.F.R. § 104.14(d). The Commission conciliated with the Transportation Political Education League. After an investigation concerning the Amalgamated Clothing and Textile Workers Union Political Action Committee was conducted, the Commission concluded on , 1984, to take no further action in this matter. Accordingly, the file in this matter, numbered MUR 1687, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Attachment II
(12)

84040493210

Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Page

If you have any questions, please contact Martha Romney, 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
General Counsel's Report

84040493211

Attachment II
(13)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1687
Transportation Political)
Education League)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 5, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1687:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed October 2, 1984.
2. Close the file as to this respondent.
3. Approve the letter to the respondent attached to the General Counsel's Report signed October 2, 1984.

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

Attest:

10-5-84

Date

Jody C. Hanson

for Marjorie W. Emmons
Secretary of the Commission

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

10-3-84, 8:26
10-3-84, 11:00

34040493212



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1984

Robert Hart
General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107-4250

RE: MUR 1687
Transportation Political Education
League

Dear Mr. Hart:

On October 5, 1984, the Commission accepted the conciliation agreement signed by your client, and a civil penalty 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 client, 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.

84040493213

Robert Hart
Page 2

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

84040493214

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Transportation Political) MUR 1687
Education League)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James Edward Antosh. The Commission found reason to believe that the Transportation Political Education League and Thomas J. McGuire, as treasurer, ("Respondent") violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution and an investigation was conducted.

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 into 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, Transportation Political Education League ("TPEL") is a multicandidate political committee.
2. Thomas J. McGuire is the National Secretary and Treasurer of TPEL.

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3. TPEL made six contributions totalling \$5,600 to the Friends of Jim Sasser Committee ("Sasser Committee") for the primary election.

4. 2 U.S.C. § 441a(a)(2)(A) provides that no multicandidate political committee shall make contributions to any candidate and his authorized political committee which, in the aggregate, exceed \$5,000.

V. Respondent violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution of \$600 to the Sasser Committee.

VI. Respondent shall pay a civil penalty to the Treasurer ✓ of the United States in the amount of three hundred dollars (\$300), pursuant to 2 U.S.C. § 437g(a)(5)(A). ✓

VII. 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.

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

FOR THE RESPONDENT:


Robert Hart


Date

84040403217



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Hart
General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107-4250

RE: MUR 1687 *mr*
Transportation Political Education
League

Dear Mr. Hart:

On , 1984, the Commission accepted the conciliation agreement signed by your client, and a civil penalty 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 client, 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.

84040493213

Robert Hart
Page 2

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

84040493219

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT H. HARRIS
Executive Vice President

RECEIVED AT THE FEC

GCC
#4436

August 23, 1984

Express Mail #B 38663387

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

Re: MUR 1687 Amalgamated Clothing and Textile Workers Union
Political Action Committee

Dear Mr. Steele:

This letter responds to the notification on July 18, 1984 that the Federal Election Commission ("FEC") determined there was reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act"), as alleged in the Complaint filed by James Edward Antosh in MUR 1687.

The Complaint alleges that ACTWU-PAC made a contribution to James R. Sasser, Friends of Jim Sasser, for the general election of 1982 which was \$500.00 in excess of the statutory maximum contribution limits. ACTWU-PAC submitted an initial response to the allegations on May 29, 1984, explaining that the apparent excessive contribution was a consequence of a clerical error misidentifying a \$500.00 contribution to the primary election as a contribution to the general election. ACTWU-PAC submitted an Amended Report of Receipts and Disbursements for May 1981 with its initial response correcting this clerical error. The Amended Report is now on file with the FEC.

ACTWU-PAC will again review the relevant facts presented in its initial response to MUR 1687 to demonstrate that the \$500.00 contribution was intended for the primary election and that ACTWU-PAC made best efforts to comply with the statutory maximum contribution limits. Significantly, all the parties treated the \$500.00 as a contribution to the primary election, with the exception of the ACTWU-PAC's clerical error misidentifying the contribution. As stated above, this clerical error has been corrected by the Amended Report filed with the FEC. Moreover, with the \$500.00 correctly identified as a contribution to the primary election, ACTWU-PAC's total contributions are within the \$5,000.00 maximum statutory limits for each of the primary and general elections in 1982.

VICE PRESIDENTS

JOHN ALLERUZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FORD
ANGELO G. GEORGIN
HARRY GORDON
MARION E. GRACE
WILLIAM HALL
JOSEPH HUGHES
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

18 : 1 p 1290V 14 AUG 24 1984

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RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Elizabeth M. Smith, Director of ACTWU's Legislative and Political Education Department, is responsible for initiating requests for contributions from ACTWU-PAC. In May 1981, Ms. Smith requested that ACTWU-PAC make a \$500.00 contribution for tickets to a fund raising dinner for Senator James Sasser. The check was made payable to Friends of Jim Sasser and specifically designated for tickets in the margin. (An affidavit of Elizabeth M. Smith is annexed hereto as Attachment A with copies of the check and the response card marked as Exhibits 1a and 1b respectively.)^{1/} As noted in Ms. Smith's affidavit, the contemporaneous writing accompanying the check was a response card which provided no place to indicate whether the contribution was for the primary or the general election. Ms. Smith fully intended this first contribution to the Sasser primary campaign to be used for the primary election. The FEC's own regulations provide that a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the primary. 11 CFR § 110.1(2)(ii)(A). The May 1981 contribution for tickets to the fund raising dinner was well in advance of the Tennessee primary election on August 5, 1982 and was not designated in writing for any particular election. The \$500.00 should be properly deemed a contribution to the primary election.

Ms. Smith intended the \$500.00 contribution for tickets to the fund raising dinner as a primary contribution and treated it as a primary contribution in monitoring all other contributions to the Friends of Jim Sasser.^{2/} The subsequent contribution to the primary on October 6, 1981, was limited to \$4,500.00 to comply with the \$5,000.00 ceiling on election contributions. ACTWU-PAC's combined contributions to the Friends of Jim Sasser for the primary election on August 5, 1982 totalled the maximum \$5,000.00. ACTWU-PAC again contributed the maximum \$5,000.00 to the Friends of Sasser for the general election in a check dated October 7, 1982, shortly before the general election on November 2, 1982, .

James R. Sasser, Friends of Jim Sasser correctly reported the contribution as a contribution to the primary election. The understanding that the contributions to purchase tickets for the fund raising dinner in May 1981 were to be used for the primary expenses of the Sasser Campaign is confirmed by the attached statement of Michael A. Nemeroff, Treasurer of Friends of Jim Sasser. (A copy of the letter of Treasurer Michael A. Nemeroff is annexed hereto as Attachment B.) Treasurer Nemeroff states that the \$500.00 contribution was for the purpose of purchasing tickets to a fund raising dinner which occurred over a year before the 1982 primary election, and he believes that the contribution was used in connection with primary expenses.

^{1/} Copies of the response card and the \$500.00 check for tickets to the fund raising dinner were previously submitted as Exhibit #2 to ACTWU-PAC's initial response.

^{2/} A complete listing of ACTWU-PAC's contributions to the Friends of Jim Sasser is set forth in paragraph 6 of the Affidavit of Elizabeth Smith, Attachment A.

ACTWU-PAC's contribution activity demonstrates that it was aware of the statutory limits and made good faith efforts to comply with the Act. All of the parties consistently treated the first contribution to the Friends of Jim Sasser in May 1981 as a primary contribution. The inadvertent clerical error misidentifying this \$500.00 as a general, rather than primary contribution, should not be dispositive of the designation of the contribution, where the conduct of the parties and the FEC'S own regulations require that it be considered a contribution to the primary election.

A reasonable analysis of the contribution history of ACTWU-PAC described above, and the conduct of all parties involved demonstrates that there has essentially been no violation of the maximum contribution limits provided for in § 441a(a)(2)(A) of the Act. In fact, \$5,000.00 was intended and used for Sasser's campaign in the primary election of 1982, and \$5,000.00 was intended and used for Sasser's campaign in the general election of 1982. If any harm is found, it is only a de minimus violation attributable to an inadvertent clerical error. This clerical error misidentifying the \$500.00, did not taint the subsequent contributions since all parties properly treated the \$500.00 as a primary contribution in assuring that the maximum \$5,000.00 contribution limits were adhered to. In addition, this clerical error has since been corrected by the Amended Report filed with the FEC.

For the foregoing reasons, ACTWU-PAC respectfully requests that no further action be taken on this matter and that the Complaint be dismissed.

Respectfully submitted,

Arthur M. Goldberg / jr /

Arthur M. Goldberg
General Counsel

Joan Ruby

Joan Ruby
Assistant General Counsel

cc: Thomas E. Harris, Vice Chairman
Martha Romney, Esq.
George Solomons
Elizabeth M. Smith

AFFIDAVIT

City of Washington)
 ss.:
District of Columbia)

I, Elizabeth M. Smith, being duly sworn, depose and state as follows:

1. I am the Director of the Legislative and Political Education Department of Amalgamated Clothing and Textile Workers Union, and am responsible for initiating requests for contributions from the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC").

2. I am submitting this affidavit in opposition to the Complaint numbered MUR 1687, filed on April 30, 1984 with the Federal Election Commission ("FEC") by James Edward Antosh which alleges that ACTWU-PAC violated 2 U.S.C. § 441a (a)(2)(A) of the Federal Election Campaign Act (the "Act").

3. In early May 1981, I requested that ACTWU-PAC prepare a check for five hundred dollars (\$500.00) made payable to Friends of Jim Sasser for tickets to a dinner to raise funds for the primary election on August 5, 1982. The response card prepared by Friends of Jim Sasser provided no place to indicate whether the contribution was for the primary or general election. I was aware that under FEC regulations a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the date of the primary (11 CFR § 110.1(2)(ii)(A)), and I fully intended the contribution to be used for the primary election. (Copies of the check made payable to Friends of Jim Sasser, designated for "tickets", and the response card are attached hereto as Exhibits 1(a) and (b)).

4. Although ACTWU-PAC did not generally contribute the maximum statutory limits for any senatorial campaign in 1981, ACTWU Vice-President Emma Dameron, a constituent of Senator James Sasser, recommended that the maximum contributions be made to Senator Sasser's campaign.

5. Thereafter, I continued my best efforts to comply with the Act and acted in good faith to assure that all requests for contributions from ACTWU-PAC

complied with the statutory limits of \$5,000.00 for each federal election pursuant to 2 U.S.C. § 441a (a)(2)(A) of the Act.

6. The timing and the amounts of contributions to Friends of Jim Sasser confirm the good faith attempts to comply with the statutory maximum contribution limits. The full listing of ACTWU-PAC's contribution to Friends of Jim Sasser campaigns in the 1982 elections are as follows:^{1/}

DATE OF THE
PRIMARY ELECTION

August 5, 1982

DATE OF THE
CONTRIBUTION

May 20, 1981 \$ 500.00
October 6, 1981 \$4,500.00

TOTAL \$5,000.00

DATE OF THE
GENERAL ELECTION

November 2, 1982

DATE OF THE
CONTRIBUTION

October 7, 1982 \$5,000.00

TOTAL \$5,000.00

7. The clerical error misidentifying the \$500.00 contribution in May 1981 as a general contribution was contrary to my instructions, and all subsequent contribution activity by myself and ACTWU-PAC demonstrates that the intent was to treat the \$500.00 check dated May 20, 1981 as a contribution for the primary election of August 1982.

8. I have at all times made my best efforts to assure that ACTWU-PAC contributions to federal election campaigns were within the statutory contribution limits.

Elizabeth M. Smith
Elizabeth M. Smith

Subscribed and sworn to before me
this 14th day of AUGUST, 1984.

Howard S. Holman
Notary Public

My Commission Expires February 28, 1989.

^{1/} Copies of ACTWU-PAC's Amended Report of Receipts and Disbursements for May 1981, Report of Receipts and Disbursements for October 1981, and the Twelfth Day Report Preceding General Election on 11/1/82 are on file with the Federal Election Commission.

8 4 3 4 0 3 2 3

"UCCUUUUUUUU"

84040493223

Friends of Jim Sasser

116 South 12th Street

Nashville, Tennessee 37206



☒ Yes, I will attend the Reception and Dinner, May 9, 1981. Enclosed is a check for 500.00 tickets. (\$500 per couple)

☐ Yes, I will attend the Dinner, May 9, 1981. Enclosed is a check for _____ tickets. (\$125 per person, Table of twelve \$1500)

☐ I will not attend the Dinner, but enclosed is my contribution of \$ _____

Make checks payable to: Friends of Jim Sasser.

Name Ms. ELIZABETH SMITH

Residence Address 815 16TH ST, NW ^{Please type or print} DC 20006 ^{Zip Code}
WASHINGTON ^{City and State}

Occupation DIRECTOR, LEGISLATIVE POLITICAL EDUCATION

Business Address ARTU 15 UNION SQUARE
New York ^{City and State} NY 10003 ^{Zip Code}

Paid for by Friends of Jim Sasser Committee



AUG 15 1984

August 13, 1984

REFER TO
A.C.T.W.U.

