



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2455

DATE FILMED 8/2/88 CAMERA NO. 4

CAMERAMAN K.A.U.

88040711167

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 4 March 1987

ANALYST: Alva E. Smith

I. COMMITTEE: International Brotherhood of Electrical  
Workers Local 98 Committee on Political  
Education  
(C00162818)  
William Gardner, Treasurer  
1807 Spring Garden Street  
Philadelphia, PA 19130

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(iii) & (iv)  
11 CFR 104.5 (c)(1)(iii) and  
(2)(i)(A) & (B)

III. BACKGROUND:

Failure to Timely File Reports

The International Brotherhood of Electrical Workers Local 98 Committee on Political Education (the "Committee") failed to timely file three (3) Reports of Receipts and Disbursements during the 1985-1986 election cycle (see chart). Two reports were filed eleven (11) and fourteen (14) calendar days late, and the 1986 30 Day Post-General Report has not been filed as of this date.

On March 12, 1986, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1985 Mid-Year and 1985 Year End Reports in a timely manner (Attachment 7). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the mailing of the Chronic Late Filing Notice, the Committee failed to file the 1986 30 Day Post-General Report.\*

IV. OTHER PENDING MATTERS INITIATED BY RAD:  
None

\*On January 5, 1987, the Commission received a copy of the Committee's State report which disclosed activity from October 21, 1986 through November 24, 1986 (Attachment 10).

88040711168

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## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Mid-Year (1/1/85-6/30/85)	6/21/85 (Attachment 2)	7/31/85	8/22/85 (Attachment 3)	8/14/85 (Attachment 4) <sup>1/</sup>
1985 Year End (7/1/85-12/31/85)	12/20/85 (Attachment 5)	1/31/86	N/A	2/11/86 (Attachment 6)
1986 30 Day Post-General <sup>2/</sup> (10/16/86-11/24/86)	9/29/86 (Attachment 8)	12/4/86	12/23/86 (Attachment 10)	not filed

<sup>1/</sup> The report was sent by certified mail on August 14, 1985; received on August 20, 1985; and appeared on the Commission data base on August 23, 1985.

<sup>2/</sup> A cover letter that was attached to the Committee's State filing indicated that "we did not know that this form should also be sent to your office."

INTERNATIONAL BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 98 COMMITTEE  
ON POLITICAL EDUCATION  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

8 8 0 4 0 7 1 1 1 7 0

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4MAR87  
PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98 COMMITTEE ON POLITICAL EDUCATION				NON-PARTY QUALIFIED	ID #C00162816	
CONNECTED ORGANIZATION: ELECTRICAL WORKERS; INT'L BROTH'D OF						
1985	MID-YEAR REPORT	26,916	7,746	1JAN85 -30JUN85	6	85FEC/386/0894
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3217
	YEAR-END	2,967	16,410	1JUL85 -31DEC85	9	86FEC/402/1782
1986	MISCELLANEOUS NOTICE FROM FEC			12MAR86	1	86FEC/404/4522
	APRIL QUARTERLY	558	7,200	1JAN86 -31MAR86	7	86FEC/412/1282
	JULY QUARTERLY	23,556	14,300	1APR86 -30JUN86	7	86FEC/422/0389
	OCTOBER QUARTERLY	75	7,800	1JUL86 -30SEP86	6	86FEC/437/2033
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1718
	NOTICE OF FAILURE TO FILE			31DEC86	1	87FEC/462/0097
1987	MISCELLANEOUS REPORT			5JAN87 TO FEC	6	87FEC/453/0539
TOTAL		54,072	0	53,456	0	45 TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 9/30/86: \$9,392

Outstanding debts owed to and by the committee as of 9/30/86: \$0



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.\*

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1985.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 1985.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee; even if such amounts were not received during the current reporting period. See 11 CFR 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

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**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

**FOR INFORMATION CALL: Information Services Division**  
202/523-4068  
800/424-9530

88040711172





FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

RQ-7

August 22, 1985

William Gardner, Treasurer  
International Brotherhood Of  
Electrical Workers Local 98  
Committee On Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130

Identification Number: C00162818

Reference: Mid-Year Report (1/1/85-6/30/85)

Dear Mr. Gardner:

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with the first name "John" being the most prominent.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

# REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

RECEIVED THE FEC

(Summary Page)

85 AUG 20 1985

ALIGN AREA

1 Name of Committee (In Full)

Local Union #98 I.B.E.W.  
Committee on Political Education

Address (Number and Street)

1719 Spring Garden Street

City, State and ZIP Code

Philadelphia, PA 19130

☐ Check here if address is different than previously reported

2 FEC Identification Number

1059 - J - 0000

3 ☐ This committee qualified as a multicandidate committee during this reporting period on \_\_\_\_\_ Date \_\_\_\_\_

4 TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☒ July 31 Mid Year Report (Non Election Year Only)☐ Monthly Report for \_\_\_\_\_☐ Twelfth day report preceding \_\_\_\_\_

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES☒ NO

## SUMMARY

5 Covering Period January 1, 1985 through June 30, 19856 (a) Cash on hand January 1, 19 85

(b) Cash on hand at Beginning of Reporting Period

(c) Total Receipts from Line 18

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

7 Total Disbursements from Line 25

8 Cash on hand at Close of Reporting Period (Subtract Line 7 from Line 6 (d))

9 Debts and Obligations Owed TO the Committee  
(Itemize on Schedule C or Schedule D)10 Debts and Obligations Owed BY the Committee  
(Itemize on Schedule C or Schedule D)COLUMN A  
This PeriodCOLUMN B  
Calendar Year to Date

	\$ 8,774.78
\$ 8,774.78	
\$ 26,916.56	\$ 26,916.56
\$ 35,691.34	\$ 35,691.34
\$ 7,746.39	\$ 7,746.39
\$ 27,944.95	\$ 27,944.95
\$ None	
\$ None	

11 I, the undersigned, have examined this Report and the supporting schedules and believe the figures are true and complete.

For further information contact:

Signed: James F. J. [illegible] Register

SIGNATURE OF TREASURER



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**CERTIFIED MAIL -  
RETURN RECEIPT REQUESTED**

**Local Union No. 98**  
International Brotherhood  
of Electrical Workers  
1719 Spring Garden Street  
Philadelphia, Pennsylvania 19130

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



**CERTIFIED**

**P 679 054 352**

**MAIL**

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 20, 1985

**WHO MUST FILE**

ALL PARTY COMMITTEES, NON-CONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration\* through December 31, 1985. For more detailed instructions, consult your campaign guide.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

**WHERE TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

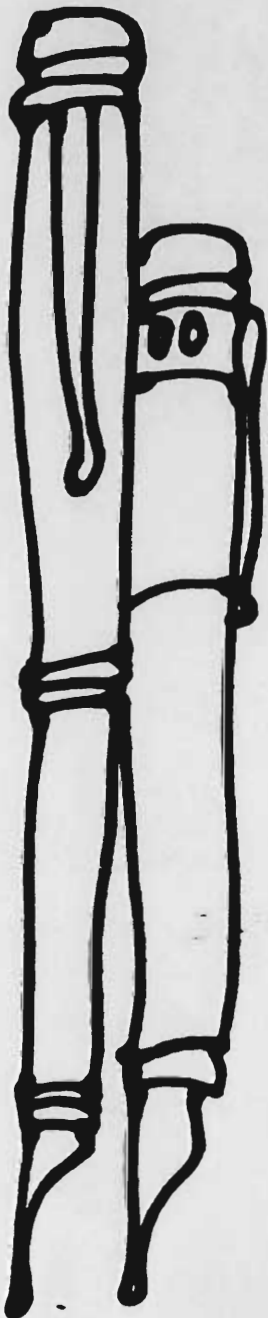
**1986 FILING REQUIREMENTS**

See the January 1986 issue of the FEC Record for filing requirements during 1986. A committee that wishes to change its reporting schedule (e.g. from semiannually in 1985 to monthly--rather than quarterly in 1986) must notify the Commission by submitting a letter with the next report due under its current reporting schedule.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Information Services Division  
202/523-4068 or 800/424-9530

33040711176



# REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

JAN 19 1985

ALIGN AREA

ALIGN AREA

## 1. Name of Committee (in Full)

LOCAL UNION #98 I.B.E.W.  
COMMITTEE ON POLITICAL EDUCATION

## Address (Number and Street)

1719 SPRING GARDEN STREET

## City, State and ZIP Code

PHILADELPHIA, PA 19130

☐ Check here if address is different than previously reported.

## 2. FEC Identification Number

C 0016 2818

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_ (Date)

## 4. TYPE OF REPORT (Check appropriate boxes)

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

☐ July 15 Quarterly Report ☒ January 31 Year End Report

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

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Event)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is the Report an Amendment?

