



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2927

DATE FILMED 8-16-89 CAMERA NO. 2

CAMERAMAN AS

89040761129

**REPORTS ANALYSIS REFERRAL**  
**TO**  
**OFFICE OF GENERAL COUNSEL**

**DATE:** December 27, 1988

**ANALYST:** Mike Tangney

**I. COMMITTEE:**           The Tooling & Machining PAC of the  
                              National Tooling and Machining  
                              Association (C00043091)  
                              Harold L. Corner, Treasurer  
                              P.O. Box 44162  
                              Ft. Washington, MD 20744

**II. RELEVANT STATUTE:**   2 U.S.C. §441b(a)  
                              11 CFR 114.5(b)

**III. BACKGROUND:**

**Receipt of Funds from a Connected Organization**

The Tooling & Machining PAC of the National Tooling and Machining Association (the "PAC") received \$6,732.26 in impermissible funds on September 1, 1988 from its connected organization, the National Tooling and Machining Association (the "Association").

On October 20, 1988, Ms. Trudy Raby, a representative of the PAC, telephoned the Reports Analysis Division analyst and explained that due to a clerical error, funds from the Association were deposited into the PAC. In addition, Ms. Raby stated that the receipt of the funds was not disclosed on the 1988 October Monthly Report and that the funds had been returned to the Association. Ms. Raby was advised to amend the 1988 October Monthly Report to disclose the receipt of the funds, disclose the transfer-out of the funds on the 1988 12 Day Pre-General Report and provide an explanation concerning what had occurred (Attachment 2).

The PAC submitted an amendment to the 1988 October Monthly Report on October 22, 1988 which disclosed the receipt of \$6,732.26 from the Association on September 1, 1988 (Attachment 3).

On October 22, 1988, the PAC submitted the 1988 12 Day Pre-General Report which disclosed that the funds were transferred-out to the Association on October 14, 1988 (Attachment 4).

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THE TOOLING & MACHINING PAC OF THE  
NATIONAL TOOLING AND MACHINING  
ASSOCIATION  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

On October 27, 1988, the PAC submitted an amendment to the 1988 12 Day Pre-General Report which stated that the funds were "inadvertently deposited in the PAC checking account due to a clerical error with a deposit slip" (Attachment 5).