Joan Ruby, Esq.
Amalgamated Clothing and
Textile Workers Union PAC
Legal Department
15 Union Square West
New York, New York 10003

Dear Ms. Ruby:

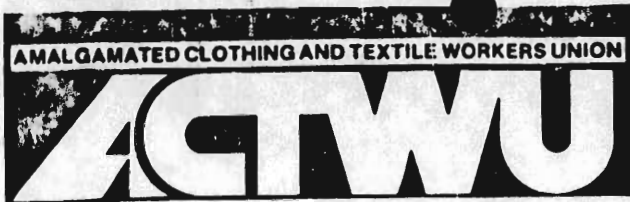
At your request, we have reviewed our files and have determined that the Union's PAC made a contribution to Friends of Jim Sasser dated May 20, 1981, in the amount of \$500.00. The contribution was for the purpose of purchasing tickets to a fundraising dinner held in Tennessee on May 9, 1981. This dinner occurred over a year before the 1982 primary election and, although the Committee cannot trace the exact use of the funds received, we believe that your contribution was used in connection with our primary expenses.

If you require any additional information, please do not hesitate to contact me.

Very truly yours,



Michael A. Nemeroff
Treasurer



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

300# 4465

RECEIVED AT THE FEC

MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT D. ...
Executive Vice President

84 AUG 27 8:08

August 22, 1984

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Express Mail #B 38663387

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

Re: MUR 1687 Amalgamated Clothing and Textile Workers Union
Political Action Committee

Dear Mr. Steele:

This letter responds to the notification on July 18, 1984 that the Federal Election Commission ("FEC") determined there was reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act"), as alleged in the Complaint filed by James Edward Antosh in MUR 1687.

The Complaint alleges that ACTWU-PAC made a contribution to James R. Sasser, Friends of Jim Sasser, for the general election of 1982 which was \$500.00 in excess of the statutory maximum contribution limits. ACTWU-PAC submitted an initial response to the allegations on May 29, 1984, explaining that the apparent excessive contribution was a consequence of a clerical error misidentifying a \$500.00 contribution to the primary election as a contribution to the general election. ACTWU-PAC submitted an Amended Report of Receipts and Disbursements for May 1981 with its initial response correcting this clerical error. The Amended Report is now on file with the FEC.

ACTWU-PAC will again review the relevant facts presented in its initial response to MUR 1687 to demonstrate that the \$500.00 contribution was intended for the primary election and that ACTWU-PAC made best efforts to comply with the statutory maximum contribution limits. Significantly, all the parties treated the \$500.00 as a contribution to the primary election, with the exception of the ACTWU-PAC's clerical error misidentifying the contribution. As stated above, this clerical error has been corrected by the Amended Report filed with the FEC. Moreover, with the \$500.00 correctly identified as a contribution to the primary election, ACTWU-PAC's total contributions are within the \$5,000.00 maximum statutory limits for each of the primary and general elections in 1982.

VICE PRESIDENTS

JOHN ALLERUZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN MARC COUTURE
OLGA DIAZ
JAMES DILLON
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BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
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CECIL TOPPIN
JIM WALRAVEN

Elizabeth M. Smith, Director of ACTWU's Legislative and Political Education Department, is responsible for initiating requests for contributions from ACTWU-PAC. In May 1981, Ms. Smith requested that ACTWU-PAC make a \$500.00 contribution for tickets to a fund raising dinner for Senator James Sasser. The check was made payable to Friends of Jim Sasser and specifically designated for tickets in the margin. (An affidavit of Elizabeth M. Smith is annexed hereto as Attachment A with copies of the check and the response card marked as Exhibits 1a and 1b respectively.)^{1/} As noted in Ms. Smith's affidavit, the contemporaneous writing accompanying the check was a response card which provided no place to indicate whether the contribution was for the primary or the general election. Ms. Smith fully intended this first contribution to the Sasser primary campaign to be used for the primary election. The FEC's own regulations provide that a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the primary. 11 CFR § 110.1(2)(ii)(A). The May 1981 contribution for tickets to the fund raising dinner was well in advance of the Tennessee primary election on August 5, 1982 and was not designated in writing for any particular election. The \$500.00 should be properly deemed a contribution to the primary election.

Ms. Smith intended the \$500.00 contribution for tickets to the fund raising dinner as a primary contribution and treated it as a primary contribution in monitoring all other contributions to the Friends of Jim Sasser.^{2/} The subsequent contribution to the primary on October 6, 1981, was limited to \$4,500.00 to comply with the \$5,000.00 ceiling on election contributions. ACTWU-PAC's combined contributions to the Friends of Jim Sasser for the primary election on August 5, 1982 totalled the maximum \$5,000.00. ACTWU-PAC again contributed the maximum \$5,000.00 to the Friends of Sasser for the general election in a check dated October 7, 1982, shortly before the general election on November 2, 1982, .

James R. Sasser, Friends of Jim Sasser correctly reported the contribution as a contribution to the primary election. The understanding that the contributions to purchase tickets for the fund raising dinner in May 1981 were to be used for the primary expenses of the Sasser Campaign is confirmed by the attached statement of Michael A. Nemeroff, Treasurer of Friends of Jim Sasser. (A copy of the letter of Treasurer Michael A. Nemeroff is annexed hereto as Attachment B.) Treasurer Nemeroff states that the \$500.00 contribution was for the purpose of purchasing tickets to a fund raising dinner which occurred over a year before the 1982 primary election, and he believes that the contribution was used in connection with primary expenses.

^{1/} Copies of the response card and the \$500.00 check for tickets to the fund raising dinner were previously submitted as Exhibit #2 to ACTWU-PAC's initial response.

^{2/} A complete listing of ACTWU-PAC's contributions to the Friends of Jim Sasser is set forth in paragraph 6 of the Affidavit of Elizabeth Smith, Attachment A.

ACTWU-PAC's contribution activity demonstrates that it was aware of the statutory limits and made good faith efforts to comply with the Act. All of the parties consistently treated the first contribution to the Friends of Jim Sasser in May 1981 as a primary contribution. The inadvertent clerical error misidentifying this \$500.00 as a general, rather than primary contribution, should not be dispositive of the designation of the contribution, where the conduct of the parties and the FEC's own regulations require that it be considered a contribution to the primary election.

A reasonable analysis of the contribution history of ACTWU-PAC described above, and the conduct of all parties involved demonstrates that there has essentially been no violation of the maximum contribution limits provided for in § 441a(a)(2)(A) of the Act. In fact, \$5,000.00 was intended and used for Sasser's campaign in the primary election of 1982, and \$5,000.00 was intended and used for Sasser's campaign in the general election of 1982. If any harm is found, it is only a de minimus violation attributable to an inadvertent clerical error. This clerical error misidentifying the \$500.00, did not taint the subsequent contributions since all parties properly treated the \$500.00 as a primary contribution in assuring that the maximum \$5,000.00 contribution limits were adhered to. In addition, this clerical error has since been corrected by the Amended Report filed with the FEC.

For the foregoing reasons, ACTWU-PAC respectfully requests that no further action be taken on this matter and that the Complaint be dismissed.

Respectfully submitted,

Arthur M. Goldberg/jc/

Arthur M. Goldberg
General Counsel

Joan Ruby

Joan Ruby
Assistant General Counsel

cc: Thomas E. Harris, Vice Chairman
Martha Romney, Esq.
George Solomons
Elizabeth M. Smith

34340493230

AFFIDAVIT

City of Washington)
 ss.:
District of Columbia)

I, Elizabeth M. Smith, being duly sworn, depose and state as follows:

1. I am the Director of the Legislative and Political Education Department of Amalgamated Clothing and Textile Workers Union, and am responsible for initiating requests for contributions from the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC").

2. I am submitting this affidavit in opposition to the Complaint numbered MUR 1687, filed on April 30, 1984 with the Federal Election Commission ("FEC") by James Edward Antosh which alleges that ACTWU-PAC violated 2 U.S.C. § 441a (a)(2)(A) of the Federal Election Campaign Act (the "Act").

3. In early May 1981, I requested that ACTWU-PAC prepare a check for five hundred dollars (\$500.00) made payable to Friends of Jim Sasser for tickets to a dinner to raise funds for the primary election on August 5, 1982. The response card prepared by Friends of Jim Sasser provided no place to indicate whether the contribution was for the primary or general election. I was aware that under FEC regulations a contribution not designated in writing for a particular election is deemed a contribution for the primary election if made before the date of the primary (11 CFR § 110.1(2)(ii)(A)), and I fully intended the contribution to be used for the primary election. (Copies of the check made payable to Friends of Jim Sasser, designated for "tickets", and the response card are attached hereto as Exhibits 1(a) and (b)).

4. Although ACTWU-PAC did not generally contribute the maximum statutory limits for any senatorial campaign in 1981, ACTWU Vice-President Emma Dameron, a constituent of Senator James Sasser, recommended that the maximum contributions be made to Senator Sasser's campaign.

5. Thereafter, I continued my best efforts to comply with the Act and acted in good faith to assure that all requests for contributions from ACTWU-PAC

complied with the statutory limits of \$5,000.00 for each federal election pursuant to 2 U.S.C. § 441a (a)(2)(A) of the Act.

6. The timing and the amounts of contributions to Friends of Jim Sasser confirm the good faith attempts to comply with the statutory maximum contribution limits. The full listing of ACTWU-PAC's contribution to Friends of Jim Sasser campaigns in the 1982 elections are as follows:^{1/}

DATE OF THE
PRIMARY ELECTION

August 5, 1982

DATE OF THE
CONTRIBUTION

May 20, 1981 \$ 500.00
October 6, 1981 \$4,500.00

TOTAL \$5,000.00

DATE OF THE
GENERAL ELECTION

November 2, 1982

DATE OF THE
CONTRIBUTION

October 7, 1982 \$5,000.00

TOTAL \$5,000.00

7. The clerical error misidentifying the \$500.00 contribution in May 1981 as a general contribution was contrary to my instructions, and all subsequent contribution activity by myself and ACTWU-PAC demonstrates that the intent was to treat the \$500.00 check dated May 20, 1981 as a contribution for the primary election of August 1982.

8. I have at all times made my best efforts to assure that ACTWU-PAC contributions to federal election campaigns were within the statutory contribution limits.

Elizabeth M. Smith
Elizabeth M. Smith

Subscribed and sworn to before me
this 14th day of AUGUST, 1984.

Howard B. Holman
Notary Public

My Commission Expires February 28, 1989.

^{1/} Copies of ACTWU-PAC's Amended Report of Receipts and Disbursements for May 1981, Report of Receipts and Disbursements for October 1981, and the Twelfth Day Report Preceding General Election on 11/1/82 are on file with the Federal Election Commission.

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עדו זה
Klontz

0000500000

Friends of Jim Sasser

116 South 12th Street

Nashville, Tennessee 37206



☒ Yes, I will attend the Reception and Dinner, May 9, 1981. Enclosed is a check for 500.00 tickets. (\$500 per couple)

☐ Yes, I will attend the Dinner, May 9, 1981. Enclosed is a check for _____ tickets. (\$125 per person, Table of twelve \$1500)

☐ I will not attend the Dinner, but enclosed is my contribution of \$_____

Make checks payable to: Friends of Jim Sasser

Name Ms. ELIZABETH SMITH

Residence Address 815 16th St, NW ^{Please type or print} Dist. Ct. (202) 628-0214
WASHINGTON ^{Street} DC 20006

City and State DIRECTOR, LEGISLATIVE & POLITICAL EDUCATION ^{Zip Code}

Business Address ACQUA, 15 UNION SQUARE
New York ^{Street} NY 10003
City and State Zip Code

Paid for by Friends of Jim Sasser Committee



Exhibit # 1 b

AUG 15 1984

August 13, 1984

REFER TO
A.C.I.W.U.

Joan Ruby, Esq.
Amalgamated Clothing and
Textile Workers Union PAC
Legal Department
15 Union Square West
New York, New York 10003

Dear Ms. Ruby:

At your request, we have reviewed our files and have determined that the Union's PAC made a contribution to Friends of Jim Sasser dated May 20, 1981, in the amount of \$500.00. The contribution was for the purpose of purchasing tickets to a fundraising dinner held in Tennessee on May 9, 1981. This dinner occurred over a year before the 1982 primary election and, although the Committee cannot trace the exact use of the funds received, we believe that your contribution was used in connection with our primary expenses.

If you require any additional information, please do not hesitate to contact me.

Very truly yours,



Michael A. Nemeroff
Treasurer

ATTACHMENT B



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 31, 1984

Joan Ruby
Assistant General Counsel
Amalgamated Clothing and Textile Workers
Union Political Action Committee
15 Union Square
New York, New York 10003

Re: MUR 1687

Dear Ms. Ruby:

This is to inform you that the Office of General Counsel has determined to grant you your requested extension until August 24, 1984, in which to submit a response on behalf of the Amalgamated Clothing and Textile Workers Union Political Action Committee, in the above referenced matter.