☐ YES ☐ NO

## SUMMARY

5. Covering Period July 1, 1985 through December 31, 1985

6. (a) Cash on hand January 1, 1985

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

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

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

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

Signature of Treasurer

SIGNATURE OF TREASURER

Date

On this 27 day of January, 1985  
personally appeared \_\_\_\_\_

NOTE: Submitting this report to the Federal Election Commission may subject the person signing this report to the penalties of 2 U.S.C. § 437e.

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

FEC FORM 3 (13-80)



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

105-1

William Gardner, Treasurer  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130

**APR 12 1986**

Identification Number: C90162818

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Gardner:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year Report (1/1/85-6/30/85)	7/31/85	8/14/85
Year End Report (7/1/85-12/31/85)	1/31/86	2/11/86

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Alva Smith on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk  
Chief, Party/Non-Party Branch  
Reports Analysis Division

3373404520

# GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

September 29, 1986

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

All COMMITTEES that file quarterly that have made contributions or expenditures (including independent expenditures and coordinated party expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

**WHAT MUST BE REPORTED**

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration\* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration\* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

\*\*\*\*\*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

**WHAT MUST BE REPORTED**

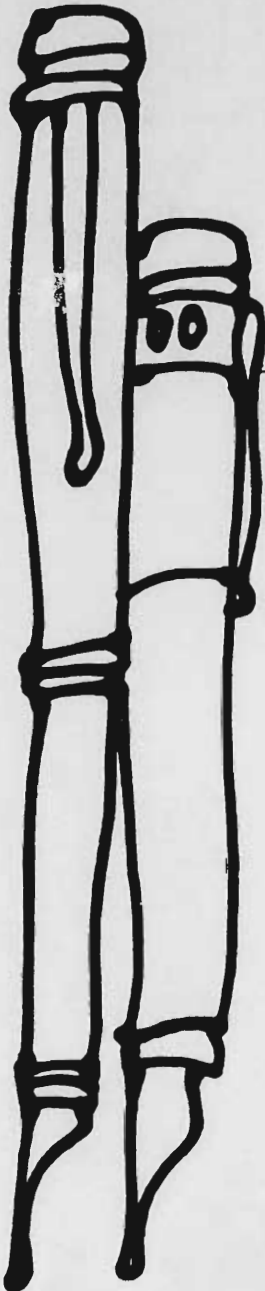
The report must disclose all financial activity from the close of books of the last report, or the date of registration\* (whichever is later), through November 24, 1986.

**WHEN TO FILE**

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

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**QUARTERLY FILERS**

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert.</u> <u>Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 <sup>1</sup> - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General <sup>2</sup>	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

**MONTHLY FILERS**

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert.</u> <u>Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 <sup>1</sup> - 09/30	10/20/86	10/20/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

\*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

**INDEPENDENT EXPENDITURES**

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X, for details.

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

<sup>1</sup>/Or from date of registration, or the close of books of the last report filed, whichever is later.

<sup>2</sup>/Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

80304071180





## FEDERAL ELECTION COMMISSION

HQ-7

WASHINGTON, D.C. 20463

December 23, 1966

William Gardner, Treasurer  
International Brotherhood of Electrical  
Workers Local 98 Committee on  
Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130

Identification Number: C00162818

Reference: 30 Day Post-General Report (through 11/24/66)

Dear Mr. Gardner:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Alva E. Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

October 23, 1988

William Gardner, Treasurer  
International Brotherhood of Electrical  
Workers Local 98 Committee on  
Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130

Identification Number: C00162818

Reference: 30 Day Post-General Report (through 11/24/86)

Dear Mr. Gardner:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. 9434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NE, Washington, DC 20461 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. 9439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Alva E. Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2400.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

87034530539



**LOCAL UNION 1719**  
**INTERNATIONAL BROTHERHOOD OF TEAMSTERS**

1719

Local Office 503-2274

Union Office 503-9991

January 5, 1987

Mr. John D. Glass  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

Dear Mr. Glass:

As Per your letter of December 23, 1986 we are enclosing a copy of Campaign an Expense Report for period 10/21/86 to 11/24/86. We did not know that this form should also be sent to your office

Fraternally yours,

*John D. Wilson*  
JOHN D. WILSON  
Financial Secretary

JW:sp  
aff-cio  
OSPEIU/14  
Encl.

87034570540

CANDIDATE

PAGE 1 OF 2  
JAN 1988

**COMMONWEALTH OF MASSACHUSETTS  
COMMISSION ON CAMPAIN FINANCE  
REGULATIONS**

COMBINED INFORMATION NAME OF CANDIDATE, COMMITTEE OR GROUP	DISBURSEMENT CHECK NUMBER	REPORT NUMBER	TYPE OF REPORT
<b>8200501 PAC</b> <b>ISBN LOCAL 98 ISBN COPS</b> <b>C/O TREASURER RACKIN, JAMES P</b> <b>1719 SPRING GARDEN ST</b> <b>PHILA PA 19130-0000</b>	OFFICE/INSTITUTION	<input type="checkbox"/> Qualifier	<input type="checkbox"/> Old Term, Pre-Deadline
	COUNTRY	<input checked="" type="checkbox"/> Candidate	<input type="checkbox"/> 2nd PL. Pre-Deadline
		<input type="checkbox"/> Lobbyist	<input type="checkbox"/> 30-Day Post-Deadline
			<input type="checkbox"/> Annual Report
			<input type="checkbox"/> Amendment Report
			<input type="checkbox"/> Termination Report

**SUMMARY OF RECEIPTS AND EXPENDITURES FROM 10-21-86 TO 11-24-86**

A. Cash Balance - Beginning (See instruction # 11) .....	1,297.04
B. Total Receipts (From Schedule I - This Report Only) .....	0
C. Total of Lines A and B .....	1,297.04
D. Total Expenditures (From Schedule II - This Report Only) ...	1,267.99
E. Cash Balance - Ending (Subtract Line D from Line C) .....	2,129.06
F. Unpaid Debts and Obligations (From Schedule III) .....	
G. In-Kind Contributions (From Schedule IV - This Report Only) ..	

FOR OFFICE USE ONLY

**AFFIDAVIT SECTION**

**PART I - TO BE COMPLETED BY THE PERSON SUBMITTING THIS REPORT**  
 (Treasurer - If Filed By Committee; Candidate - If Filed By Candidate)

I swear (or affirm) that this report, accompanying schedules and statements are to the best of my knowledge and belief true, correct and complete.

Sworn to and subscribed before me this

15 day of December 1986  
 J. L. O. N. V. N. (Signature)  
 My Commission Expires August 22, 1988.

*James P. Rackin* (Signature)  
 Signature of Person Submitting Report  
 JAMES P. RACKIN (Printed Name)  
 Title

**PART II - TO BE COMPLETED BY THE CANDIDATE IF THIS REPORT IS FILED BY THE CANDIDATE'S AUTHORIZED COMMITTEE**

I swear (or affirm) that to the best of my knowledge and belief this political committee has not violated any provisions of the Act of June 3, 1977 P.L. 1333, No. 3201 as amended.

Sworn to and subscribed before me this

day of 19

Signature Office Use

Signature of Candidate

Printed Name

8-3-0407-1-134

7034530541

8

# **SCHEDULE I** **SUMMARY OF CONTRIBUTIONS AND RECEIPTS**

USE THIS SCHEDULE TO SUMMARIZE ALL CONTRIBUTIONS AND RECEIPTS  
 RECEIVED DURING THE REPORTING PERIOD.

NAME OF CANDIDATE, COMMITTEE OR LEGISLATOR LOCAL UNION 730, I.B.E.W. COMMITTEE ON POLITICAL EDUCATION	REPORTING PERIOD From 12-21-85 To 12-21-86
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## **A. UNITEMIZED CONTRIBUTIONS AND RECEIPTS - \$99.99 OR LESS**

TOTAL (For the Reporting Period)	00
----------------------------------	----

## **B. CONTRIBUTIONS AND RECEIPTS - \$99.91 TO \$299.99 (Complete Sections 1.1 & 1.2)**

ONLY CONTRIBUTIONS RECEIVED FROM POLITICAL COMMITTEES (Section 1.1)	0
ALL OTHER CONTRIBUTIONS (Section 1.2)	0
TOTAL (For the Reporting Period)	00

## **C. CONTRIBUTIONS AND RECEIPTS - OVER \$299.99 (Complete Sections 2.1 & 2.2)**

ONLY CONTRIBUTIONS RECEIVED FROM POLITICAL COMMITTEES (Section 2.1)	0
ALL OTHER CONTRIBUTIONS (Section 2.2)	0
TOTAL (For the Reporting Period)	00

## **D. REFUNDS RECEIVED (Complete Section 3)**

TOTAL (For the Reporting Period)	00
----------------------------------	----

TOTAL THIS PERIOD - ADD AMOUNT TOTALS FROM BOXES A, B, C & D ENTER ON PAGE 1 (Face Sheet) - ITEM 8	00
---	----

87034570542

USE THIS SECTION TO REPORT ALL DISBURSEMENTS MADE DURING THE REPORTING PERIOD.