An Informational Notice was sent on December 2, 1988 which advised the PAC that the transfer-in of such funds is prohibited by the Act and that the Commission may take further legal steps concerning the acceptance of impermissible funds (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 15DEC88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
TOOLING & MACHINING PAC OF THE NATIONAL TOOLING AND MACHINING ASSOCIATION				ID #C00043091	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: TOOL DIE & PRECISION MACHINING ASS'N						
1987 STATEMENT OF ORGANIZATION - AMENDMENT				12FEB87	3	87FEC/460/3293
	FEBRUARY MONTHLY	4,139	2,350	1JAN87 -31JAN87	8	87FEC/460/4419
	MARCH MONTHLY	22,528	2,900	1FEB87 -28FEB87	10	87FEC/462/1506
	MARCH MONTHLY - AMENDMENT	22,528	2,900	1FEB87 -28FEB87	5	87FEC/464/3455
	APRIL MONTHLY	1,311	2,585	1MAR87 -31MAR87	6	87FEC/464/3460
	MAY MONTHLY	4,666	500	1APR87 -30APR87	7	87FEC/467/0100
	JUNE MONTHLY	6,563	1,543	1MAY87 -31MAY87	8	87FEC/469/1769
	JULY MONTHLY	2,527	2,150	1JUN87 -30JUN87	6	87FEC/471/5265
	AUGUST MONTHLY	3,088	3,000	1JUL87 -31JUL87	6	87FEC/482/4160
	SEPTEMBER MONTHLY	1,536	250	1AUG87 -31AUG87	7	87FEC/484/5145
	SEPTEMBER MONTHLY - AMENDMENT	1,536	250	1AUG87 -31AUG87	7	87FEC/493/0233
	OCTOBER MONTHLY	5,637	2,000	1SEP87 -30SEP87	7	87FEC/486/3476
	NOVEMBER MONTHLY	5,391	1,400	1OCT87 -31OCT87	8	87FEC/493/0629
	DECEMBER MONTHLY	1,766	0	1NOV87 -30NOV87	6	87FEC/495/4959
	YEAR-END	2,083	0	1DEC87 -31DEC87	6	88FEC/499/3276
1988 STATEMENT OF ORGANIZATION - AMENDMENT				20JAN88	2	88FEC/499/3005
STATEMENT OF ORGANIZATION - AMENDMENT				19OCT88	2	88FEC/556/2419
	FEBRUARY MONTHLY	5,623	0	1JAN88 -31JAN88	6	88FEC/509/0262
	MARCH MONTHLY	16,478	3,750	1FEB88 -29FEB88	7	88FEC/512/4761
	APRIL MONTHLY	14,358	7,648	1MAR88 -31MAR88	9	88FEC/516/4978
	MAY MONTHLY	5,007	1,700	1APR88 -30APR88	8	88FEC/524/5343
	JUNE MONTHLY	7,248	5,982	1MAY88 -31MAY88	8	88FEC/529/0268
	JULY MONTHLY	5,383	3,150	1JUN88 -30JUN88	7	88FEC/532/5630
	JULY MONTHLY - AMENDMENT	-	-	1JUN88 -30JUN88	2	88FEC/541/4391
REQUEST FOR ADDITIONAL INFORMATION				1JUN88 -30JUN88	1	88FEC/541/2387
	AUGUST MONTHLY	6,434	2,138	1JUL88 -31JUL88	8	88FEC/541/0058
	AUGUST MONTHLY - AMENDMENT	6,434	2,138	1JUL88 -31JUL88	9	88FEC/547/5037
1ST LETTER INFORMATIONAL NOTICE				1JUL88 -31JUL88	1	88FEC/546/0626
	SEPTEMBER MONTHLY	3,238	23,850	1AUG88 -31AUG88	10	88FEC/545/2264
	OCTOBER MONTHLY	5,926	590	1SEP88 -30SEP88	9	88FEC/551/4665
	OCTOBER MONTHLY - AMENDMENT	12,658	590	1SEP88 -30SEP88	8	88FEC/557/4582
	PRE-GENERAL	5,180	11,482	1OCT88 -19OCT88	8	88FEC/557/4574
	PRE-GENERAL - AMENDMENT	-	-	1OCT88 -19OCT88	2	88FEC/562/1261
1ST LETTER INFORMATIONAL NOTICE				1OCT88 -19OCT88	1	88FEC/566/2823
	POST-GENERAL	3,448	21,600	20OCT88 -28NOV88	9	88FEC/570/0515
TOTAL		146,290	0	100,568	0	217 TOTAL PAGES

All reports have been reviewed up to the 12 Day Pre-General Report.

Cash on hand as of 11/28/88: \$86,310

Debts owed to the Committee as of 11/28/88: \$0

Debts owed by the Committee as of 11/28/88: \$0

**ANALYST:** Mike Tangney

**CONVERSATION WITH:** Ms. Trudy Raby

**COMMITTEE:** The Tooling & Machining PAC of the National Tooling and Machining Association (C00043091)

**DATE:** 10/20/88

**SUBJECT(S):** Receipt of Funds from connected organization

Ms Raby called to explain that as a result of a clerical error funds from the connected organization were transfered into the PAC and were not disclosed as a receipt on the October Monthly Report. In addition, she stated that upon learning of this that the funds were returned to the association during the period covered by the 12 Day Pre-General Report. I advised her to amend the October Quarterly Report to show the receipt of the funds and disclose the transfer out on the 12 Day Pre General Report as well as provide an explanation concerning what occurred.