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

34740493236

RECEIVED AT THE FEC



MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

84 JUL 27 PR: 10
SCOTT HOWARD
Executive Vice President

AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

July 24, 1984

CERTIFIED, RETURN RECEIPT REQUESTED

#876492

GCC
#4172

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

RE: MUR 1687, Amalgamated Clothing and Textile Workers Union
Political Action Committee

Dear Mr. Steele:

Respondent in the above-titled MUR 1687 received notice on July 24, 1984 that the Commission found reason to believe that Amalgamated Clothing and Textile Workers Union Political Action Committee violated 2 U.S.C. §441(a)(2)(A) of the Act.

Respondent requests an extension of time until August 24, 1984 to submit relevant factual and legal materials to the Commission. Counsel for Respondent needs this three week extension of time to prepare a submission to the Commission because of out of town travel for the major portions of the last week in July and the first two weeks of August.

Thank you for your attention to this request.

Very truly yours,

Joan Ruby
Assistant General Counsel

JR/sf

cc: Martha Romney, Esq.
George A. Kirschenbaum

VICE PRESIDENTS

JOHN ALLERUZZO
SAMUEL J. AZZINARI
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUSTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARRION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD MACFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

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82-10-2011



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

MURRAY H. FINLEY
President

RECEIVED AT THE FEC
JACK SHEINKMAN
Secretary-Treasurer

SCOTT HOYMAN
Executive Vice President

JUL 26 9:02

July 24, 1984

CERTIFIED, RETURN RECEIPT REQUESTED

#876492

GCC
#4161

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

RE: MUR 1687, Amalgamated Clothing and Textile Workers Union
Political Action Committee

Dear Mr. Steele:

Respondent in the above-titled MUR 1687 received notice on July 24, 1984 that the Commission found reason to believe that Amalgamated Clothing and Textile Workers Union Political Action Committee violated 2 U.S.C. §441(a)(2)(A) of the Act.

Respondent requests an extension of time until August 24, 1984 to submit relevant factual and legal materials to the Commission. Counsel for Respondent needs this three week extension of time to prepare a submission to the Commission because of out of town travel for the major portions of the last week in July and the first two weeks of August.

Thank you for your attention to this request.

Very truly yours,


Joan Ruby
Assistant General Counsel

JR/sf

cc: Martha Romney, Esq. ✓
George A. Kirschenbaum

VICE PRESIDENTS

JOHN ALLERUZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
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JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD MACFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLIE
LEON SPITZER
PETER J. SWOBOODA
CECIL TOPPIN
JIM WALRAVEN

00:00 02:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
James R. Sasser, et al.) MUR 1687

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 10, 1984, do hereby certify that the Commission took the following actions in MUR 1687:

1. Decided by a vote of 6-0 to
 - a) Find reason to believe that the Transportation Political Education League and its treasurer, Thomas J. McGuire, Violated 2 U.S.C. § 441a(a) (2) (A) by making excessive contributions to the Sasser Committee.
 - b) Find reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee and its treasurer, Jacob Sheinkman, violated 2 U.S.C. § 441a(a) (2) (A), by making excessive contributions to the Sasser Committee.

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

(Continued)

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2. Decided by a vote of 5-1 to

- a) Find no reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, 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 the Transportation Political Education League.
- b) Find no reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, 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 the Amalgamated Clothing and Textile Workers Union Political Action Committee.
- c) Find no reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, violated 11 C.F.R. § 104.14(d) for improper reporting of contributions received from the Amalgamated Clothing and Textile Workers Union Political Action Committee.

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

3. Decided by a vote of 6-0 to find reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, and the Transportation Political Education League and its treasurer, Thomas J. McGuire, violated 11 C.F.R. § 104.14(d) for improper reporting of contributions made by the Transportation Political Education League to the Friends of Jim Sasser, and close the file with respect to this violation.

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3. (Continued)

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

4. Decided by a vote of 6-0 to direct the
General Counsel to send appropriate letters
pursuant to the actions taken this date.

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

Attest:

7-12-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1984

Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 I Street, N.W.
Washington, D.C. 20006

RE: MUR 1687
Friends of Jim Sasser

Dear Mr. Nemeroff:

On July 10, 1984, the Commission found reason to believe that Friends of Jim Sasser and you, as treasurer had violated 11 C.F.R. § 104.14(d) for improper reporting of contributions made by the Transportation Political Education League to the Sasser Committee in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action.

The Commission found no reason to believe that Friends of Jim Sasser and you, as treasurer had violated 2 U.S.C. § 441a(f) for receipt of excessive contributions from the Transportation Political Education League, no reason to believe that the Friends of Jim Sasser violated 2 U.S.C. § 441a(f) for receipt of excessive contributions from the Amalgamated Clothing and Textile Workers Union Political Action Committee and no reason to believe that the Friends of Jim Sasser violated 11 C.F.R. § 104.14(d) for improper reporting of contributions received from the Amalgamated Clothing and Textile Workers Union Political Action Committee.

The Commission has determined to close its file as it pertains to you and your committee. The file in this matter will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. The Commission reminds you that improperly reporting contributions nevertheless appears to be a violation of 11 C.F.R. § 104.14(d). You should take immediate steps to insure that this activity does not occur in the future.

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Michael A. Nemeroff, Treasurer
Page 2

If you have any questions, please direct them to
Marty Romney, the staff member assigned to this matter, at
(202)523-4000.

Sincerely,

Thomas E. Harris
Thomas E. Harris
Vice Chairman

Enclosure
General Counsel's Report

cc: James Sasser

84040493243



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Mr. Robert Hart, Esquire
c/o United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107

RE: MUR 1687
Transportation Political
Education League

Dear Mr. Hart:

The Federal Election Commission notified your clients on May 4, 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 explanation of this matter which was dated May 24, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on July 10, 1984, determined that there is reason to believe that the Transportation Political Education League violated 11 C.F.R. § 104.14(d), but determined to take no further action and close its file. The Commission also determined that there is reason to believe that the Transportation Political Education League 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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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Mr. Robert Hart, 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 wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Vice Chairman

Enclosures
Procedures

34040493245



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Ms. Joan Ruby, Esquire
Assitant General Counsel
Amalgamated Clothing and Textile Workers Union
Political Action Committee
15 Union Square West
New York, New York 10003

RE: MUR 1687
Amalgamated Clothing and
Textile Workers Union
Political Action Committee

Dear Ms. Ruby:

The Federal Election Commission notified your clients on May 4, 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 explanation of this matter which was dated May 29, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on July 10, 1984, determined that there is reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee 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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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Ms. Joan Ruby, 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 wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Vice Chairman

Enclosures
Procedures

34040493247



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 18, 1984

Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 I Street, N.W.
Washington, D.C. 20006

RE: MUR 1687
Friends of Jim Sasser

Dear Mr. Nemeroff:

On July 10, 1984, the Commission found reason to believe that Friends of Jim Sasser and you, as treasurer had violated 11 C.F.R. § 104.14(d) for improper reporting of contributions made by the Transportation Political Education League to the Sasser Committee in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

The Commission found no reason to believe that Friends of Jim Sasser and you, as treasurer had violated 2 U.S.C. § 441a(f) for receipt of excessive contributions from the Transportation Political Education League, no reason to believe that the Friends of Jim Sasser violated 2 U.S.C. § 441a(f) for receipt of excessive contributions from the Amalgamated Clothing and Textile Workers Union Political Action Committee and no reason to believe that the Friends of Jim Sasser violated 11 C.F.R. § 104.14(d) for improper reporting of contributions received from the Amalgamated Clothing and Textile Workers Union Political Action Committee.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that improperly reporting contributions nevertheless appears to be a violation of 11 C.F.R. § 104.14(d). You should take immediate steps to insure that this activity does not occur in the future.

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Michael A. Nemeroff, Treasurer
Page 2

If you have any questions, please direct them to
Marty Romney, the staff member assigned to this matter, at
(202)523-4000.

Sincerely,

Thomas E. Harris
Thomas E. Harris
Vice Chairman

Enclosure
General Counsel's Report

cc: James Sasser

84040423242



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CK*
DATE: June 26, 1984
SUBJECT: MUR 1687 - 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 [X]
Sensitive [X]
Non-Sensitive []

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

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

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SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

84 JUN 26 All: 13

DATE & TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION 6/26/84
11:15

MUR 1687

DATE COMPLAINT RECEIVED

BY OGC April 30, 1984

DATE OF NOTIFICATION TO

RESPONDENT: May 4, 1984

STAFF MEMBER: Marty Romney

COMPLAINANT'S NAME: James Edward Antosh

RESPONDENTS' NAMES: James R. Sasser

Friends of Jim Sasser, and its treasurer,

Michael A. Nemeroff,

Transportation Political Education League

and its treasurer, Thomas J. McGuire

Amalgamated Clothing and Textile

Workers Union Political Action

Committee and its treasurer, Jacob Sheinkman

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

2 U.S.C. § 441a(f)

11 C.F.R. § 110.1(a)(2)

INTERNAL REPORTS CHECKED: Reports submitted by respondent
committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

1. Complainant alleges that the Transportation Political Education League ("TPEL") violated 2 U.S.C. §441a(a)(2)(A) by making excessive contributions to Friends of Jim Sasser (the "Sasser Committee") during the 1982 federal primary election.

2. Complainant alleges that the Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Sasser Committee during the 1982 federal general election.

3. Complainant alleges that candidate James R. Sasser,

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Friends of Jim Sasser and Michael Nemeroff, as treasurer*/
("Sasser Committee") 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 the above-named committees.

4. Complainant alleges that candidate James R. Sasser,
Friends of Jim Sasser and Michael Nemeroff, as treasurer*/
violated 11 C.F.R. § 104.14(d), by failing to accurately report
the May 20, 1981, \$500 contribution from the ACTWU-PAC.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(2)(A) states that no multicandidate
political committee shall make contributions to any candidate and
his authorized political committees with respect to any federal
election which in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(f) prohibits a candidate or committee from
knowingly accepting contributions in violation of the \$5,000
aggregate limitation imposed on contributions under this section.

11 C.F.R. § 110.1(a) provides that a contribution designated
in writing by the contributor for a particular election shall be
attributed to that election. Except, that a contribution made
after the primary election, shall be allowed only if the
recipient committee has outstanding primary debts on the date of
the contribution which are equal to or greater than the
contribution. 11 C.F.R. § 110.1(a) further provides that

*/ Michael Nemeroff served as treasurer until July 16, 1983.
Virginia T. Heise served as treasurer from July 16, 1982 through
December 3, 1982. Michael Nemeroff resumed the position of
treasurer on December 3, 1982.

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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 and are attributable to the general election if made after the date of the primary election.

According to a complaint filed by James Edward Antosh, the Sasser Committee accepted the following contribution from TPEL for the 1982 federal primary election totaling \$5,600, \$600 in excess of limitations at 2 U.S.C. § 441a(a)(2)(A):

<u>DATE REPORTED RECEIVED BY SASSER COMMITTEE</u>	<u>AMOUNT</u>
4-20-81	\$ 250
9-28-81	3,000
11-13-81	100
2-19-82	250
6-18-82	1,000
9-13-82	<u>1,000</u>
TOTAL	\$ 5,600

Complainant asserts that a running total of the amount of contributions received from TPEL would have put the Sasser committee on notice that it had received \$4,600 on June 18, 1982, and was only permitted to accept an additional \$400. Complainant asserts that the Sasser Committee accepted an additional \$1,000 contribution thereby exceeding the \$5,000 limitation and violating 2 U.S.C. § 441a(f).

The complaint also indicates that the Sasser Committee accepted the following contributions from ACTWU-PAC for the 1982 general election totalling \$5,500, \$500 in excess of limitations at 2 U.S.C. § 441a(a) (2) (A):

<u>DATE REPORTED RECEIVED BY SASSER COMMITTEE</u>	<u>AMOUNT</u>
5-20-81	\$ 500
11-3-82	\$ 5,000
TOTAL	\$ 5,500

A running total of the amount of contributions received from ACTWU-PAC would have put the Sasser Committee on notice that it had received \$500 on May 20, 1981, and was only permitted to accept an additional \$4,500. Complainant asserts that the Sasser Committee accepted an additional \$5,000 contribution, thereby exceeding the \$5,000 limitation and violating 2 U.S.C. § 441a(f).

Furthermore, the complainant asserts that the Sasser Committee failed to accurately report the May 5, 1981, \$500 contribution by reporting it as a contribution for the primary election while the ACTWU-PAC designated it for the general election.

