



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 545

Date Filmed 6/8/79 Camera No. --- 2

Cameraman SPC

79040131163

1911104066

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MIAMI 545- Thompson

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
☐ Show to whom and date delivered. *c*
☐ Show to whom, date, and address of delivery. *c*
☒ RESTRICTED DELIVERY *RESTRICTED DELIVERY*
 Show to whom and date delivered. *c*
☐ RESTRICTED DELIVERY *RESTRICTED DELIVERY*
 Show to whom, date, and address of delivery. *c*
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *AM 8:32*
Jack B. Reehl, Texas

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
943523

(Always obtain signature of addressee or agent)

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

4. *Bar Myers*
 DATE OF DELIVERY *15th*
4/4/79

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: *c* CLERK'S INITIALS

MAUIKEE, NEWARK MAY 4 1979



FEDERAL ELECTION COMMISSION

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

May 1, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO COPE
6333 West Bluemound Road
Milwaukee, WI 53213

RE: MUR 545

Dear Mr. Reihl,

On April 25, 1979, the Federal Election Commission determined that there was no reasonable cause to believe that your committee violated 2 U.S.C. §441b for its reported acceptance of a contribution from Steamfitters Local #601 on April 20, 1977. The Commission determined that your letters of March 8, 1979 and March 22, 1979 and the amended July 10 Quarterly Report for 1977 were adequate to assure the legality of the accepted funds.

Accordingly, and upon my recommendation, the file has been closed in this matter.

If you have any questions, please contact Judy Thedford, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO COPE
6333 West Bluemound Road
Milwaukee, WI 53213

RE: MUR 545

Dear Mr. Reihl,

On April 25, 1979, the Federal Election Commission determined that there was no reasonable cause to believe that your committee violated 2 U.S.C. §441b for its reported acceptance of a contribution from Steamfitters Local #601 on April 20, 1977. The Commission determined that your letters of March 8, 1979 and March 22, 1979 and the amended July 10 Quarterly Report for 1977 were adequate to assure the legality of the accepted funds.

Accordingly, and upon my recommendation, the file has been closed in this matter.

If you have any questions, please contact Judy Thedford, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification

94
4-30-79



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Wisconsin State AFL-CIO COPE)

MUR 545

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 25, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated April 20, 1979, regarding the above-captioned matter:

1. Find no reasonable cause to believe that Wisconsin State AFL-CIO COPE violated 2 U.S.C. §441b.
2. Send the letter attached to the above-named report.
3. Close the file.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, and Thomson.

Attest:

4/25/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: Friday, 4-20-79, 3:32
Circulated on 48 hour vote basis: Monday, 4-23-79, 11:00

79040131167



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: APRIL 25, 1979
SUBJECT: COMMENTS REGARDING LETTER ATTACHED TO
GENERAL COUNSEL'S REPORT REGARDING MUR 545

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding needed corrections to the notification letter attached to the above-named report. Also attached is a copy of the letter reflecting these changes.

ATTACHEMENTS:
Copy of Vote Sheet
Copy of Letter

79040131168



FEDERAL ELECTION COMMISSION

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

79 APR 24 P 2: 26

Date and Time Transmitted: 4-23-79 - 11:00Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, THOMSON, HARRISRETURN TO OFFICE OF COMMISSION SECRETARY BY: APRIL 25, 1979 - 11:00MUR No. 545 - General Counsel's Report dated 4-20-79

- (✓) I approve the recommendation
 () I object to the recommendation

COMMENTS: Letter needs grammatical corrections as indicatedDate: 4-23-79Signature: JW Aikens

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER
 UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE
 RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO
 THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM
 ON THE EXECUTIVE SESSION AGENDA.



79040131169



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO COPE
6333 West Bluemound Road
Milwaukee, WI 53213

RE: MUR 545

Dear Mr. Reihl:

On April , 1979, the Federal Election Commission determined that there was no reasonable cause to believe that your committee violated 2 U.S.C. §441b for its reported acceptance of a contribution from Steamfitters Local #601 on April 20, 1977. The Commission determined that your letters of March 8, 1979 and March 22, 1979 and the amended July 10 Quarterly Report for 1977 ~~was~~ *were* adequate to assure the legality of the accepted funds.

Accordingly, and upon my recommendation, the file *has been* ~~is~~ closed in this matter.

If you have any questions, please contact Judy Thedford, at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification



April 20, 1979

MEMORANDUM TO: Marg Simmons
FROM: Elissa T. Carr
SUBJECT: MUR 545

Please have the attached General Counsel's
Report on MUR 545 distributed to the Commission on
a 48 hour tally basis.

Thank you.

79040131171

RECEIVED
OFFICE OF THE
COMMISSIONER
79 APR 20 P 3: 32

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Wisconsin State AFL-CIO) MUR 545
COPE)

GENERAL COUNSEL'S REPORT

I. Background:

79040131172

This matter originated from a Reports Analysis referral to the Office of the General Counsel on February 23, 1978. The referral was based on an internal reports review which revealed that Wisconsin State AFL-CIO COPE (hereinafter "the Committee") reported a \$500 contribution from Steamfitters Local #601 which appeared to be in violation of 2 U.S.C. §441b.

On April 20, 1978, the Reports Analysis Division took further action on the referral by sending the Committee a surface violation letter. The treasurer of the Committee responded to the notice on April 24, 1978 by stating that the contribution was "voluntary contributions from some of the members of Steamfitters Local #601 and some of their friends."

In discussion of this matter on June 7, 1978, the Commission directed the Office of the General Counsel to present a proposal to the Commission for the handling of corporate and union contributions. This matter remained in abeyance until the procedures were approved by the Commission on October 25, 1978.

In accordance with the October 25, 1978 procedures, the Commission, on November 15, 1978, determined that this matter should be referred back to Reports Analysis Division for appropriate

action since the April 24, 1978 response from the Committee was considered inadequate by Reports Analysis Division. The Office of the General Counsel received two referrals from the Reports Analysis Division on March 8, and March 29, 1979. (Exhibit A and Exhibit B).

II. Reports Analysis Action:

On January 30, 1979, the Commission, upon the recommendation of the Reports Analysis Division, sent a reason to believe notice to the Committee stating that the Commission had found reason to believe that a violation of 2 U.S.C. §441b may have been committed. The treasurer of the Committee phoned the Reports Analysis Division on February 5, 1979, and stated the \$500 was voluntary contributions from members of Steamfitters Local #601 only.

On February 8, 1979, the treasurer submitted a letter to the Commission stating,

"The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect."

As amended 1977 July 10 Quarterly report was also submitted with the letter disclosing the \$500 from Steamfitters Local #601 as a receipt from a mass collection on March 18, 1977. This information was forwarded to the Office of the General Counsel in a referral dated March 8, 1979.

The March 8, 1979 update, failed to identify the exact nature of the account upon which the check was drawn. This is one of two criteria, established by the Commission in the October 25,

7 9 0 4 0 1 3 1 1 7 3

1978 memorandum on corporate and union contributions, for determining whether or not a §441b violation has been committed. Without information regarding the account on which the check was drawn, it was impossible to ascertain whether or not the voluntary contributions were commingled with union treasury money. The Office of the General Counsel requested the Reports Analysis Division to supply this information so that an appropriate recommendation could be presented to the Commission.

Subsequently, the Reports Analysis Division referred another update dated March 29, 1979, to the Office of the General Counsel. According to the March 29, 1979 update, the respondent in a phone conversation with Team Chief Mims indicated that contributions from Steamfitters Local #601 "were passed in the form of neutral instruments (a money order and cashiers check)." In his March 22, 1979 letter, the respondent submitted a copy of their receipt for the \$500 contribution which indicated that the \$500 was forwarded by money order #1634284. Respondent also submitted a \$750 cashier's check to exemplify his statement that the contributions were received on "neutral instruments". It is not the check which was used to transfer the \$500 contribution at issue, but was submitted to illustrate the fact that voluntary contributions were typically forwarded on neutral instruments.

Further, respondent's written response dated March 22, 1979 states that his communications with the Business Manager of Local #601 revealed that money from the local's fundraiser is forwarded to the Wisconsin State AFL-CIO COPE "within ten days."

The Reports Analysis Division recommends closing the matter.

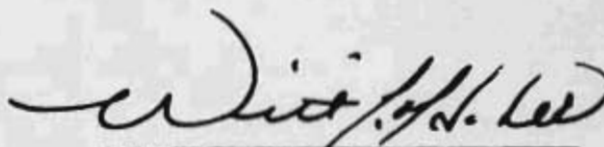
III. Analysis:

The Committee's treasurer has explained the apparent union contribution as voluntary contributions solicited from Steamfitters Local #601 members which was the result of a mass collection. The collected contributions were not commingled with union treasury funds and were forwarded promptly to the Wisconsin State AFL-CIO COPE.

IV. Recommendation:

1. Find no reasonable cause to believe that Wisconsin State AFL-CIO COPE violated 2 U.S.C. §441b.
2. Send the attached letter.
3. Close the file.

