



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 1482

Date Filmed 8/16/83 Camera No. --- 3

Cameraman JRL

FEDERAL ELECTION COMMISSION

Routing slips, internal memos, conciliation material
duplicate correspondence and attachments

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

Signed

f. kagan

Date

7-20-83

FEC 9-21-77

83040414470

8 3 0 4 0 4 1 4 4 7 1

Frances B. Hogan
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
The Friends of Loehr
Committee
AFSCME-PEOPLE

MUR 1482

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 22, 1983 the Commission decided by a vote of 6-0 to take the following actions in MUR 1482:

1. Accept the signed conciliation agreements in the above-captioned matters as submitted with the General Counsel's June 17, 1983 Memorandum to the Commission.
2. Close the file.

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

Attest:

6/22/83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

6-17-83, 12:17
6-20-83, 11:00

83040414472



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1983

Louis J. Andrew, Jr., Esquire
Andrew Law Offices, S.C.
P.O. Box 147
Ford Du Lac, Wisconsin 54935-0142

RE: MUR 1482

Dear Mr. Andrew:

This is in reference to the complaint you filed with the Commission on October 8, 1982, concerning the Loehr for Congress Committee.

After conducting an investigation in this matter, the Commission determined there was reason to believe that the Loehr for Congress Committee and AFSCME - PEOPLE violated 2 U.S.C. § 441d(a)(2), a provision of the Federal Election Campaign Act of 1971, as amended. On June 22, 1983, conciliation agreements signed by the respondents were accepted by the Commission, thereby concluding the matter. Copies of these agreements are enclosed for your information.

The file number in this matter is MUR 1482. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreements

83040414473



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 27, 1983

Walter F. Gregorski, Esquire
Dewane, Gregorski, Dewane and
Kummer
1114 South Eighth Street
P.O. Box 606
Manitowac, Wisconsin 54220

RE: MUR 1482

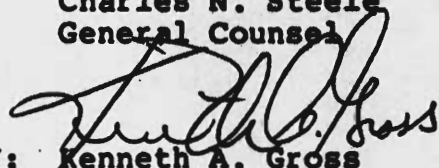
Dear Mr. Gregorski:

On June 22, 1983, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441d(a)(2), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040414474

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
The Friends of Loehr
Committee

NUR 1482

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Barbara Pollei, campaign manager for Thomas E. Petri (6/WI). An investigation was conducted, and reason to believe was found that The Friends of Loehr Committee (Respondent) violated 2 U.S.C. § 441d(a)(2) by broadcasting radio ads which did not state that such ads were paid by the Association of State, County and Municipal Employees; Public Employees Organized to Promote Legislative Equality on behalf of the Loehr Committee.

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

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

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

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

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

1. Respondent was the principal campaign committee for Gordon E. Loehr, 1982 candidate for the U.S. House

830414475

of Representatives from the Sixth Congressional District of Wisconsin.

2. Respondent authorized production and broadcast of a series of radio advertisements clearly advocating the election of candidate Gordon E. Loehr. Such ads were scheduled and aired prior to the primary election.

3. The radio advertisements in 2, above, were authorized by Respondent and paid by the AFSCME - PEOPLE. Payments for the ads totaled \$4,287.56.

4. The subect radio advertisements did not contain a statement that they were authorized by the Respondent committee, but paid for by other persons (i.e., AFSCME - PEOPLE).

V. Respondent failed to include the required authorization and payment statement in the advertisements in violation of 2 U.S.C. § 441d(a) (2).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred and Fifty Dollars (\$250), 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

63040414476

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

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

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

Charles N. Steele
General Counsel

June 27, 1983
Date

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

5/2/83
Date

Friends of Loehr Committee

BY: Walter F. August

ITS: attorney

83040414477

8 3 0 4 0 4 1 4 4 7 8

FRIENDS OF GORDON E. LOEHR

P. O. BOX 606 682-7731
MANITOWOC, WIS. 54220

185

May 4, 1983

79-112
780

PAY TO THE
ORDER OF

Treasurer of United States

\$ 250.00

Two Hundred and Fifty and no/100 -----DOLLARS



FIRST
NATIONAL BANK IN MANITOWOC
MANITOWOC, WISCONSIN 54220

MEMO

⑆075901134⑆ 30013258 0185

John DeLeon



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1983

Larry P. Weinberg, Esquire
AFSCME - PEOPLE
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 Seventeenth Street, N.W.
Washington, D.C. 20036

RE: MUR 1482

Dear Mr. Weinberg:

On June 22, 1983, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441d(a)(2), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040414479

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

MUR 1482

American Federation of State,
County, and Municipal
Employees; Public Employees
Organized to Promote
Legislative Equality)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Barbara Pollei, campaign manager for Thomas E. Petri (6/WI). An investigation was conducted, and reason to believe was found that AFSCME - PEOPLE (Respondent) violated 2 U.S.C. § 441d(a)(2) by making expenditures expressly advocating the election of candidate Gordon E. Loehr without stating in the communication that the ads were authorized by the Friends of Loehr Committee, but paid for by AFSCME - PEOPLE.

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

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Respondent, AFSCME - PEOPLE, is a political committee registered with the FEC.

83040414480

2. During the 1982 primary election, Respondent paid for production costs and broadcast time for a series of radio advertisements in support of congressional candidate Gordon E. Loehr (6/WI).

3. The radio advertisements in 2, above, were authorized by the Friends of Loehr Committee and paid for by Respondent. Payments for the ads totaled \$4,287.56.

4. The subject radio advertisements did not contain a statement explaining that they were authorized by the candidate's principal campaign committee, but paid for by other persons (i.e., Respondent).

V. Respondent failed to include the required authorization and payment statement in the advertisements in violation of 2 U.S.C. § 441d(a)(2).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred and Fifty Dollars (\$250), 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

83040414481

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

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

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

Charles N. Steele
General Counsel

June 27, 1983
Date

BY:

Kenneth A. Gross
Associate General Counsel

May 10, 1983
Date

AFSCME - PEOPLE

BY:

[Signature]

ITS:

Attorney

83040414482

3 0 4 0 4 1 4 4 8 3



AMERICAN FEDERATION OF STATE, COUNTY AND
MUNICIPAL EMPLOYEES-AFL-CIO

1200 K STREET, N. W., WASHINGTON, D. C. 20036

PUBLIC EMPLOYEES ORGANIZED TO PROMOTE LEGISLATIVE EQUALITY

QUALIFIED CONTRIBUTIONS COMMITTEE

1561

5/5 19 83 157 23

PAY TO THE
ORDER OF Treasurer of the United States

\$ 250.00*

Two Hundred Fifty and 00/100-----

DOLLARS



THE
TREASURY
DEPARTMENT

WASHINGTON Washington, D.C.

Gold M. F. [Signature]
[Signature]

000112000540000720 1 264 95 Br

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Friends of Loehr Committee (6/WI)) MUR 1482
American Federation of State, County)
and Municipal Employees; Public)
Employees Organized to Promote)
Legislative Equality ("P.E.O.P.L.E."))

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1482:

1. Find reason to believe that the Friends of Gordon E. Loehr Committee violated 2 U.S.C. §441d(a) (2).
2. Find reason to believe that the American Federation of State, County, and Municipal Employees; P.E.O.P.L.E. Committee violated 2 U.S.C. §441d(a) (2).
3. Approve the letters attached to the General Counsel's report dated January 13, 1983.

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

Attest:

February 2, 1983

Date

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

83040414484

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
)
The Friends of Loehr)
Committee (6/WI))
American Federation of State,)
County, and Municipal)
Employees; Public Employees)
Organized to Promote)
Legislative Equality)
("P.E.O.P.L.E."))

83 JAN 13 PM 2: 33

MUR 1482

GENERAL COUNSEL'S REPORT

I. ALLEGATIONS

The Friends of Loehr Committee ("the Loehr Committee") and the American Federation of State, County and Municipal Employees; P.E.O.P.L.E. violated 2 U.S.C. § 441d(a)(2) by broadcasting radio advertisements which did not state that such ads were paid by P.E.O.P.L.E. on behalf of the Loehr Committee.