TRANSPORTATION POLITICAL EDUCATION LEAGUE

A review of the reports on file with the Federal Election Commission reveals that the following contributions were made to the Sasser Committee:

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTOR</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
TPEL	\$ 250	4-20-81	Primary	4-20-81	Primary
TPEL	\$3,000	7-21-81	Primary	9-28-81	Primary
TPEL	\$ 100	10-12-81	Primary	11-13-81	Primary
TPEL	\$ 250	2-12-82	Primary	2-19-82	Primary
TPEL	\$1,000	6-10-82	Primary	6-18-81	Primary
TPEL	\$1,000	8-9-82	Primary	9-13-82	Primary
TPEL	\$3,000	8-23-82	General	9-13-82	General

The Tennessee 1982 primary election was held on August 5, 1982.

Thomas J. McGuire, National Secretary and Treasurer, responding on behalf of the Transportation Political Education League states that TPEL's records indicate that the check dated August 9, 1982, was not delivered to the Sasser Committee until September 13, 1982, more than a month after the August 5, 1982, primary. TPEL states that the August 9, 1982, contribution was erroneously reported as a primary election contribution and should have been reported as a general election contribution. No amended reports were submitted.

In response to the complaint, the treasurer for the Friends of Jim Sasser acknowledged the Sasser Committee's receipt of the contributions noted in the complaint, but denied that any contributions were accepted in excess of the statutory limitation. The Sasser Committee cites 11 C.F.R. § 110.1(a)(2) which provides that a contribution received prior to an election is considered a contribution for that election, unless the contributor states in writing that the contribution is intended for a different election. The primary election occurred on

August 5, 1982. The Sasser Committee states that all of the contributions from the Transportation Political Education League, with the exception of the \$1,000 contribution received on September 13, 1982, were received before the date of the primary and were treated by the Sasser Committee as contributions for the primary election. These contributions totaled \$4,600, less than the contribution limit of \$5,000.

The \$1,000 contribution of September 13, 1982, was received after the date of the primary, and Friends of Jim Sasser did not receive any letter designating this contribution for the primary election. Therefore, the Sasser Committee asserts the Commission's regulations require that this contribution be counted toward the general election. If the \$1,000 received on September 13, 1982, is counted toward the general election limit, then TPEL did not exceed the \$5,000 contribution limit for either the primary or general election. It is noted that the Sasser Committee's report of October 11, 1982, listed the September contribution as for the primary election. This reporting was considered by the Committee to be an inadvertent error corrected by their filing of an amended report.

The 1982 contribution was made after the August 5, 1982, primary, however, it was designated in TPEL's reports as being for the primary election. Since the contribution was designated by TPEL for the primary election and since the Sasser Committee had primary debts, the designation made by the contributing committee, TPEL, is controlling. Thus, the contribution is

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attributed to the primary election and an excessive contribution has occurred. Therefore the Office of General Counsel recommends reason to believe that TPEL and the Sasser Committee violated 2 U.S.C. § 441a(a)(2)(A) and 2 U.S.C. § 441a(f) respectively.

**Amalgamated Clothing and Textile Workers Union
Political Action Committee**

A review of the reports on file with the Federal Election Commission reveals that the following contributions were made to the Sasser Committee:

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTOR</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
ACTWU-PAC	\$ 500	5-20-81	General	5-20-81	Primary
		(tickets)			
ACTWU-PAC	\$5,000	10-7-82	General	11-3-82	General

The Tennessee 1982 primary election was held on August 5, 1982.

In response to the complaint, the Assistant General Counsel for ACTWU-PAC states that the "apparent illegal contribution was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements." Counsel asserts that the May 20 \$500 contribution although reported for the general election, represents a contribution for the primary election. The May 20 contribution was contributed prior to the August 5, 1982, primary election.

In response to the complaint the Sasser Committee acknowledged the Committee's receipt of two contributions from ACTWU-PAC, \$500 on May 20, 1981, and \$5,000 on November 3, 1982.

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The Sasser Committee reported the \$500 contribution as being for the primary election and the \$5,000 contributions being for the general election.

The Sasser Committee again cites 11 C.F.R. § 110.1(a)(2) and states that the contribution was received more than a year prior to the primary election and that the contribution was not accompanied with a written designation stating that it was for the general election. Therefore, the Committee asserts it had no alternative but to report it as a primary contribution. If the \$500 contribution is counted against the limit for the primary, the Committee did not exceed the \$5,000 limit for either the primary or the general election.

The May 20, 1981, contribution was made before the August 5, 1982, primary, however, it was designated in ACTWU-PAC's reports as being for the general election. Since the contribution was designated by ACTWU-PAC, such designation is controlling. Thus, the contribution is attributed to the general election and an excessive contribution has occurred.

Further, since the Sasser Committee designated in its report that the May 20, 1981, contribution was for the primary election, such contribution was improperly reported, as it should have been reported for the general election. Therefore, the Sasser Committee violated 11 C.F.R. § 104.14(d). Therefore, the Office of General Counsel recommends that the Commission find reason to believe that ACTWU-PAC violated 2 U.S.C. § 441a(a)(2)(A) and the Sasser Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d).

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RECOMMENDATIONS

1. a. Find reason to believe that the Transportation Political Education League and its treasurer, Thomas J. McGuire, violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Sasser Committee.
- b. Find reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, 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 the Transportation Political Education League.
2. a. Find reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee and its treasurer, Jacob Sheinkman, violated 2 U.S.C. § 441a(a)(2)(A), by making excessive contributions to the Sasser Committee.
- b. Find reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, 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 the Amalgamated Clothing and Textile Workers Union Political Action Committee.
- c. Find reason to believe that the Friends of Jim Sasser and its treasurer, Michael A. Nemeroff, violated 11 C.F.R. § 104.14(d) for improper reporting of contributions.

3 4 0 4 0 4 9 3 2 5 7

3. Approve and authorize the sending of the attached letters.

Charles N. Steele
General Counsel

June 26, 1984
Date

Kenneth A. Gross
BY: Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from Sasser Committee
2. Response from TPEL
3. Response from ACTWU-PAC
4. Letters

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Attachment I ①

GCC# 2190

SIDLEY & AUSTIN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603
DIE: 833-7000 TELEX 88-4084

8040 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
DIE: 833-8100 TELEX 18-1091

55 EAST 52ND STREET
NEW YORK, NEW YORK 10055
DIE: 486-7717 TELEX 97-1698

31 ST. JAMES'S SQUARE
LONDON, SW1Y 4JR, ENGLAND
DI: 930-5596 TELEX 81781

1722 EYE STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE 202: 429-4000
TELEX 89-463

May 17, 1984

P.O. BOX 190
MUSCAT, SULTANATE OF OMAN
782-411 TELEX 0866

P.O. BOX 4619
DEIRA, DUBAI-U.A.E.
9714-880194 TELEX 47216

8 SHENTON WAY
SINGAPORE 0106
88 884-8000 TELEX 28754

SIDLEY & AUSTIN & WAQUIB
AHMED NESSIM STREET, 8
CAIRO, EGYPT
729-499 TELEX 93780

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

*MUR 1687
Demougeot*

Re: MUR 1687

Dear Mr. Demougeot:

This letter responds to the complaint filed by James Edward Antosh against Friends of Jim Sasser and its treasurers, Michael A. Nemeroff and Virginia T. Heise, during the 1982 campaign. The complaint alleges two violations. First, it asserts that Friends of Jim Sasser accepted contributions for the primary election in the amount of \$5600 from Transportation Political Education League which exceeded the contribution limit of \$5000 per election. 2 U.S.C. §441a. Second, the complaint alleges that Friends of Jim Sasser accepted contributions totalling \$5500 from the ACTWU-PAC for the 1982 general election which also exceeded the \$5000 contribution limit. 2 U.S.C. §441a.

We have reviewed our records and have concluded that Friends of Jim Sasser did not violate the contribution limit with respect to either of these contributors. The Tennessee primary occurred on August 5, 1982. The Commission's regulations provide that a contribution received prior to an election is considered a contribution for that election, unless the contributor states in writing that the contribution is intended for a different election. 11 C.F.R. 110.1(a)(2).

All of the contributions from the Transportation Political Education League, with the exception of the \$1000 contribution received September 13, 1982, were received

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George Demougeot, Esq.
May 17, 1984
Page Two

before the date of the primary and were treated as contributions for the primary election. These contributions totaled \$4600 --less than the contribution limit of \$5000.

The Transportation Political Education League also contributed \$1000 on September 13, 1982. This contribution was after the date of the primary, and Friends of Jim Sasser did not receive any letter designating this contribution for the primary election. Therefore, the Commission's regulations require that this contribution be counted toward the contribution limit for the general election. 11 C.F.R. 110.1(a)(2).^{*} The Committee's records indicate that if the \$1000 received on September 13, 1982, is counted toward the general election limit, the Transportation Political Education League did not exceed the \$5000 contribution limit for that election.

The allegation concerning contributions received from ACTWU-PAC is also without merit. The complaint indicates that the Committee accepted two contributions from ACTWU-PAC. The first contribution in the amount of \$500 was accepted on May 20, 1981, and the second contribution in the amount of \$5000 was accepted on November 3, 1982. The complaint charges that the \$500 contribution was improperly reported as a primary contribution because ACTWU-PAC designated this contribution in its report as for the general election.

As previously noted, the Commission's regulations require the Committee to treat any contribution received prior to the primary as a contribution for that election unless the contribution is designated in writing for a different election. 11 C.F.R. 110.1(a)(2). This contribution was received more than a year prior to the primary election and was not designated in writing for the general election. Accordingly, the Committee had no alternative but to report it as a primary contribution. Moreover, if this contribution is counted against the limit for the primary, the Committee did not exceed the \$5000 limit for either the primary or the general election.

^{*} Some confusion concerning this contribution apparently arose because the Committee's report, dated October 11, 1982, lists this contribution as for the primary. See the attached sheet. This inadvertent error will be corrected by filing an amendment to our report, a copy of which is hereby attached.

George Demougeot, Esq.
May 17, 1984
Page Three

In conclusion, the complaint fails to state a violation of law, and we respectfully request that it be dismissed.

Very truly yours,



Michael A. Nemeroff

Enclosure

MAN:nkw

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11-Oct-82

④
FRIENDS OF JIM SASSIF
PFC LINE 110 RECEIPTS
POLITICAL ACTION COMMITTEES
JULY 17 THRU SEPTEMBER 30, 1982

Page - 19

PAC I.D./NAME	DATE	ELECTION	\$ THIS PERIOD
PAC I.D.: THRIFT PAC	09 30 82	General	\$ 500.00

Suite 200
1709 New York Avenue NE
Washington, DC 20006

AGGREGATE YTD: \$ 500.00

PAC I.D.: Transportation Political	09 13 82	General	\$ 3,000.00
	09 13 82	Primary	\$ 1,000.00

Education League
14600 Detroit Avenue
Cleveland, OH 44107

AGGREGATE YTD: \$ 5,250.00

PAC I.D.: Truck Operators Non Partisan	08 06 82	Primary	\$ 1,000.00
	09 30 82	General	\$ 1,000.00

Committee of The American
Trucking Association, Inc.
430 First Street, S. E.
Washington, DC 20003

AGGREGATE YTD: \$ 2,000.00

PAC I.D.: U.S. League Savings Association PEC	09 22 82	General	\$ 1,000.00
--	----------	---------	-------------

1709 New York Avenue, NE
Suite 511
Washington, DC 20006

AGGREGATE YTD: \$ 1,000.00

PAC I.D.: Union Planters Committee on Govt Affairs	08 05 82	Primary	\$ 400.00
---	----------	---------	-----------

Post Office Box 347
Memphis, TN

AGGREGATE YTD: \$ 600.00

(5)

Friends of Jim Sasser
C/O Michael A. Nemeroff, Treasurer
1722 Eye Street, N.W.
Washington, D.C. 20006

May 17, 1984

U.S.. Senate Reports
Office of Public Records
Office of the Secretary
of the Senate
232 Hart Senate Office Building
Washington, D.C. 20510

Dear Sir:

Enclosed is an amendment to Friends of Jim
Sasser's October 11, 1982 report.

Very truly yours,

Michael A. Nemeroff

Michael A. Nemeroff

Enclosure

MAN:nkw

84040493265

SCHEDULE A

ITEMIZED RECEIPTS

AMENDMENT

Page 19 of 23 for
 LINE NUMBER 11C
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Friends of Jim Sasser

A. Full Name, Mailing Address and ZIP Code

Transportation Political
 Education League
 14600 Detroit Avenue
 Cleveland, Ohio 44107

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

9-13-82

\$3000.00

Occupation

9-13-82

\$1000.00

Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Aggregate Year-to-Date—\$

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date—\$

SUBTOTAL of Receipts This Page (optional)

\$4000.00

TOTAL This Period (last page this line number only)

\$4000.00

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T.P.E.L.

84 MAY 29 12:11

TRANSPORTATION POLITICAL EDUCATION LEAGUE

14600 DETROIT AVENUE

● CLEVELAND, OHIO 44107-4260

FRED A. HARDIN, National Chairman
 J. R. (JIM) SNYDER, National Vice Chairman
 THOMAS J. MCGUIRE, National Sec. & Treas.

