



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 900
DATE FILMED 2/27/79 CAMERAMAN SPC





FEDERAL ELECTION COMMISSION

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

January 19, 1979

Ms. Edithe A. Fulton
Treasurer
New Jersey Education Association
Political Action Committee
180 West State Street
Trenton, New Jersey 08608

Re: MUR 900

Dear Ms. Fulton:

On December 12, 1978, the Reports Analysis Division referred your Committee to the Office of General Counsel for accepting a contribution from a labor union in violation of 2 U.S.C. § 441b. As a Division staff member explained to Ms. Duperrault, your acceptance of \$250 from the union for printed materials was illegal. However, in that your Committee promptly refunded the funds to the union, the Commission has determined that no action should be taken with reference to the violation of 2 U.S.C. § 441b.

Accordingly, the Commission intends to close its file on this matter. A copy of the Commission's certification is enclosed for your information.

Sincerely yours

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

7904010330

Ms. Edith A. Fulton
Treasurer
New Jersey Education Association
Political Action Committee
180 West State Street
Trenton, New Jersey 08608

Re: MUR 900

Dear Ms. Fulton:

On December 12, 1978, the Reports Analysis Division referred your Committee to the Office of General Counsel for accepting a contribution from a labor union in violation of 2 U.S.C. § 441b. As a Division staff member explained to Ms. Duperrault, your acceptance of \$250 from the union for printed materials was illegal. However, in that your Committee promptly refunded the funds to the union, the Commission has determined that no action should be taken with reference to the violation of 2 U.S.C. § 441b.

Accordingly, the Commission intends to close its file on this matter. A copy of the Commission's certification is enclosed for your information.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

Robert F. Farnsworth
1-18-79

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Ms. Edithe A. Fulton) MUR 900
New Jersey Education Association)
Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 17, 1979, the Commission determined by a vote of 4-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated January 12, 1979, regarding the above-captioned matter:

1. Take no action against the New Jersey Education Association Political Action Committee, and send the letter attached to the above-named report.
2. Close the file.

Voting for this determination were Commissioners Springer, Tierna, McGarry, and Thomson.

Attest:

1/18/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: Friday, 1-12-79, 3:29
Circulated on 48 hour vote basis: Monday, 1-15-79, 3:30

January 12, 1979

MEMORANDUM TO: Mary Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 900

Please have the attached First General Counsel's
Report on MUR 900 distributed to the Commission on a 48
hour tally basis.

Thank you.

79040103332

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

RECEIVED
OFFICE OF THE
COMMISSIONER SECRETARY

79 JAN 12

MUR NO. 900 P 3: 20
STAFF MEMBER(S) FurnissDATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JAN 12 1979

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Ms. Edythe A. Fulton
New Jersey Education Association Political
Action Committee

RELEVANT STATUTE: 2 U.S.C. § 441b

INTERNAL REPORTS CHECKED: Reports Analysis Division

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

A Reports Analysis Division review of the 1977 Year End Report filed by the New Jersey Education Association Political Action Committee, ("the Committee") revealed an apparent violation of 2 U.S.C. § 441b. Specifically, the report listed a receipt of \$250 from the New Jersey Education Association, constituting a possible contribution from labor treasury funds. On December 12, 1978, the Division referred the matter to the Office of General Counsel.

EVIDENCE

According to the NJEAPAC report, the New Jersey Education Association, the sponsoring union, paid the Committee \$250 on October 10, 1977, for the purchase of printed material for NJEA use. On August 11, 1978, the Reports Analysis Division informed the Committee in writing of the possible contribution from labor treasury funds and requested an explanation within 15 days.

On September 1, 1978, Ms. Margaret Duperrault representing the Committee, contacted the Division by telephone at 10 a.m. Ms. Duperrault explained that the \$250 was a reimbursement from the union for printed information about the Committee which was placed in a folder of guidelines and sent to union employees. The Division staff member replied that the union should have paid for the printing of the material in the first place. If the Committee accepted money for this material, it would be considered a vendor with the capability of raising unlimited funds for candidates. Ms. Duperrault was advised to return the \$250 to the union as soon as possible and she agreed to urge the Committee's officials to comply. The Committee's October 10 Quarterly Report, received on October 14, 1978, recorded a \$250 repayment to the union on September 14, 1978.