4/20/79
Date


William C. Oldaker
General Counsel

ATTACHMENTS:

Proposed letter
March 8, 1979 Update
March 29, 1979 Update

79040131175



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO COPE
6333 West Bluemound Road
Milwaukee, WI 53213

RE: MUR 545

Dear Mr. Reihl:

On April , 1979, the Federal Election Commission determined that there was no reasonable cause to believe that your committee violated 2 U.S.C. §441b for its reported acceptance of a contribution from Steamfitters Local #601 on April 20, 1977. The Commission determined that your letters of March 8, 1979 and March 22, 1979 and the amended July 10 Quarterly Report for 1977 was adequate to assure the legality of the accepted funds.

Accordingly, and upon my recommendation, the file is closed in this matter.

If you have any questions, please contact Judy Thedford, at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification



79040131175

REPORTS ANALYSIS REFERRAL UPDATE

U 254
RAD 85-14
L8-28

*ORIGIN: RAD (returned to RAD) *Shepard*

DATE March 8, 1979

ANALYST Beverly Brown *BB*

TO: OFFICE OF GENERAL COUNSEL
ATTENTION:

TEAM CHIEF Steve Mims *SM*

THROUGH: STAFF DIRECTOR *JP*

COMPLIANCE REVIEW Carroll Bowen *CB*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *PAH*

MUR No. 545

DATE OF ORIGINAL REFERRAL 2/23/78

**PURPOSE: Subject: WISCONSIN STATE AFL-CIO COPE
RAD ACTION AND COMMITTEE RESPONSE

BACKGROUND: The Wisconsin State AFL-CIO Committee On Political Education, a political committee, reported receiving a \$500 contribution from Steamfitters' Local #601 which does not have a committee registered with the Commission and, thus, appeared to have made a union contribution to a political committee. On April 20, 1978, the Reports Analysis Division sent a surface violation letter to the Wisconsin State AFL-CIO COPE Committee citing the \$500 contribution as a possible violation of 2 U.S.C. 441b. The committee responded by describing the contribution as "voluntary contributions from some of the members of Steamfitters' Local #601 and some of their friends".

On 2/23/78 the above matter was referred to the Office of General Counsel. The Office of General Counsel recommended that no reason to believe be found that the committee was in violation of 2 U.S.C. 441b. On 11/3/78, however, an Executive Session was held and the Commission determined that the matter should be forwarded to the Reports Analysis Division in accordance with 10/25/78 procedures that an inadequate response notice be sent to the respondent.

OUTCOME: (if applicable)

On 1/30/79 the Reports Analysis Division sent an inadequate response notice to Jack B. Reihl, treasurer of Wisconsin State AFL-CIO COPE. (See attachment #1) On 2/5/79, Mr. Reihl called the Commission and disclosed that the receipt of \$500 represented voluntary contributions from members of Steamfitters' Local #601. The statement in their first response, indicating that contributions had come from members friends, was erroneous. (See attachment #2)

On 2/8/79, the Wisconsin State AFL-CIO COPE amended their July 10 Quarterly 1977 report to disclose the receipt of \$500 from the Steamfitters' Local #601 as a receipt from mass collections. In addition, in an attached cover letter, Mr. Reihl states:

The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect. (See attachment #3)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

The Reports Analysis Division recommends that this matter be closed in as much that it appears the committee has responded adequately.

Exhibit A pg 1

79040131177



FEDERAL ELECTION COMMISSION

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

January 30, 1979

Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO Committee on Political Education
6333 West Bluemound Rd.
Milwaukee, WI 53213

Dear Mr. Reihl:

On April 20, 1978, you were notified that certain entries in the July 10 Quarterly '77 Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on April 24, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Beverly Brown, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John H. McCreary", is written over the word "Sincerely,".

Commissioner

Certified Mail: Return Receipt Requested

Exhibit A pg. 2

7994831133901

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BB 25V2/78-24 11P

• SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).
☐ Show to whom and date delivered C
☒ Show to whom, date, and address of delivery C
☐ RESTRICTED DELIVERY
Show to whom and date delivered C
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
94376
(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 2/5/78 13 POSTMARK MILWAUKEE, WI 53201
FEB 5 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

☆GPO 1977-0-249-596

TELECON

TO: THE FILE

FROM: BEVERLY BROWN, REPORTS ANALYST - NON- PARTY SECTION

DATE: 2/5/79

CONCERNING: WISCONSIN STATE AFL-CIO COPE - Surface Violation 2SV2/78-24

COMMITTEE CONTACT: MR. JACK REIHL , Treasurer

Mr. Reihl called to discuss the Commission's finding that the committee had responded inadequately to a surface violation notice. The committee was asked to explain the nature of the receipt of \$500 from the Steamfitters' Local #601 since it appeared, from the manner in which the receipt was reported, to be a receipt of prohibited union funds.

Mr. Reihl asked if the Commission found their response to be inadequate for having described the contribution as "voluntary contributions from members and some of their friends." I informed Mr. Reihl that the statement needed further clarification.

Mr. Reihl stated that records had been checked and that all contributions had come from local members only. The statement, indicating that contributions had come from members friends, was erroneous. The Steamfitters' Local #601 simply forwarded mass collections received at an annual event to the Wisconsin State AFL-CIO COPE Committee.

I instructed Mr. Reihl to amend his report by disclosing the receipt of mass collections on Schedule D and attaching a letter to clarify the statement regarding the receipt of contributions from friends of local members.

Exhibit A pg 4



Wisconsin State AFL-CIO

CHARTERED 1958

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213

PHONE 771-0700

John W. Schmitt, President

Joseph A. Gruber, Exec. Vice President

Jack B. Reihl, Secretary-Treasurer

February 8, 1979

000003

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

Re: 25V2/78-24

Gentlemen:

In response to your letter of January 30, 1979, we would like to clarify the original response letter that was sent April 20, 1978.

The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect.

Our committee has also filed an amended FEC Form 3 for the period involved and it is herewith enclosed.

Based on the conversation with Beverly Brown, this letter and the filing of the amended reports should be an adequate response.

Sincerely,

Jack B. Reihl, Secretary-Treasurer
WISCONSIN STATE AFL-CIO
Committee on Political Education

JBR:mh

Enc.



Exhibit A pg 5

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

7 SEP 12 10:30

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 Wisconsin State AFL-CIO Committee on Political Education		2 I.D. No. c00005413
Name of Candidate or Committee (in full)		Candidate/Committee
6333 West Bluemound Road		
Address (number and street)		3 Office Sought, State/District (if applicable)
Milwaukee, Wisconsin 53213		
City, State and ZIP Code		Year of Election
<input type="checkbox"/> Check if address is different than previously reported.		

4 Type of Report (check appropriate boxes)

- | | | |
|--|--|---|
| <input type="checkbox"/> April 10 Quarterly Report | <input type="checkbox"/> Tenth day report preceding _____ election
(primary, general or convention) | <input type="checkbox"/> Termination Report |
| <input checked="" type="checkbox"/> July 10 Quarterly Report | on _____ in the State of _____
(date) | <input type="checkbox"/> Amendment for: _____
(which report) |
| <input type="checkbox"/> October 10 Quarterly Report | <input type="checkbox"/> Thirtieth day report following _____ election
(primary, general or convention) | |
| <input type="checkbox"/> January 31 Annual Report | | |
| <input type="checkbox"/> Monthly Report _____
(month) | on _____ in the State of _____
(date) | |
| This is a report for <input type="checkbox"/> Primary Election <input type="checkbox"/> General Election <input type="checkbox"/> Primary and General <input type="checkbox"/> Other (special, runoff, etc.) | | |

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
4/1/77 Through 6/30/77		
6 Cash on hand January 1, 1977		\$ 3,391.39
7 Cash on hand at beginning of reporting period	\$ 3,391.39	
8 Total receipts (from line 19)	\$ 512.00	\$ 512.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,903.39	\$ 3,903.39
9 Total expenditures (from line 25)	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 3,903.39	\$ 3,903.39
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$	

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

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:

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

or call 800/424-9530

Approved by GAO
8-187620 (R0506)
Expires 3-31-81

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Exhibit A pg 6

DETAIL SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
Wisconsin State AFL-CIO Committee on Political Education		FROM: 4/1/77	TO: 6/30/77
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$ 512.66	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ 500.00)			
(d) Subtotal of contributions from individuals		\$ 512.00	\$ 512.00
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)		\$	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts		\$ 512.00	\$ 512.00
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$	
(b) To other committees (itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$	
(d) Subtotal of transfers out		\$	\$
23. Independent Expenditures (use Schedule E)		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)		\$	\$
25. Total Expenditures		\$	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 512.00	
27. Transfers In (from line 15(a))		\$	
28. Net Receipts (Subtract line 27 from line 26)		\$ 512.00	
29. Total Expenditures (from line 25)		\$	
30. Transfers Out (from line 22(a))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$	

Exhibit A pg 6

SCHEDULE D

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3**

(See Instructions on Back)

Page 1 of 1 for

LINE NUMBER 14c

Name of Candidate or Committee in Full

Wisconsin State AFL-CIO Committee on Political Education

Total Proceeds during the Reporting Period:

- | | | |
|---|----|--------|
| 1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)* | \$ | |
| 2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** | \$ | 500.00 |
| 3. Subtotal Receipts from the Sale of Items (not listed below) | \$ | |
| 4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3) | \$ | 500.00 |