A copy of our report filed with the appropriate
 supervisory officer is available for purchase
 from the Superintendent of Documents, U.S.
 Printing Office, Washington, D. C. 20402



May 24, 1984

Federal Election Commission
 Washington, DC 20463

Re: MUR 1687

MUR 1687
Romney
 14:57

Dear Sirs:

This has reference to your letter of May 4, 1984 addressed to John H. Shepherd, Treasurer-Transportation Political Education League regarding the complaint filed with the Commission and designated as MUR 1687. John H. Shepherd retired as Treasurer of the Transportation Political Education League and was replaced by the undersigned. This response relates to the contributions by the Transportation Political Education League referred to in the complaint.

The records of the Transportation Political Education League indicate the following contributions made to the campaign committee of James R. Sasser:

<u>DATE OF CHECK</u>	<u>AMOUNT</u>
4/20/81	\$ 250.00
7/21/81	3,000.00
10/12/81	100.00
2/12/82	250.00
6/10/82	1,000.00
8/09/82	1,000.00

All of these checks were indicated as being primary contributions for the 1982 Primary, however, the check dated August 9, 1982 was not delivered to the campaign committee until September 13, 1982 more than a month after the August 5, 1982 Primary. This check was dated after the August 5, 1982 Primary and delivered after the August 5, 1982 Primary and should have been designated as a General Election Contribution.

The Transportation Political Education League did not intentionally violate any laws, rules or regulations and it is requested that no further action be taken on this matter. Steps are being taken to place the contribution records of the Transportation Political Education League on a computer to prevent a recurrence of the possible overcontribution to any candidate in a particular election cycle. It is the belief of the Transportation Political Education League that the request was inadvertently made for a primary contribution when it should have been made for a general election contribution. This is supported by the date of the check making the contribution which was after the primary and also by the fact that the check was not delivered until September 13th,

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Federal Election Commission
Page two
May 24, 1984

considerably after the primary election. There was no intentional violation of any law, rule or regulation.

Very truly yours,

Thomas J. McGuire
National Secretary and Treasurer
Transportation Political Education League

84040493269

AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

May 29, 1984

CERTIFIED MAIL, RRR, #P 352 566 142

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

Re: MUR 1687, Amalgamated Clothing and Textile Workers Union Political
Action Committee; George Solomons Assistant Treasurer

Dear Mr. Demougeot:

This is in response to your letter dated May 4, 1984, notifying the Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") and George Solomons, Assistant Treasurer, that a complaint had been filed alleging that excessive campaign contributions had been made in violation of the Federal Election Campaign Act of 1971 (the "Act"). The apparent illegal contribution (\$500.00 in excess of the statutory limit), was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter.

The Complaint alleges that ACTWU-PAC contributed \$5,500.00 to the 1982 federal general election for James R. Sasser, Friends of Jim Sasser and its treasurer in violation of the \$5,000.00 statutory limit provided in 2 U.S.C. § 441(a)(2)(A). In fact, the \$500.00 in alleged excessive contributions to the general election represents a contribution of \$500.00 made in May 1981 which was intended for the primary election and inadvertently attributed to the general election in ACTWU-PAC's report to the Federal Election Commission. This clerical error has been corrected in the Amended Report of Receipts and Disbursements for May 1981, attached as Exhibit #1.

A review of all of the relevant facts demonstrates that the \$500.00 contribution of May 20, 1981 was intended for the primary election. On May 20, 1981, ACTWU-PAC made a \$500.00 contribution by check made payable to Friends of Jim Sasser for a ticket to a fundraiser dinner. (Copies of the response card and accompanying check are attached as Exhibit #2). The \$500.00 contribution was not designated in writing for any particular election but was contributed prior to the

1/ George Solomons is the Assistant Treasurer to the ACTWU-PAC and is incorrectly named as "Treasurer" in the Complaint.

VICE PRESIDENTS

JOHN ALPEROZO
SAMUEL AZZARRO
JIMMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUSTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUGHES
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD M. MADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOEDCA
CECIL TOPPIN
JIM WILKINSON

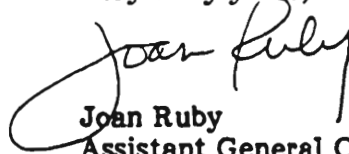
Tennessee primary election of August 5, 1982. The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election is deemed a contribution for a primary election if made on or before the date of the primary. 11 CFR § 110.1(2)(ii)(A). Pursuant to the regulations, the undesignated \$500.00 contribution of May 20, 1981 is properly considered a contribution for the primary election of August 1982. In all respects, the parties consistently treated the contribution as a contribution for the primary election, with the exception of ACTWU-PAC's clerical reporting error.

James R. Sasser, Friends of Jim Sasser and its treasurer correctly reported the \$500.00 as a contribution for the primary election. ACTWU-PAC considered the \$500.00 as a primary election contribution, which combined with a subsequent \$4,500.00 contribution for the primary election on October 6, 1981, met the \$5,000.00 statutory limit.^{2/} After the primary election on October 7, 1982, ACTWU-PAC made a \$5,000.00 contribution to the Sasser Campaign for the general election of November 1982. ACTWU-PAC has fully intended to and did comply with the statutory ceiling of \$5,000.00 for each election, as revealed in an overall review of the contributions to Friends of Jim Sasser.

As stated above, the identification of the May 20, 1981 contribution as a disbursement for the general election was an inadvertent clerical error corrected in the amended report submitted with this letter. (The Amended Report of Receipts and Disbursements for May 1981, Schedule B, Item I correctly identifies the \$500.00 as a contribution to the primary.) The clerical error identifying the \$500.00 as a contribution to the general election should not be dispositive of the designation of the contribution, where the conduct of the parties and the application of Federal Election Commission regulations require that it be considered a contribution to the primary election.

For the foregoing reasons, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

Very truly yours,



Joan Ruby
Assistant General Counsel

JR:hb

Enc.

cc: Arthur M. Goldberg
Barbara Carey
George Solomons
Liz Smith

^{2/} A copy of ACTWU-PAC's Report of Receipts and Disbursements for October 1981 is on file with the Federal Election Commission.

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

34 MAY 1 10:58

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Amalgamated Clothing and Textile Workers
Union Political Action Committee

Address (Number and Street)

15 UNION SQUARE

City, State and ZIP Code

New York, N.Y. 10003

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00005728

3. ☐ This committee qualified as a multicandidate committee during
this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☒ Monthly Report for May 1981

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES

☐ NO

SUMMARY

5. Covering Period 5/1/81 through 5/31/81

6. (a) Cash on hand January 1, 19 81

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 25,892.42

\$ 24,388.02

\$ 8,826.14 \$ 17,791.14

\$ 33,214.16 \$ 43,683.56

\$ 7,425.00 \$ 17,894.40

\$ 25,789.16 \$ 25,789.16

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

George Solomons

Type or Print Name of ~~XXXXX~~ ASST. TREASURER

SIGNATURE OF ~~XXXXXXXX~~ ASST. TREASURER

May 24, 1984
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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

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

FEC FORM 3X (3/80)

Exhibit #1

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

(12)

Name of Committee (in full)

Amalgamated Clothing and Textile Workers Union
Political Action Committee

Report Covering the Period

From: **5/1/81** To: **5/31/81**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees.	3,826.14	12,791.14	11(a)
(Memo Entry Unitemized \$ <u>3,826.14</u>)			
(b) Political Party Committees			11(b)
(c) Other Political Committees.			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	3,826.14	12,791.14	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.	5,000.00	5,000.00	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED.			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES			16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	8,826.14	17,791.14	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES.			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES.			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND	7,125.00	17,535.00	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E).		59.40	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES.			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE.			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees.			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees.			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)).			26(d)
27. OTHER DISBURSEMENTS	300.00	300.00	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27).	7,425.00	17,894.40	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)			29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)			34

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
 LINE NUMBER 12
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Chicago and Central States, ACTWU Political Education Committee 333 S. Ashland Chicago, ILL. 60607	Name of Employer Chicago and Central States Joint Board ACTWU 333 S. Ashland, Chi. ILL	Date (month, day, year) 5/27/81	Amount of Each Receipt this Period 5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Labor Union	Aggregate Year-to-Date-\$ 5,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			5,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Fazio Campaign Comm. Suite 1016 1346 Conn. Ave. N.W. Washington, D. C. 20036 CALIF	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	300.00
B. Full Name, Mailing Address and ZIP Code Treas. Comm. for Congressman Addabbo Addabbo Reception Fund 1120 20th St. N.W. Washington, D. C. 20036 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	250.00
C. Full Name, Mailing Address and ZIP Code Citizens for Downey Committee 153 N. Carolina Ave. S. E. Washington, D. C. 20003 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	250.00
D. Full Name, Mailing Address and ZIP Code Volunteers for Vento 401 N. Beauregard #203 Alexandria, Va. 22312 MINN.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	200.00
E. Full Name, Mailing Address and ZIP Code Citizens for Dave Obey Committee P. O. Box 1322 Wausau, Wisconsin 54401 WISC.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	200.00
F. Full Name, Mailing Address and ZIP Code Shamansky for Congress Committee P. O. Box 15668 Columbus, Ohio 43215 OHIO	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Deficit	5/7/81	125.00
G. Full Name, Mailing Address and ZIP Code Mineta for Congress Committee 900 17th St. N. W. Washington, D. C. 20006 CALIF	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/20/81	150.00
H. Full Name, Mailing Address and ZIP Code Nick J. Rahall for Congress Comm. P. O. Box 1122 Washington, D. C. 20013 W. VA.	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Deficit '76	5/20/81	150.00
I. Full Name, Mailing Address and ZIP Code Friends of Jim Sasser 116 S. 12th St. Nashville, TN. 37206 TENN.	Tickets Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/20/81	500.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
The Committee to Re-elect Senator Kennedy P.O. Box 2884 Washington, D. C. 20013 MASS.	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/22/81	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			7,125.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 67
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Doddona for Mayor 1928 Walnut Street Allentown, Pa. 18104 PENNA.	Purpose of Disbursement Tickets Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5/20/81	Amount of Each Disbursement This Period 300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			300.00



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

RECEIVED AT THE FED
6CC3124
MAY 11 11:37
MURRAY R. WILEY, President
JACK SHEINKMAN, Secretary-Treasurer
SCOTT HOYMAN, Executive Vice President

May 9, 1984

George Demouget
Office of the General Counsel
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1687

Dear Mr. Demouget:

Enclosed please find a Statement of Designation of Counsel in MUR 1687.

Respondents, George Solomons and Amalgamated Clothing and Textile Workers Union Political Action Committee (ACTWU-PAC) respectfully request a two week extension of time until June 4, 1984, to submit a response to MUR 1687. Counsel for Respondents were not apprised of this matter until late in the afternoon of May 9, 1984. Additional time is required to gather the necessary information to submit a complete response.

Very truly yours,

Joan Ruby
Joan Ruby
Assistant General Counsel

JR/mdc
enc.

cc: Arthur M. Goldberg
Barbara Jane Carey
George Solomons

VICE PRESIDENTS

JOHN ALLERUZZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES EDD. CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPAIE

BRUCE RAYNOR
CHARLES SALLEF
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

84040493273

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1687

NAME OF COUNSEL: Barbara Jane Carey and Joan Ruby

ADDRESS: ACTWU

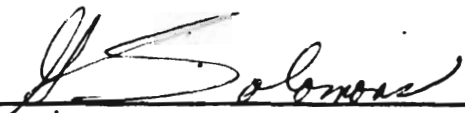
15 Union Square West

New York, N.Y. 10003

TELEPHONE: 212-242-0700

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

5/9/84
Date


Signature

RESPONDENT'S NAME: George Solomons, Individual and as Assistant
Treasurer of ACTWU-PAC,

ADDRESS: ACTWU-PAC

15 Union Square West

New York, N.Y. 10003

HOME PHONE: _____

BUSINESS PHONE: 212-242-0700

84040493279



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 Eye Street, N.W.
Washington, D.C. 20006

RE: MUR 1687
Friends of Jim Sasser

Dear Mr. Nemeroff:

The Federal Election Commission notified you on May 4, 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. We acknowledge receipt of your explanation of this matter which was dated May 17, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on May 17, 1984, determined that there is reason to believe that Friends of Jim Sasser and you, as treasurer, have violated 2 U.S.C. § 441a(f), a provision of the Act and 11 C.F.R. § 104.14(d). 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 Friends of Jim Sasser 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.

3 4 0 4 0 4 9 3 2 8 0

(19)

Mr. Michael A. Nemeroff, 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 you wish the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures
Procedures

cc: Mr. James R. Sasser

84040493291



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Joan Ruby, Esquire
Assitant General Counsel
Amalgamated Clothing and Textile Workers Union
Political Action Committee
15 Union Square West
New York, New York 10003

RE: MUR 1687
Amalgamated Clothing and
Textile Workers Union
Political Action Committee

Dear Ms. Ruby:

The Federal Election Commission notified your clients on May 4, 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 explanation of this matter which was dated May 29, 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 Amalgamated Clothing and Textile Workers Union Political Action Committee 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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

3 4 0 4 0 4 9 3 2 8 2

Ms. Joan Ruby, 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 wishes the matter to
be made public. If you have any questions, please contact Marty
Romney, the staff member assigned to this matter, at
(202)523-4000.