[illegible]

**Abstract This Page (Optional)**

**Read This Period - Enter on Page 1 (Face Sheet) - Item D**

**\$ 1,167.98**



8 3 0 4 0 7 1 1 1 3 7

8 7 0 3 4 5 3 0 5 4

U.S. POSTAGE

1 8 4

RETURN RECEIPT  
REQUESTED

FEDERAL ELECTION COMMISSION  
900 E. STREET, N.W.  
WASHINGTON, D.C. 20403

ENTERED

P 155 565 124

MAIL

**SENSITIVE**

**FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463**

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

87 NF 56  
STAFF MEMBER: Shelley G. [unclear]

87 MAR 27

A 9:11

RECEIVED  
OFFICE OF THE FEO  
COMMISSION SECRETARY

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

RESPONDENT'S NAMES: International Brotherhood of Electrical  
Workers Local 98 Committee on Political  
Education  
William Gardner, Treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv)

INTERNAL REPORTS  
CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES  
CHECKED: N/A

**GENERATION OF MATTER**

The International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("Committee") and William Gardner, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division for failing to file the 1985 Mid Year and Year End Reports in a timely manner. The reports were filed 11 and 14 days late, respectively.<sup>1/</sup>

1/ The Committee reported the following information:

	<u>Receipts</u>	<u>Expenditures</u>
1985 Mid Year Report	\$26,916	\$ 7,746
1985 Year End Report	2,967.50	16,410

8804071133

### SUMMARY OF ALLEGATIONS

On March 12, 1986, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1985 Mid-Year and 1985 Year End Reports in a timely manner. The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the mailing of the Chronic Late Filing Notice, the Committee failed to file the 1986 30 Day Post-General Report.<sup>2/</sup>

### LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

Additionally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), those committees are required to file, in any other calendar year, a report covering the period January 1 through June 30 which shall be filed no later than July 31 and a report covering the period July 1 through December 31 which shall be filed no later than January 31 of the following calendar year.

<sup>2/</sup> On January 5, 1987, the Commission received a copy of the Committee's State report which disclosed activity from October 21, 1986 through November 24, 1986.

8804071189

The Committee's failure to timely file its 1985 Mid Year and Year End Reports and its failure to file the 1986 30 Day Post General Report are in the view of the General Counsel's Office, violations of 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).

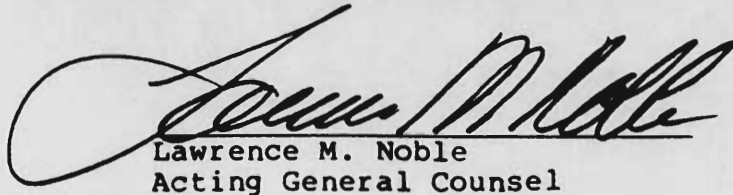
RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Open a MUR;
2. Find reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv).
3. Approve the attached letters and Legal and Factual Analysis.

Date

3/23/87

  
Lawrence M. Noble  
Acting General Counsel

Attachments

1. Referral
2. Proposed letter and legal factual analysis

38040711190

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR  
2378)

In the Matter of )  
 )  
International Brotherhood of Electrical ) RAD Ref. 87NF-56  
Workers Local 98 Committee on Political )  
Education )  
William Gardner, Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on March 26,  
1987, the Commission decided by a vote of 6-0 to take  
the following actions in RAD Ref. 87NF-56:

1. Open a MUR.
2. Find reason to believe that the International  
Brotherhood of Electrical Workers Local 98  
Committee on Political Education and William  
Gardner, as treasurer, violated 2 U.S.C.  
§§ 434(a)(4)(A)(iii) and (iv).

(continued)

88040711191

Federal Election Commission  
Certification for RAD Ref. 87NF-56  
March 26, 1987

Page 2

3. Approve the letters and legal Factual Analysis, as recommended in the First General Counsel's Report signed March 23, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

3-26-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 3-24-87, 9:10  
Circulated on 48 hour tally basis: Tues., 3-24-87, 11:00  
Deadline for vote: Thurs., 3-26-87, 11:00

88040711192





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 1987

William Gardner, Treasurer  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130

RE: MUR 2378  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political  
Education  
William Gardner, Treasurer

Dear Mr. Gardner:

On March 26, 1987, the Federal Election Commission determined that there is reason to believe the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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William Gardner, Treasurer  
Page 2

recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

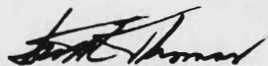
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

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

83040711194

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: \_\_\_\_\_

ANALYST: Alva E. Smith

I. COMMITTEE: International Brotherhood of Electrical  
Workers Local 98 Committee on Political  
Education  
(C00162818)  
William Gardner, Treasurer  
1719 Spring Garden Street  
Philadelphia, PA 19130

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(i) and (ii)  
11 CFR 104.5 (c)(1)(i)(A) and (ii)(A)

III. BACKGROUND:

Failure to File the 1986 12 Day Pre-General Report by  
Election Day and Failure to Timely File the 1986 Year End  
Report

The International Brotherhood of Electrical Workers  
Local 98 Committee on Political Education ("the Committee")  
failed to file the 1986 12 Day Pre-General Report by  
Election Day November 4, 1986, and also failed to timely  
file the 1986 Year End Report.

The Committee was notified on September 29, 1986 that  
it must file a 1986 12 Day Pre-General Report by October 23,  
1986 if it had made contributions or expenditures in  
connection with the general election that had not been  
previously reported (Attachment 2). The Committee was also  
notified on December 26, 1986, that the 1986 Year End  
Report, covering the period from November 25, 1986 to  
December 31, 1986, was due on January 31, 1987 (Attachment  
3). A Non-Filer Notice was sent to the Committee on March  
2, 1987 for failure to file the 1986 Year End Report  
(Attachment 4).

On March 24, 1987, the Reports Analysis Division  
("RAD") analyst telephoned Mr. Len Santavasi, accountant for  
the Committee. The RAD analyst informed Mr. Santavasi that  
the Year End Report was not filed. Mr. Santavasi explained

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INTERNATIONAL BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 98 COMMITTEE ON POLITICAL  
EDUCATION  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

that he had prepared the report in January and forwarded it to the Committee, but would check with the Committee to ascertain the whereabouts of the report (Attachment 5).

On March 27, 1986, Mr. Santavasi telephoned the RAD analyst and said that the report was found in the secretary's desk drawer. He stated that the report would be sent by Federal Express as soon as possible (Attachment 6).

On April 2, 1987, the Committee filed the 1986 Year End Report, which covered the period of October 1, 1986 through December 31, 1986. The report disclosed a \$500 contribution to a federal candidate committee on October 14, 1986, indicating that the 1986 12 Day Pre-General Report was required to be filed October 23, 1986 (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

88040711196

8 8 0 4 0 7 1 1 1 9 7

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 22APR87  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98	COMMITTEE ON POLITICAL EDUCATION			NON-PARTY QUALIFIED		ID #C00162818
CONNECTED ORGANIZATION:	ELECTRICAL WORKERS; INT'L BROT'H'D OF					
1985	MID-YEAR REPORT	26,916	7,746	1JAN85 -30JUN85	6	85FEC/386/0894
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3217
	YEAR-END	2,967	16,410	1JUL85 -31DEC85	9	86FEC/402/1782
1986	MISCELLANEOUS NOTICE FROM FEC			12MAR86	1	86FEC/404/4522
	APRIL QUARTERLY	558	7,200	1JAN86 -31MAR86	7	86FEC/412/1282
	JULY QUARTERLY	23,536	14,300	1APR86 -30JUN86	7	86FEC/422/0389
	OCTOBER QUARTERLY	75	7,800	1JUL86 -30SEP86	6	86FEC/437/2033
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1710
	YEAR-END	125	8,837	1OCT86 -31DEC86	10	87FEC/464/2893
	NOTICE OF FAILURE TO FILE			31DEC86	1	87FEC/462/0097
1987	MISCELLANEOUS REPORT			5JAN87 TO FEC	6	87FEC/453/0539
	TOTAL	54,197	0	62,293	0	33 TOTAL PAGES

All reports have been reviewed.

Ending Cash on Hand as of 12/31/87: \$679.86.