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Steamfitters Local #601 Smoker 4112 West Burleigh Milwaukee, Wisconsin 53216	3/18/77	\$	\$ 500.00
SUBTOTAL this period		\$*	\$** 500.00

Exhibit A pg 7

Wisconsin State AFL-CIO
6333 W. BLUE MOUND ROAD
MILWAUKEE, WISCONSIN 53213



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



DEC 12 10:40

5811-101062

REPORTS ANALYSIS REFERRAL UPDATE

KAD 21 26

D-385

*ORIGIN: RAD (returned to RAD)

Thedford

DATE March 29, 1979

ANALYST Beverly Brown *BBB*

TO: OGC
ATTENTION: Judy Thedford

TEAM CHIEF Steve Mims *SM*

THROUGH: STAFF DIRECTOR *BP*

COMPLIANCE REVIEW Carroll Bowen *CB*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *ADH*

MUR No. 545

DATE OF ORIGINAL REFERRAL 2/23/78

**PURPOSE: Subject: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
UPDATE ON ACTION INITIATED BY RAD

On March 8, 1979, a referral update was forwarded to the Office Of General Counsel. Based on the response to a second letter surface violation notice, submitted by the Wisconsin State AFL-CIO COPE committee, the Reports Analysis Division recommended that the matter be closed. The Office of General Counsel again returned the matter to RAD requesting that they seek out information pertaining to the instruments used to forward the contribution money from Steamfitters Local #601 to Wisconsin State AFL-CIO COPE.

OUTCOME: (if applicable)

On 3/22/79, Steve Mims, Non-Party Section Chief, spoke with Jack Reihl, treasurer of the respondent committee, regarding the instruments used to forward contribution money from the Steamfitters Local #601 to Wisconsin State AFL-CIO COPE. Mr. Reihl indicated that contributions were passed in the form of neutral instruments (a money order and cashiers check). In addition, Steve Mims inquired after the time element involved in transferring the proceeds of the fundraiser to the Wisconsin State AFL-CIO COPE. Mr. Reihl, stated that he would look into the matter. (See attachment #1).

On March 22, 1979, Mr. Reihl forwarded a written response to the questions raised by Steve Mims. The response discloses sufficient evidence to conclude that the contribution from Steamfitters Local #601 was forwarded to Wisconsin State AFL-CIO COPE by neutral instruments on a timely basis. (See attachment #2).

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

The Reports Analysis Division recommends that this matter be closed.

Exhibit B pg 1

7904013135



FEDERAL ELECTION COMMISSION

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

March 23, 1979

MEMORANDUM

TO : THE FILE — WISCONSIN AFL-CIO
TELECON : 3/22/79 16:20
FROM : STEVE MIMS

Spoke with Jack Reihl (414-771-0700) regarding contributions from Steamfitters Local 601. As indicated, the contributions were passed along in the form of neutral instruments (a money order and cashiers check).

The question as to time between fundraiser and receipt by the committee will have to be looked into. Reihl indicated he would contact local 601 to determine the answer.

Both responses will be forwarded in writing.

Exhibit B pg 2



Wisconsin State AFL-CIO

CHARTERED 1958

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213

PHONE 771-0700

John W. Schmitt, President • Joseph A. Gruber, Exec. Vice President • Jack B. Reihl, Secretary-Treasurer

March 22, 1979

Mr. Steve Mims
Federal Election Commission
1325 K Street N.W.
Washington D.C. 20463

Dear Mr. Mims;

Enclosed are copies of the receipt and money order concerning the voluntary contributions made to our C.O.P.E. fund from Steamfitters Local 601. I called the Business Manager of Local 601 and he informed me that they submit the money to us within ten days after their fundraiser.

I hope this meets with your approval.

Sincerely

Jack B. Reihl
Secretary-Treasurer
WISCONSIN STATE AFL-CIO

JBR/kh
opeiu#9afl-cio

Exhibit B pg 3

79040131183



FIRST WISCONSIN NATIONAL BANK MILWAUKEE

MILWAUKEE, WIS

CASHIER'S CHECK

1/7

NO. 2804071

\$750.00 **

PAY TO THE
ORDER OF

Wisconsin State AFL-CIO COPE

PAID TO ORDER

NOT VALID OVER \$50,000.00

⑈2804076⑈ ⑆0750⑈0002⑈ 102162⑈000⑈

↑

*Steampfeters Union Local 601
Deposit in COPE Fund
Voluntary Contribution*

7904011189

Exhibit B pg 2

Wisconsin State AFL-CIO

No 3939

Milwaukee, Wis.

4/20 1977

Received from

Stametta Union Local #601

For

COPE - Contribution

money order # 1634284

\$ 500.00

James B. Kelly

Secretary-Treasurer

06111104062

Wisconsin State AFL-CIO
633 W. BLUE MOUND ROAD
MILWAUKEE, WISCONSIN 53213



Attn: Mr. Steve Mims

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



Exhibit B pg. 6

16115101062

REPORTS ANALYSIS REFERRAL UPDATE

KAD 49-28
D-385

*ORIGIN: RAD (returned to RAD)

DATE March 29, 1979 ANALYST Beverly Brown *BBB*
TO: OGC TEAM CHIEF Steve Mims *SM*
ATTENTION: Judy Thedford
THROUGH: STAFF DIRECTOR *ABP.* COMPLIANCE REVIEW Carroll Bowen *CB*
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *QH*

MUR No. 545 DATE OF ORIGINAL REFERRAL 2/23/78

****PURPOSE:** Subject: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
UPDATE ON ACTION INITIATED BY RAD

On March 8, 1979, a referral update was forwarded to the Office Of General Counsel. Based on the response to a second letter surface violation notice, submitted by the Wisconsin State AFL-CIO COPE committee, the Reports Analysis Division recommended that the matter be closed. The Office of General Counsel again returned the matter to RAD requesting that they seek out information pertaining to the instruments used to forward the contribution money from Steamfitters Local #601 to Wisconsin State AFL-CIO COPE.

OUTCOME: (if applicable)

On 3/22/79, Steve Mims, Non-Party Section Chief, spoke with Jack Reihl, treasurer of the respondent committee, regarding the instruments used to forward contribution money from the Steamfitters Local #601 to Wisconsin State AFL-CIO COPE. Mr. Reihl indicated that contributions were passed in the form of neutral instruments (a money order and cashiers check). In addition, Steve Mims inquired after the time element involved in transferring the proceeds of the fundraiser to the Wisconsin State AFL-CIO COPE. Mr. Reihl, stated that he would look into the matter. (See attachment #1).

On March 22, 1979, Mr. Reihl forwarded a written response to the questions raised by Steve Mims. The response discloses sufficient evidence to conclude that the contribution from Steamfitters Local #601 was forwarded to Wisconsin State AFL-CIO COPE by neutral instruments on a timely basis. (See attachment #2).

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

****INFORMATION, or RESULTS OF RAD ACTION, as appropriate.**

The Reports Analysis Division recommends that this matter be closed.

79040131192



FEDERAL ELECTION COMMISSION

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

March 23, 1979

MEMORANDUM

TO : THE FILE — WISCONSIN AFL-CIO
TELECON : 3/22/79 16:20
FROM : STEVE MIMS

Spoke with Jack Reihl (414-771-0700) regarding contributions from Steamfitters Local 601. As indicated, the contributions were passed along in the form of neutral instruments (a money order and cashiers check).

The question as to time between fundraiser and receipt by the committee will have to be looked into. Reihl indicated he would contact local 601 to determine the answer.

Both responses will be forwarded in writing.



State AFL-CIO

CHARTERED 1958

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213

PHONE 771-0700

John W. Schmitt, President

Joseph A. Gruber, Exec. Vice President

Jack B. Reihl, Secretary-Treasurer

March 22, 1979

Mr. Steve Mims
Federal Election Commission
1325 K Street N.W.
Washington D.C. 20463

Dear Mr. Mims;

Enclosed are copies of the receipt and money order concerning the voluntary contributions made to our C.O.P.E. fund from Steamfitters Local 601. I called the Business Manager of Local 601 and he informed me that they submit the money to us within ten days after their fundraiser.

I hope this meets with your approval.

Sincerely

Jack B. Reihl
Secretary-Treasurer
WISCONSIN STATE AFL-CIO

JBR/kh
opeiu#9afl-cio

79040131194



FIRST WISCONSIN NATIONAL BANK MILWAUKEE
MILWAUKEE, WIS

CASHIER'S CHECK
12/75

NO. 2804076

PAY TO THE ORDER OF Wisconsin State AFL-CIO COPE

\$750.00 **

PAID BY 12/75

NOT VALID OVER \$50,000.00

⑈ 2804076 ⑆ ⑆ 0750 ⑆ 0002 ⑆ 102162 ⑆ 000 ⑆



*Steampfeters Union Local 601
Deposit in COPE Fund
Voluntary Contribution*

79040131195

Wisconsin State AFL-CIO

No 3939

Milwaukee, Wis.,

4/20 1977

Received from

Stamflett Union Local # 601

For

COPE - Contribution

money order # 1634284

\$ 500.00

Jack B. Kelly

Secretary-Treasurer

96113104062

Wisconsin State AFL-CIO
6333 W. BLUE MOUND ROAD
MILWAUKEE, WISCONSIN 53213



Attn: Mr. Steve Mims

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



76115104062



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *mwe*

DATE:

APRIL 2, 1979

SUBJECT:

MUR 545 - Interim Investigatory Report
dated 3-28-79; Received in OCS
3-30-79, 10:54

The above-named document was circulated on a 24
hour no-objection basis at 4:30, March 30, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as
of 4:30 this date.