II. FACTUAL AND LEGAL ANALYSIS

According to a complaint filed on October 8, 1982, by Barbara Pollei, campaign manager for Thomas E. Petri, the Loehr Committee ran a series of radio ads which were paid for by P.E.O.P.L.E. Complainant submitted an affidavit from a radio station vice president along with copies of advertising contracts and tapes of the aired ads to support the allegation that a violation of 2 U.S.C. § 441d(a)(2) occurred when the AFSCME committee paid for Loehr's advertisements without stating so in the radio spots. The two advertising contracts, dated September 7 and 9, 1982, which were supplied with the complaint,

83040414485

document advertising totaling \$1,795.70 apparently paid by AFSCME.

On November 1, 1982, counsel for the Friends of Gordon E. Loehr Committee responded to the complaint with copies of the Loehr Committee's 1982 October 15 Quarterly Report covering the period in question, August 26, 1982 through September 30, 1982. The Loehr Committee reported an in-kind gift from AFSCME for "radio advertising" totaling \$3,755.45. On its September Monthly report, AFSCME's national committee, P.E.O.P.L.E., reported disbursements to several radio stations for "in-kind radio time" on behalf of Gordon E. Loehr. P.E.O.P.L.E.'s report indicates that it purchased radio time for the Loehr Committee totaling \$2,849.75 for the period and \$3,445.45 for the election.

In its response to notification of the complaint, dated January 10, 1983, P.E.O.P.L.E. explains that it made in-kind contributions rather than direct contributions because its check would not have cleared in time to have the ads run prior to the election. P.E.O.P.L.E. states that, "those responsible for placing the ads either were not aware that the advertisements did not contain an appropriate disclaimer or failed to consider the implications of the combination of the purchase of this radio time by P.E.O.P.L.E. and the disclaimer which was contained in the ads."

P.E.O.P.L.E.'s response to the complaint concedes that omitting the appropriate disclaimer may constitute a "technical" violation of the Act, but the statement offers several factors

83040414486

which may mitigate the seriousness of the violation.

P.E.O.P.L.E. asserts that the "violation was merely an oversight" which did not occur in other campaigns which P.E.O.P.L.E. supported. P.E.O.P.L.E. states that no deception was involved concerning its contributions as the advertising agreements stated the source of payment. P.E.O.P.L.E. also attests that its staff is now "fully aware of the Act's requirements" so that similar problems will not recur.

III. LEGAL ANALYSIS

2 U.S.C. § 441d(a)(2) states that whenever any person makes an expenditure financing communications expressly advocating the election or defeat of a clearly identified candidate, such communication, if paid for but authorized by a candidate, an authorized political committee, or its agents, shall clearly state that the communication is paid for by such other persons and authorized by the authorized political committee.

The Loehr Committee treasurer indicated in a telephone conversation that the Loehr Committee authorized AFSCME's purchase of the radio advertising time. Both committees reported the in-kind contributions. Clearly, the communication should have stated P.E.O.P.L.E.'s payment and the Loehr Committee's authorization in accordance with the statute. 1/

1/ If P.E.O.P.L.E. paid for any production costs of the ads, such payment should have been noted in the ad. AO 1980-70. However, P.E.O.P.L.E.'s statement indicates that its in-kind contribution was limited to air time only.

83040414487

Therefore, the Office of General Counsel recommends findings of reason to believe against the Loehr Committee and P.E.O.P.L.E. for violations of 2 U.S.C. § 441d(a) (2).

IV. RECOMMENDATIONS

1. Find reason to believe that the Friends of Gordon E. Loehr Committee violated 2 U.S.C. § 441d(a) (2).
2. Find reason to believe that the American Federation of State, County and Municipal Employees; P.E.O.P.L.E. Committee violated 2 U.S.C. § 441d(a) (2).
3. Approve attached letters.

Charles N. Steele
General Counsel

83040414488
Date January 13, 1983

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

Letter from Loehr Committee counsel
Letter from P.E.O.P.L.E. counsel
Proposed letters to Respondents (2)

JOHN P. DEWANE
WALTER F. GREGORSKI
PATRICK A. DEWANE, JR.
LEE H. KUMMER

WALTER M. JOYCE
1982 - 1983
JOHN J. HEALY
1983 - 1985
PATRICK A. DEWANE
1985 - 1987

DEWANE, GREGORSKI, DEWANE & KUMMER

2114 SOUTH CROFT STREET
P. O. BOX 602
MANTOWOC, WISCONSIN 54220-0602

82 NOV 1

ALL

October 27, 1982

12 NOV 1 P3:49

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

Dear Mr. Gross:

Re: MUR 1482

Enclosed herein is the respondent's Statement of Designation of Counsel for this matter.

I can indicate on behalf of the Treasurer, John Dewane, that the radio advertisements mentioned in your letter were reported on our October 15 Quarterly Report as an in-kind contribution as is shown by the report we are enclosing.

Thank you.

Very truly yours,

DEWANE, GREGORSKI
DEWANE & KUMMER

By


Walter F. Gregorski

JD/del

Enclosures

Attachment A

83040414489

(Summary Page)

1. Name of Committee (in Full) Friends of Gordon E. Leshr	2. FEC Identification Number 10A26A
Address (Number and Street) P.O. Box 606	3. Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO
City, State and ZIP Code <input type="checkbox"/> Check if address is different than previously reported. Manitowoc, WI 54220	

4. TYPE OF REPORT

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

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

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>8-26-82</u> Through <u>9-30-82</u>		
6. Net Contributions (other than loans):		
(a) Total Contributions (other than loans) (from Line 11e)	\$ 10,833.56	\$ 12,664.56
(b) Total Contribution Refunds (from Line 20d)	\$ -0-	\$ -0-
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	\$ 10,833.56	\$ 12,664.56
7. Net Operating Expenditures:		
(a) Total Operating Expenditures (from Line 17)	\$ 8,876.92	\$ 9,451.42
(b) Total Offsets to Operating Expenditures (from Line 14)	\$ -0-	\$ -0-
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	\$ 8,876.92	\$ 9,451.42
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$ 3,213.14	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4088

John Dewane
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

11-2-82
Date

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

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

--	--	--	--	--	--	--	--	--

FEC FORM 3 (3/80)

83040414490

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

Name of Committee (in Full)

Friends of Gordon E. Loehr

Report Covering the Period:

From: **8-26-82** To: **9-30-82**

	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	\$ 422.00	\$ 2,112.00
(Memo Entry Unitemized \$ <u>422.00</u>)		
(b) Political Party Committees	-0-	100.00
(c) Other Political Committees	10,087.56	10,128.56
(d) The Candidate	324.00	324.00
(e) TOTAL CONTRIBUTIONS (other than loans)(add 11a, 11b, 11c and 11d)	10,833.56	12,664.56
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-0-	0
13. LOANS:		
(a) Made or Guaranteed by the Candidate	-0-	-0-
(b) All Other Loans	-0-	-0-
(c) TOTAL LOANS (add 13a and 13b)	-0-	-0-
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	10,833.56	12,664.56
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	8,876.92	9,451.42
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	-0-	-0-
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	-0-	-0-
(b) Of All Other Loans	-0-	-0-
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	-0-	-0-
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	-0-	-0-
21. OTHER DISBURSEMENTS	-0-	-0-
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	8,876.92	9,451.42

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 1,256.50
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 10,833.56
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 12,090.06
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 8,876.92
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 3,213.14

83040414491

ITEMIZED RECEIPTS

Page 1 of 1
 This receipt is required for each category of the Detailed Summary Page

Any information printed 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 Gordon E. Loehr

A. Full Name, Mailing Address and ZIP Code

American Federation of State,
 County and Municipal Employees
 1625 L Street, N.W.
 Washington, D.C. 20036

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

9-9-82

\$4,287.56
 in-kind

Aggregate Year-to-Date-\$ 4,287.56

B. Full Name, Mailing Address and ZIP Code

Gordon E. Loehr
 269 E. Merrill
 Fond du Lac, WI 54935

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

8-13-82

\$324.00
 In-Kind

Aggregate Year-to-Date-\$ 324.00

C. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Date (month,
 day, year)

Amount of Each
 Receipt This Period

Occupation

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) \$4,611.56

83040414492

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 LINE NUMBER
 (Use separate sheets) 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)