ANALYSIS

Though the \$250 union payment constitutes a violation of the prohibition against labor contributions contained in 2 U.S.C. § 441b, the Office of General Counsel believes that the Commission should take no action against the Committee. The size and nature of the payment, along with the Committee's prompt compliance action, indicate that no action should be taken in this matter.

RECOMMENDATIONS

1. Take no action against the New Jersey Education Association Political Action Committee, and send the attached letter.
2. Close the file.

ATTACHMENTS

1. Referral materials from RAD
2. Letter to respondent.

79010101331

7904010333;

Attachment #1

6 0 0 1 0 1 0 1 3 D
REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING RAD

306
82-198
MUR 900

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/12/78

ANALYST Beverly Brown BB

TO: William Oldaker

TEAM CHIEF Steve Mims SM

THROUGH: STAFF DIRECTOR *JP*

COMPLIANCE REVIEW Carroll Bowen CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *TJH*

CANDIDATE/COMMITTEE: NEW JERSEY EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE

TREASURER: Edithe A. Fulton

ADDRESS: 180 West State Street
Trenton, NJ 08608

AFFILIATE(S):

ALLEGATION(S):

Receipt of Prohibited
Labor Funds

CITE:

441b

ATTACHMENT(S)

2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

Initiated on 8/1 /78

ATTACHMENT

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

PERIOD COVERED FROM October 1, 1977 TO December 31, 1977

TOTAL RECEIPTS \$ 11,068 TOTAL EXPENDITURES \$ 24,070

CASH ON HAND \$ 1,096 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Request For Additional Information sent 8/1/78
Response received 10/11/78 indicating refund
of labor funds

#3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 9/1/78

#4

REASON(S) FOR REFERRAL:

ATTACHMENT

Exceeds the threshold amount for referral to OGC

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

None

Previous Referrals:

Attachment #2

79040103333

7-27-77 Edition 1-2-3-3-1
COMMITTEE INDEX OF DISCLOSURE 5/14/75 - (C)

DATE 7-27-77
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW JERSEY ENVIRONMENTAL ACTION POLITICAL ACTION COMMITTEE*	STATE ORGANIZATION AMENDMENT					24JAN77	1	77HSE/119/0926
	STATEMENT OF ORGANIZATION					11OCT77	2	77HSE/125/3744
	STATE TO QUARTERLY		25,441		17,301	1JAN77 - 31MAR77	7	77HSE/125/4257
	STATE TO QUARTERLY		12,810		7,497	1APR77 - 30JUN77	7	77HSE/125/1935
	QUARTERLY TO STATE	6,732		6,168		1JUL77 - 30SEP77	7	77HSE/125/4426
	YEAR END REPORT	11,060		24,079		1OCT77 - 31DEC77	16	77HSE/125/3902
	REQUEST FOR ADDITIONAL INFORMATION						2	78FEC/081/3106
	STATE TO QUARTERLY		2,433		2,593	1JAN78 - 31MAR78	11	78FEC/071/5342
	STATE TO QUARTERLY		42,302		22,148	1APR78 - 30JUN78	13	78FEC/080/2874
	STATE TO QUARTERLY		19,794		23,228	1JUL78 - 30SEP78	12	78FEC/083/2766
	10 DAY PRE-GENERAL		21,708		13,761	1OCT78 - 23OCT78	7	78FEC/093/1962
	30 DAY POST-GENERAL		2,478		1,295	24OCT78 - 27NOV78	8	78FEC/098/4250
	TOTAL		101,625		93,263		93	TOTAL PAGES