79040101198

March 30, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 545

Please have the attached Interim Invest Report on
MUR 545 distributed to the Commission.

Thank you.

79040131199

BEFORE THE FEDERAL ELECTION COMMISSION

79 MAR 30 A10: 54

In the Matter of)
) MUR 545
Wisconsin State AFL-CIO COPE)

INTERIM INVESTIGATORY REPORT

On March 8, 1979, the Reports Analysis Division forwarded a referral update to the Office of the General Counsel in connection with this matter. (Attachment A)

In the update, the respondent has clarified the source of the reported \$500 union contribution from Steamfitters Local #601 as voluntary contributions by members of Steamfitters Local 601 only. The update further stated, "The Reports Analysis Division recommends that this matter be closed in as much as it appears the committee has responded adequately."

The March 8, 1979 update, however, fails to identify the exact nature of the account upon which the check was drawn. This is one of two criteria, establish by the Commission in the October 25, 1978 memorandum on corporate and union contributions, for determining whether or not a §441b violation has been committed. Without information regarding the account on which the check was drawn it is impossible to ascertain whether or not the voluntary contributions were commingled with union treasury money. The Office of the General Counsel has requested the

79040131200

Reports Analysis Division to supply us with this information so that we may make an appropriate recommendation to the Commission.

3/28/14
Date

William C. Oldaker
General Counsel

Attachments

A - Referral Update

79040131201

REPORTS ANALYSIS REFERRAL UPDATE

U
RAD 85-14
18-28

*ORIGIN: RAD (returned to RAD) *Sheaford*

DATE March 8, 1979

ANALYST Beverly Brown *BB*

TO: OFFICE OF GENERAL COUNSEL
ATTENTION:

TEAM CHIEF Steve Mims *SM*

THROUGH: STAFF DIRECTOR *ofc.*

COMPLIANCE REVIEW Carroll Bowen *CB*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *PH*

MUR No. 545

DATE OF ORIGINAL REFERRAL 2/23/78

**PURPOSE: Subject: WISCONSIN STATE AFL-CIO COPE
RAD ACTION AND COMMITTEE RESPONSE

BACKGROUND: The Wisconsin State AFL-CIO Committee On Political Education, a political committee, reported receiving a \$500 contribution from Steamfitters' Local #601 which does not have a committee registered with the Commission and, thus, appeared to have made a union contribution to a political committee. On April 20, 1978, the Reports Analysis Division sent a surface violation letter to the Wisconsin State AFL-CIO COPE Committee citing the \$500 contribution as a possible violation of 2 U.S.C. 441b. The committee responded by describing the contribution as "voluntary contributions from some of the members of Steamfitters' Local #601 and some of their friends".

On 2/23/78 the above matter was referred to the Office of General Counsel. The Office of General Counsel recommended that no reason to believe be found that the committee was in violation of 2 U.S.C. 441b. On 11/3/78, however, an Executive Session was held and the Commission determined that the matter should be forwarded to the Reports Analysis Division in accordance with 10/25/78 procedures that an inadequate response notice be sent to the respondent.

OUTCOME: (if applicable)

On 1/30/79 the Reports Analysis Division sent an inadequate response notice to Jack B. Reihl, treasurer of Wisconsin State AFL-CIO COPE. (See attachment #1) On 2/5/79, Mr. Reihl called the Commission and disclosed that the receipt of \$500 represented voluntary contributions from members of Steamfitters' Local #601. The statement in their first response, indicating that contributions had come from members friends, was erroneous. (See attachment #2)

On 2/8/79, the Wisconsin State AFL-CIO COPE amended their July 10 Quarterly 1977 report to disclose the receipt of \$500 from the Steamfitters' Local #601 as a receipt from mass collections. In addition, in an attached cover letter, Mr. Reihl states:

The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect. (See attachment #3)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

The Reports Analysis Division recommends that this matter be closed in as much that it appears the committee has responded adequately.

ATTACHMENT A *pg 1*

7 2 0 4 0 1 3 1 2 0 2



FEDERAL ELECTION COMMISSION

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

January 30, 1979

Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO Committee on Political Education
6333 West Bluemound Rd.
Milwaukee, WI 53213

Dear Mr. Reihl:

On April 20, 1978, you were notified that certain entries in the July 10 Quarterly '77 Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on April 24, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Beverly Brown, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

John B. McInerney
Commissioner

Certified Mail: Return Receipt Requested

ATTACHMENT A pg 2

792999139301

BB 25V2 178.24 11P

PS Form 3811 Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

1. SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered C
☒ Show to whom, date, and address of delivery C
☐ RESTRICTED DELIVERY
Show to whom and date delivered C
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
94376
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY 2/5/78 POSTMARK MILWAUKEE, WI FEB 5 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

☆GPO: 1977-0-249-595

ATTACHMENT A pg 3

TELECON

TO: THE FILE

FROM: BEVERLY BROWN, REPORTS ANALYST - NON- PARTY SECTION

DATE: 2/5/79

CONCERNING: WISCONSIN STATE AFL-CIO COPE - Surface Violation 2SV2/78-24

COMMITTEE CONTACT: MR. JACK REIHL , Treasurer

Mr. Reihl called to discuss the Commission's finding that the committee had responded inadequately to a surface violation notice. The committee was asked to explain the nature of the receipt of \$500 from the Steamfitters' Local #601 since it appeared, from the manner in which the receipt was reported, to be a receipt of prohibited union funds.

Mr. Reihl asked if the Commission found their response to be inadequate for having described the contribution as "voluntary contributions from members and some of their friends." I informed Mr. Reihl that the statement needed further clarification.

Mr. Reihl stated that records had been checked and that all contributions had come from local members only. The statement, indicating that contributions had come from members friends, was erroneous. The Steamfitters' Local #601 simply forwarded mass collections received at an annual event to the Wisconsin State AFL-CIO COPE Committee.

I instructed Mr. Reihl to amend his report by disclosing the receipt of mass collections on Schedule D and attaching a letter to clarify the statement regarding the receipt of contributions from friends of local members.

ATTACHMENT A PG 4



Wisconsin State AFL-CIO

CHARTERED 1958

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213

PHONE 771-0700

John W. Schmitt, President

Joseph A. Gruber, Exec. Vice President

Jack B. Reihl, Secretary-Treasurer

February 8, 1979

000003

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

Re: 25V2/78-24

Gentlemen:

In response to your letter of January 30, 1979, we would like to clarify the original response letter that was sent April 20, 1978.

The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect.

Our committee has also filed an amended FEC Form 3 for the period involved and it is herewith enclosed.

Based on the conversation with Beverly Brown, this letter and the filing of the amended reports should be an adequate response.

Sincerely,

Jack B. Reihl, Secretary-Treasurer
WISCONSIN STATE AFL-CIO
Committee on Political Education

JBR:mh

Enc.



ATTACHMENT A DS 5

790401312063

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

7 SEP 12 10:30

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 Wisconsin State AFL-CIO Committee on Political Education
Name of Candidate or Committee (in full)
6333 West Bluemound Road
Address (number and street)
Milwaukee, Wisconsin 53213
City, State and ZIP Code
2 I.D. No. c00005413
Candidate/Committee
3 Office Sought, State/District (if applicable)
4 Type of Report (check appropriate boxes)
☐ April 10 Quarterly Report
☒ July 10 Quarterly Report
☐ October 10 Quarterly Report
☐ January 31 Annual Report
☐ Monthly Report (month) on (date) in the State of
☐ Tenth day report preceding election (primary, general or convention)
☐ Thirtieth day report following election (primary, general or convention)
☐ Termination Report
☐ Amendment for: (which report)
This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
4/1/77 Through 6/30/77		
6 Cash on hand January 1, 1977		\$ 3,391.39
7 Cash on hand at beginning of reporting period	\$ 3,391.39	
8 Total receipts (from line 19)	\$ 512.00	\$ 512.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,903.39	\$ 3,903.39
9 Total expenditures (from line 25)	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 3,903.39	\$ 3,903.39
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$	

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

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
Expires 3-31-81

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

ATTACHMENT A pg 6

DETAIL SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
Wisconsin State AFL-CIO Committee on Political Education		FROM: 4/1/77	TO: 6/30/77
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$ 512.00	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ 500.00)			
(d) Subtotal of contributions from individuals		\$ 512.00	\$ 512.00
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)		\$	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts		\$ 512.00	\$ 512.00
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$	
(b) To other committees (itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$	
(d) Subtotal of transfers out		\$	\$
23. Independent Expenditures (use Schedule E)		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)		\$	\$
25. Total Expenditures		\$	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 512.00	
27. Transfers In (from line 15(a))		\$	
28. Net Receipts (Subtract line 27 from line 26)		\$ 512.00	
29. Total Expenditures (from line 25)		\$	
30. Transfers Out (from line 22(a))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$	