Friends of Gordon E. Loehr

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Fricke Printing Service 2001 S. 14th Street Manitowoc, WI 54220	Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-14-82	\$251.79
B. Full Name, Mailing Address and ZIP Code Robert Fields 393 Wettstein Fond du Lac, WI 54935	Purpose of Disbursement Construction of lawn signs Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-14-82	\$300.00
C. Full Name, Mailing Address and ZIP Code FMA Printing 20 Tayco Street Menasha, WI 54952	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-17-82	\$500.00
D. Full Name, Mailing Address and ZIP Code Aristo-Craft Press 1038 N. Main Street Oshkosh, WI 54901	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-23-82	\$308.70
E. Full Name, Mailing Address and ZIP Code American Federation of State County, Municipal Employees 1625 L Street, N.W. Washington, D.C. 20036	Purpose of Disbursement Radio advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-9-82	Amount of Each Disbursement This Period In-Kind \$4,287.56
F. Full Name, Mailing Address and ZIP Code Gordon E. Loehr 269 E. Merrill Fond du Lac, WI 54935	Purpose of Disbursement Button and Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-13-82 9-12-82	Amount of Each Disbursement This Period In-Kind \$324.00
G. Full Name, Mailing Address and ZIP Code Haber Printing P.O. Box 1064 Fond du Lac, WI 54935	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-21-82	\$400.00
H. Full Name, Mailing Address and ZIP Code FMA Printing 20 Tayco Street Menasha, WI	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-30-82	\$1,669.59
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)			\$ 8,041.64

03040414493

83040414494

Name of Beneficiary in Full Friends of Gordon S. Lohr			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Balance Outstanding at Close of This Period
Terms: Date Insured _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Balance Outstanding at Close of This Period
Terms: Date Insured _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			-0-
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

DEBTS AND OBLIGATIONS Excluding Loans

Page 1 of 1 for
LINE NUMBER
This schedule attaches
for each numbered line

Debtor or Creditor (Full Name)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
Friends of Gordon E. Lochr				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				-0-

83040414495



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1983

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 Seventeenth Street, N.W.
Washington, D.C. 20036

RE: MUR 1482

Dear Mr. Weinberg:

The Federal Election Commission notified you on November 24, 1982, of a complaint which alleges that your client has violated 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 January 10, 1983.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on February 1, 1983, determined that there is reason to believe that your client has violated 2 U.S.C. § 441d(a)(2), 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 10 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.

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.

33040414496

Letter to Larry P. Weinberg, Esquire
Page 2

If you have any questions, please contact Frances B. Hagan,
the staff member assigned to this matter, at (202) 523-4529.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosure
Procedures

83040414497



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1983

Walter F. Gregorski, Counsel
Friends of Gordon E. Loehr
P.O. Box 606
Manitowac, Wisconsin

RE: MUR 1482

Dear Mr. Gregorski:

The Federal Election Commission notified you on October 14, 1982, of a complaint which alleges that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on February 1, 1983, determined that there is reason to believe that your client has violated 2 U.S.C. § 441d(a)(2), a provision of the Act. Specifically, it appears that certain radio ads used prior to the election did not state that the advertising time and/or production costs were paid for by AFSCME's P.E.O.P.L.E. Committee and authorized by the Friends of Gordon E. Loehr.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

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.

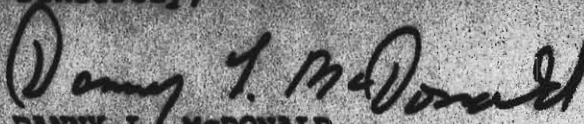
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

83040414498

Letter to Walter F. Gregorski, Counsel
Page 2

If you have any questions, please contact Frances B. Hagan,
the staff member assigned to this matter, at (202) 523-4529.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosure
Procedures
Questions

83040414499

QUESTIONS

1. Please clarify whether the in-kind contributions by P.E.O.P.L.E. included production costs as well as air time for the radio ads.

2. The P.E.O.P.L.E. Committee's 1982 September Monthly report noted radio time for the period paid on behalf of Gordon Loehr totaling \$2,849.75. The same report noted total election expenditures of \$3,445.45 on behalf of Mr. Loehr. Clarify these amounts in relation to your Committee's reported total in-kind receipt of \$3,755.45 from AFSCME-P.E.O.P.L.E.

83040414500

KIRSCHNER, WENDERS, DENPSEY, WALTERS & WILLIS

SUITE 1100

1100 17TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 775-2000

RICHARD KIRSCHNER
LARRY P. WENDERS
JOHN C. DENPSEY
JONATHAN WALTERS
DEBORAH R. WILLIS

ALAINE S. WILLIAMS
MARILYN S. MAY
ROBERT T. FENDT
ROBERT TIM BROWN
BARBARA KRAFT
MICHAEL WOLF
MARITHA WALFOORT
ROBERT M. FELLNEIMER
LEE W. JACKSON

*NOT ADMITTED IN DISTRICT OF COLUMBIA
*ALSO ADMITTED IN NEW JERSEY

PHILADELPHIA OFFICE
SUITE 1100
1400 WALNUT STREET
PHILADELPHIA, PA. 19102
215 382-6000

HARRISBURG OFFICE
CITY TOWERS BUILDING
HARRISBURG, PA. 17101
717 233-6112

January 10, 1983

Hand Delivered

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

Re: MUR 1482

Dear Mr. Steele:

Our client, Public Employees Organized to Promote Legislative Equality (PEOPLE), a political committee affiliated with the American Federation of State, County and Municipal Employees (AFSCME) has asked us to respond to the complaint in the above-captioned matter.

As we understand it, the complaint alleges that a violation of 2 USC Section 441d and Section 110.11 of the Commission's regulations occurred in connection with certain radio advertisements placed for the congressional campaign of Gordon E. Loehr in the Sixth Congressional District in Wisconsin. Specifically, the complaint alleges that radio advertisements for Gordon Loehr were broadcast on three radio stations, KFIZ, WYTL, and WOSH and that the ads stated that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer" although they were in fact paid for by AFSCME. Our client has just completed its internal investigation of these allegations, and has determined that there may in fact have been a technical violation of the provisions of the Act.

Just a few days before the September 14, 1982 primary in this congressional district, a decision was made by PEOPLE to assist the campaign of Gordon Loehr by financing the cost of broadcasting radio advertisements on several stations in the Sixth Congressional District. While this support would normally

Attachment B (1)

8 3 0 4 0 4 1 4 5 0 1

61:62 JAN 10 1983

RECEIVED
JAN 10 1983

8 3 0 4 0 4 1 4 5 0 2

have been given through a contribution made directly to the candidate's campaign committee, there was apparently concern among the staff of the PEOPLE Committee that such a check would not clear in time for the advertising to be placed prior to the primary. For this reason, the checks to purchase the radio time were made payable directly to the radio stations in question. The advertisements in questions closed with the statement that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer." Apparently, those responsible for placing the ads either were not aware that the advertisements did not contain an appropriate disclaimer or failed to consider the implications of the combination of the purchase of this radio time by PEOPLE and the disclaimer which was contained in the ads. In the course of its internal investigation, respondent also discovered that similar purchases of radio advertising time had been made in connection with this campaign at four other radio stations not referred to in the complaint. All of these expenditures were properly reported as in-kind contributions by respondent in its September report to the Commission.

While respondent concedes that the above actions may constitute a technical violation of the Act, respondent believes that no further compliance action by the Commission is required for the following reasons:

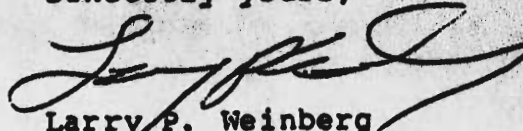
1. The violation was merely an oversight which occurred due to the urgency of the situation;
2. There was no intent to deceive the listening public, in fact, if one examines the "AGREEMENT FORM FOR POLITICAL BROADCASTS" for purchase of advertising on stations WYTL and WOSH attached to the complaint, the form itself states that the broadcast time was paid for by AFSCME, the organization with which PEOPLE is affiliated;*
3. While PEOPLE was actively involved in dozens of other races, we can find no other situation in which a similar mistake was made;

* In fact, this broadcast time was paid for by PEOPLE, not AFSCME.