reviewed

(1) 100 (2) 200 (3) 300 (4) 400 (5) 500 (6) 600 (7) 700 (8) 800 (9) 900 (10) 1000 (11) 1100 (12) 1200 (13) 1300 (14) 1400 (15) 1500 (16) 1600 (17) 1700 (18) 1800 (19) 1900 (20) 2000 (21) 2100 (22) 2200 (23) 2300 (24) 2400 (25) 2500 (26) 2600 (27) 2700 (28) 2800 (29) 2900 (30) 3000 (31) 3100 (32) 3200 (33) 3300 (34) 3400 (35) 3500 (36) 3600 (37) 3700 (38) 3800 (39) 3900 (40) 4000 (41) 4100 (42) 4200 (43) 4300 (44) 4400 (45) 4500 (46) 4600 (47) 4700 (48) 4800 (49) 4900 (50) 5000 (51) 5100 (52) 5200 (53) 5300 (54) 5400 (55) 5500 (56) 5600 (57) 5700 (58) 5800 (59) 5900 (60) 6000 (61) 6100 (62) 6200 (63) 6300 (64) 6400 (65) 6500 (66) 6600 (67) 6700 (68) 6800 (69) 6900 (70) 7000 (71) 7100 (72) 7200 (73) 7300 (74) 7400 (75) 7500 (76) 7600 (77) 7700 (78) 7800 (79) 7900 (80) 8000 (81) 8100 (82) 8200 (83) 8300 (84) 8400 (85) 8500 (86) 8600 (87) 8700 (88) 8800 (89) 8900 (90) 9000 (91) 9100 (92) 9200 (93) 9300 (94) 9400 (95) 9500 (96) 9600 (97) 9700 (98) 9800 (99) 9900 (100) 10000 (101) 10100 (102) 10200 (103) 10300 (104) 10400 (105) 10500 (106) 10600 (107) 10700 (108) 10800 (109) 10900 (110) 11000 (111) 11100 (112) 11200 (113) 11300 (114) 11400 (115) 11500 (116) 11600 (117) 11700 (118) 11800 (119) 11900 (120) 12000 (121) 12100 (122) 12200 (123) 12300 (124) 12400 (125) 12500 (126) 12600 (127) 12700 (128) 12800 (129) 12900 (130) 13000 (131) 13100 (132) 13200 (133) 13300 (134) 13400 (135) 13500 (136) 13600 (137) 13700 (138) 13800 (139) 13900 (140) 14000 (141) 14100 (142) 14200 (143) 14300 (144) 14400 (145) 14500 (146) 14600 (147) 14700 (148) 14800 (149) 14900 (150) 15000 (151) 15100 (152) 15200 (153) 15300 (154) 15400 (155) 15500 (156) 15600 (157) 15700 (158) 15800 (159) 15900 (160) 16000 (161) 16100 (162) 16200 (163) 16300 (164) 16400 (165) 16500 (166) 16600 (167) 16700 (168) 16800 (169) 16900 (170) 17000 (171) 17100 (172) 17200 (173) 17300 (174) 17400 (175) 17500 (176) 17600 (177) 17700 (178) 17800 (179) 17900 (180) 18000 (181) 18100 (182) 18200 (183) 18300 (184) 18400 (185) 18500 (186) 18600 (187) 18700 (188) 18800 (189) 18900 (190) 19000 (191) 19100 (192) 19200 (193) 19300 (194) 19400 (195) 19500 (196) 19600 (197) 19700 (198) 19800 (199) 19900 (200) 20000 (201) 20100 (202) 20200 (203) 20300 (204) 20400 (205) 20500 (206) 20600 (207) 20700 (208) 20800 (209) 20900 (210) 21000 (211) 21100 (212) 21200 (213) 21300 (214) 21400 (215) 21500 (216) 21600 (217) 21700 (218) 21800 (219) 21900 (220) 22000 (221) 22100 (222) 22200 (223) 22300 (224) 22400 (225) 22500 (226) 22600 (227) 22700 (228) 22800 (229) 22900 (230) 23000 (231) 23100 (232) 23200 (233) 23300 (234) 23400 (235) 23500 (236) 23600 (237) 23700 (238) 23800 (239) 23900 (240) 24000 (241) 24100 (242) 24200 (243) 24300 (244) 24400 (245) 24500 (246) 24600 (247) 24700 (248) 24800 (249) 24900 (250) 25000 (251) 25100 (252) 25200 (253) 25300 (254) 25400 (255) 25500 (256) 25600 (257) 25700 (258) 25800 (259) 25900 (260) 26000 (261) 26100 (262) 26200 (263) 26300 (264) 26400 (265) 26500 (266) 26600 (267) 26700 (268) 26800 (269) 26900 (270) 27000 (271) 27100 (272) 27200 (273) 27300 (274) 27400 (275) 27500 (276) 27600 (277) 27700 (278) 27800 (279) 27900 (280) 28000 (281) 28100 (282) 28200 (283) 28300 (284) 28400 (285) 28500 (286) 28600 (287) 28700 (288) 28800 (289) 28900 (290) 29000 (291) 29100 (292) 29200 (293) 29300 (294) 29400 (295) 29500 (296) 29600 (297) 29700 (298) 29800 (299) 29900 (300) 30000 (301) 30100 (302) 30200 (303) 30300 (304) 30400 (305) 30500 (306) 30600 (307) 30700 (308) 30800 (309) 30900 (310) 31000 (311) 31100 (312) 31200 (313) 31300 (314) 31400 (315) 31500 (316) 31600 (317) 31700 (318) 31800 (319) 31900 (320) 32000 (321) 32100 (322) 32200 (323) 32300 (324) 32400 (325) 32500 (326) 32600 (327) 32700 (328) 32800 (329) 32900 (330) 33000 (331) 33100 (332) 33200 (333) 33300 (334) 33400 (335) 33500 (336) 33600 (337) 33700 (338) 33800 (339) 33900 (340) 34000 (341) 34100 (342) 34200 (343) 34300 (344) 34400 (345) 34500 (346) 34600 (347) 34700 (348) 34800 (349) 34900 (350) 35000 (351) 35100 (352) 35200 (353) 35300 (354) 35400 (355) 35500 (356) 35600 (357) 35700 (358) 35800 (359) 35900 (360) 36000 (361) 36100 (362) 36200 (363) 36300 (364) 36400 (365) 36500 (366) 36600 (367) 36700 (368) 36800 (369) 36900 (370) 37000 (371) 37100 (372) 37200 (373) 37300 (374) 37400 (375) 37500 (376) 37600 (377) 37700 (378) 37800 (379) 37900 (380) 38000 (381) 38100 (382) 38200 (383) 38300 (384) 38400 (385) 38500 (386) 38600 (387) 38700 (388) 38800 (389) 38900 (390) 39000 (391) 39100 (392) 3920