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DISCLOSURE A

Amended 1988 October Monthly Report

The amount disclosed  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 37

The information stated from each Receipt and Statement may not be sold or used by any person for the purpose of soliciting contributions or for any other purpose, other than using the name and address of any political committee to solicit contributions from such committee.

ATTACHMENT 3

NAME OF COMMITTEE (in Full)

National Tooling & Machining PAC of NTMA

<p>A. Full Name, Mailing Address and ZIP Code Shearson/American Express Two World Trade Center New York, NY 10048</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year) 09/30/88</p>	<p>Amount of Each Receipt this Period \$ 486.09</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): INTEREST</p>		<p>Aggregate Year-to-Date &gt; \$ 3,729.00</p>	
<p>B. Full Name, Mailing Address and ZIP Code United Bank &amp; Trust Company 9401 Indian Road Highway Ft. Washington, MD 20744</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year) 09/30/88</p>	<p>Amount of Each Receipt this Period 149.23</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): CHECKING ACCOUNT</p>		<p>Aggregate Year-to-Date &gt; \$ 1,160.02</p>	
<p>C. Full Name, Mailing Address and ZIP Code NTMA 9300 Livingston Road Ft. Washington, MD 20744</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year) 09/01/88</p>	<p>Amount of Each Receipt this Period 6,732.26</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): DEPOSIT ERROR</p>		<p>Aggregate Year-to-Date &gt; \$ 6,732.26</p>	
<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date &gt; \$</p>	
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date &gt; \$</p>	
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date &gt; \$</p>	
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date &gt; \$</p>	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$ 7,367.58

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## MODULE B

## ITEMIZED DISBURSEMENTS

1988 12 Day Pre-General Report

Use separate schedule  
for each category of the  
Detailed Summary PartPAGE 1 OF 1  
FOR LINE NUMBER  
27

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 (to full)

National Tooling &amp; Machining PAC of NTMA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
NTMA 9300 Livingston Road Ft. Washington, MD 20744	Reimbursement for clerical error Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	10-14-88	\$ 6,732.26
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page 00 line number only) .....			\$ 6,732.26

5  
3  
4  
6  
7  
0  
4  
0  
2  
7  
6  
4  
3  
5

**(301) 248-6200**

# PAGE

**October 20, 1988**

### 1968 BOARD OF DIRECTORS

**HAROLD L. CORNER**  
Chairman/Treasurer  
C & J Industries  
Meadowdale, PA

HOWARD GLAZER  
Vice Chairman  
ABC Corporation  
Quings Mills, MD

BRUCE PHELPS  
Police Chairman  
Fulton Tool Co., Inc.  
Fulton, NY

**HARRY TRIESLER**  
Vice Chairman  
Precision Grinding  
Phoenix, AZ

GORDON ZINSCHLAG  
Exec. Comm. Liaison  
QOR-Tel. Inc.  
St. Paul, MN

32-17264  
Spec. Comm. Liaison  
Avion Machine Products  
Ft. Lauderdale, FL

JEFFREY WEAVER  
Secretary  
Bible Tool & Die, Inc.  
Gadsden, AL

WALTER D. COFFIN  
New Orleans

LEE E. RYAN, JR.  
Asst. Treasurer

JOHN V. HANN  
Sales Executive

ANNA MARIE LEMAY  
Staff Executive

**Mr. Mike Tangney  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463**

**Identification Number: C 000 43091**

**Reference: October Pre-Election Report (10/1/88-10/19/88)**

**Dear Mr. Tangney:**

This letter is to notify you that on September 1, 1988, \$6,732.26 was inadvertently deposited in the PAC checking account due to a clerical error with a deposit slip. A disbursement from PAC was made on October 14, 1988. At the time the error occurred, PAC had an account balance of \$104,032.16.

In addition, we are filing an Amended Monthly Report for September.