4. Although substantial in-kind contributions were made by PEOPLE to the Loehr campaign, the Act's contribution limitations were not exceeded; and
5. This problem will not recur, since respondent's political staff is now fully aware of the Act's requirements and has also been made aware of ways of transferring funds to avoid problems related to clearance of checks.

While respondent regrets its error in this matter, for the reasons set forth above we urge the Commission to close this matter without further action. The undersigned is available to meet with appropriate members of the General Counsel's staff to discuss this matter further if that would be helpful.

Sincerely yours,



Larry P. Weinberg

LPW/feg

B (3)

83040414503



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Walter F. Gregorski, Counsel
Friends of Gordon E. Loehr
P.O. Box 606
Manitowac, Wisconsin

RE: MUR 1482

Dear Mr. Gregorski:

The Federal Election Commission notified you on October 14, 1982, of a complaint which alleges that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1983, determined that there is reason to believe that your client has violated 2 U.S.C. § 441d(a)(2), a provision of the Act. Specifically, it appears that certain radio ads used prior to the election did not state that the advertising time and/or production costs were paid for by AFSCME's P.E.O.P.L.E. Committee and authorized by the Friends of Gordon E. Loehr.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

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.

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.

Attachment C (1)

83040414504

Letter to Walter P. Gregorski, Counsel
Page 2

If you have any questions, please contact Frances B. Hagan,
the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosure
Procedures

83040414305

C (2)

QUESTIONS

1. Please clarify whether the in-kind contributions by P.E.O.P.L.E. included production costs as well as air time for the radio ads.

2. The P.E.O.P.L.E. Committee's 1982 September Monthly report noted radio time for the period paid on behalf of Gordon Loehr totaling \$2,849.75. The same report noted total election expenditures of \$3,445.45 on behalf of Mr. Loehr. Clarify these amounts in relation to your Committee's reported total in-kind receipt of \$3,755.45 from AFSCME-P.E.O.P.L.E.

C(3)

83040414506



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 Seventeenth Street, N.W.
Washington, D.C. 20036

RE: MUR 1482

Dear Mr. Weinberg:

The Federal Election Commission notified you on November 24, 1982, of a complaint which alleges that your client has violated 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 January 10, 1983.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1983, determined that there is reason to believe that your client has violated 2 U.S.C. § 441d(a)(2), 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 10 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.

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.

Attachment D (1)

83040414507

Letter to Larry P. Weinberg, Esquire
Page 2

If you have any questions, please contact Frances B. Hagan,
the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Enclosure
Procedures

83040414508

D (2)

600#9299

KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG

SUITE 800

1100 17TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 775-3600

RICHARD KIRSCHNER*
LARRY P. WEINBERG
JOHN C. DEMPSEY
JONATHAN WALTERS*
DEBORAH R. WILLIG

ALAINE S. WILLIAMS*
MARILYN S. MAY*
ROBERT T. FENOT*
ROBERT TIM BROWN*
BARBARA KRAFT
MICHAEL WOLF
MARTHA WALFOORT*
ROBERT M. FELLHEIMER*
LEE W. JACKSON

*NOT ADMITTED IN DISTRICT OF COLUMBIA
(ALSO ADMITTED IN NEW JERSEY)

PHILADELPHIA OFFICE
SUITE 1100
1420 WALNUT STREET
PHILADELPHIA, PA. 19102
(215) 585-5500

HARRISBURG OFFICE
CITY TOWERS BUILDING
HARRISBURG, PA. 17101
(717) 233-8013

January 10, 1983

3 JAN 10 P 3:19

Hand Delivered

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

Re: MUR 1482

Dear Mr. Steele:

Our client, Public Employees Organized to Promote Legislative Equality (PEOPLE), a political committee affiliated with the American Federation of State, County and Municipal Employees (AFSCME) has asked us to respond to the complaint in the above-captioned matter.

As we understand it, the complaint alleges that a violation of 2 USC Section 441d and Section 110.11 of the Commission's regulations occurred in connection with certain radio advertisements placed for the congressional campaign of Gordon E. Loehr in the Sixth Congressional District in Wisconsin. Specifically, the complaint alleges that radio advertisements for Gordon Loehr were broadcast on three radio stations, KFIZ, WYTL, and WOSH and that the ads stated that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer" although they were in fact paid for by AFSCME. Our client has just completed its internal investigation of these allegations, and has determined that there may in fact have been a technical violation of the provisions of the Act.

Just a few days before the September 14, 1982 primary in this congressional district, a decision was made by PEOPLE to assist the campaign of Gordon Loehr by financing the cost of broadcasting radio advertisements on several stations in the Sixth Congressional District. While this support would normally

63040414509

8 3 0 4 0 4 1 4 5 1 0

have been given through a contribution made directly to the candidate's campaign committee, there was apparently concern among the staff of the PEOPLE Committee that such a check would not clear in time for the advertising to be placed prior to the primary. For this reason, the checks to purchase the radio time were made payable directly to the radio stations in question. The advertisements in questions closed with the statement that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer." Apparently, those responsible for placing the ads either were not aware that the advertisements did not contain an appropriate disclaimer or failed to consider the implications of the combination of the purchase of this radio time by PEOPLE and the disclaimer which was contained in the ads. In the course of its internal investigation, respondent also discovered that similar purchases of radio advertising time had been made in connection with this campaign at four other radio stations not referred to in the complaint. All of these expenditures were properly reported as in-kind contributions by respondent in its September report to the Commission.

While respondent concedes that the above actions may constitute a technical violation of the Act, respondent believes that no further compliance action by the Commission is required for the following reasons:

1. The violation was merely an oversight which occurred due to the urgency of the situation;
2. There was no intent to deceive the listening public, in fact, if one examines the "AGREEMENT FORM FOR POLITICAL BROADCASTS" for purchase of advertising on stations WYTL and WOSH attached to the complaint, the form itself states that the broadcast time was paid for by AFSCME, the organization with which PEOPLE is affiliated;*
3. While PEOPLE was actively involved in dozens of other races, we can find no other situation in which a similar mistake was made;

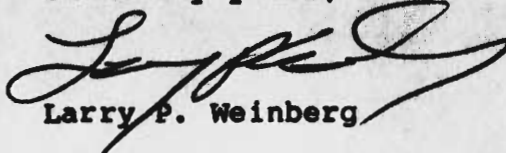
* In fact, this broadcast time was paid for by PEOPLE, not AFSCME.

Charles N. Steele, Esquire
January 10, 1983
Page 3

4. Although substantial in-kind contributions were made by PEOPLE to the Loehr campaign, the Act's contribution limitations were not exceeded; and
5. This problem will not recur, since respondent's political staff is now fully aware of the Act's requirements and has also been made aware of ways of transferring funds to avoid problems related to clearance of checks.

While respondent regrets its error in this matter, for the reasons set forth above we urge the Commission to close this matter without further action. The undersigned is available to meet with appropriate members of the General Counsel's staff to discuss this matter further if that would be helpful.

Sincerely yours,


Larry P. Weinberg

LPW/feg

83040414511



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1982

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 Seventeenth Street, N.W.
Washington, D.C. 20036

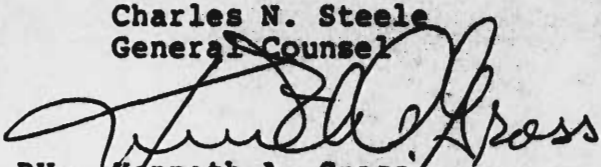
RE: MUR 1482

Dear Mr. Weinberg:

Receipt is hereby acknowledged of your December 22, 1982 letter to Thomas J. Whitehead, Esquire, of this Office, requesting an extension of time in which to respond to the complaint in the above referenced MUR. For the reasons stated in your letter, namely, that your client did not receive the complaint until December 21, 1982, and the intervening holidays, you are hereby granted an extension to January 7, 1983, in which to respond to the complaint.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

83040414512

RECEIVED AT THE FEC

Dec 22 1982

82 DEC 22 AM: 32

KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG

SUITE 608

1100 17TH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 775-8900

RICHARD KIRSCHNER
LARRY P. WEINBERG
JOHN C. DEMPSEY
JONATHAN WALTERS
DEBORAH R. WILLIG

ALAINE S. WILLIAMS
MARILYN S. MAY
ROBERT T. FENDT
ROBERT TIM BROWN
BARBARA KRAFT
MICHAEL WOLF
MARTHA WALFOORT
ROBERT M. FELLHEIMER
LEE W. JACKSON