AND JUNIOR LEADERS' ASSOCIATION POLITICAL ACTION COMMITTEE

Name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
New Jersey Education Association 280 West Market Street Trenton, N.J. 08608			
Name and place of business	Occupation Professional Association <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$ 250.00)	10/10/77	250.00
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
Full name, mailing address and ZIP code		Date (month, day, year)	Amount of cash receipt this period
Name and place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date (> \$		
			\$ 0
			\$ 250.00

Attachment # 3

70040103341



FEDERAL ELECTION COMMISSION

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

August 11, 1978

Ms. Edythe A. Fulton, Treasurer
NEW JERSEY EDUCATION ASSOCIATION
POLITICAL ACTION COMMITTEE
180 West State Street
Trenton, NJ 08608

Dear Ms. Fulton,

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the January 31 Year End Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12



REQUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 10/1/77 THROUGH 12/31/77, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

☐ Coverage Dates ☐ omitted or ☐ incorrect

☐ Signature ☐ omitted or ☐ incorrect

☐ Summary Page Line(s) ☐ Column(s) ☐ Totals ☐ omitted or ☐ incorrect

☐ Detailed Summary (Page 2) Line(s) ☐ Column(s) ☐ Totals ☐ omitted or ☐ incorrect

☐ Schedule Totals ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☐ Date(s) ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Full Name(s) Omitted for Schedule(s) ☐ Line(s) ☐

☐ Mailing Address(es) ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Occupational Descriptions ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Principal Place(s) of Business ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Aggregate Year-to-date Totals ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Expenditure ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Receipt ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Inadequate Description of ☐ proceeds ☐ dates ☐ events ☐ location of Schedule ☐

☒ Other: Please explain the nature of receipt of \$250 from the New Jersey Education

Association on 10/18/77. In addition, for future filing, please use your correct committee identification number: C00022251.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

(Use Separate Schedules for
each numbered line)