Sincerely,

Enclosures
Procedures

84040493285



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Robert Hart, Esquire
c/o United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107

RE: MUR 1687
Transportation Political
Education League

Dear Mr. Hart:

The Federal Election Commission notified your clients on May 4, 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 explanation of this matter which was dated May 24, 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 Transportation Political Education League 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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

84040493284

23
Mr. Robert Hart, 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 wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures
Procedures

34040493285

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

MURRAY H. FINLEY
President

SCOTT HOYMAN
Executive Vice President

RECEIVED AT THE FEC

BCC #3408

84 MAY 31 1984

May 29, 1984

CERTIFIED MAIL, RRR, #P 352 566 142

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

Re: MUR 1687, Amalgamated Clothing and Textile Workers Union Political
Action Committee; George Solomons Assistant Treasurer

Dear Mr. Demougeot:

This is in response to your letter dated May 4, 1984, notifying the Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") and George Solomons, Assistant Treasurer, that a complaint had been filed alleging that excessive campaign contributions had been made in violation of the Federal Election Campaign Act of 1971 (the "Act"). The apparent illegal contribution (\$500.00 in excess of the statutory limit), was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter.

The Complaint alleges that ACTWU-PAC contributed \$5,500.00 to the 1982 federal general election for James R. Sasser, Friends of Jim Sasser and its treasurer in violation of the \$5,000.00 statutory limit provided in 2 U.S.C. § 441(a)(2)(A). In fact, the \$500.00 in alleged excessive contributions to the general election represents a contribution of \$500.00 made in May 1981 which was intended for the primary election and inadvertently attributed to the general election in ACTWU-PAC's report to the Federal Election Commission. This clerical error has been corrected in the Amended Report of Receipts and Disbursements for May 1981, attached as Exhibit #1.

A review of all of the relevant facts demonstrates that the \$500.00 contribution of May 20, 1981 was intended for the primary election. On May 20, 1981, ACTWU-PAC made a \$500.00 contribution by check made payable to Friends of Jim Sasser for a ticket to a fundraiser dinner. (Copies of the response card and accompanying check are attached as Exhibit #2). The \$500.00 contribution was not designated in writing for any particular election but was contributed prior to the

1/ George Solomons is the Assistant Treasurer to the ACTWU-PAC and is incorrectly named as "Treasurer" in the Complaint.

VICE PRESIDENTS

JOHN ALERUZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUIO CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLIE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPAN
JIM WALBAUGH

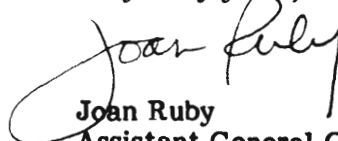
Tennessee primary election of August 5, 1982. The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election is deemed a contribution for a primary election if made on or before the date of the primary. 11 CFR § 110.1(2)(ii)(A). Pursuant to the regulations, the undesignated \$500.00 contribution of May 20, 1981 is properly considered a contribution for the primary election of August 1982. In all respects, the parties consistently treated the contribution as a contribution for the primary election, with the exception of ACTWU-PAC's clerical reporting error.

James R. Sasser, Friends of Jim Sasser and its treasurer correctly reported the \$500.00 as a contribution for the primary election. ACTWU-PAC considered the \$500.00 as a primary election contribution, which combined with a subsequent \$4,500.00 contribution for the primary election on October 6, 1981, met the \$5,000.00 statutory limit.^{2/} After the primary election on October 7, 1982, ACTWU-PAC made a \$5,000.00 contribution to the Sasser Campaign for the general election of November 1982. ACTWU-PAC has fully intended to and did comply with the statutory ceiling of \$5,000.00 for each election, as revealed in an overall review of the contributions to Friends of Jim Sasser.

As stated above, the identification of the May 20, 1981 contribution as a disbursement for the general election was an inadvertant clerical error corrected in the amended report submitted with this letter. (The Amended Report of Receipts and Disbursements for May 1981, Schedule B, Item I correctly identifies the \$500.00 as a contribution to the primary.) The clerical error identifying the \$500.00 as a contribution to the general election should not be dispositive of the designation of the contribution, where the conduct of the parties and the application of Federal Election Commission regulations require that it be considered a contribution to the primary election.

For the foregoing reasons, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

Very truly yours,



Joan Ruby
Assistant General Counsel

JR:hb
Enc.

cc: Arthur M. Goldberg
Barbara Carey
George Solomons
Liz Smith

^{2/} A copy of ACTWU-PAC's Report of Receipts and Disbursements for October 1981 is on file with the Federal Election Commission.

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

RECEIVED BY THE FEC

84 MAY 1 AID: 58

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Amalgamated Clothing and Textile Workers
Union Political Action Committee

Address (Number and Street)

15 UNION SQUARE

City, State and ZIP Code

New York, N.Y. 10003

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00005728

3. ☐ This committee qualified as a multicandidate committee during
this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☒ Monthly Report for May 1981

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES

☐ NO

SUMMARY

5. Covering Period 5/1/81 through 5/31/81

6. (a) Cash on hand January 1, 19 81

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 25,892.42

\$ 24,388.02

\$ 8,826.14 \$ 17,791.14

\$ 33,214.16 \$ 43,683.56

\$ 7,425.00 \$ 17,894.40

\$ 25,789.16 \$ 25,789.16

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

George Solomons

Type or Print Name of ~~XXXXXX~~ ASST. TREASURER

SIGNATURE OF ~~XXXXXX~~ ASST. TREASURER

May 24, 1984
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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

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

FEC FORM 3X (3/80)

Exhibit #1

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union
Political Action Committee

Report Covering the Period

From: 5/1/81

To: 5/31/81

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-To-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees.

3,826.14

12,791.14

11(a)

(Memo Entry Unitemized \$ 3,826.14)

(b) Political Party Committees.

11(b)

(c) Other Political Committees.

11(c)

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

3,826.14

12,791.14

11(d)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.

5,000.00

5,000.00

12

13. ALL LOANS RECEIVED

13

14. LOAN REPAYMENTS RECEIVED.

14

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES

16

AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

17

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

8,826.14

17,791.14

18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES.

19

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

20

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND

7,125.00

17,535.00

21

OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

59.40

22

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES.

23

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE.

24

25. LOANS MADE

25

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees.

26(a)

(b) Political Party Committees.

26(b)

(c) Other Political Committees.

26(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)).

26(d)

27. OTHER DISBURSEMENTS

300.00

300.00

27

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27).

7,425.00

17,894.40

28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

29

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

30

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

31

32. TOTAL OPERATING EXPENDITURES from Line 19

32

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

33

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

34

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
 LINE NUMBER 12
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Chicago and Central States, ACTWU Political Education Committee 333 S. Ashland Chicago, ILL. 60607	Name of Employer Chicago and Central States Joint Board ACTWU 333 S. Ashland, Chi. ILL	Date (month, day, year) 5/27/81	Amount of Each Receipt this Period 5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Labor Union		
		Aggregate Year-to-Date—\$ 5,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
		Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			5,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 2 for
LINE NUMBER 21
(Use separate schedule(s) for each
category of the Detailed
Summary Page)

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Fazio Campaign Comm. Suite 1016 1346 Conn. Ave. N.W. Washington, D. C. 20036 CALIF	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	300.00
B. Full Name, Mailing Address and ZIP Code Treas. Comm. for Congressman Addabbo Addabbo Reception Fund 1120 20th St. N.W. Washington, D. C. 20036 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	250.00
C. Full Name, Mailing Address and ZIP Code Citizens for Downey Committee 153 N. Carolina Ave. S. E. Washington, D. C. 20003 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	250.00
D. Full Name, Mailing Address and ZIP Code Volunteers for Vento 401 N. Beauregard #203 Alexandria, Va. 22312 MINN.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	200.00
E. Full Name, Mailing Address and ZIP Code Citizens for Dave Obey Committee P. O. Box 1322 Wausau, Wisconsin 54401 WISC.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/7/81	200.00
F. Full Name, Mailing Address and ZIP Code Shamansky for Congress Committee P. O. Box 15668 Columbus, Ohio 43215 OHIO	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Deficit	5/7/81	125.00
G. Full Name, Mailing Address and ZIP Code Mineta for Congress Committee 900 17th St. N. W. Washington, D. C. 20006 CALIF	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/20/81	150.00
H. Full Name, Mailing Address and ZIP Code Nick J. Rahall for Congress Comm. P. O. Box 1122 Washington, D. C. 20013 W. VA.	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Deficit '76	5/20/81	150.00
I. Full Name, Mailing Address and ZIP Code Friends of Jim Sasser 116 S. 12th St. Nashville, TN. 37206 TENN.	Tickets Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/20/81	500.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
The Committee to Re-elect Senator Kennedy P.O. Box 2884 Washington, D. C. 20013 MASS.	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/22/81	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			7,125.00

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Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Doddona for Mayor 1928 Walnut Street Allentown, Pa. 18104 PENNA.	Tickets Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/20/81	300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			300.00

324

- Make checks payable to: Friends of Jim Sasser.

Paid for by Friends of Jim Davis Committee

624 3356
RECEIVED AT THE FEC

T.P.E.L.

84 MAY 29 12:11

TRANSPORTATION POLITICAL EDUCATION LEAGUE

14600 DETROIT AVENUE

• CLEVELAND, OHIO 44107-4250

FRED A. HARDIN, National Chairman
J. R. (JIM) SNYDER, National Vice Chairman
THOMAS J. MCGUIRE, National Sec. & Treas.

A copy of our report filed with the appropriate
supervisory officer is available for purchase
from the Superintendent of Documents, U.S.
Printing Office, Washington, D. C. 20402



May 24, 1984

Federal Election Commission
Washington, DC 20463

Re: MUR 1687

*MUR 1687
Romney*

Dear Sirs:

This has reference to your letter of May 4, 1984 addressed to John H. Shepherd, Treasurer-Transportation Political Education League regarding the complaint filed with the Commission and designated as MUR 1687. John H. Shepherd retired as Treasurer of the Transportation Political Education League and was replaced by the undersigned. This response relates to the contributions by the Transportation Political Education League referred to in the complaint.

The records of the Transportation Political Education League indicate the following contributions made to the campaign committee of James R. Sasser:

<u>DATE OF CHECK</u>	<u>AMOUNT</u>
4/20/81	\$ 250.00
7/21/81	3,000.00
10/12/81	100.00
2/12/82	250.00
6/10/82	1,000.00
8/09/82	1,000.00

All of these checks were indicated as being primary contributions for the 1982 Primary, however, the check dated August 9, 1982 was not delivered to the campaign committee until September 13, 1982 more than a month after the August 5, 1982 Primary. This check was dated after the August 5, 1982 Primary and delivered after the August 5, 1982 Primary and should have been designated as a General Election Contribution.

The Transportation Political Education League did not intentionally violate any laws, rules or regulations and it is requested that no further action be taken on this matter. Steps are being taken to place the contribution records of the Transportation Political Education League on a computer to prevent a re-occurrence of the possible overcontribution to any candidate in a particular election cycle. It is the belief of the Transportation Political Education League that the request was inadvertently made for a primary contribution when it should have been made for a general election contribution. This is supported by the date of the check making the contribution which was after the primary and also by the fact that the check was not delivered until September 13th,

84040493295

Federal Election Commission
Page two
May 24, 1984

considerably after the primary election. There was no intentional violation of any law, rule or regulation.

Very truly yours,

Thomas J. McGuire
National Secretary and Treasurer
Transportation Political Education League

84040493296

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1687

NAME OF COUNSEL: Robert Hart

ADDRESS: c/o United Transportation Union

14600 Detroit Avenue

Cleveland, OH 44107

TELEPHONE: (216) 228-9400

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

5/23/84

Date

Thomas J. McGuire
Signature

RESPONDENT'S NAME: Transportation Political Education League

ADDRESS: c/o United Transportation Union
14600 Detroit Avenue

Cleveland, OH 44107

HOME PHONE: (216) 777-7469

BUSINESS PHONE: (216) 228-9400

84040493297



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1984

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing and Textile
Workers Union
15 Union Square
New York, N.Y. 10003

RE: MUR 1687
Amalgamated Clothing and Textile
Workers Union Political Action
Committee; and George Solomons,
Treasurer

Dear Ms. Ruby:

This is in reference to your letter dated May 9, 1984, requesting an extension of two weeks to respond to the Commission's notification letter. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on June 4, 1984.