PHILADELPHIA OFFICE
SUITE 200
1400 WALNUT STREET
PHILADELPHIA, PA. 19102
(215) 561-1111

HARRISBURG OFFICE
CITYOWNERS BUILDING
HARRISBURG, PA. 17101
(717) 333-8813

December 22, 1982

12:28

*NOT ADMITTED IN DISTRICT OF COLUMBIA
(ALSO ADMITTED IN NEW JERSEY)

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

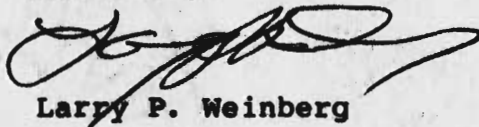
RE: MUR 1482

Dear Gentleperson:

Enclosed with this letter is a Statement of Designation of Counsel, executed by the Treasurer of Public Employees Organized to Promote Legislative Equality (PEOPLE) a political committee affiliated with the American Federation of State, County and Municipal Employees, designating our firm as counsel for the Union and its Committee in connection with this matter. Pursuant to the enclosed, all correspondence and other communications with regard to this matter should be made through our office directed to the attention of the undersigned.

Thank you for your assistance.

Sincerely,


Larry P. Weinberg

LPW/zkf

Enclosure

83040414513

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Kirschner, Weinberg, Dempsey, Walters & Willig

ADDRESS: 1100 17th St., NW Suite 800, Washington, DC 20036

TELEPHONE: 202-775-5900

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.

Date

12/22/82

Signature



NAME: William Lucy

ADDRESS: 1625 L St. NW, Washington, DC 20036

HOME PHONE:

BUSINESS PHONE: 202-452-4800

83040414514

8 3 0 4 0 4 1 0 4 5 1 5

LPW
LAW OFFICES
KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG
SUITE 800
1100 17TH STREET, N.W.
WASHINGTON, D.C. 20036



RECEIVED AT THE FEC



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

RECEIVED AT THE FED

CONF 9213

82 DEC 27 1982

LAW OFFICES
KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIS
SUITE 800

1100 17TH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 775-5000

RICHARD KIRSCHNER*
LARRY P. WEINBERG
JOHN C. DEMPSEY
JONATHAN WALTERS*
DEBORAH R. WILLIS

ALAIN E. WILLIAMS*
MARILYN S. MAY*
ROBERT T. FENDT*
ROBERT TIM BROWN*
BARBARA KRAFT
MICHAEL WOLF
MARTHA WALFOORT*
ROBERT M. FELLHEIMER*
LEE W. JACKSON

PHILADELPHIA OFFICE
SUITE 1100
1425 WALNUT STREET
PHILADELPHIA, PA. 19102
(215) 252-2000

HARRISBURG OFFICE
CITY TOWERS BUILDING
HARRISBURG, PA. 17101
(717) 232-2012

December 22, 1982

10

*NOT ADMITTED IN DISTRICT OF COLUMBIA
*ALSO ADMITTED IN NEW JERSEY

Thomas J. Whitehead, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

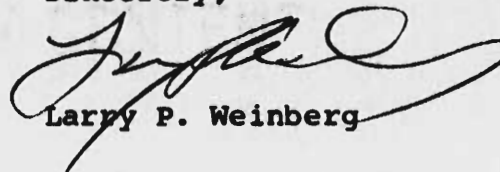
Re: MUR 1482

Dear Mr. Whitehead:

As I advised you in our telephone conversation today, we are representing the American Federation of State, County and Municipal Employees, AFL-CIO ("AFSCME") and its political action committee, PEOPLE. I am enclosing a copy of the Designation of Counsel Form, the original of which was filed with the Commission.

As I further advised you, our client did not actually have the complaint and related documents in hand until December 21, because they were sent to its post office box which is emptied only once each week. As a result, our client is uncertain as to when this correspondence was received and, therefore, unable to determine when its response is due. In addition, due to an extremely liberal leave policy during the week between Christmas and New Year's, our client operates with only a very skeleton staff during that period and, as a result, will be unable to do the background investigation necessary to prepare a response to the complaint. For these reasons, we are requesting until January 7, 1983, to respond to the complaint in this matter. From our conversation, it is my understanding that there should be no problem in granting this extension.

Sincerely,


Larry P. Weinberg

LPW:zkf

83040414516

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Kirschner, Weinberg, Dempsey, Walters & Willig

ADDRESS: 1100 17th St., NW Suite 800, Washington, DC 20036

TELEPHONE: 202-775-5900

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.

Date

12/22/82

Signature



NAME: William Lucy

ADDRESS: 1625 L St. NW, Washington, DC 20036

HOME PHONE:

BUSINESS PHONE: 202-452-4800

83040414517

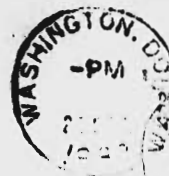
83040414518

LPW
LAW OFFICES

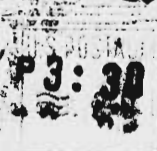
KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG

SUITE 800

1100 17TH STREET, N.W.
WASHINGTON, D.C. 20036



RECEIVED AT THE FEC



Thomas J. Whitehead, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 NOV 30 AIO: 00

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION 11-30-82

MUR NO. 1482
STAFF MEMBER Frances B. Hagan

COMPLAINANT'S NAME:

Barbara Pollei, Campaign Manager
for Thomas E. Petri (6/WI)

RESPONDENTS' NAMES:

The Friends for Loehr Committee (6/WI)
American Federation of State, County and
Municipal Employees; Public Employees
Organized to Promote Legislative
Equality (not named in complaint)

RELEVANT STATUTES:

2 U.S.C. § 441d(a)(2)
11 C.F.R. § 110.11(a)(1)(iv)

INTERNAL REPORTS CHECKED: Disclosure Reports, AO 1980-70

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The Friends for Loehr Committee ("the Loehr Committee")
violated 2 U.S.C. § 441d(a)(2) and 11 C.F.R. § 110.11(a)(1)(iv)
by broadcasting radio advertisements which did not state that
such ads were paid for by another political committee.

FACTUAL AND LEGAL ANALYSIS

On October 8, 1982, the Office of General Counsel received a
complaint filed by Barbara Pollei, campaign manager for Thomas E.
Petri, against the Friends for Loehr Committee, campaign
committee for Gordon E. Loehr. Both Mr. Petri and Mr. Loehr were
candidates for Congress from Wisconsin's Sixth District.

The complaint alleges that the Friends for Loehr Committee
violated 11 C.F.R. § 110.11(a)(1)(iv) by running radio

83040414519

advertisements which did not state that such ads were paid for by another political committee. The complaint mentions that the ads were paid for by the American Federation of State, County and Municipal Employees (AFSCME), but does not name the union as a respondent.

Our expedited report to the Commission noted that we would defer notification of AFSCME's involvement in the complaint until it was clear which of its union locals or national political committees may have purchased the ads on behalf of the Loehr Committee and until we could determine the applicable violations. 1/ Since that time, the Loehr Committee responded to the complaint notice and the in-kind expenditures in question appeared on reports filed by the Loehr Committee and by the National Committee of AFSCME - P.E.O.P.L.E.

Because the complaint mentions AFSCME, we would offer its P.E.O.P.L.E. committee the opportunity to respond to the complaint prior to recommending reason to believe. We expect to make the appropriate recommendations when AFSCME - P.E.O.P.L.E. responds to receipt of the complaint.

Charles N. Steele
General Counsel

November 27, 1982
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

1/ The complaint's wording initially raised the question of possible § 441b violations.

3040414520

JOHN P. DEWANE
WALTER F. GREGORSKI
PATRICK A. DEWANE, JR.
LEE H. KUMMER

WALTER M. JOYCE
1992 - 1992
JOHN J. HEALY
1992 - 1992
PATRICK A. DEWANE
1992 - 1992

DEWANE, GREGORSKI, DEWANE & KUMMER

1224 NORTH EIGHTH STREET
P. O. BOX 694
MANTON, WISCONSIN 54225-0694

RECEIVED AT THE FEC

604-8819

82 NOV 1 AM 10:11

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

12 NOV 1 10:49

October 27, 1982

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

Dear Mr. Gross:

Re: MUR 1482

Enclosed herein is the respondent's Statement of Designation
of Counsel for this matter.