NEW JERSEY EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Allen Envelope Co, Inc. 185 Highland Parkway Roselle, NJ 07203	Supplies	8/11/78	\$131.25
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code RFA Photo Offset Printers 705-217 Stokes Avenue Trenton, N. J. 08638	Supplies	8/11/78	\$23.10
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Elkco Associates c/o Holiday Inn PO Box 1781 North Brunswick, N. J.	Meals for meeting	8/23/78 9/9/78	\$100.00 350.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code New Jersey Education Association 180 West State Street Trenton, New Jersey 08603	Return to NJEA the amount received by NJEA PAC on 10/15/77 for supplies	9/14/78	\$250.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code New Jersey Education Association 180 West State St., Trenton N. J. 08603	Postage and paper	8/11/78	\$216.36
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing address and ZIP Code Inhouse's 70 Dover Avenue Trenton, NJ : 08619	Meals for meeting	9/25/78	\$90.54
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Parsell Alana 100 Brookview Avenue Trenton, N. J. 08619	Supplies	8/11/78	\$70.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code			
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Total of all expenditures for the month of August			0 1231.25
Total of all expenditures for the month of September			0 1231.25

707:0:0311

ATTACHMENT #4

Beverly Brown

(name of analyst)

Ms. Margaret Duperrault

(committee contact)

DATE/TIME: 9-1-78 10:00

IN REFERENCE TO: RFAI Year End 1977 - Prohibited Union Contribution

Phone Number : 609-599-4561

REMARKS:

Background: On August 11, 1978 a RFAI was sent to the above committee asking them to explain the nature of receipt of \$250 from the New Jersey Education Association (connected organization).

Ms. Duperrault called to explain that the \$250 was a reimbursement for printed information about the PAC to be placed in a folder of guidelines and sent to union employees. I explained to Ms. Duperrault that the \$250 would be considered a prohibited contribution from the union. The union, I explained, should have paid for the printing of the material in the first place. Were the Pac to receive money for these printouts, it would then be considered a vendor and there is no telling what kind of profit might be made and used towards contributions to candidates etc. I then advised Ms. Duperrault to return the \$250 to the Union and report the expenditure in their next filing. I also informed her of the committee's right to send an advisory opinion to the commission regarding their circumstances. Ms. Duperrault stated that the PAC would like to comply with the Act. She would meet with PAC officials and encourage them to return the \$250 to the Union. I suggested that she meet with her officials as soon as possible so that the money does not sit in their account and create greater problems. Ms. Duperrault stated that she would meet with officials as soon as possible.



FEDERAL ELECTION COMMISSION

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

Ms. Edithe A. Fulton
Treasurer
New Jersey Education Association
Political Action Committee
180 West State Street
Trenton, New Jersey 08608

Re: MUR 900

Dear Ms. Fulton:

On December 12, 1978, the Reports Analysis Division referred your Committee to the Office of General Counsel for accepting a contribution from a labor union in violation of 2 U.S.C. § 441b. As a Division staff member explained to Ms. Duperrault, your acceptance of \$250 from the union for printed materials was illegal. However, in that your Committee promptly refunded the funds to the union, the Commission has determined that no action should be taken with reference to the violation of 2 U.S.C. § 441b.

Accordingly, the Commission intends to close its file on this matter. A copy of the Commission's certification is enclosed for your information.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

9 9 4 0 1 0 3 3
REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

D
RAD

306
82-198
MUR 900

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/12/78

ANALYST Beverly Brown BB

TO: William Oldaker

TEAM CHIEF Steve Mims SM

THROUGH: STAFF DIRECTOR *pl*

COMPLIANCE REVIEW Carroll Bowen CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *TJH*

CANDIDATE/COMMITTEE: NEW JERSEY EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE

TREASURER: Edithe A. Fulton

ADDRESS: 180 West State Street
Trenton, NJ 08608

AFFILIATE(S):

ALLEGATION(S):
Receipt of Prohibited
Labor Funds

CITE:
441b

ATTACHMENT(S)
2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

PERIOD COVERED FROM October 1, 1977 TO December 31, 1977

TOTAL RECEIPTS \$ 11,068 TOTAL EXPENDITURES \$ 24,070

CASH ON HAND \$ 1,096 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Request For Additional Information sent 8/1/78
Response received 10/11/78 indicating refund
of labor funds