Debts and Obligations Owed To the Committee as of 12/31/87: \$0.0.

Debts and Obligations Owed By the Committee as of 12/31/87: \$0.0.



# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

September 29, 1986

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

All COMMITTEES that file quarterly that have made contributions or expenditures (including independent expenditures and coordinated party expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

**WHAT MUST BE REPORTED**

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration\* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration\* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

\*\*\*\*\*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

**WHAT MUST BE REPORTED**

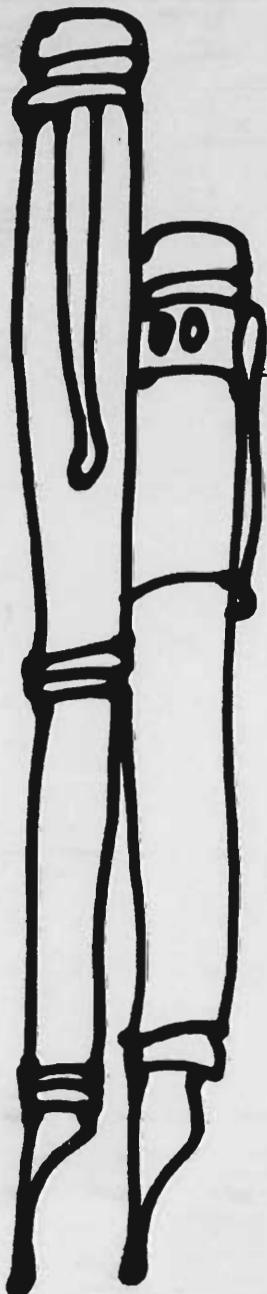
The report must disclose all financial activity from the close of books of the last report, or the date of registration\* (whichever is later), through November 24, 1986.

**WHEN TO FILE**

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

33040711193





# QUARTERLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert.</u> <u>Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 <sup>1/</sup> - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General <sup>2/</sup>	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

# MONTHLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert.</u> <u>Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 <sup>1/</sup> - 09/30	10/20/86	10/20/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

\*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

# INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

# WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X, for details.

# COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

<sup>1/</sup>Or from date of registration, or the close of books of the last report filed, whichever is later.

<sup>2/</sup>Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

88040711192

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

December 26, 1986

**WHO MUST FILE**

ALL PARTY COMMITTEES, NONCONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1987.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through December 31, 1986.\* For more detailed instructions, consult your Campaign Guide.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1987. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1987.

**WHERE TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**COMPLIANCE**

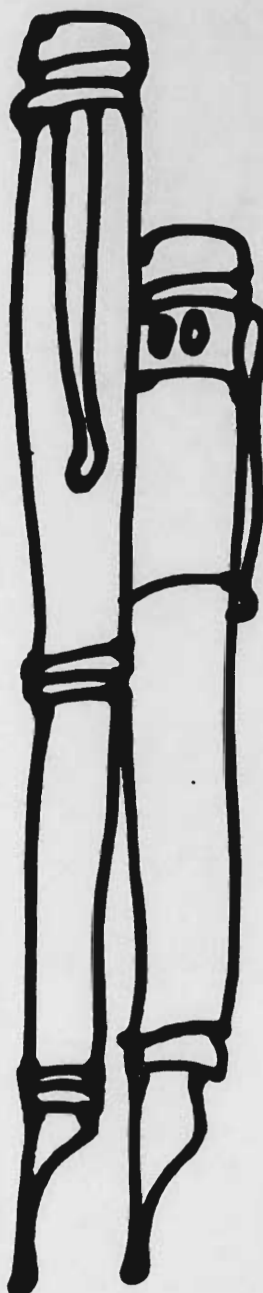
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

**FOR INFORMATION CALL:** Information Services Division  
202/376-3120 or 800/424-9530

(over)

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**1987 FILING SCHEDULE FOR PARTIES AND PACS**

Committees may file reports on a semiannual or a monthly schedule during 1987. Committees that choose to file reports on a monthly schedule must file reports no later than the 20th day of the month. Each report must include all financial activity that occurred during the previous month. Committees that choose to file reports on a semiannual schedule must file a mid-year report by July 31, 1987, and a year-end report by January 31, 1988. The July 31 mid-year report should include all activity from January 1 through June 30, 1987. The year-end report should include all activity from July 1 through December 31, 1987. See the charts below.

Committees that wish to change their reporting schedule must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

**MONTHLY FILERS\***

Report	Period Covered**	Reg./Cert. Mailing Date	Filing Date
Year-End	11/25 - 12/31	01/31/87	01/31/87
February	01/01 - 01/31	02/20/87	02/20/87
March	02/01 - 02/28	03/20/87	03/20/87
April	03/01 - 03/31	04/20/87	04/20/87
May	04/01 - 04/30	05/20/87	05/20/87
June	05/01 - 05/31	06/20/87	06/20/87
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

**SEMIANNUAL FILERS\***

Report	Period Covered**	Reg./Cert. Mailing Date	Filing Date
Year-End	11/25 - 12/31	01/31/87	01/31/87
July 31 Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

\*Be sure to retain this Report Notice for future reference. The next Notice will be sent July 7, 1987. See also the January 1987 issue of the FEC Record.

\*\*Each report must disclose all financial activity that occurred from the close of books for the last report filed through the end of the reporting period. Political committees that have not previously filed a financial disclosure report should report all financial activity through the end of the reporting period. See the footnote on page 1.

38040711201



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

BQ-7

March 2, 1987

William Gardner, Treasurer  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
1719 Spring Garden Street  
Philadelphia, PA 19130

Identification Number: C00162818

Reference: Year End Report (through 12/31/86)

Dear Mr. Gardner:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Alva Smith on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

88340711202

**ANALYST:** Alva E. Smith

**CONVERSATION WITH:** Len Santavasi, Committee's Accountant  
Touche Ross and Co. (215) 561-2727

**COMMITTEE:** International Brotherhood of Electrical Workers Local 98  
Committee on Political Education

**DATE:** March 24, 1987

**SUBJECT(S):** Year End non-filer

I called Mr. Santavasi to inform him that the Year End report has not been filed. He explained that he prepared the report in January and forwarded it to Local 98 for the treasurer's signature. The Local was responsible for sending the report to the Commission. He will check with the Local to ascertain what happened to the report and call me back.

88040711203

**ANALYST:** Alva E. Smith

**CONVERSATION WITH:** Len Santavasi

**COMMITTEE:** International Brotherhood of Electrical Workers Local 98  
Committee on Political Education

**DATE:** March 27, 1987

**SUBJECT(S):** Year End Report

Mr. Santavasi called to explain that the report was found in the secretary's desk drawer. The report will be sent Federal Express as soon as possible.

83040711204



Teuchie Ross & Co.  
Twenty-Fourth Floor  
1700 Market Street  
Philadelphia, PA 19103-3384  
Telephone 215 581-2727

ATTACHMENT 7  
(Page 1 of 7)

March 30, 1987

Mr. James Mackin  
Local Union #98 I.B.E.W.  
Committee on Political Education  
1719 Spring Garden Street  
Philadelphia, Pennsylvania 19130

Dear Jim:

Enclosed herewith are the following reports for Local Union  
#98 I.B.E.W. Committee on Political Education:

Federal Election Commission Report for the period  
October 1, 1986 to December 31, 1986

Campaign Expense Report - Commonwealth of Pennsylvania  
for the periods:

\*October 21, 1986 to November 24, 1986

\*November 25, 1986 to December 31, 1986

Jim, the report to the Federal Election Commission should be  
federal expressed to:

Ms. Alva Smith  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

The reports to the Commonwealth of Pennsylvania should be fed-  
eral expressed to:

Commonwealth of Pennsylvania  
Department of State  
Bureau of Commission  
Elections and Legislation  
Harrisburg, PA 17120

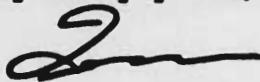
Attachment 7  
(Page 2 of 7)

Mr. James Mackin  
March 30, 1987  
Page 2

Jim, as we discussed today, the deadline for filing these reports has past and they need to be sent immediately after appropriate execution.

Please be informed that the information on these forms was compiled by us and the person performing this function had them completed on January 5, 1987. However, the secretary typing the reports misfiled the typed copies before issuance and we did not discover this fact until last Thursday. I apologize for any problems this has caused and assure you that we have taken corrective action to avoid this happening in the future.