ATTACHMENT A 0287

(See Instructions on Back)

LINE NUMBER 14c

ATTACHMENT A pgs 8

Waconia State AFL-CIO
633 W. BLUE MOUND ROAD
MILWAUKEE, WISCONSIN 53213



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



FEB 12 10:40

ATTACHMENT A 08 9

D
RAD 8-14
L8-28

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD (returned to RAD)

DATE March 8, 1979

ANALYST Beverly Brown BB

TO: OFFICE OF GENERAL COUNSEL
ATTENTION:

TEAM CHIEF Steve Mims SM

THROUGH: STAFF DIRECTOR ORP

COMPLIANCE REVIEW Carroll Bowen CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS PAH

MUR No. 545

DATE OF ORIGINAL REFERRAL 2/23/78

**PURPOSE: Subject: WISCONSIN STATE AFL-CIO COPE
RAD ACTION AND COMMITTEE RESPONSE

BACKGROUND: The Wisconsin State AFL-CIO Committee On Political Education, a political committee, reported receiving a \$500 contribution from Steamfitters' Local #601 which does not have a committee registered with the Commission and, thus, appeared to have made a union contribution to a political committee. On April 20, 1978, the Reports Analysis Division sent a surface violation letter to the Wisconsin State AFL-CIO COPE Committee citing the \$500 contribution as a possible violation of 2 U.S.C. 441b. The committee responded by describing the contribution as "voluntary contributions from some of the members of Steamfitters' Local #601 and some of their friends".

On 2/23/78 the above matter was referred to the Office of General Counsel. The Office of General Counsel recommended that no reason to believe be found that the committee was in violation of 2 U.S.C. 441b. On 11/3/78, however, an Executive Session was held and the Commission determined that the matter should be forwarded to the Reports Analysis Division in accordance with 10/25/78 procedures that an inadequate response notice be sent to the respondent.

OUTCOME: (if applicable)

On 1/30/79 the Reports Analysis Division sent an inadequate response notice to Jack B. Reihl, treasurer of Wisconsin State AFL-CIO COPE. (See attachment #1) On 2/5/79, Mr. Reihl called the Commission and disclosed that the receipt of \$500 represented voluntary contributions from members of Steamfitters' Local #601. The statement in their first response, indicating that contributions had come from members friends, was erroneous. (See attachment #2)

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The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect. (See attachment #3)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

The Reports Analysis Division recommends that this matter be closed in as much that it appears the committee has responded adequately.

79040131211



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

January 30, 1979

Jack B. Reihl, Treasurer
Wisconsin State AFL-CIO Committee on Political Education
6333 West Bluemound Rd.
Milwaukee, WI 53213

Dear Mr. Reihl:

On April 20, 1978, you were notified that certain entries in the July 10 Quarterly '77 Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on April 24, 1978, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Beverly Brown, our Reports Analyst assigned to you on our toll free number (800) 424-9530. Our local number is 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John H. McManis", is written over the word "Sincerely,".

Commissioner

Certified Mail: Return Receipt Requested

7904940121201

PS Form 3811, Apr. 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

BB 25V2/78-24 11P

<p>SENDER Complete items 1, 2, and 3 Add your address in the "RETURN TO" space on reverse</p>								
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered c</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery c</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered c</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)</p>								
<p>2. ARTICLE ADDRESSED TO:</p>								
<p>3. ARTICLE DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>94376</td> <td></td> </tr> </table> <p>(Always obtain signature of addressee or agent)</p> <p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent</p>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		94376	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	94376							
<p>4. DATE OF DELIVERY: 2/5/78 13 POSTMARK</p>								
<p>5. ADDRESS (Complete only if requested)</p>								
<p>6. UNABLE TO DELIVER BECAUSE</p> <p>CLERK'S INITIALS</p>								

TELECON

TO: THE FILE

FROM: BEVERLY BROWN, REPORTS ANALYST - NON- PARTY SECTION

DATE: 2/5/79

CONCERNING: WISCONSIN STATE AFL-CIO COPE - Surface Violation 2SV2/78-24

COMMITTEE CONTACT: MR. JACK REIHL , Treasurer

Mr. Reihl called to discuss the Commission's finding that the committee had responded inadequately to a surface violation notice. The committee was asked to explain the nature of the receipt of \$500 from the Steamfitters' Local #601 since it appeared, from the manner in which the receipt was reported, to be a receipt of prohibited union funds.

Mr. Reihl asked if the Commission found their response to be inadequate for having described the contribution as "voluntary contributions from members and some of their friends." I informed Mr. Reihl that the statement needed further clarification.

Mr. Reihl stated that records had been checked and that all contributions had come from local members only. The statement, indicating that contributions had come from members friends, was erroneous. The Steamfitters' Local #601 simply forwarded mass collections received at an annual event to the Wisconsin State AFL-CIO COPE Committee.

I instructed Mr. Reihl to amend his report by disclosing the receipt of mass collections on Schedule D and attaching a letter to clarify the statement regarding the receipt of contributions from friends of local members.

79040131214



Wisconsin State AFL-CIO

CHARTERED 1955

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213

PHONE 771-0700

John W. Schmitt, President

Joseph A. Gruber, Exec. Vice President

Jack B. Reihl, Secretary-Treasurer

February 8, 1979

000003

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

Re: 25V2/78-24

Gentlemen:

In response to your letter of January 30, 1979, we would like to clarify the original response letter that was sent April 20, 1978.

The money consisted of strictly voluntary contributions by members of Steamfitters Local 601. Only members of that local contributed. The friends statement in the letter of April 20, 1978 was incorrect.

Our committee has also filed an amended FEC Form 3 for the period involved and it is herewith enclosed.

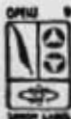
Based on the conversation with Beverly Brown, this letter and the filing of the amended reports should be an adequate response.

Sincerely,

Jack B. Reihl, Secretary-Treasurer
WISCONSIN STATE AFL-CIO
Committee on Political Education

JBR:mh

Enc.



REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

2 FEB 12 10:30

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 Wisconsin State AFL-CIO Committee on Political Education		2 I.D. No. c00005413
Name of Candidate or Committee (in full)		Candidate/Committee
6333 West Bluemound Road		
Address (number and street)		3 Office Sought, State/District (if applicable)
Milwaukee, Wisconsin 53213		
City, State and ZIP Code		Year of Election
<input type="checkbox"/> Check if address is different than previously reported.		

4 Type of Report (check appropriate boxes)

- | | | |
|--|--|---|
| <input type="checkbox"/> April 10 Quarterly Report | <input type="checkbox"/> Tenth day report preceding _____ election
(primary, general or convention) | <input type="checkbox"/> Termination Report |
| <input checked="" type="checkbox"/> July 10 Quarterly Report | on _____ in the State of _____
(date) | <input type="checkbox"/> Amendment for: _____
(which report) |
| <input type="checkbox"/> October 10 Quarterly Report | <input type="checkbox"/> Thirtieth day report following _____ election
(primary, general or convention) | |
| <input type="checkbox"/> January 31 Annual Report | | |
| <input type="checkbox"/> Monthly Report _____
(month) | on _____ in the State of _____
(date) | |
| This is a report for <input type="checkbox"/> Primary Election <input type="checkbox"/> General Election <input type="checkbox"/> Primary and General <input type="checkbox"/> Other (special, runoff, etc.) | | |

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
4/1/77 Through 6/30/77		
6 Cash on hand January 1, 1977		\$ 3,391.39
7 Cash on hand at beginning of reporting period	\$ 3,391.39	
8 Total receipts (from line 19)	\$ 512.00	\$ 512.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,903.39	\$ 3,903.39
9 Total expenditures (from line 25)	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 3,903.39	\$ 3,903.39
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$	

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

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:



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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
Expires 3-31-81

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
Wisconsin State AFL-CIO Committee on Political Education		FROM: 4/1/77	TO: 6/30/77
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 512.00		
(b) Unitemized	\$		
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ 500.00)			
(d) Subtotal of contributions from individuals	\$ 512.00	\$ 512.00	
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	\$	
16. Other Income:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of other income	\$	\$	
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$	\$	
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of refunds, rebates, returns of deposits	\$	\$	
19. Total Receipts	\$ 512.00	\$ 512.00	
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of operating expenditures	\$	\$	
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$	
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$		
(b) To other committees (itemize on Schedule B regardless of amount)	\$		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$		
(d) Subtotal of transfers out	\$	\$	
23. Independent Expenditures (use Schedule E)	\$	\$	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$	\$	
25. Total Expenditures	\$	\$	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 512.00		
27. Transfers In (from line 15(a))	\$		
28. Net Receipts (Subtract line 27 from line 26)	\$ 512.00		
29. Total Expenditures (from line 25)	\$		
30. Transfers Out (from line 22(a))	\$		
31. Net Expenditures (Subtract line 30 from line 29)	\$		

ITEMIZED RECEIPTS SALES AND COLLECTIONS
FOR LINE NUMBER 14c ONLY OF FEC FORM 3

(See Instructions on Back)