#3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 9/1/78

#4

REASON(S) FOR REFERRAL:

ATTACHMENT

Exceeds the threshold amount for referral to OGC

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

None

Previous Referrals:

None

79040103350

Attachment #1

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 HOUSE COMMISSION
 COMMITTEE ON SELECTED SUBJECTS - (C)

DATE 1978
 PAGE 1

NON-PARTY RELATED

DESCRIPTION	EXPLNDITURES DATE	GENERAL	GENERAL	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
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79040103352

Attachment #2

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Attachment #3



FEDERAL ELECTION COMMISSION

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

August 11, 1978

Ms. Edithe A. Fulton, Treasurer
NEW JERSEY EDUCATION ASSOCIATION
POLITICAL ACTION COMMITTEE
180 West State Street
Trenton, NJ 08608

Dear Ms. Fulton,

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the January 31 Year End Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12



REQUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10/1/77 THROUGH 12/31/77,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

☐ Coverage Dates ☐ omitted or ☐ incorrect

☐ Signature ☐ omitted or ☐ incorrect

☐ Summary Page Line(s) ☐ Column(s) ☐ Totals ☐ omitted or ☐ incorrect

☐ Detailed Summary (Page 2) Line(s) ☐ Column(s) ☐ Totals ☐ omitted or ☐ incorrect

☐ Schedule Totals ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☐ Date(s) ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Full Name(s) Omitted for Schedule(s) ☐ Line(s) ☐

☐ Mailing Address(es) ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Occupational Descriptions ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Principal Place(s) of Business ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Aggregate Year-to-date Totals ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Expenditure ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Receipt ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Inadequate Description of ☐ proceeds ☐ dates ☐ events ☐ location of Schedule ☐

☒ Other: Please explain the nature of receipt of \$250 from the New Jersey Education

Association on 10/18/77. In addition, for future filing, please use your correct
committee identification number: C00022251.

Your initial submission(s), together with this request for additional information, has been made available for
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.
If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530.
The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FORM 100
 10-10-73
 Federal Election Commission
 1100 K Street, N.W.
 Washington, D.C. 20004

ITEMIZED DISBURSEMENTS
 (Operating, Transfer Out, Contribution to Other,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 23a, and 27a
 of FEC FORM 13

Page 1 of 1 for
 Line Number 20 A

(Use Separate Schedules for
 each numbered line)