Very truly yours,



Leonard V. Santivasi

LVS:lcb

Enclosures

88040711206  
970346.2871

Touché & Ross  
Twenty-First Floor  
1700 Market Street  
Philadelphia, PA 19104  
Telephone: 215-591-1000

**Touché & Ross**

Attachment 7  
(Page 3 of 7)

January 3, 1987

To the Officers and Members  
Local Union #98 I.B.E.W.  
Committee on Political Education  
1719 Spring Garden Street  
Philadelphia, Pennsylvania 19130

The financial information with respect to receipts and disbursements included in the accompanying forms prescribed by the Federal Election Commission for the period from October 1, 1986 through December 31, 1986 has been compiled by us.

Our compilation was limited to presenting in the form prescribed by the above Commission, financial information that is the representation of the officers. We have not audited or reviewed the financial information included in the prescribed form referred to above and, accordingly, do not express an opinion or any other form of assurance on it.

This financial information is presented in accordance with the requirements of the above Commission, and it is not in accordance with generally accepted accounting principles. Accordingly, this financial information is not designed for those who are not informed about such matters.

*Touché & Ross*

Certified Public Accountants

078804076161207

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

Attachment 7  
(Page 4 of 7)

(Summary Page)

1. Name of Committee (In Full)  
**Local Union #98 I.B.E.W.  
Committee on Political Education**

---

Address (Number and Street)  
**1719 Spring Garden Street**

---

City, State and ZIP Code  
**Philadelphia, PA 19130**

---

☐ Check here if address is different than previously reported.

---

2. FEC Identification Number  
**C 0016 2818**

---

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☐ YES ☒ NO

**SUMMARY**

5. Covering Period 10-1-86 through 12-31-86

6. (a) Cash on hand January 1, 19 86 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

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

7. Total Disbursements (from Line 28) .....

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

9. Debts and Obligations Owed TO The Committee .....

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee .....

(Itemize all on Schedule C or Schedule D)

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	\$ 14,502.45
\$ 9,392.84	
\$ 125.00	\$ 24,315.39
\$ 9,517.84	\$ 38,817.84
\$ 8,837.98	\$ 38,137.98
\$ 679.86	\$ 679.86
\$	
\$	

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  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9630  
Local 202-376-3120

JAMES F. MACKIN  
Type or Print Name of Treasurer

James Mackin  
SIGNATURE OF TREASURER

3-31-87  
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 3e are obsolete and should no longer be used.

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

FEC FORM 3X (3/80)

880407112003

**Local Union 100 I.B.F.W.**  
**Committee on Political Education**

Page 12-1-86 to 12-31-86

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than from:**

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unchecked 0 125.00)

(b) Political Party Committees

(c) Other Political Committees

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

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

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

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES**

AND OTHER POLITICAL COMMITTEES

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

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

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND**

OTHER POLITICAL COMMITTEES

**22. INDEPENDENT EXPENDITURES (see Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES**

(2 U.S.C. § 441 (old) (See Schedule F))

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

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

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

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

**30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)**

**31. NET CONTRIBUTIONS (other than from Subtotal Line 29 from Line 28)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (Subtotal Line 32 from Line 33)**

Column A Total This Period	Column B Calendar Year-To-Date	
125.00	24,315.39	11(d)
		11(b)
		11(c)
125.00	24,315.39	11(d)
		12
		13
		14
		15
		16
		17
125.00	24,315.39	18
2,867.98	4,867.98	19
0	8,500.00	20
		21
		22
		23
		24
		25
		26(a)
		26(b)
		26(c)
		26(d)
6,776.00	25,376.00	27
8,837.98	38,137.98	28
125.00	24,315.39	29
		30
125.00	24,315.39	31
2,867.98	4,867.98	32
		33
2,867.98	4,867.98	34



**SCHEDULE B**

**(ITEMIZED DISBURSEMENTS)**

See instructions for each category of the Schedules 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)		Attachment 7 (Page 6 of 7)	
<b>LOCAL UNION 998 I.B.B.W. COMMITTEE ON POLITICAL EDUCATION</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Committee to Elect Ed Morris 1111 First Avenue Westville Grove, NJ 08093	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-02-86	<b>Amount of Each Disbursement This Period</b> \$ 50.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Committee to Elect Bob O'Brien 3123 Barnett Street Philadelphia, PA 19149	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-10-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Springler for Congress Chas. Lilliciop, Treasurer 24 Veterans Squire Media, PA 19063	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 500.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Kasinski for State House 4479 Almond Street Philadelphia, PA 19137	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Foglietta '86 P. O. Box 40126 Philadelphia, PA 19106	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 500.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Mr. W. Rieger Re-Election Campaign D. William J. Rieger, Treasurer 1141 Rising Sun Avenue Philadelphia, PA 19140	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>G. Full Name, Mailing Address and ZIP Code</b> Pennsylvania for Rep. Cohen Room 106 South Office Bldg. Harrisburg, PA 17120	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>H. Full Name, Mailing Address and ZIP Code</b> Burlington County Democrats P. O. Box 156 Vincetown, NJ 08088	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>I. Full Name, Mailing Address and ZIP Code</b> Committee to Re-Elect Frank Lynch P. O. Box 15482 Philadelphia, PA 19142	<b>Purpose of Disbursement</b> <b>CONTRIBUTION</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 10-14-86	<b>Amount of Each Disbursement This Period</b> 500.00
<b>SUBTOTAL of Disbursements This Page (optional)</b>			<b>\$3,050.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

97 33 16 3 3 2 1 0



87 APR 6 All: 09

Attachment 7  
(Page 7 of 7)



**FIRST CLASS**

MS. ALVA SMITH  
FEDERAL ELECTION COMMISSION  
999 E. STREET. N.W.  
WASHINGTON, D.C. 20463

**RETURN RECEIPT  
REQUESTED**

**CERTIFIED**

P 743 424 535

**MAIL**

88040711211

**SENSITIVE**

**FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463**

**FIRST GENERAL COUNSEL'S REPORT**

**RAD Rreferral # 87NF 85  
STAFF MEMBER:  
Garr**

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

**RESPONDENTS:** International Brotherhood of Electrical  
Workers Local 98 Committee on Political  
Education  
William Gardner, Treasurer

**RELEVANT STATUTES:** 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii)

**INTERNAL REPORTS  
CHECKED:** FEC Disclosure Documents

**FEDERAL AGENCIES  
CHECKED:** N/A

**I. GENERATION OF MATTER**

The International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("Committee") and William Gardner, as treasurer, were referred to the Office of General Counsel for failing to timely file its 1986 12 Day Pre-General and 1986 Year End Reports.<sup>1/</sup>

The Committee was notified on September 29, 1986 that it must file a 1986 12 Day Pre-General Report by October 23, 1986, if it had made contributions or expenditures in connection with

<sup>1/</sup> On April 7, 1987, the Commission notified the Committee that it had found reason to believe that the Committee violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) for failing to timely file its 1985 Mid Year and Year End Reports and its failure to file its 1986 30 Day Post-General Report (MUR 2378). As of this date the Committee has not responded to the Commission's notification.

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the general election that had not been previously reported. The Committee was also notified on December 26, 1986, that the 1986 Year End Report, covering the period from November 25, 1986 to December 31, 1986, was due on January 31, 1987. A Non-Filer Notice was sent to the Committee on March 2, 1987 for failure to file the 1986 Year End Report.

On March 24, 1987, the Reports Analysis Division analyst telephoned the Committee's accountant to inform him that the Year End Report had not been filed.

The accountant responded on March 27, 1987, and advised that the report had been located and that the report would be sent by Federal Express as soon as possible.

On April 2, 1987, the Committee filed the 1986 Year End Report, which covered the period of October 1, 1986 through December 31, 1986. The report disclosed a \$500 contribution to a federal candidate committee on October 14, 1986, indicating that the 1986 12 Day Pre-General Report was required to be filed October 23, 1986.<sup>2/</sup>

## II. LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate may elect to file, in a calendar year in which a regularly scheduled

<sup>2/</sup> The Committee's 1986 Year End Report, filed on April 2, 1987, covered the period October 1, 1986, through December 31, 1986, and included the 12 Day Pre-General Report activity. Thus, this Office views the filing of the 12 Day Pre-General Election Report as being 161 days late.

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election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except for the quarter ending on December 31 of such calendar year which shall be filed no later than January 31 of the following calendar year. Further, pursuant to 2 U.S.C.

§ 434(a)(4)(A)(ii), those committees are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

The Committee's failure to timely file a 1986 12 Day Pre-General and Year End Reports is, in the view of this Office, in violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).

### III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).
3. Merge this matter with MUR 2378.
4. Approve and send the attached letter and legal and factual analysis.