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

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doc# 2190

SIDLEY & AUSTIN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603
DIR: 850-7000 TELEX 28-4364

2049 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
DIR: 553-6100 TELEX 18-1091

55 EAST 52ND STREET
NEW YORK, NEW YORK 10055
DIR: 486-7717 TELEX 97-1696

31 ST. JAMES'S SQUARE
LONDON, SW1Y 4JH, ENGLAND
DIR: 930-5596 TELEX 21781

1722 EYE STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE 202: 429-4000
TELEX 89-463

May 17, 1984

P.O. BOX 190
MUSCAT, SULTANATE OF OMAN
722-411 TELEX 0266

P.O. BOX 4619
DEIRA, DUBAI-U.A.E.
9714-263194 TELEX 47216

5 SHENTON WAY
SINGAPORE 0106
65 224-5000 TELEX 28754

SIDLEY & AUSTIN & NAQUIS
AHMED NESSIM STREET, 3
CAIRO, EGYPT
729-499 TELEX 93750

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

MUR 1687
Demougeot

Re: MUR 1687

Dear Mr. Demougeot:

This letter responds to the complaint filed by James Edward Antosh against Friends of Jim Sasser and its treasurers, Michael A. Nemeroff and Virginia T. Heise, during the 1982 campaign. The complaint alleges two violations. First, it asserts that Friends of Jim Sasser accepted contributions for the primary election in the amount of \$5600 from Transportation Political Education League which exceeded the contribution limit of \$5000 per election. 2 U.S.C. §441a. Second, the complaint alleges that Friends of Jim Sasser accepted contributions totalling \$5500 from the ACTWU-PAC for the 1982 general election which also exceeded the \$5000 contribution limit. 2 U.S.C. §441a.

We have reviewed our records and have concluded that Friends of Jim Sasser did not violate the contribution limit with respect to either of these contributors. The Tennessee primary occurred on August 5, 1982. The Commission's regulations provide that a contribution received prior to an election is considered a contribution for that election, unless the contributor states in writing that the contribution is intended for a different election. 11 C.F.R. 110.1(a)(2).

All of the contributions from the Transportation Political Education League, with the exception of the \$1000 contribution received September 13, 1982, were received

64040493299

George Demougeot, Esq.
May 17, 1984
Page Two

before the date of the primary and were treated as contributions for the primary election. These contributions totaled \$4600 --less than the contribution limit of \$5000.

The Transportation Political Education League also contributed \$1000 on September 13, 1982. This contribution was after the date of the primary, and Friends of Jim Sasser did not receive any letter designating this contribution for the primary election. Therefore, the Commission's regulations require that this contribution be counted toward the contribution limit for the general election. 11 C.F.R. 110.1(a)(2).^{*} The Committee's records indicate that if the \$1000 received on September 13, 1982, is counted toward the general election limit, the Transportation Political Education League did not exceed the \$5000 contribution limit for that election.

The allegation concerning contributions received from ACTWU-PAC is also without merit. The complaint indicates that the Committee accepted two contributions from ACTWU-PAC. The first contribution in the amount of \$500 was accepted on May 20, 1981, and the second contribution in the amount of \$5000 was accepted on November 3, 1982. The complaint charges that the \$500 contribution was improperly reported as a primary contribution because ACTWU-PAC designated this contribution in its report as for the general election.

As previously noted, the Commission's regulations require the Committee to treat any contribution received prior to the primary as a contribution for that election unless the contribution is designated in writing for a different election. 11 C.F.R. 110.1(a)(2). This contribution was received more than a year prior to the primary election and was not designated in writing for the general election. Accordingly, the Committee had no alternative but to report it as a primary contribution. Moreover, if this contribution is counted against the limit for the primary, the Committee did not exceed the \$5000 limit for either the primary or the general election.

^{*} Some confusion concerning this contribution apparently arose because the Committee's report, dated October 11, 1982, lists this contribution as for the primary. See the attached sheet. This inadvertent error will be corrected by filing an amendment to our report, a copy of which is hereby attached.

George Demougeot, Esq.
May 17, 1984
Page Three

In conclusion, the complaint fails to state a violation of law, and we respectfully request that it be dismissed.

Very truly yours,



Michael A. Nemeroff

Enclosure

MAN:nkw

84040493301

11-Oct-82

FRIENDS OF JIM SASSIE
 EFC LINE 110 RECEIPTS
 POLITICAL ACTION COMMITTEES
 JULY 17 THRU SEPTEMBER 30, 1982

Page - 19

PAC I.D./NAME	DATE	ELECTION	\$ THIS PERIOD
PAC I.D.: THRIFTPAC	09 30 82	General	\$ 500.00

Suite 200
 1709 New York Avenue NW
 Washington, DC 20006

AGGREGATE YTD: \$ 500.00

PAC I.D.:	09 13-82	General	\$ 3,000.00
Transportation Political	09 13-82	Primary	\$ 1,000.00

Education League
 14600 Detroit Avenue
 Cleveland, OH 44107

AGGREGATE YTD: \$ 5,250.00

PAC I.D.:	08-06-82	Primary	\$ 1,000.00
Truck Operators Non Partisan	09 30-82	General	\$ 1,000.00

Committee of the American
 Trucking Association, Inc.
 436 First Street, S. E.
 Washington, DC 20003

AGGREGATE YTD: \$ 2,000.00

PAC I.D.:	09 22-82	General	\$ 1,000.00
S.S. League Savings Association PEC			

1709 New York Avenue, NW
 Suite 101
 Washington, DC 20006

AGGREGATE YTD: \$ 1,000.00

PAC I.D.:	09 05-82	Primary	\$ 400.00
Union Planters Committee on Govt Affairs			

Post Office Box 317
 Memphis, TN

AGGREGATE YTD: \$ 600.00

Friends of Jim Sasser
C/O Michael A. Nemeroff, Treasurer
1722 Eye Street, N.W.
Washington, D.C. 20006

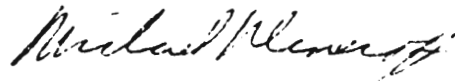
May 17, 1984

U.S. Senate Reports
Office of Public Records
Office of the Secretary
of the Senate
232 Hart Senate Office Building
Washington, D.C. 20510

Dear Sir:

Enclosed is an amendment to Friends of Jim
Sasser's October 11, 1982 report.

Very truly yours,



Michael A. Nemeroff

Enclosure

MAN:nkw

34040493303

SCHEDULE A

ITEMIZED RECEIPTS

Page 19 of 23 for
LINE NUMBER 11C
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

AMENDMENT

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

Name of Committee (in Full)

Friends of Jim Sasser

A. Full Name, Mailing Address and ZIP Code Transportation Political Education League 14600 Detroit Avenue Cleveland, Ohio 44107	Name of Employer Occupation	Date (month, day, year) 9-13-82 9-13-82	Amount of Each Receipt this Period \$3000.00 \$1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			\$4000.00
TOTAL This Period (last page this line number only)			\$4000.00

8404049304

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION

6-CC-3124
MURRAY H. PINLEY, JR. JACK SHEINKMAN
President Secretary-Treasurer

SCOTT HOYMAN
Executive Vice President

11 2:39
AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

May 9, 1984

George Demouget
Office of the General Counsel
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1687

Dear Mr. Demouget:

Enclosed please find a Statement of Designation of
Counsel in MUR 1687.

Respondents, George Solomons and Amalgamated Clothing
and Textile Workers Union Political Action Committee (ACTWU-
PAC) respectfully request a two week extension of time until
June 4, 1984, to submit a response to MUR 1687. Counsel for
Respondents were not apprised of this matter until late in
the afternoon of May 9, 1984. Additional time is required
to gather the necessary information to submit a complete
response.

Very truly yours,

Joan Ruby
Joan Ruby
Assistant General Counsel

JR/mdc
enc.

cc: Arthur M. Goldberg
Barbara Jane Carey
George Solomons

VICE PRESIDENTS

ARTHUR M. GOLDBERG
BARBARA JANE CAREY
GEORGE SOLOMONS
JAMES JACKSON

ARTHUR M. GOLDBERG
BARBARA JANE CAREY
GEORGE SOLOMONS
JAMES JACKSON

ARTHUR M. GOLDBERG
BARBARA JANE CAREY
GEORGE SOLOMONS
JAMES JACKSON

ARTHUR M. GOLDBERG
BARBARA JANE CAREY
GEORGE SOLOMONS
JAMES JACKSON

ARTHUR M. GOLDBERG
BARBARA JANE CAREY
GEORGE SOLOMONS
JAMES JACKSON

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1687

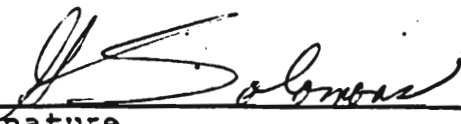
NAME OF COUNSEL: Barbara Jane Carey and Joan Ruby

ADDRESS: ACTWU
15 Union Square West
New York, N.Y. 10003

TELEPHONE: 212-242-0700

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

5/9/84
Date


Signature

RESPONDENT'S NAME: George Solomons, Individual and as Assistant
Treasurer of ACTWU-PAC,

ADDRESS: ACTWU-PAC

15 Union Square West

New York, N.Y. 10003

HOME PHONE: _____

BUSINESS PHONE: 212-242-0700

94040493306



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John H. Shepherd, Treasurer
Transportation Political
Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1687

Dear Mr. Shepherd:

This letter is to notify you that on April 30, 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 1687. 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.

3404049337



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 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 the complaint of your client, James E. Antosh, which we received on April 30, 1984, against James Sasser, Michael A. Nemeroff, Friends of Jim Sasser, Virginia T. Heise, Thomas J. McGuire, John H. Shepherd, Transportation Political Education League, Jacob Sheinkman, George Solomons and Amalgamated Clothing and Textile Workers Union 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 Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure

84040493308

34040493307

100-1157 Democrat

75 Form 3871, July 1962

C. RETURN: 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 other receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
Michael Ernest Avakian
Martha Townsend Policy Suite 400
c/o 101 N. Main Road
Springfield Va 22151

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED

☒ CERTIFIED ☐ COD

☐ EXPRESS MAIL

ARTICLE NUMBER
943487

(Signer should sign name of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

J. Fabian

5. DATE OF DELIVERY
MAY 9 1984

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

POSTMARK
(may be on reverse side)

93

• GPO: 1983-575-000

RETURN RECEIPT



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael A. Nemeroff, Treasurer
Friends of Jim Sasser
1722 Eye Street, N.W.
Washington, D.C. 20006

Re: MUR 1687

Dear Mr. Nemeroff:

This letter is to notify you that on April 30, 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 1687. 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.

8404049310

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

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

84040493311

PS Form 3811, July 1982

170427 170427

• **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 Nemeroff, Jr.
Friends of Jim Sasser
1722 Eye St. NW
Wash DC 20004

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

ARTICLE NUMBER
943483

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
D. Rose

5. **DATE OF DELIVERY**
5-8-84

POSTMARK
(may be on reverse side)

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

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**

RETURN RECEIPT

5/4/84

* GPO: 1982-378-003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Virginia T. Heise, Treasurer
Friends of Jim Sasser
1722 Eye Street, N.W.
Washington, D.C. 20006

Re: MUR 1687

Dear Ms. Heise:

This letter is to notify you that on April 30, 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 1687. 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.

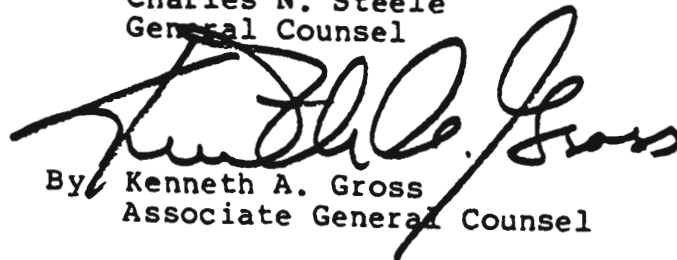
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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.

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

84040493313

MUR 11687 Demougeot

PS Form 3811, July 1982

• **GENERAL:** 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 \$11.11

3. ARTICLE ADDRESSED TO: VA Heise, Jr
Friends of Jim Sasser
1722 Eye St. NW
Wash DC 20004

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

ARTICLE NUMBER
943484

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
P. Rose

5. DATE OF DELIVERY
5-8-84

POSTMARK
(may be on reverse side)

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

5/4/84

★ GPO: 1982-579-603



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. McGuire, Treasurer
Transportation Political
Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1687

Dear Mr. McGuire:

This letter is to notify you that on April 30, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, 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 1687. 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, 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.

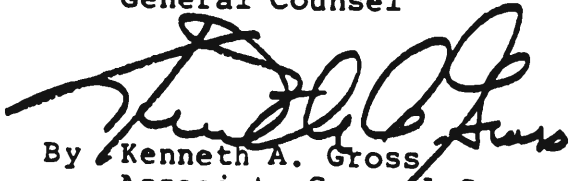
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8404049314

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

84040493315

PS Form 3811, July 1982

MUS Hall 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: Thomas McQuire
Transportation Political Education League
14600 Detroit Avenue
Cleveland OH 44107

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

ARTICLE NUMBER
942482

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
UTU Jak

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if restricted)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK
(May be for return date)
1984
MAY
17
1984

RETURN RECEIPT

5/4/84

* GPC: 1982-379-003



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jacob Sheinkman, Treasurer
Amalgamated Clothing and
Textile Workers Union
Political Action Committee
15 Union Square
New York, New York 10003

Re: MUR 1687

Dear Mr. Sheinkman:

This letter is to notify you that on April 30, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, 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 1687. 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, 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.