Page 1 of 1 for

LINE NUMBER 14c

Name of Candidate or Committee in Full

Wisconsin State AFL-CIO Committee on Political Education

Total Proceeds during the Reporting Period:

1. Subtotal Receipts from the Sale of Tickets (list by event below and enter from subtotal Column A)*. \$
2. Subtotal Receipts from Mass Collections (list by event below and enter from subtotal Column B)** \$ 500.00
3. Subtotal Receipts from the Sale of Items (not listed below). \$
4. TOTAL (carry forward to Line 14c of Detailed Summary, Page 2, FEC Form 3). \$ 500.00

LIST OF SALES AND COLLECTIONS BY EVENT

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	COLUMN A Amount from Sale of Tickets this Period*	COLUMN B Amount from Mass Collections this Period**
Steamfitters Local #601 Smoker 4112 West Burleigh Milwaukee, Wisconsin 53216	3/18/77	\$	\$ 500.00
SUBTOTAL this period		\$*	\$** 500.00

72040131213

Wisconsin State AFL-CIO
6333 W. BLUE MOUND ROAD
MILWAUKEE, WISCONSIN 53213



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



DEC 12 AIO: 40

612101062



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *mwe*

DATE:

MARCH 5, 1979

SUBJECT:

MUR 545 - Interim Investigative Report
dated 2-27-79; Signed by GC 3-1-79;
Received in OCS 3-2-79, 11:02

The above-named document was circulated on a 24
hour no-objection basis at 4:30, Friday, March 2, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigative Report as of
4:30 this date.

79040131220

March 2, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 545

Please have the attached Interim Invest Report
on MUR 545 distributed to the Commission.

Thank you.

79040131221

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
BEFORE THE FEDERAL ELECTION COMMISSION
February 27, 1979

79 MAR 2 11:02

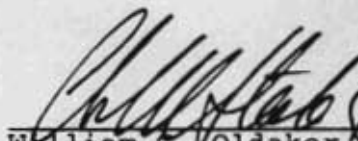
In the Matter of)
)
Wisconsin State AFL-CIO) MUR 545
COPE)

INTERIM INVESTIGATIVE REPORT

On November 21, 1978, the Wisconsin State AFL-CIO COPE was referred to the Reports Analysis Division for appropriate action. On January 23, 1979, upon the recommendation of the Reports Analysis Division, the Commission found reason to believe that the respondent may have committed a violation of 2 U.S.C. §441b.

As of this date, no further information has been provided to the Office of the General Counsel in connection with this referral.

Date: 1 March 1979


William C. Oldaker
General Counsel

79040131222



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *mwe*

DATE:

FEBRUARY 13, 1979

SUBJECT:

MUR 545 - Interim Investigative Report
dated 2-6-79; Signed by GC 2-8-79;
Received in OCS 2-9-79, 12:32

The above-named document was circulated on a 24
hour no-objection basis at 10:30, Monday, February 12, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigative Report as of
12:00 this date.

79040131223

February 9, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 545

Please have the attached Interim Invest Report
on MUR 545 distributed to the Commission.

Thank you.

79040131224

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
February 6, 1979

79 FEB 9 PI2: 32

In the Matter of)
)
Wisconsin State AFL-CIO) MUR 545
COPE)
Steamfitters Local #601)

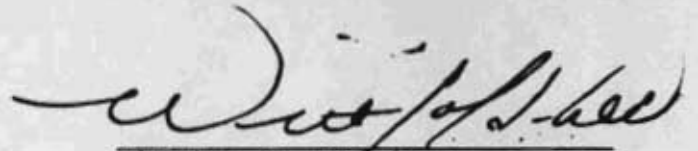
INTERIM INVESTIGATIVE REPORT

On November 21, 1978, the Wisconsin State AFL-CIO COPE was referred to the Reports Analysis Division for appropriate action in connection with its reported acceptance of a union contribution on April 20, 1977.

The Office of the General Counsel contacted the Reports Analysis Division in reference to this matter and was notified that on January 23, 1979, upon the recommendation of the Reports Analysis Division, the Commission had found reason to believe that a violation of 2 U.S.C. §441b had been committed by the Wisconsin State AFL-CIO COPE; and that the committee had been notified accordingly.

Date:

2/8/79



William C. Oldaker
General Counsel

79040131225



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS

DATE:

JANUARY 16, 1979

SUBJECT:

MUR 545 - Interim Investigatory Report
dated 1-10-79; Signed 1012-79;
Received in OCS Friday, 1-12-79,
3:20

MWE

The above-named document was circulated on a 24
hour no-objection basis at 3:30, January 15, 1978, Monday.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as of
4:00 this date.

79040131226

January 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 548

Please have the attached Interim Invest Report on
MUR 548 distributed to the Commission.

Thank you.

79040131227

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
January 10, 1979

79 JAN 12 P 3: 20

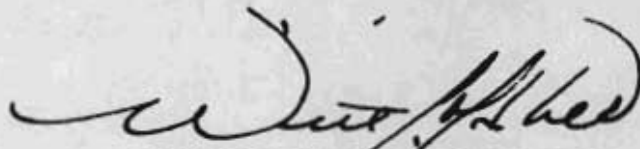
In the Matter of)
)
Wisconsin State AFL-CIO) MUR 545
COPE)
Steamfitters Local #601)

INTERIM INVESTIGATORY REPORT

On November 21, 1978, Wisconsin State AFL-CIO COPE was referred to the Reports Analysis Division for appropriate action in connection with its reported acceptance of a union contribution on April 20, 1977.

As of this date, no further information has been provided to the Office of the General Counsel from the Reports Analysis Division in connection with the referral.

1/12/79
Date


William C. Oldaker
General Counsel

79040131228



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS

DATE:

DECEMBER 15, 1978

SUBJECT:

MUR 545 - Interim Investigatory Report
dated 12-11-78: Signed by GC
12-12-78; Received in OCS 12-13-78
1:03

mwe

The above-named document was circulated on a 24
hour no-objection basis at 10:00, December 14, 1978.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as of
11:00 this date.

79040161229

December 13, 1978

MEMORANDUM TO: Marge Emons
FROM: Eliasa T. Garr
SUBJECT: NUR 545

Please have the attached Interim Invest Report on
NUR 545 distributed to the Commission.

Thankyou.

79040151230

BEFORE THE FEDERAL ELECTION COMMISSION
DECEMBER 11, 1978

RECEIVED
OFFICE OF THE
SECRETARY

78 DEC 13 P 1: 03

In the Matter of)
)
Wisconsin State AFL-CIO) MUR 545
COPE)
Steamfitters Local #601)

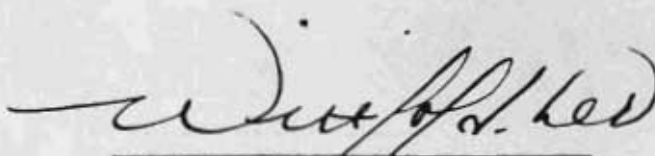
INTERIM INVESTIGATORY REPORT

On November 21, 1978, Wisconsin State AFL-CIO COPE was referred to the Reports Analysis Division for appropriate action in connection with its reported acceptance of a union contribution on April 20, 1977.

As of this date, no further information has been provided to the Office of the General Counsel from the Reports Analysis Division in connection with the referral.

12/12/78

Date



William C. Oldaker
General Counsel

79040131231



FEDERAL ELECTION COMMISSION

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

November 21, 1978

MEMORANDUM

TO: TOM HASELHORST

FROM: WILLIAM C. OLDAKER

SUBJECT: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL
EDUCATION

In accordance with the Commission procedures for handling corporate/union contributions, the Commission voted to refer the Wisconsin State AFL-CIO COPE to the Reports Analysis Division for appropriate action.

The committee was originally referred to the Office of the General Counsel on February 23, 1978, after a review of the reports revealed that the committee may have received a union contribution from Steamfitters Local #601 on April 20, 1977.



FEDERAL ELECTION COMMISSION

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

11/20/78

MEMORANDUM

TO: TOM HASELHORST

FROM: WILLIAM C. OLDAKER

SUBJECT: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL
EDUCATION

In accordance with the Commission procedures for handling corporate/union contributions, the Commission voted to refer the Wisconsin State AFL-CIO COPE to the Reports Analysis Division for appropriate action.

The committee was originally referred to the Office of the General Counsel on February 23, 1978, after a review of the reports revealed that the committee may have received a union contribution from Steamfitters Local #601 on April 20, 1977.

86-11-7-78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 545
Wisconsin State AFL-CIO COPE)
Steamfitters Local #601)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 15, 1978, at an Executive Session at which a quorum was present, the Commission determined by a vote of 5-0 to approve the following recommendations in the above-captioned matter:

1. Refer respondent Wisconsin State AFL-CIO COPE to the Reports Analysis Division for appropriate action.
2. Leave the file open.

Voting for this determination were Commissioners Aikens, Harris, McGarry, Springer, and Tiernan. Commissioner Thomson was not present at the time of the vote.