I can indicate on behalf of the Treasurer, John Dewane,
that the radio advertisements mentioned in your letter
were reported on our October 15 Quarterly Report as an
in-kind contribution as is shown by the report we are
enclosing.

Thank you.

Very truly yours,

DEWANE, GREGORSKI
DEWANE & KUMMER

By


Walter F. Gregorski

JD/del

Enclosures

83040414521

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Walter F. Gregorski

ADDRESS: P.O. Box 606, Manitowoc, WI 54220

TELEPHONE: 414-682-7731

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.

10-25-82
Date

John Dewane
Signature

NAME: John Dewane

ADDRESS: P.O. Box 606, Manitowoc, WI 54220

HOME PHONE: 684-6372

BUSINESS PHONE: 682-7731

83040414522

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Federally Regulated Committees

(Summary Page)

1. Name of Committee (in Full) Friends of Gordon E. Leahr		2. FEC Identification Number 104264
Address (Number and Street) P.O. Box 606		3. Is this Report an Amendment? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
City, State and Zip Code Manitowoc, WI 54220		<input type="checkbox"/> Check if address is different than previously reported.

4. TYPE OF REPORT

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

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>8-26-82</u> through <u>9-30-82</u>			
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (a))		\$ 10,301.45	\$ 12,132.45
(b) Total Contribution Refunds (from Line 20 (d))		-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		10,301.45	12,132.45
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		8,344.81	8,916.31
(b) Total Offsets to Operating Expenditures (from Line 14)		-0-	-0-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		8,344.81	8,916.31
8. Cash on Hand at Close of Reporting Period (from Line 27)		3,213.14	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		-0-	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

John Dewane
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

10-7-82
Date

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

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3 (3/80)

83040414523

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

Name of Committee or Pool

Friends of Gordon E. Loehr

Report Covering the Period:

From: **8-26-82**

To: **9-30-82**

		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	\$ 422.00	2,112.00	11 (a)
	(Name Entry Unchecked \$ 422.00)			
(b)	Political Party Committees	-0-	100.00	11 (b)
(c)	Other Political Committees	9,555.45	9,596.45	11 (c)
(d)	The Candidate	324.00	324.00	11 (d)
(e)	TOTAL CONTRIBUTIONS (other than loans add 11(a), 11(b), 11(c) and 11(d))	10,301.45	12,132.45	11 (e)
12.	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-0-	-0-	12
13.	LOANS:			
(a)	Made or Guaranteed by the Candidate	-0-	-0-	13 (a)
(b)	All Other Loans	-0-	-0-	13 (b)
(c)	TOTAL LOANS (add 13 (a) and 13 (b))	-0-	-0-	13 (c)
14.	OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	14
15.	OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	15
16.	TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	10,301.45	12,132.45	16
II. DISBURSEMENTS				
17.	OPERATING EXPENDITURES	8,344.81	8,914.31	17
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	-0-	-0-	18
19.	LOAN REPAYMENTS:			
(a)	Of Loans Made or Guaranteed by the Candidate	-0-	-0-	19 (a)
(b)	Of All Other Loans	-0-	-0-	19 (b)
(c)	TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	-0-	-0-	19 (c)
20.	REFUNDS OF CONTRIBUTIONS TO:			
(a)	Individuals/Persons Other Than Political Committees	-0-	-0-	20 (a)
(b)	Political Party Committees	-0-	-0-	20 (b)
(c)	Other Political Committees	-0-	-0-	20 (c)
(d)	TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	-0-	-0-	20 (d)
21.	OTHER DISBURSEMENTS	-0-	-0-	21
22.	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	8,344.81	8,914.31	22
III. CASH SUMMARY				
23.	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 1,256.50		23
24.	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 10,301.45		24
25.	SUBTOTAL (Add Line 23 and Line 24)	\$ 11,557.45		25
26.	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 8,344.81		26
27.	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 3,213.14		27

83040414524

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1
 LINE NUMBER
 (The amount scheduled 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 Gordon E. Loehr

A. Full Name, Mailing Address and ZIP Code American Federation of State, County and Municipal Employees 1625 L Street, N.W. Washington, D.C. 20036	Name of Employer Occupation	Date (month, day, year) 9-9-82	Amount of Each Receipt This Period \$3,755.45 In-Kind
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 3,755.45		
B. Full Name, Mailing Address and ZIP Code Gordon E. Loehr 269 E. Merrill Fond du Lac, WI 54935	Name of Employer Occupation	Date (month, day, year) 8-13-82	Amount of Each Receipt This Period \$324.00 In-Kind
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 324.00		
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)			
TOTAL This Period (last page this line number only)			\$4,079.45

03040414525

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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

Name of Committee (in Full)

Friends of Gordon E. Loehr

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Fricke Printing Service 2001 S. 14th Street Manitowoc, WI 54220	Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-14-82	\$251.79
B. Full Name, Mailing Address and ZIP Code Robert Fields 393 Wettstein Fond du Lac, WI 54935	Purpose of Disbursement Construction of lawn signs Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-14-82	\$300.00
C. Full Name, Mailing Address and ZIP Code FMA Printing 20 Tayco Street Menasha, WI 54952	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-17-82	\$500.00
D. Full Name, Mailing Address and ZIP Code Aristo-Craft Press 1038 N. Main Street Oshkosh, WI 54901	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-23-82	\$308.70
E. Full Name, Mailing Address and ZIP Code American Federation of State, County, Municipal Employees 1625 L Street, N.W. Washington, D.C. 20036	Purpose of Disbursement Radio Advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-9-82	\$3,755.45 In-kind
F. Full Name, Mailing Address and ZIP Code Gordon E. Loehr 269 E. Merrill Fond du Lac, WI 54935	Purpose of Disbursement Button and Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-13-82 9-12-82	\$324.00 In-kind
G. Full Name, Mailing Address and ZIP Code Haber Printing P.O. Box 1064 Fond du Lac, WI 54935	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-21-82	\$400.00
H. Full Name, Mailing Address and ZIP Code FMA Printing 20 Tayco Street Menasha, WI	Purpose of Disbursement Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9-30-82	\$1,669.59
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)			\$7,509.53

03040414526

Name of Guarantor (if full) Friends of Gordon E. Loehr				
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Inured _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Inured _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				-0-
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

83040414527

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Debtor or Creditor Friends of Gordon E. Lochr	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING DEBTS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				-0-

83040414528

8304041452

LAW OFFICES OF

DEWANE, GREGORSKI, DEWANE & KUMMER

1114 SOUTH EIGHTH STREET

P. O. BOX 606

MANITOWOC, WISCONSIN 54220-0606

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



RECEIVED THE FEC



GCC#9299

LAW OFFICES
KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG

SUITE 900
1160 17TH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 775-5900

RICHARD KIRSCHNER*
LARRY P. WEINBERG
JOHN C. DEMPSEY
JONATHAN WALTERS*
DEBORAH R. WILLIG

ALAINE S. WILLIAMS*
MARILYN S. MAY*
ROBERT T. FENDT*
ROBERT TIM BROWN*
BARBARA KRAFT
MICHAEL WOLF
MARTHA WALFOORT*
ROBERT M. FELLHEIMER*
LEE W. JACKSON

*NOT ADMITTED IN DISTRICT OF COLUMBIA
†ALSO ADMITTED IN NEW JERSEY

PHILADELPHIA OFFICE
SUITE 1100
1425 WALNUT STREET
PHILADELPHIA, PA. 19102
(215) 565-5900

HARRISBURG OFFICE
CITY TOWERS BUILDING
HARRISBURG, PA. 17101
(717) 233-5613

January 10, 1983

Hand Delivered

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

Re: MUR 1482

Dear Mr. Steele:

Our client, Public Employees Organized to Promote Legislative Equality (PEOPLE), a political committee affiliated with the American Federation of State, County and Municipal Employees (AFSCME) has asked us to respond to the complaint in the above-captioned matter.