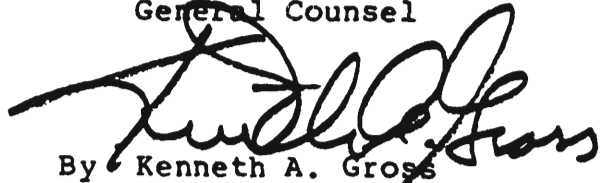
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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.

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

PS Form 3811, July 1982

MUR 1687 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: Jacob SHEINKMAN, Jr.
Amalgamated Clothing & Textile PAC
15 Union Square
New York, NY 10003

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

ARTICLE NUMBER
943498

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE INITIALS

5/4/84

* GPO: 1983-378-563



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Solomons, Treasurer
Amalgamated Clothing and
Textile Workers Union
Political Action Committee
15 Union Square
New York, New York 10003

Re: MUR 1687

Dear Mr. Solomons:

This letter is to notify you that on April 30, 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 1687. 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.

3404049318

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

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

PS Form 3811, July 1982

MUR 1687 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.)

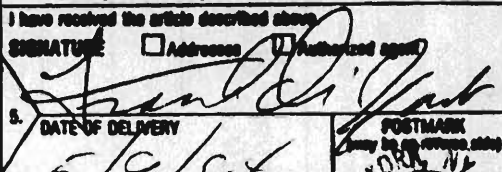
TOTAL \$

3. ARTICLE ADDRESSED TO: George Solomons, Tr
Amalgamated Clothing & Textile PAC
15 UNION SQUARE
New York, NY 10003

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

ARTICLE NUMBER

(Always obtain signature of addressee or agent)

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


5. DATE OF DELIVERY
5/9/84

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK
NEW YORK, NY
MAY 10 1984

EMPLOYEE'S INITIALS
GDC

8/4/84

• GPO: 1982-379-003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable James R. Sasser
298 Russell Senate Office
Building
Washington, D.C. 20510

Re: MUR 1687

Dear Senator Sasser:

This letter is to notify you that on April 30, 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 1687. 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.

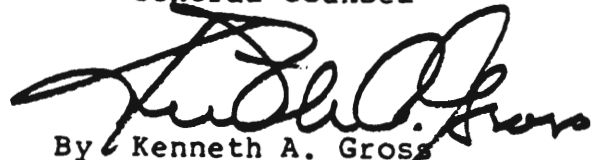
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

34040493320

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

MUR 1687 Demougeot

PS Form 3811, July 1982

• 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: Honorable James H. Sasser
298 Russell Senate Office Bldg
Wash DC 20510

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

ARTICLE NUMBER
943496

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if restricted delivery)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

5/4/84

★ GPO: 1982-379-093

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

11/16/87 Demougeot

PS Form 3871, July 1982

● 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).	
<input type="checkbox"/> Show to whom and date delivered	_____
<input checked="" type="checkbox"/> Show to whom, date, and address of delivery ..	_____
2. <input type="checkbox"/> RESTRICTED DELIVERY	_____
<small>(This restricted delivery fee is charged in addition to the return receipt fee.)</small>	
TOTAL \$ _____	
3. ARTICLE ADDRESSED TO: John Shepherd Jr. Transportation Political Education League 14600 Detroit Ave Cleveland, OH 44107	
4. TYPE OF SERVICE:	ARTICLE NUMBER
<input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED	943499
<input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD	
<input type="checkbox"/> EXPRESS MAIL	
<small>(Always obtain signature of addressee or agent)</small>	
I have received the article described above.	
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
UNITED TRANSPORTATION UNION	
5. DATE OF DELIVERY	POSTMARK <small>(may be on reverse side)</small>
6. ADDRESSEE'S ADDRESS <small>(Only if requested)</small>	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

5/4/84

* GPO: 1983-570-583

14 MAR 30 P 2:21

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

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

Complainant,)

v.)

James R. Sasser,)
Friends of Jim Sasser,)
Transportation Political)
Education League, Amalgamated)
Clothing and Textile Workers)
Union Political Action)
Committee, and all the)
Committees' treasurers,)

Respondents.)

Complaint
MUR No. 1687

34040493323

I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against former candidate for federal public office, James R. Sasser, Friends of Jim Sasser, Transportation Political Education League, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-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) during either the general or the primary election cycles.

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. James R. Sasser, 1730 Pennsylvania Avenue, N.W., Washington, D.C. 20006; 1722 Eye Street, N.W., Washington, D.C. 20006; 907 Main Street, Nashville, Tennessee 37206; 116 S. 12th Street, Nashville, Tennessee 37206; 260 Russell Senate Office Building, Washington D.C. 20510, and 405 Russell Senate Office Building, Washington, D.C. 20510.

- 84040493325
- b. Michael A. Nemeroff, individually and in his capacity as treasurer of Friends of Jim Sasser, 1730 Pennsylvania Avenue, N.W., Washington, D.C. 20006; 1722 Eye Street, N.W., Washington, D.C. 20006; 907 Main Street, Nashville, Tennessee 37206; 116 S. 12th Street, Nashville, Tennessee 37206.
 - c. Virginia T. Heise, individually and in her capacity as treasurer of Friends of Jim Sasser, 1730 Pennsylvania Avenue, N.W., Washington, D.C. 20006; 1722 Eye Street, N.W., Washington, D.C. 20006; 907 Main Street, Nashville, Tennessee 37206; 116 S. 12th Street, Nashville, Tennessee 37206.
 - d. Friends of Jim Sasser, 1730 Pennsylvania Avenue, N.W., Washington, D.C. 20006; 1722 Eye Street, N.W., Washington, D.C. 20006; 907 Main Street, Nashville, Tennessee 37206; 116 S. 12th Street, Nashville, Tennessee 37206.
 - e. John H. Shepherd, individually and in his capacity as treasurer of Transportation Political Education League, 14600 Detroit Avenue, Cleveland, Ohio 44107.
 - f. Transportation Political Education League, 14600 Detroit Avenue, Cleveland, Ohio 44107.

g. George Solomons, individually and in his capacity as treasurer of Amalgamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square, New York, New York 10003.

h. Analgamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square, New York, New York 10003.

III. LIABILITY

3. Liability may be imposed upon the candidate, James R. Sasser, Friends of Jim Sasser, Transportation Political Education League, and ACTWU-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).

IV. OVERVIEW

6. Based on Complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00

**V. VIOLATIONS OF THE F.E.C.A. BY
FRIENDS OF JIM SASSER
IN THE 1982 FEDERAL PRIMARY AND GENERAL ELECTIONS**

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, James R. Sasser, Friends of Jim Sasser and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from Transportation Political Education League in the amount of \$5,600.00 (FIVE THOUSAND SIX HUNDRED DOLLARS).

10. Candidate James R. Sasser, Friends of Jim Sasser and its treasurer, for the 1982 federal primary election, accepted contributions from Transportation Political Education League in the following amounts:

<u>Date Received</u>	<u>Amount</u>	F.E.C. Microfilm <u>Location</u>
4/20/81	\$250.00	81020042566
9/28/81	\$3,000.00	82020012639
11/13/81	\$100.00	82020012639
2/19/82	\$250.00	82020042225
6/18/82	\$1,000.00	82020090052
9/13/82	<u>\$1,000.00</u>	82020132979
Total	<u>\$5,600.00</u>	

11. A running total of the amount of contributions received from Transportation Political Education League would have put on notice James R. Sasser, Friends of Jim Sasser and its treasurer that they had received \$4,600.00 (FOUR THOUSAND SIX HUNDRED DOLLARS) on June 18, 1982. On that date, James R. Sasser, Friends of Jim Sasser and its treasurer were only permitted to accept an additional contribution of \$400.00 (FOUR HUNDRED 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.

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, James R. Sasser, Friends of Jim Sasser and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from ACTWU-PAC in the amount of \$5,500.00 (FIVE THOUSAND FIVE HUNDRED DOLLARS).

13. Candidate James R. Sasser, Friends of Jim Sasser and its treasurer, for the 1982 federal general election, accepted contributions from ACTWU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
5/20/81	\$500.00	81020042570
11/3/82	\$5,000.00	82020182396
Total	<u>\$5,500.00</u>	

14. A running total of contributions from ACTWU-PAC would have put on notice James R. Sasser, Friends of Jim Sasser and its treasurer that they had received \$500.00 (FIVE HUNDRED DOLLARS) on May 20, 1981. On that date, James R. Sasser, Friends of Jim Sasser and its treasurer were only permitted to accept an additional contribution of \$4,500.00 (FOUR THOUSAND FIVE HUNDRED 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.

15. James R. Sasser, Friends of Jim Sasser and its treasurer failed to accurately report the \$500.00 (FIVE HUNDRED DOLLAR) contribution of May 20, 1981 which was designated by ACTWU-PAC as a contribution for the general election. (See F.E.C. Microfilm #81031973553). In violation of 11 C.F.R. §104.14(d), James R. Sasser, Friends of Jim Sasser and its treasurer reported it as a contribution for the primary election. (See F.E.C. Microfilm #81020042570). F.E.C. regulation, 11 C.F.R. §104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained therein."

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**VI. VIOLATIONS OF THE F.E.C.A. BY
TRANSPORTATION POLITICAL EDUCATION LEAGUE
IN THE 1982 FEDERAL PRIMARY ELECTION**

15. 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 Transportation Political Education League, for the 1982 federal primary election contributed to candidate James R. Sasser, Friends of Jim Sasser and its treasurer a total of \$5,600.00 (FIVE THOUSAND SIX HUNDRED DOLLARS).

16. Transportation Political Education League contributed the following amounts:

a. On April 20, 1981, Transportation Political Education League contributed \$250.00 (TWO HUNDRED FIFTY DOLLARS). (See F.E.C. Microfilm #81031960457).

b. On July 21, 1981, Transportation Political Education League contributed \$3,000.00 (THREE THOUSAND DOLLARS). (See F.E.C. Microfilm #81032051245).

c. On October 12, 1981, Transportation Political Education League contributed \$100.00 (ONE HUNDRED DOLLARS). (See F.E.C. Microfilm #81032101472).

d. On February 12, 1982, Transportation Political Education League contributed \$250.00 (TWO HUNDRED FIFTY DOLLARS). (See F.E.C. Microfilm #82032254697).

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e. On June 10, 1982, Transportation Political Education League contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm #82032395252).

f. On August 9, 1982, Transportation Political Education League contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm #82032444758).

17. A running total of the amount contributed to James R. Sasser, Friends of Jim Sasser and its treasurer would have put on notice Transportation Political Education League that as of June 10, 1982, it had contributed \$4,600.00 (FOUR THOUSAND SIX HUNDRED DOLLARS) and that it could only contribute an additional \$400.00 (FOUR HUNDRED DOLLARS) if it wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$1,000.00 (ONE THOUSAND DOLLAR) contribution was made to James R. Sasser, Friends of Jim Sasser and its treasurer. This amount exceeded the statutory monetary ceiling by \$600.00 (SIX HUNDRED DOLLARS).

**VII. VIOLATIONS OF THE F.E.C.A. BY
ACTWU-PAC
IN THE 1982 FEDERAL GENERAL ELECTION**

18. 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 ACTWU-PAC for the

1982 federal general election contributed to candidate James R. Sasser, Friends of Jim Sasser and its treasurer a total of \$5,500.00 (FIVE THOUSAND FIVE HUNDRED DOLLARS).

19. ACTWU-PAC contributed the following amounts:

a. On May 20, 1981, ACTWU-PAC contributed \$500.00 (FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #81031973553).

b. On October 7, 1982, ACTWU-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm #82032531834).


20. A running total of the amount contributed to James R. Sasser, Friends of Jim Sasser and its treasurer would have put on notice ACTWU-PAC that as of May 20, 1981, it had contributed \$500.00 (FIVE HUNDRED DOLLARS) and that it could only contribute an additional \$4,500.00 (FOUR THOUSAND FIVE HUNDRED DOLLARS) if it wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$5,000.00 (FIVE THOUSAND DOLLAR) contribution was made to James R. Sasser, Friends of Jim Sasser and its treasurer. This amount exceeded the statutory monetary ceiling by \$500.00 (FIVE HUNDRED DOLLARS).

VIII. CONCLUSION

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

22. 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

April 30, 1984

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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 E. Antosh

Subscribed and sworn to before me this 23rd day of April 1984.

Denise K. Allison
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.

April 23, 1984
Date

James E. 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 # 1687

Date Filmed 1/2/85 Camera No. --- 2

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