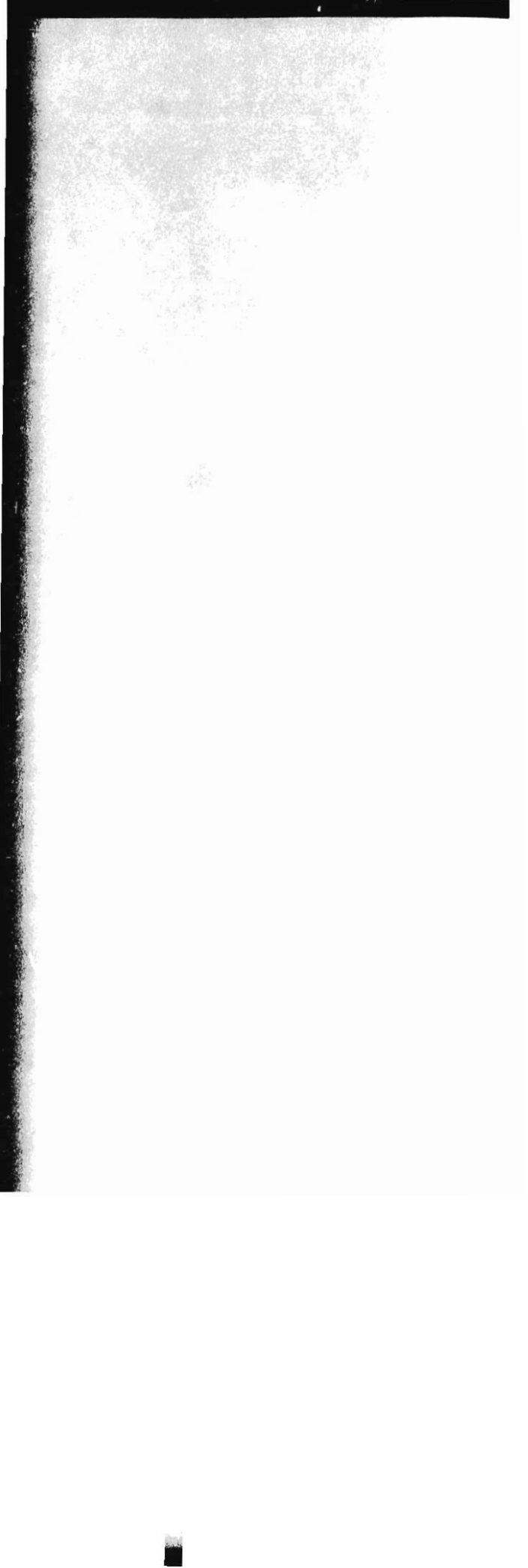
Name of Candidate or Committee in Full
NEW JERSEY EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code Allen Envelope Co., Inc. 135 Highland Parkway Reselle, NJ 07203	Particulars of Expenditure Supplies Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 8/11/78	Amount of each expend- iture this period \$131.25
Full Name, Mailing Address and ZIP Code BNA Photo Offset Printers 209-213 Stokes Avenue Trenton, N. J. 08638	Particulars of Expenditure Supplies Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 8/11/78	Amount of each expend- iture this period \$23.10
Full Name, Mailing Address and ZIP Code Elke Associates c/o Holiday Inn PO Box 1781 North Brunswick, N. J.	Particulars of Expenditure Meals for meeting Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 8/28/78 9/8/78	Amount of each expend- iture this period \$100.00 \$50.00
Full Name, Mailing Address and ZIP Code New Jersey Education Association 180 West State Street Trenton, NEW Jersey 08608	Particulars of Expenditure Return to NJEA the amount received by NJEA PAC on 10/18/77 for supplies Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 9/14/78	Amount of each expend- iture this period \$250.00
Full Name, Mailing Address and ZIP Code New Jersey Education Association 180 West State St., Trenton N. J. 08608	Particulars of Expenditure Postage and paper Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 8/11/78	Amount of each expend- iture this period \$216.36
Full Name, Mailing Address and ZIP Code Polanco's 71 Dover Avenue Trenton, NJ 08618	Particulars of Expenditure Meals for meeting Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 9/25/78	Amount of each expend- iture this period \$90.54
Full Name, Mailing Address and ZIP Code Purcell's Signs 100 Brunswick Avenue Trenton, N. J. 08611	Particulars of Expenditure Supplies Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 8/11/78	Amount of each expend- iture this period \$70.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expend- iture this period
Total of all expenditures (do not include)			0 1031.25
Total of all expenditures (do not include)			0 1231.25

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7904010333

ATTACHMENT #4



(full name of committee)

(identification number)

Beverly Brown

(name of analyst)

Ms. Margaret Duperrault

(committee contact)

DATE/TIME: 9-1-78 10:00

IN REFERENCE TO: RFAI Year End 1977 - Prohibited Union Contribution

Phone Number : 609-599-4561

REMARKS:

Background: On August 11, 1978 a RFAI was sent to the above committee asking them to explain the nature of receipt of \$250 from the New Jersey Education Association (connected organization).

Ms. Duperrault called to explain that the \$250 was a reimbursement for printed information about the PAC to be placed in a folder of guidelines and sent to union employees. I explained to Ms. Duperrault that the \$250 would be considered a prohibited contribution from the union. The union, I explained, should have paid for the printing of the material in the first place. Were the Pac to receive money for these printouts, it would then be considered a vendor and there is no telling what kind of profit might be made and used towards contributions to candidates etc. I then advised Ms. Duperrault to return the \$250 to the Union and report the expenditure in their next filing. I also informed her of the committee's right to send an advisory opinion to the commission regarding their circumstances. Ms. Duperrault stated that the PAC would like to comply with the Act. She would meet with PAC officials and encourage them to return the \$250 to the Union. I suggested that she meet with her officials as soon as possible so that the money does not sit in their account and create greater problems. Ms. Duperrault stated that she would meet with officials as soon as possible.



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 900

DATE FILMED 2/27/79

CAMERAMAN BPC