As we understand it, the complaint alleges that a violation of 2 USC Section 441d and Section 110.11 of the Commission's regulations occurred in connection with certain radio advertisements placed for the congressional campaign of Gordon E. Loehr in the Sixth Congressional District in Wisconsin. Specifically, the complaint alleges that radio advertisements for Gordon Loehr were broadcast on three radio stations, KFIZ, WYTL, and WOSH and that the ads stated that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer" although they were in fact paid for by AFSCME. Our client has just completed its internal investigation of these allegations, and has determined that there may in fact have been a technical violation of the provisions of the Act.

Just a few days before the September 14, 1982 primary in this congressional district, a decision was made by PEOPLE to assist the campaign of Gordon Loehr by financing the cost of broadcasting radio advertisements on several stations in the Sixth Congressional District. While this support would normally

33 JAN 10 P3:19

RECEIVED
GENERAL COUNSEL

83040414530

8 3 0 4 0 4 1 4 5 3 1
have been given through a contribution made directly to the candidate's campaign committee, there was apparently concern among the staff of the PEOPLE Committee that such a check would not clear in time for the advertising to be placed prior to the primary. For this reason, the checks to purchase the radio time were made payable directly to the radio stations in question. The advertisements in questions closed with the statement that they were "paid for by the friends of Gordon E. Loehr, John Dewane, Treasurer." Apparently, those responsible for placing the ads either were not aware that the advertisements did not contain an appropriate disclaimer or failed to consider the implications of the combination of the purchase of this radio time by PEOPLE and the disclaimer which was contained in the ads. In the course of its internal investigation, respondent also discovered that similar purchases of radio advertising time had been made in connection with this campaign at four other radio stations not referred to in the complaint. All of these expenditures were properly reported as in-kind contributions by respondent in its September report to the Commission.

While respondent concedes that the above actions may constitute a technical violation of the Act, respondent believes that no further compliance action by the Commission is required for the following reasons:

1. The violation was merely an oversight which occurred due to the urgency of the situation;
2. There was no intent to deceive the listening public, in fact, if one examines the "AGREEMENT FORM FOR POLITICAL BROADCASTS" for purchase of advertising on stations WYTL and WOSH attached to the complaint, the form itself states that the broadcast time was paid for by AFSCME, the organization with which PEOPLE is affiliated;*
3. While PEOPLE was actively involved in dozens of other races, we can find no other situation in which a similar mistake was made;

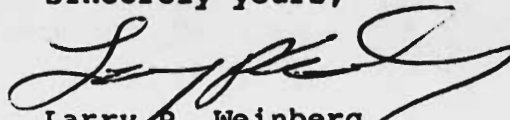
* In fact, this broadcast time was paid for by PEOPLE, not AFSCME.

Charles N. Steele, Esquire
January 10, 1983
Page 3

4. Although substantial in-kind contributions were made by PEOPLE to the Loehr campaign, the Act's contribution limitations were not exceeded; and
5. This problem will not recur, since respondent's political staff is now fully aware of the Act's requirements and has also been made aware of ways of transferring funds to avoid problems related to clearance of checks.

While respondent regrets its error in this matter, for the reasons set forth above we urge the Commission to close this matter without further action. The undersigned is available to meet with appropriate members of the General Counsel's staff to discuss this matter further if that would be helpful.

Sincerely yours,


Larry P. Weinberg

LPW/feg

83040414532



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 OCT 13 P 3: 58

October 13, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1482 - Expedited

On October 8, 1982, the Office of General Counsel received a complaint filed by Barbara Pollei, campaign manager for Thomas E. Petri, against the Friends for Loehr Committee, campaign committee for Gordon E. Loehr. Both Mr. Petri and Mr. Loehr are candidates for Congress from Wisconsin's Sixth District.

The complaint alleges that the Friends for Loehr Committee violated 11 C.F.R. § 110.11(a)(1)(iv) by running radio advertisements which did not state that such ads were paid for by another political committee.

The complainant submitted an affidavit from a radio station vice president along with copies of advertising contracts and tapes of the aired ads to support the allegation that the American Federation of State, County and Municipal Employees (AFSCME) committee paid for Loehr's advertisements without stating so in the radio spots.

The issue raised concerning 2 U.S.C. § 441d(a)(2) and 11 C.F.R. § 110.11(a)(1)(iv) may not pose complex legal questions; however, this matter cannot be resolved without further investigation and consideration of a response from the Friends of Gordon Loehr. ^{1/} On October 13, 1982, this Office

^{1/} We will contact AFSCME when the nature of its involvement in the alleged violations can be established. It is not clear which AFSCME committee may have purchased the ads. In addition, reports covering the pre-primary period in question are not due, and therefore cannot be reviewed, until October 20 and 21, 1982.

83040414533

Memorandum to the Commission
MUR 1482 - Expedited
Page 2

notified the Friends of Gordon Loehr Committee of the complaint. We anticipate a response by the end of October. At that time, we will prepare a report for Commission consideration.

83040414534



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 24, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Lucy, Treasurer
AFSCME - P.E.O.P.L.E.
P.O. Box 6587
Washington, D.C. 20036

Re: MUR 1482

Dear Mr. Lucy:

This letter is to notify you that on October 8, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1482. Please refer to this number in all future correspondence.

You were not previously notified as you were not clearly identified as a respondent in the complaint. 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.

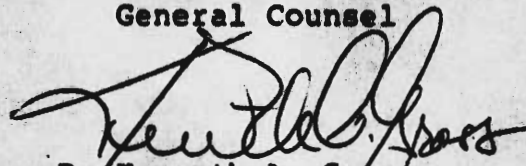
83040414535

- 2 -

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 523-4529. 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

83040414536

Enclosures

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

1482 11/24

SENDER'S 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:
William Lucy
AFSCME
Washington, D.C. 20036

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

ARTICLE NUMBER
438661

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ ADDRESS ☐ AUTHORITY

DATE OF DELIVERY

5. ADDRESSEE'S ADDRESS (Only if required)
82 DEC 10 P 1:25

7. UNABLE TO DELIVER REASON
RECEIVED AT THE FCC

8. EMPLOYEE'S INITIALS

WASHINGTON
DEC 10 1982
U.S. POST OFFICE
ST. EUSTACE

MUR # 1482
DATE 10/12/62

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

Friends of Gordon E. Loehr
c/o John DeWane, Treasurer
1719 S. 15th Street
Manitowish, Wisconsin 54220

cc: Gordon E. Loehr

83040414537



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 14, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Friends of Gordon E. Loehr
c/o John DeWane, Treasurer
1719 South 15th Street
Manitowoc, Wisconsin 54220

Re: MUR 1482

Dear Mr. DeWane:

This letter is to notify you that on October 12, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1482. 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.

83040414538

- 2 -

If you have any questions, please contact Fran Hagan the staff member assigned to this matter at (202) 523-4529. 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

83040414539

Enclosures

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

cc: Gordon E. Loehr.

1482

1482

• **SENDER'S** Complete items 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, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1982

Mr. Louis J. Andrew, Jr.
Andrew Law Offices
P.O. Box 147
Fond Du Lac, Wisconsin 54935-0147

Dear Mr. Andrew:

This letter is to acknowledge receipt of your complaint of October 4, 1982, against Mr. Gordon E. Loehr and Friends for Loehr 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 complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

83040414540

ANDREW LAW OFFICES, S.C.

Attorney At Law
P. O. BOX 147
FOND DU LAC, WISCONSIN 54935-0147

Louis J. Andrew, Jr.
Court Commissioner

153 S. Macy Street
(414) 921-6000

October 4, 1982

Federal Election Commission
1325 K. Street, N.W.
Washington, DC 20463

Gentlemen:

Re: Complaint--Congressional
Candidate Gordon E. Loehr
for Violation of Federal
Election Commission Rules
and United States Code

I am writing this letter to you as the attorney for the Petri for Congress Committee and am hereby filing a complaint against Gordon E. Loehr and/or the Friends for Loehr Committee. Both Mr. Petri and Mr. Loehr are candidates for Congress in the Sixth Congressional District for Wisconsin.