Date

5/22/87

Lawrence M. Noble  
Acting General Counsel

### Attachments

1. Referral
2. Proposed letter and legal and factual analysis

38040711214

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

International Brotherhood of Electrical )

Workers Local 98 Committee on Political )

Education )

William Gardner, Treasurer )

RAD Ref. 87NF-85 (MUR 2453)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 28, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-85:

1. Open a MUR.
2. Find reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii).
3. Merge this matter with MUR 2378.
4. Approve and send the letter and legal and factual analysis, as recommended in the First General Counsel's Report signed May 22, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

5-29-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 5-26-87, 11:17  
Circulated on 48 hour tally basis: Tues., 5-26-87, 4:00  
Deadline for vote: Thurs., 5-28-87, 4:00

88040711215





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

June 3, 1987

**William Gardner, Treasurer  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
1807 Spring Garden Street  
Philadelphia, PA 19130**

**RE: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political  
Education  
William Gardner, Treasurer**

**Dear Mr. Gardner:**

On May 28, 1987, the Federal Election Commission determined that there is reason to believe the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and merged this matter with current Commission action involving your committee (MUR 2378). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General

88040711216

*Tem*



William Gardner, Treasurer  
Page 2

Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

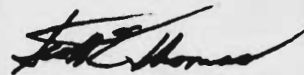
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

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

88040711217

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

87 OCT -2 PM 1:11

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee or Political Education )  
 )  
William Gardner, as treasurer )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 26, 1987, the Commission determined that there is reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("the Committee") and William Gardner, as treasurer violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) by failing to timely file its 1985 Mid Year and Year End Reports and its 1986 30 Day Post General Election Report (MUR 2378).<sup>1/</sup>

On May 28, 1987, the Commission again found reason to believe that the Committee violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii) by failing to timely file its 1986 12 Day Pre General and Year End Reports (MUR 2445).<sup>2/</sup> By letter dated August 13, 1987, counsel for the Committee requested that this matter be settled prior to a finding of probable cause to believe (Attachment 1).

<sup>1/</sup> On April 2, 1987, the Committee filed a 1986 Year End Report which included the period 10/1/86 - 12/31/86. Because the 1986 Year End Report included the coverage dates of the 1986 30 Day Post General Report, this Office considers this report as being filed 119 days late.

<sup>2/</sup> MURs 2378 and 2445 were merged as MUR 2445.

88040711218

**II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

88040711219

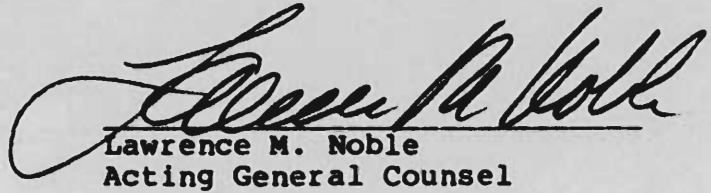
8040711220

### **III. GENERAL COUNSEL'S RECOMMENDATIONS**

1. Enter into conciliation with the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement and letter.

Date 10/2/87

  
Lawrence M. Noble  
Acting General Counsel

Attachments

1. Response
2. Proposed conciliation agreement and letter

38040711221

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee or Political Education )  
 )  
William Gardner, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 7, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2455:

1. Enter into conciliation with the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's report signed October 2, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

10-8-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 10-02-87, 1:11  
Circulated on 48 hour tally basis: Mon., 10-05-87, 11:00  
Deadline for vote: Wed., 10-07-87, 11:00

83040711222





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

14 October 1987

Bernard N. Katz, Esquire  
Meranze and Katz  
12th Floor  
Lewis Tower Building  
15th and Locust Streets  
Philadelphia, PA 19102

RE: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political  
Education  
William Gardner, as treasurer

Dear Mr. Katz:

On March 26, 1987, the Commission found reason to believe that your clients, the International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("Committee") and William Gardner, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iii) and (iv) (MUR 2378). Subsequently, on May 28, 1987, the Commission also found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) (MUR 2455) and merged these two matters as MUR 2455. At your request, the Commission determined on October 7, 1987, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

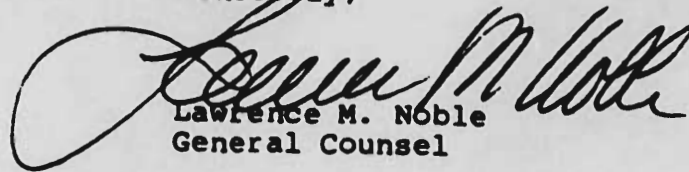
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact

88040711223

Letter to Bernard N. Katz  
Page 2

Shelley Garr, the staff member assigned to this matter, at (202)  
376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure

88040711224

RECEIVED  
FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

88 JAN 20 PM 5:01

SENSITIVE

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee on Political )  
Education )  
William Gardner, as treasurer )

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the International Brotherhood of Electrical Workers Local 98 Committee on Political Education, William Gardner, as treasurer, based on the assessment of the information presently available.

Date

1/20/88

  
Lawrence M. Noble  
General Counsel

Staff Person: Shelley Garr

88040711225

RECEIVED  
FEDERAL ELECTION COMMISSION

88 JAN 22 PH 3:21



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 22, 1988

**SENSITIVE**

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LMN*  
General Counsel

SUBJECT: MUR #2455

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on January 22, 1988. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Brief
- 2-Letter to respondent

88040711226



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Bernard N. Katz, Esquire  
Meranze and Katz  
12th Floor  
Lewis Tower Building  
15th and Locust Streets  
Philadelphia, PA 19102

RE: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political  
Education  
William Gardner, as treasurer

Dear Mr. Katz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on March 26, 1987, found reason to believe that your clients, the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), and instituted an investigation in this matter. Subsequently, on May 28, 1987, the Commission again found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you

83040711227

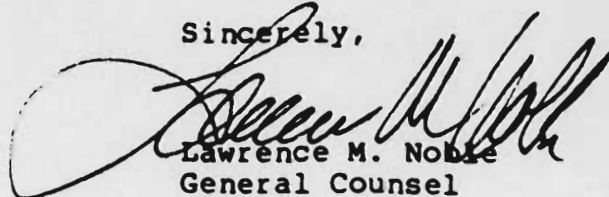
may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

88040711228



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee on Political Education )  
 )  
William Gardner, as treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 26, 1987, the Commission determined that there is reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("the Committee") and William Gardner, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv) by failing to timely file its 1985 Mid Year and Year End Reports and its 1986 30 Day Post General Election Report (MUR 2378).

On May 28, 1987, the Commission again found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to timely file its 1986 12 Day Pre General and Year End Reports (MUR 2455).<sup>1/</sup>

II. ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate may elect to file, in a calendar year in which a regularly scheduled election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except for the quarter ending on December 31 of such calendar

1/ MURs 2378 and 2455 were merged as MUR 2455.

68040711229

year which shall be filed no later than January 31 of the following calendar year. Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), those committees are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

Additionally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), those committees are required to file, in any other calendar year, a report covering the period January 1 through June 30 which shall be filed no later than July 31 and a report covering the period July 1 through December 31 which shall be filed no later than January 31 of the following calendar year.

The Committee's failure to file its 1985 Mid Year and Year End Reports and its 1986 12 Day Pre-General, 30 Day Post-General, and Year End Reports in a timely manner are, in the view of the General Counsel's Office, violations of 2 U.S.C.

§ 434(a)(4)(A)(i), (ii), (iii) and (iv).

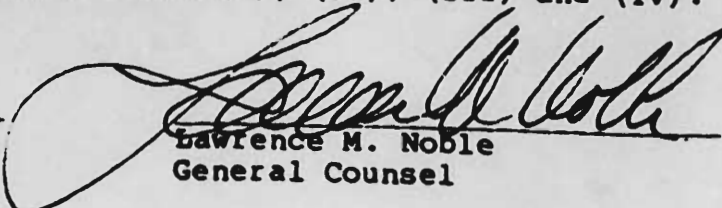
38040711230

**III. RECOMMENDATIONS**

1. Find probable cause to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).

Date

1/22/88

  
Lawrence M. Noble  
General Counsel

38040711231

LAW OFFICES  
MERANZE AND KATZ  
TWELFTH FLOOR  
LEWIS TOWER BUILDING  
N.E. COR 15TH & LOCUST STREET  
PHILADELPHIA, PA. 19102  
215-546-4183

BERNARD N. KATZ\*\*  
MICHAEL N. KATZ\*  
MARIE A. FRITZINGER\*  
RONALD A. KOVLER\*  
WILLIAM WALLEN\*  
ROBERT KALLEN\*  
LYNNE P. FOX  
LITA WAIN\*  
ROBERT G. ROTHSTEIN

OF COUNSEL  
JOSEPH B. MERANZE

\*NEW JERSEY BAR ALSO  
\*NEW YORK BAR ALSO

January 27, 1988

Shelley Garr, Esquire  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
William Gardner, as treasurer

Dear Ms. Garr:

This will confirm our conversation of January 27, 1988. It is my understanding that at this juncture the Commission as a matter of policy will not enter into a pre-probable cause Conciliation Agreement and that accordingly, per your advice, I should not execute and return the Conciliation Agreement your office had initially forwarded. As I indicated, I had received authorization from my client to execute the Agreement.