Attest:

11/17/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040131234



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: NOVEMBER 3, 1978
SUBJECT: OBJECTION - MUR 545 - General Counsel's
Report dated 10-31-78
Received in OCS: 11-3-78, 7:45

The above-named document was circulated on a 48
hour vote basis at 12:00, November 3, 1978.

Commissioner Aikens submitted an objection at
2:31 thereby placing MUR 545 on the Executive Session
Agenda for November 15, 1978.

79040131235

November 2, 1978

MEMORANDUM TO: Marge Hanson
FROM: Elissa T. Carr
SUBJECT: MUR 545

Please have the attached General Counsel's Report
on MUR 545 distributed to the Commission on a 48-hour
tally basis.

Thank you.

79040131236

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
)
Wisconsin State AFL-CIO COPE) MUR 545
Steamfitters Local #601)

GENERAL COUNSEL'S REPORT

I. BACKGROUND:

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The 7 Day Report on MUR 545 was previously circulated to the Commission and placed on the June 7, 1978 agenda. Commission discussion of this matter directed the Office of the General Counsel to present to the Commission a proposal for Commission handling of corporate and union contributions. The matter remained in abeyance until the proposal was presented to the Commission. On October 25, 1978, the Commission approved procedures for Commission-wide handling of corporate/union contributions.

II. ANALYSIS

This matter originated from a referral to the Office of the General Counsel on February 23, 1978. At the time of the referral the Reports Analysis Division had not made any attempt to contact the Wisconsin State AFL-CIO COPE, the committee reporting a union contribution. On April 20, 1978, however, the Reports Analysis Division sent a surface violation letter to respondent Wisconsin State AFL-CIO COPE. The committee responded on April 24, 1978 and stated that, "The money consisted of voluntary contributions from some of the members of Steamfitters Local 601 and some of their friends,..." The Reports Analysis Division has notified the Office of the General Counsel that this response is not adequate in that the letter fails

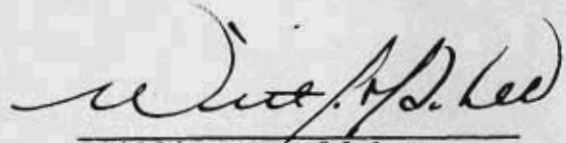
to provide the nature of account from which the check is drawn. This is one of the two criteria for determining §441b violations set forth in the October 25, 1978 Commission procedures. The Reports Analysis Division also feels that further information is necessary to assure compliance with 2 U.S.C. §434(b)(2).

In accordance with the procedures approved by the Commission on October 25, 1978, the Reports Analysis Division would take further action before referring the committee to the Office of the General Counsel. As the Office of the General Counsel has not initiated any action on the referred reporting violation and the October 25, 1978 procedures dictate that the Reports Analysis Division take further action, the Office of the General Counsel recommends that respondent Wisconsin State AFL-CIO COPE be referred to Reports Analysis Division for appropriate action.

III. RECOMMENDATION:

1. Refer respondent Wisconsin State AFL-CIO COPE to the Reports Analysis Division for appropriate action.
2. Close the file.

11/1/78
Date


William C. Oldaker
General Counsel

ATTACHMENT:
Referral Memo



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: TOM HASELHORST

FROM: WILLIAM C. OLDAKER

SUBJECT: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL
EDUCATION

In accordance with the Commission procedures for handling corporate/union contributions, the Commission voted to refer the Wisconsin State AFL-CIO COPE to the Reports Analysis Division for appropriate action.

The committee was originally referred to the Office of the General Counsel on February 23, 1978, after a review of the reports revealed that the committee may have received a union contribution from Steamfitters Local #601 on April 20, 1977.

79040131239



FEDERAL ELECTION COMMISSION

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

June 5, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: OBJECTION - MUR 545 - First General Counsel
Report dated 6-2-78

The above-mentioned document was circulated to the
Commissioners at 10:30 a.m., June 5, 1978.

Commissioner Tiernan submitted an objection at 11:10 a.m.,
this date.

Therefore, MUR 545 will be placed on the agenda for
June 7, 1978.

cc: Commissioner Tiernan

79040131240

June 2, 1978

MEMORANDUM TO: Marge Emmons
FROM: Eliasa T. Garr
SUBJECT: MUR 545

Please have the attached revised 7 day report on
MUR 545 distributed to the Commission on a 48 hour tally
basis.

Thank you.

79040131241

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUN 2 1978

MUR NO. 545 (78)
STAFF MEMBER(S) THEDFORD

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D
RESPONDENT'S NAME: Wisconsin State AFL-CIO Committee On Political
Education
Steamfitters' Local #601
RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Wisconsin State AFL-CIO COPE

FEDERAL AGENCIES CHECKED: N/A

GENERATION OF MATTER

This matter was initiated through the alphabetical review of non-party reports normally conducted by the Reports Analysis Division, Non-Party Team. The matter was referred to the Office of the General Counsel after the Reports Analysis review indicated a violation of 2 U.S.C. §441b.

PRELIMINARY LEGAL ANALYSIS

The Wisconsin State AFL-CIO Committee On Political Education, a political committee, reported receiving a \$500 contribution from Steamfitters' Local #601. Steamfitters' Local #601 does not have a committee registered with the Commission and, thus, appeared to have made a union contribution to a political committee.

On April 20, 1978, the Reports Analysis Division sent a surface violation letter to Wisconsin State AFL-CIO COPE citing the \$500 contribution from Steamfitters' Local #601 as a possible

violation of 2 U.S.C. §441b. On April 26, 1978, the attached response was received from the committee (Exhibit A). The apparent union contribution was described as "voluntary contributions from some of the members of Steamfitters Local #601 and some of their friends".

RECOMMENDATION

- 1) Find no reason to believe that a violation of 2 U.S.C. §441b has been committed by Wisconsin State AFL-CIO COPE and Steamfitters' Local #601.
- 2) Close the file.

79040131243

Wisconsin State AFL-CIO



CHARTERED 1958

6333 W. BLUE MOUND RD., MILWAUKEE, WISCONSIN 53213 PHONE 771-0700

John W. Schmitt, President • Joseph A. Gruber, Exec. Vice President • Jack B. Reihl, Secretary-Treasurer

April 24, 1978

000144

Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Attention: Marybeth Tarrant
Re: 2SV1/78-24

Dear Sir:

In response to your certified letter dated April 20, 1978, concerning my report of July 10 Quarterly Report of Receipts and Expenditures, please be advised that the contribution listed as having been received on 4/20/77 from Steamfitters Local 601, in the amount of \$500.00, was not union treasury money and was not money raised to be union treasury money.

The money consisted of voluntary contributions of some of the members of Steamfitters Local 601 and some of their friends, and should have been reported as such.

Sincerely,

Jack B. Reihl

Jack B. Reihl, Secretary-Treasurer
WISCONSIN STATE AFL-CIO

JBR:mh

(Exhibit A)



7 97084003103713214049 6



FEDERAL ELECTION COMMISSION

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

329
Tom - do review of Bill A
memo of 2/22. I am
returning this, since
it appears to cover the
types of cases on which
February 23, 1978
OFC would like to
take further action.

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASELHORST TH

FROM: STEVE MIMS SM

RE: MUK 545
WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
(JULY 10 QUARTERLY)
WYOMING-DENTAL-POLITICAL-ACTION-COMMITTEE
(OCTOBER 10 QUARTERLY)
NORTH TEXAS POLITICAL ACTION COMMITTEE
(YEAR END 1977)

A review of the Reports of Receipts and Expenditures filed by the above captioned committees shows four instances of receipts from union and/or corporate funds other than separate segregated political funds. In keeping with the Commission's decision of November 17, 1977 these apparent violations are referred to your office for immediate consideration.

Should you have any questions in this regard please let me know.



X () NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. Steamfitters' Local #601

(full name of committee making the contribution)

4112 West Burleigh Street

(address)

Milwaukee, Wisconsin 53210

(city, state, zip)

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S)

CODED BY: Beverly Brown

DATE: 12 / 28 / 77

SV#

7 APPENDIX XII

7 APPENDIX XII(R)

7 APPENDIX XII(NR)

2. Wisconsin State AFL-CIO Committee on Political Education

(full name of committee receiving the contribution)

6333 West Bluemound Road

(address)

Milwaukee, Wisconsin 53213

(city, state, zip)

Jack B. Reihl

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S) - Union

CODED BY: Beverly Brown

DATE: 12/28/77

SV# 2SV1 - 77-88

7 APPENDIX XII

7 APPENDIX XII(R)

7 APPENDIX XII(NR)

Schedule A

July 2000
 Federal Election Commission
 1000 K Street, N.W.
 Washington, D.C. 20046-3

Contributions, Ticket Purchases, Loans,
 Debts, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3
 (see instructions on back)

LINE NUMBER 15A

(Use separate schedule(s) for each
 numbered line)

Name of Candidate or Committee in full

Wisconsin State AFL-CIO Committee on Political Education

Full Name, mailing address and ZIP code

Steamfitters' Local #601
 4112 West Burleigh Street
 Milwaukee, Wisconsin 53210

Date (month,
day, year)

4/20/77

Amount of cash
receipt this period

500.00

Principal place of business

Same

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of cash
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of cash
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of cash
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of cash
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of cash
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$