Enclosed herewith is an Affidavit from Bruce Grassman, Vice President of KFIZ Radio, located in Fond du Lac, Wisconsin, showing that Gordon E. Loehr authorized the placement of radio advertising on KFIZ which was paid for by AFSCME (American Federation of State and Municipal Employees). The agreement form for political broadcasts showed that the Loehr Committee was paying for this advertising, and a tape of the advertising enclosed showed that the Loehr Committee was paying for the advertising; but, in fact, the advertising was not paid for by the "Friends of Gordon E. Loehr, John DeWayne, Treasurer," but was paid for by AFSCME.

It is our understanding that these advertisements appeared regularly on KFIZ Radio after September 7, and also on Radio Stations WYTL, WOSH, and numerous other stations throughout this congressional district. These radio advertisements were placed in violation of Chapter 1 of the Federal Election Commission Regulations, Section 110.11, and this complaint is filed pursuant to Section 111.4 of Chapter 1 of the Federal Election Commission Regulations. A formal complaint is enclosed for your review.

83040414541

RECEIVED AT THE PER

82 OCT 8 10:32

Federal Election Commission
October 4, 1982
Page 2

If we can assist you in conducting an investigation in this matter, we would be most happy to do so.

Cordially,

ANDREW LAW OFFICES, S.C.

By:


Louis J. Andrew, Jr.

LJA/amw

Encls.

83040414542

COMPLAINT

Barbara Pollei, on oath, deposes and states:

1. That she is the campaign manager for Thomas E. Petri, a candidate for the United States Congress in the Sixth Congressional District of Wisconsin.

2. That, as such campaign manager, it has come to her attention that the opposition candidate, namely, Gordon E. Loehr, has violated the rules and regulations of the Federal Election Commission.

3. That such violation, referred to in Paragraph 2, consisted of a series of radio advertisements with radio stations KFIZ, WYTL, and WOSH, being radio stations located in the Sixth Congressional District, whereby such radio advertisements did not contain a proper disclaimer, as required by Section 110.11 of the Federal Election Commission Regulations, and, in fact, said radio advertisements contained misleading and false disclaimers.

4. That the disclaimers referred to in Paragraph 3 stated that the "Friends for Gordon E. Loehr" purchased such advertising, when, in fact, AFSCME (American Federation of State and Municipal Employees) purchased the advertising.

83040414543

WHEREFORE, this affiant asks that the Federal Election Commission take appropriate steps to enforce its regulations in the manner it finds appropriate.

Barbara Pollet
Barbara Pollet

Subscribed and sworn to before me
this 4th day of October, 1982.

Anne M. Wondra
Anne M. Wondra
Notary Public, State of Wisconsin
My Commission Expires 12/12/82

83040414544

AFFIDAVIT

STATE OF WISCONSIN)
) ss.
COUNTY OF FOND DU LAC)

Bruce Grassman, being duly sworn on oath, deposes and says:

1. That he is a Vice President of KFIZ Radio, located in Fond du Lac, Wisconsin.

2. That attached to this Affidavit is a true and correct list of radio advertisements that ran on KFIZ radio on the dates and at the times shown for Friends of Gordon E. Loehr.

3. That said radio advertisements were paid for by AFSCME and were not paid for by "Friends of Gordon E. Loehr, John DeWayne, Treasurer."

Dated this 28 day of September, 1982.

Bruce Grassman
Bruce Grassman

Subscribed and sworn to before me
this 28 day of September, 1982.

Louis J. [Signature]

Notary Public, State of Wisconsin
My Commission Expires PERMANENT COMMISSION

83040414348

AGREEMENT FORM FOR POLITICAL BROADCASTS #2: 82

STATION and LOCATION KFIZ RADIO FOND DULAC WISCONSIN SEPT 7 19 82

I, LYNN ROSINSKY (being) GORDON LOEHR
a legally qualified candidate of the DEMOCRATIC (on behalf of) 6TH DIST CONGRESS
in the SEPTEMBER (PRIMARY) political party for the office of SEPTEMBER 14, 1982
time as follows: election to be held on

LENGTH OF BROADCAST	HOOR	DAYS	TIMES PER WEEK	TOTAL NO. WEEKS	RATE
60	6A-7A	5	12	1	12.95
60	11A-1P	5	16	1	12.95
60	4P-6P	5	18	1	12.95

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST	Total Charges:
<u>SEPTEMBER 10, 1982</u>	<u>SEPTEMBER 14, 1982</u>	<u>\$595.70</u>

The broadcast time will be used by GORDON LOEHR FOR CONGRESS COMMITTEE
I represent that the advance payment for the above-described broadcast time has been furnished by
ABOVE and you are authorized to so describe that sponsor in your log
and to announce the program as paid for by such person or entity. The entity furnishing the payment, if
other than an individual person, is: () a corporation; (☒) a committee; () an association; or () other
unincorporated group. The names and offices of the chief executive officers of the entity are:

It is my understanding that: LYNN ROSINSKY/LOEHR COMMITTEE
If the time is to be used by the candidate himself within 45 days of a primary
or primary runoff election, or within 60 days of a general or special election, the above charges represent
the lowest unit charge of the station for the same class and amount of time for the same period; where the
use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned
45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station
by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications
Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on
the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the
station for any damages or liability that may ensue from the performance of the above-stated broadcasts.
For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered
to the station at least 24 HOURS before the time of the scheduled broadcasts; (note:
this last statement is not applicable if the candidate is personally using the time).

Date: SEPT 7, 1982 LYNN ROSINSKY
(Candidate, Supporter or Agent)

Accepted } by Bruce Johnson Title Vice President / Sales
Rejected }

This application, whether accepted or rejected, will be available for public inspection for a period of two
years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

CERTIFICATION

The following certification must be made with respect to all time purchases by or on behalf of federal candi-
dates (also for state and local candidates in any state which has enacted campaign spending limitations pur-
suant to section 104(c) of the Federal Election Campaign Act of 1971):

I hereby certify that _____% of the total charges paid for the use of the time purchased above, including any
agent's commission allowed the agent by the station, will not violate the above-named candidate's permissible
limit of campaign spending under the provisions of Section 104(a) of the Federal Election Campaign Act of
1971. If I am not the above-named candidate, I further certify that I have given the station a written state-
ment signed by the above-named candidate authorizing me to make the foregoing certification in his behalf.

Date: SEPTEMBER 7, 1982 LYNN ROSINSKY
(Candidate, Supporter or Agent)

AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WYTL & WOSH Sep 9 1982

I, Lynn Rosinsky (being) Gordon Loehr
(on behalf of)

a legally qualified candidate of the Democratic political party for the office of Congressman

in the Primary election to be held on Sep 14, 82, do hereby request station time as follows:

LENGTH OF BROADCAST	HOUR	DAYS	TIMES PER WEEK	TOTAL NO WEEKS	RATE
WYTL 60"	6a-12n	F-T	8x	40	1500
WOSH "	"	"	"	"	"

DATE OF FIRST BROADCAST	DATE OF LAST BROADCAST
9/10/82	9/14/82

Total Charges: \$1200.00

The broadcast time will be used by Gordon Loehr
I represent that the advance payment for the above-described broadcast time has been furnished by

AFSCME (American Federation of State and Municipal Employees)

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: () a corporation; () a committee; () an association; or () other unincorporated group. The names and offices of the chief executive officers of the entity are:

John Dewane

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 9/9/82 Lynn Rosinsky
(Candidate, Supporter or Agent)

Accepted) [Signature] by [Signature] Title President

This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (Sections 73.3526 and 73.1940).

33040414547

Authorized Signature

WOSH/WYTL
2333 Bowen St.
Oshkosh, WI 54901

September 9, 1982

Dear WOSH/WYTL:

Enclosed please find a check in the amount of \$1200 as
payment for advertising two 60 second spots for Gordon E. Loehr
Democrat for Congress from 9/10/82 through 9/14/82.

Sincerely,

John Dewane
John Dewane
Treasurer

Friends of Gordon E. Loehr



83040414549

8 3 0 4 0 4 1 4 5 5 0

ANDREW LAW OFFICES, S.C.
P.O. Box 147
Fond du Lac, WI 54935

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

CERTIFIED
P 337 239 778



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1482

Date Filmed 8/16/83 Camera No. --- 3

Cameraman JRL