It is my further understanding that I can anticipate receiving shortly a proposed post probable cause Conciliation Agreement which in substantive terms, including penalties, will be identical to the initial pre-probable cause Conciliation Agreement. Upon my receipt thereof, and per our discussions, I will contact you to discuss any mutually agreeable language changes and to thereafter bring this matter to an expedited conclusion.

I appreciate your cooperation in this matter.

Very truly yours,  
MERANZE AND KATZ

BY: MICHAEL N. KATZ *dm*

MNK:dm  
UIW/SIU

cc: James Mackin, Bus. Mgr., IBEW Local 98

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 JAN 30 PM 12:00

200 N. TEXAS AVENUE  
ATLANTIC CITY, N.J. 08401  
609-347-9383

431 WYOMING AVENUE  
SCRANTON, PA. 18503  
717-346-7699

1230 UNION AVENUE  
CHERRY HILL, N.J. 08034  
609-662-3952

M. HERBERT SYME  
(1938-1986)  
FRANK BIELITSKY  
(1953-1970)

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
88 FEB -1 AM 10:38

3 8 0 4 0 7 1 1 2 3 2

BEFORE THE FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION  
88 APR 15 PM 12:01

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee on Political Education )  
 )  
William Gardner, as treasurer )

**SENSITIVE**  
**EXECUTIVE SESSION**  
**APR 28 1988**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On March 26, 1987, the Commission determined that there is reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("the Committee") and William Gardner, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv) by failing to timely file its 1985 Mid Year and Year End Reports and its 1986 30 Day Post General Election Report (MUR 2378).

On May 28, 1987, the Commission again found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to timely file its 1986 12 Day Pre General and Year End Reports (MUR 2455).<sup>1/</sup>

<sup>1/</sup> MURs 2378 and 2455 were merged as MUR 2455.

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8 8 0 4 0 7 1 1 2 3 4

The Office of General Counsel forwarded to counsel its brief recommending probable cause to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv) on January 22, 1988. Subsequent to the mailing of the brief, counsel contacted this Office to advise that the Committee would be agreeable to executing the Commission's pre-probable cause conciliation agreement. Counsel was advised, however, that because the brief had already been mailed, pre-probable cause conciliation was no longer possible. Counsel's letter, dated January 27, 1988, confirms this conversation (Attachment I).

## **II. ANALYSIS**

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate may elect to file, in a calendar year in which a regularly scheduled election is held, quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except for the quarter ending on December 31 of such calendar year which shall be filed no later than January 31 of the following calendar year. Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), those committees are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution



to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

Additionally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), those committees are required to file, in any other calendar year, a report covering the period January 1 through June 30 which shall be filed no later than July 31 and a report covering the period July 1 through December 31 which shall be filed no later than January 31 of the following calendar year.

The Committee's failure to file its 1985 Mid Year and Year End Reports and its 1986 12 Day Pre-General, 30 Day Post-General, and Year End Reports in a timely manner are, in the view of the General Counsel's Office, violations of 2 U.S.C.

§ 434(a)(4)(A)(i), (ii), (iii) and (iv).

### III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

83040711235

III. RECOMMENDATIONS

1. Find probable cause to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv); and
2. Approve and send the attached conciliation agreement and letter.

Date

4/14/88

  
Lawrence M. Noble  
General Counsel

Attachments

1. Proposed conciliation agreement
2. Proposed letter

Staff Person: Shelley Garr

88040711236

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
International Brotherhood of )  
Electrical Workers Local 98 )  
Committee on Political Education ) MUR 2455  
 )  
William Gardner, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 28, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2455:

1. Find probable cause to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv); and
2. Approve and send the conciliation agreement and letter attached to the General Counsel's report dated April 19, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-27-88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

68040711237



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 3, 1988

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Michael Katz, Esquire  
Meranze and Katz  
12th Floor  
Lewis Tower Building  
15th and Locust Streets  
Philadelphia, PA 19102

RE: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political  
Education  
William Gardner, as treasurer

Dear Mr. Katz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on March 26, 1987, found reason to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), and instituted an investigation in this matter. Subsequently, on May 28, 1987, the Commission again found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

On April 28, 1988, the Federal Election Commission found that there is probable cause to believe that your clients violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

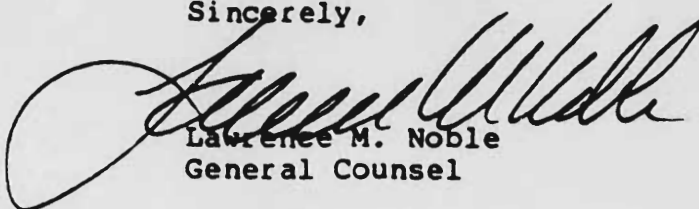
88040711233

Letter to Bernard N. Katz, Esquire  
Page 2

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

83040711239

6CC#9245

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAY 12 1988

88 MAY 12 AM 9:49

LAW OFFICES  
MERANZE AND KATZ  
TWELFTH FLOOR  
LEWIS TOWER BUILDING  
N.E. COR 15TH & LOCUST STREET  
PHILADELPHIA, PA. 19102  
215-546-4183

BERNARD N. KATZ\*\*  
MICHAEL N. KATZ\*  
MARIE A. FRITZINGER\*  
RONALD A. KOVLER\*  
WILLIAM WALLEN\*  
ROBERT KALLEN\*  
LYNNE P. FOX\*  
LITA WAIN\*  
ROBERT G. ROTHSTEIN  
ELISSA B. KATZ\*

OF COUNSEL  
JOSEPH B. MERANZE

\*NEW JERSEY BAR ALSO  
\*NEW YORK BAR ALSO

200 N. TEXAS AVENUE  
ATLANTIC CITY, N.J. 08401  
609-347-9363

431 WYOMING AVENUE  
SCRANTON, PA. 18503  
717-346-7699

1230 UNION AVENUE  
CHERRY HILL, N.J. 08034  
609-662-3952

M. HERBERT SYME  
(1932-1956)  
FRANK BIELITSKY  
(1953-1970)

May 10, 1988

Lawrence M. Noble,  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
William Gardner, as treasurer

Dear Mr. Noble:

Your letter of May 3, 1988 with enclosed Conciliation Agreement was received on May 9, 1988. The Conciliation Agreement has been forwarded to my client for review and appropriate action. I will get back to either you or Ms. Garr as quickly as possible to bring this matter to a final resolution.

Very truly yours,

MERANZE AND KATZ

BY: MICHAEL N. KATZ

*Michael N. Katz*  
*dm*

MNK:dm  
UIW/SIU  
CERTIFIED MAIL, RRR  
cc: James F. Mackin, Bus. Mgr., IBEW Local 98

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAY 12 1988 AM 11:40

83040711240



600#9393

LAW OFFICES  
MERANZE AND KATZ  
TWELFTH FLOOR  
LEWIS TOWER BUILDING  
N. E. COR 15TH & LOCUST STREET  
PHILADELPHIA, PA. 19102  
215-546-4183

FEDERAL ELECTION COMMISSION

88 MAY 27 AM 11:19

BERNARD N. KATZ\*\*  
MICHAEL N. KATZ\*  
MARIE A. FRITZINGER\*  
RONALD A. KOVLER\*  
WILLIAM WALLEN\*  
ROBERT KALLEN\*  
LYNNE P. FOX\*  
LITA WAIN\*  
ROBERT G. ROTHSTEIN  
ELISSA B. KATZ\*

OF COUNSEL  
JOSEPH B. MERANZE

\*NEW JERSEY BAR ALSO  
\*NEW YORK BAR ALSO

200 N. TEXAS AVENUE  
ATLANTIC CITY, N.J. 08401  
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SCRANTON, PA. 18503  
717-346-7699

1230 UNION AVENUE  
CHERRY HILL, N.J. 08034  
609-662-3952

M. HERBERT SYME  
(1932-1956)  
FRANK BIELITSKY  
(1953-1970)

May 25, 1988

Lawrence M. Noble,  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education  
William Gardner, as treasurer

Dear Mr. Noble:

Enclosed please find the executed Conciliation Agreement and Respondent's check no. 1263 in the amount of \$1,800.00 in settlement of this matter. Would you kindly return to my attention a fully executed copy of the Agreement.

It is my understanding that Respondent's submission of the executed Agreement with penalty constitutes a final settlement of this matter.