Very truly yours,

**Maryorie V. Carson**  
**Assistant Treasurer**

MVC/tar

RECEIVED  
FEDERAL BUREAU OF INVESTIGATION  
MAY 1964





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20463

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**Harold L. Corner, Treasurer**  
**Tooling & Machining PAC of the**  
**National Tooling and Machining**  
**Association**  
**P.O. Box 44162**  
**Ft. Washington, MD 20744**

**Identification Number: C00043091**

**Reference: 12 Day Pre-General Report (10/1/88-10/19/88)**

**Dear Mr. Corner:**

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

-The Commission notes the transfer-out of the funds deposited in error. You are advised that the transfer-in of such funds is prohibited by 2 U.S.C. §441b.

Although the Commission may take further legal steps concerning the acceptance of impermissible funds, the prompt action by your committee will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

**Mike Tangney**  
**Reports Analyst**  
**Reports Analysis Division**

8 9 0 4 0 7 6 1 1 3 3 7  
3 1 0 3 5 6 6 2 8 2 3 7

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

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

89 JUN 21 AM 9:02

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

RAD 88L-29

STAFF MEMBER: Debby Curry

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

RESPONDENTS: Tooling and Machining PAC of the National Tooling and Machining Association and Harold L. Corner, as treasurer, and the National Tooling and Machining Association

RELEVANT STATUTE: 2 U.S.C. § 441b(a)  
11 C.F.R. § 114.5

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF THE MATTER

This matter was generated by the Reports Analysis Division ("RAD"), after a review of the disclosure reports of the Tooling and Machining PAC of the National Tooling and Machining Association ("PAC"). The RAD review revealed that the PAC had received \$6,732.26 in impermissible funds from its connected organization, the National Tooling and Machining Association ("Association").

II. FACTUAL AND LEGAL ANALYSIS

On October 20, 1988, Ms. Trudy Raby, a representative of the PAC, telephoned the RAD Analyst and explained that due to a clerical error, funds from the Association were deposited into the PAC. In addition, Ms. Raby stated that the receipt of the funds was not disclosed on the 1988 October Monthly Report and that the funds had been returned to the Association. Ms. Raby was advised by the RAD Analyst to amend the 1988 October Monthly

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Report to disclose the receipt of the funds, to disclose the transfer-out of the funds on the 1988 12 Day Pre-General Report and to provide an explanation of the transaction in question. (Attachment 1, page 5).

The PAC submitted an amendment to the 1988 October Monthly Report on October 22, 1988, which disclosed the receipt of \$6,732.26 from the Association on September 1, 1988.

(Attachment 1, page 6). On October 22, 1988, the PAC submitted the 1988 12 Day Pre-General Report which disclosed that the funds were transferred-out to the Association on October 14, 1988. (Attachment 1, page 7).

The PAC submitted an amendment to the 1988 12 Day Pre-General Report on October 27, 1988, which stated that the funds were "inadvertently deposited in the PAC checking account due to a clerical error with a deposit slip." (Attachment 1, page 8).

An Information Notice was sent to the PAC on December 2, 1988. (Attachment 1, page 9). The Information Notice advised the PAC that the transfer-in of such funds is prohibited by the Act and that the Commission may take further legal steps concerning the acceptance of impermissible funds. (Attachment 1, page 9).

Title 2 U.S.C. § 441b(a) prohibits corporations from making contributions or expenditures in connection with federal elections. Pursuant to 11 C.F.R. § 114.5(b), treasury monies may be used by a corporation for the establishment, administration,

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and solicitation of contributions to its separate segregated fund. However, such corporate monies under this exception may not be used as a means of exchanging treasury monies for voluntary contributions. 11 C.F.R. § 114.5(b).

In the instant case, the PAC has admitted that it received an impermissible transfer-in of \$6,732.26, in the form of a deposit to the PAC account, from its connected organization. The PAC has amended its reports to show the impermissible transfer in and the transfer out of the funds in question. The transfer of \$6,732.26 from the Association to the PAC account does not appear to fall under the exemption for treasury monies that are used for the establishment, administration, and solicitation of contributions to a corporation's separate segregated fund. Therefore, it appears that a violation of 2 U.S.C. § 441b(a) has occurred with respect to the \$6,732.26 transfer into the PAC account.

Nonetheless, due to mitigating circumstances, it is the view of this Office that no enforcement proceedings should be undertaken by the Commission in this matter. First, it appears that Association funds were deposited in the PAC account due to clerical error. Second, it also appears that upon becoming aware of the error, the PAC transferred out the impermissible funds in question and notified the Reports Analysis Division of the error. Furthermore, the cash on hand balance in the PAC account was over \$100,000 during the time period (1 1/2 months) that the \$6,732.26

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in impermissible funds remained in the PAC account. Thus, it is unlikely that the misdeposit had any material impact on federal elections. Accordingly, in view of the particular circumstances presented, the Office of the General Counsel recommends that the Commission decline to open a MUR.

**III. RECOMMENDATIONS**


1. Decline to open a MUR.
2. Close the file.

Lawrence M. Noble  
General Counsel

Date

6-20-89

By:

  
Lois G. Zerner  
Associate General Counsel

Attachment  
Referral Materials

Staff Person: Debby Curry

89040761141



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN  
COMMISSION SECRETARY

DATE: JUNE 26, 1989

SUBJECT: OBJECTION TO RAD Ref. 88L-29: FIRST G.C. REPORT  
SIGNED JUNE 20, 1989

The above-captioned document was circulated to the  
Commission on Wednesday, June 21, 1989 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____ X _____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda  
for July 11, 1989.

Please notify us who will represent your Division before the  
Commission on this matter.

89040761142



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Tooling and Machining PAC of the )  
National Tooling and Machining )  
Association and Harold L. Corner, ) RAD Referral 88L-29  
as treasurer )  
National Tooling and Machining )  
Association )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of July 11, 1989,  
do hereby certify that the Commission decided by a vote of 5-1  
to take the following actions with respect to RAD Referral 88L-29:

1. Open a Matter Under Review.
2. Find reason to believe that the Tooling and  
Machining PAC of the National Tooling and  
Machining Association and Harold L. Corner,  
as treasurer, and the National Tooling and  
Machining Association violated 2 U.S.C. § 441b.
3. Direct the General Counsel to send an appro-  
priate letter and Factual and Legal Analysis  
pursuant to the above-noted actions.
4. Close the file.

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

Attest:

7-13-89

Date

Corrected

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

July 24, 1989

Harold L. Corner, Treasurer  
The Tooling & Machining PAC of the  
National Tooling and Machining  
Association  
P. O. Box 44162  
Ft. Washington, Maryland 20744

RE: MUR 2927

The Tooling & Machining PAC of  
the National Tooling and  
Machining Association and  
Harold L. Corner, as treasurer,  
and the National Tooling and  
Machining Association

Dear Mr. Corner:

On July 11, 1989, the Federal Election Commission found reason to believe that the Tooling & Machining PAC of the National Tooling and Machining Association ("Committee") and Harold L. Corner, as treasurer, and the National Tooling and Machining Association ("Association") violated 2 U.S.C. § 441b(a) a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and close its file as it pertains to the Committee and you as treasurer, and the Association. The Factual and Legal Analysis, which formed a basis for the Commission's finding is attached for your information. The Commission reminds you, however, that the PAC's receipt of \$6,732.26 in impermissible funds from the Association appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

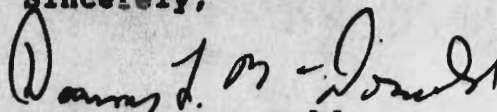
The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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Harold L. Corner  
Page 2

If you have any questions, please direct them to Deborah =  
Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

  
Danny L. McDonald  
Chairman

Enclosure  
Factual and Legal Analysis

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

THIS IS THE END OF MUR # 2927

DATE FILMED 8-16-89 CAMERA NO. 2

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