Very truly yours,

MERANZE AND KATZ

BY: MICHAEL N. KATZ

*Michael N. Katz*  
*dm*

MNK:dm  
UIW/SIU  
enc.  
Certified Mail, RRR  
cc: Shelley Garr, Esquire

124117040308

LOCAL No. 98-I.B.E.W.  
COMMITTEE ON POLITICAL EDUCATION  
1719 SPRING GARDEN STREET  
PHILA., PA 19130

1263

5-19-1988

3-1  
310

PAY TO THE  
ORDER OF

Federal Election Commission

\$ 1,800.00

\$1,000.00

DOLLARS

PNB Philadelphia  
National Bank

*Donald J. [unclear]*

⑈001263⑈ • ⑈03100001⑈

0103⑈1394⑈

6CC#9393

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 1263 { A COPY OF WHICH IS ATTACHED } RELATING TO

FOR 2455 AND NAME International Brotherhood of Electrical  
(Garr) Workers Local 98 Cmte. on Political Education  
WAS RECEIVED ON 5/27/88 PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }  
/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }  
/ / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 6/1/88

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

RECEIVED  
FEDERAL ELECTION COMMISSION

88 JUN 16 AM 11:59

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 Committee )  
on Political Education )  
William Gardner, as treasurer )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been submitted by counsel for the International Brotherhood of Electrical Workers - Local 98 Committee on Political Education ("the Committee") (Attachment I). The agreement contains no changes from the agreement initially approved by the Commission on April 23, 1988.

Also attached is a copy of a check for \$1,800.00 representing the Committee's payment of a civil penalty.

II. RECOMMENDATION

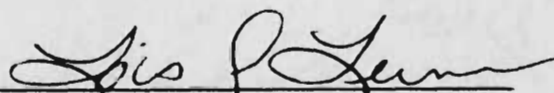
1. Accept the attached agreement with the International Brotherhood of Electrical Workers - Local 98 Committee on Political Education and William Gardner, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

Date

6/16/88

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

- 1) Conciliation agreement
- 2) Photocopy of civil penalty check
- 3) Proposed letter to respondent

Staff Person: Shelley Garr

88040711243

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 Committee )  
on Political Education )  
William Gardner, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on June 20,  
1988, the Commission decided by a vote of 5-0 to take  
the following actions in MUR 2455:

1. Accept the agreement with the International  
Brotherhood of Electrical Workers - Local 98  
Committee on Political Education and William  
Gardner, as treasurer, as recommended in the  
General Counsel's Report signed June 16, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General  
Counsel's Report signed June 16, 1988.

Commissioners Aikens, Elliot, Josefiak, McGarry, and  
Thomas voted affirmatively for the decision; Commissioner  
McDonald did not cast a vote.

Attest:

6/20/88  
Date

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

Received in the Office of the Commission Secretary: Thurs., 6-16-88, 11:59  
Circulated on a 48 hour tally basis: Thurs., 6-16-88, 4:00  
Deadline for vote: Mon., 6-20-88, 4:00

38040711244



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1988

Michael Katz, Esquire  
Meranze and Katz  
12th Floor, Lewis Tower Building  
15th and Locust Streets  
Philadelphia, PA 19102

RE: MUR 2455  
International Brotherhood of Electrical  
Workers Local 98 Committee on Political  
Education, William Gardner, as treasurer

Dear Mr. Katz

On June 20, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty which you submitted on behalf of your clients, the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your file. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

88040711245

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
International Brotherhood of ) MUR 2455  
Electrical Workers Local 98 )  
Committee on Political Education )  
William Gardner, as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and William Gardner, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

NOW THEREFORE, the Commission and Respondents, having duly entered into conciliation, pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over Respondents, and the subject matter of this proceeding.

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent International Brotherhood of Electrical Workers Local 98 Committee on Political Education is a political committee registered with the Commission.

63040711246



2. William Gardner is the treasurer of the International Brotherhood of Electrical Workers Local 98 Committee on Political Education.

3. Respondents were required to file the 1985 Mid Year Report on July 31, 1985. The report was filed on August 14, 1985, 14 days late.

4. Respondents were required to file the 1985 Year End Report on January 31, 1986. The report was filed on February 11, 1986, 11 days late.

5. Respondents were required to file the 1986 30 Day Post General Election Report on December 4, 1986. The report was filed on April 2, 1987, 119 days late.

6. Respondents were required to file a 1986 12 Day Pre General Election Report on October 23, 1986. The report was filed on April 2, 1987, 161 days late.

7. Respondents were required to file a 1986 Year End Report on January 31, 1987. The report was filed on April 2, 1987, 61 days late.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate, may elect to file, in a calendar year in which a regularly scheduled election is held, a quarterly report which shall be filed no later than the 15th day after the last day of each calendar quarter, except for the quarter ending on December 31 of such calendar year which shall be filed no later than January 31 of the

88040711247

following calendar year. Respondents' failure to timely file a 1986 Year End Report is in violation of 2 U.S.C.

§ 434(a)(4)(A)(i).

VI. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), all political committees other than authorized committees of a candidate are required to file a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election. Respondents' failure to timely file a 1986 12 Day Pre General Election Report in a timely manner is in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VII. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, a post-general election report, which shall be filed no later than the 30th day after the general election and shall be complete as of the 20th day after such general election. Respondents' failure to file a 1986 30 Day Post General Election Report in a timely manner is in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VIII. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees of a candidate may elect to file, in any year in which a regularly scheduled election is not held, a report covering the period January 1

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through June 30 which shall be filed no later than July 31 and a report covering the period July 1 through December 31 which shall be filed no later than January 31 of the following calendar year. Respondents' failure to file 1985 Mid Year and Year End Reports in a timely manner, is in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

IX. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Eight Hundred Dollars (\$1,800) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

XII. Respondents 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.

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

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

By:

Lois G. Lerner  
Lois G. Lerner  
Associate General Counsel

Date

6/22/88

FOR THE RESPONDENT:

James Mackare

Date

5-19-88

88040711250

600#9664

LAW OFFICES  
MERANZE AND KATZ  
TWELFTH FLOOR  
LEWIS TOWER BUILDING  
N. E. COR 15TH & LOCUST STREET  
PHILADELPHIA, PA. 19102  
215-546-4183

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BERNARD N. KATZ\*\*  
MICHAEL N. KATZ\*  
MARIE A. FRITZINGER\*  
RONALD A. KOVLER\*  
WILLIAM WALLEN\*  
ROBERT KALLEN\*  
LYNNE P. FOX\*  
LITA WAIN\*  
ROBERT G. ROTHSTEIN  
ELISSA B. KATZ\*

OF COUNSEL  
JOSEPH B. MERANZE

\*NEW JERSEY BAR ALSO  
\*NEW YORK BAR ALSO

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431 WYOMING AVENUE  
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609-682-3982

M. HERBERT SYME  
(1932-1956)  
FRANK SIELITSKY  
(1963-1970)

June 28, 1988

Ms. Shelley Garr, Staff Member  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2455  
International Brotherhood of  
Electrical Workers Local 98  
Committee on Political Education,  
William Gardner, as treasurer

Dear Ms. Garr:

In accordance with your office's letter of June 23, 1988,  
please be advised that Respondents request the following state-  
ment to appear in the public record:

By entering into a Conciliation Agreement,  
Respondents do not admit any wrongdoing  
or liability. Respondents have entered  
into said Conciliation Agreement solely for  
purposes of avoiding costs and expenses  
of further litigation.

If there is any problem with including this statement in  
the public record please advise.

Very truly yours,

MERANZE AND KATZ

*Michael N. Katz*

BY: MICHAEL N. KATZ *mt*

MNK:dmf  
UIW/SIU

cc: James F. Mackin, Bus. Mgr., IBEW Local 98

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1521170708



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2455

DATE FILMED 8/2/88 CAMERA NO. \_\_\_\_

CAMERAMAN K.A.U.

88040711252





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**T06-06-89**

**THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2455**

89040752937

600#9664

LAW OFFICES  
**MERANZE AND KATZ**  
 TWELFTH FLOOR  
 LEWIS TOWER BUILDING  
 N.E. COR 15TH & LOCUST STREET  
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 215-546-4183

FEDERAL ELECTION COMMISSION

88 JUL -1 AM 8:58

BERNARD N. KATZ\*\*  
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 MARIE A. FRITZINGER\*  
 RONALD A. KOVLER\*  
 WILLIAM WALLEN\*  
 ROBERT KALLEN\*  
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BY: MICHAEL N. KATZ



MNK:dmt

UIW/SIU

cc: James F. Mackin, Bus. Mgr., IBEW Local 98

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