Total this period (last page this line number only) ▶ \$ 500.00

7907703015247320

~~1~~ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
~~2~~ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
~~3~~RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
(full name of committee making the contribution)

(address)

(city, state, zip)

(treasurer, if given)

TYPE OF REPORT: _____

FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____

SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

CODED BY: _____

DATE: _____

SV# 2SV1 / 78-01

☒ APPENDIX XII

☒ APPENDIX XII(R)

☒ APPENDIX XII(NR)

2. Wyoming Dental Political Action Committee
(full name of committee receiving the contribution)

1200 E. 19th Street
(address)

Cheyenne, Wyoming 82001
(city, state, zip)

H. Paul Fanning
(treasurer, if given)

TYPE OF REPORT: October 10 Quarterly FILED WITH: Federal Election Commission

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Marybeth Tarrant

SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A(S) - UNION

CODED BY: Marybeth Tarrant

DATE: January 3, 1978

SV# 2SV1 / 78-01

☒ APPENDIX XII

☒ APPENDIX XII(R)

☒ APPENDIX XII(NR)

Receipts, Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 3 of 4 for
LINE NUMBER 18(a)
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code

WYOMING DENTAL ASSOCIATION
(Parent organization of Wyoming D-PAC)

Date (month, day, year)

9/2/77

Amount of each receipt this period

\$1,000.00

Principal place of business

1303 South Jackson
Casper, Wyoming 82601

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$1,000.00

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$

Total this period (last page this line number only) ▶ \$1,000.00

TRANSMITTAL TO WORD PROCESSING

☒ 1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☐ 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☐ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
 (full name of committee making the contribution)

 (address)

 (city, state, zip)

 (treasurer, if given)

TYPE OF REPORT: _____ FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____ SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

CODED BY: _____

DATE: _____

SV# _____

- ☒ APPENDIX XII
☒ APPENDIX XII(R)
☒ APPENDIX XII(NR)

2. North Texas Political Action Committee
 (full name of committee receiving the contribution)

200 City National Building
 (address)

Wichita Falls, TX 76301
 (city, state, zip)

- Jerry F. Mathis
 (treasurer, if given)

TYPE OF REPORT: Year End 77 FILED WITH: Federal Election Commission

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Ron Ewalt SECTION IN VIOLATION: 4416b

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A(p)

CODED BY: RJE

DATE: 2/8/77

SV# 2502-781

- ☐ APPENDIX XII
☐ APPENDIX XII(R)
☐ APPENDIX XII(NR)

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 6 of 6 for

LINE NUMBER 15a

(Use separate schedule(s) for each numbered line)

Section Commission
N. Street, N.W.,
Washington, D.C. 20463

Name of Candidate or Committee in full

North Texas Political Action Committee

Full Name, mailing address and ZIP code

**Expando Production Co.
607 Hamilton Bldg.
Wichita Falls, TX 76301**

Principal place of business

Expando Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ **500.00**

Date (month,
day, year)

12/6/77

Amount of each
receipt this period

500.00

Full Name, mailing address and ZIP code

**Jack Grace Production Co.
821 Petroleum Bldg.
Wichita Falls, TX 76301**

Principal place of business

Jack Grace Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ **500.00**

Date (month,
day, year)

11/20/77

Amount of each
receipt this period

500.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Subtotal of receipts this page (optional)

▶ \$ **1,000.00**

Total this period (last page this line number only)

▶ \$ **14,650.00**



FEDERAL ELECTION COMMISSION

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

May 3, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: MURs 545 and 546 (78) - Memorandum dated 5-1-78
Received in Office of
Commission Secretary:
5-2-78, 1:54

The above-mentioned document was circulated on a
24 hour no-objection basis as 4:00 p.m., May 1, 1978.

As of 4:00 p.m., this date, no objections have been
received in the Office of Commission Secretary to the
Memorandum.

79040131252

May 2, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MURs 545 & 546

Please have the attached Memo to the Commission
circulated on a 24 hour no-objection basis.

Thank you.

79040131253



FEDERAL ELECTION COMMISSION

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

May 1, 1978

MEMORANDUM

TO: The Commissioners
FROM: William C. Oldaker *WCO*
SUBJECT: MUR 545 and 546

On February 23, 1978, the Reports Analysis Division referred three committees to the Office of the General Counsel as having possibly violated 2 U.S.C. §441b for receiving corporate and/or union contributions. Two committees, Wisconsin State AFL-CIO Committee On Political Education and the Wyoming Dental Political Action Committee, became respondents in MURs 545 and 546. The 7 Day Reports for these matters were circulated to the Commission on April 21, 1978 recommending finding reason to believe that violations of 2 U.S.C. §441b had been committed.

On April 27, 1978, the staff member assigned to these matters was notified that the Reports Analysis Division had taken action on the referrals. Surface violation letters had been sent to the two committees on April 20, 1978; and a response had been received from the Wisconsin State AFL-CIO COPE in response to their notification.

79040131254

In light of the fact of the above-mentioned action having been taken by the Reports Analysis Division, we request authorization to withdraw the 7 Day Report for MUR 545. The 7 Day Report for MUR 546 will be revised and recirculated.

79040131255



FEDERAL ELECTION COMMISSION

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

APRIL 24, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE EMMONS *mwe*

RE: MUR 545 - FIRST GENERAL COUNSEL'S REPORT

The Commission Secretary's Office circulated the above-captioned document on April 21, 1978 at 3:30 p.m.

An "objection" was filed by Commissioner Harris on April 24, 1978, and we have placed this matter on the agenda for the Executive Session of Wednesday, May 3, 1978.

79040131256



April 21, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 545

Please have the attached 7 day report on MUR 545 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040131257

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION APR 21 1978

MUR NO. 545 (78)
STAFF MEMBER(S) Thedford

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

RESPONDENT'S NAME: Wisconsin State AFL-CIO Committee On Political
Education
Steamfitters' Local #601

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Wisconsin State AFL-CIO Committee On Political
Education

FEDERAL AGENCIES CHECKED: N/A

GENERATION OF MATTER

This matter was initiated through the alphabetical review of non-party reports normally conducted by the Reports Analysis Division, Non-Party Team. The matter was referred to the Office of the General Counsel after the Reports Analysis review indicated a violation of 2 U.S.C. §441b.

PRELIMINARY LEGAL ANALYSIS

The Wisconsin State AFL-CIO Committee On Political Education, a political committee, reported receiving a \$500 contribution from Steamfitters' Local #601. Steamfitters' Local #601 is not registered with the Commission and appears to have made a union contribution to a political committee. In keeping with the Commission's March 15, 1978 decision, this matter is being given MUR status with both the union and the recipient committee being made respondents since the \$500 contribution meets the prescribed threshold of \$100. (memo attached). Therefore, Steamfitters' Local #601 may have committed a violation of 2 U.S.C. §441b for contributing union treasury money to a political committee, and Wisconsin State AFL-CIO Committee On Political Education may have committed a violation of 2 U.S.C. §441b for accepting a union contribution.

RECOMMENDATION

- 1) Find reason to believe that Wisconsin State AFL-CIO Committee On Political Education and Steamfitters' Local #601 may have committed a violation of 2 U.S.C. §441b.
- 2) Send the attached letters.



FEDERAL ELECTION COMMISSION

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

March 15, 1978

SUPPLEMENTAL
MEMORANDUM TO: The Commission

FROM: William C. Oldaker *WCO*

SUBJECT: Changing the Commission's Threshold for
Making MURs of Corporate/Union Contributions

As a supplement and amendment to the Office of General Counsel's memorandum dated February 23, 1978, this office would like to propose a different 441b threshold for the Commission's consideration.

We recommend that the \$100 threshold for making corporate/union contributors respondents be approved as originally proposed. However, to accommodate the possibility of one or two large 441b contributions being accepted by a committee, we now propose that a committee be made a respondent for acceptance of one or more 441b contributions aggregating \$100 or more.

It should be noted that both the Audit and Disclosure Divisions would continue to request that a committee reimburse corporations/unions who have made contributions in any amount; however, a MUR would not be initiated unless the committee refused to reimburse the 441b contributor or the proposed thresholds were met.

It is important to reiterate the resource problem inherent in launching compliance actions against every suspected or verified 441b contribution which comes to the Commission's attention. We feel these thresholds strike a practical balance between the pursuit of all corporate/union contributions, no matter how small, and a careless disregard for the Congressional intent behind prohibiting 441b contributions.

Recommendation:

Threshold for making a corporate/union contributor a respondent = contribution of \$100 or more to a committee per election.

Threshold for making a recipient committee a respondent = receipt of one or more 441b contributions aggregating in excess of \$100 per election.





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Steamfitters' Local #601
4112 West Burleigh Street
Milwaukee, WI 53210

Re: MUR 545 (78)

Dear Madam or Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your union local may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your contribution of \$500 to Wisconsin State AFL-CIO Committee On Political Education on April 20, 1977 violates 2 U.S.C. §441b which prohibits unions from making contributions to political committees. A copy of the report disclosing this contribution is attached for your clarification. We have numbered this matter MUR 545.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.



79040131260

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040131261



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John B. Riehl, Treasurer
Wisconsin State AFL-CIO Committee On
Political Education
6333 West Blue Mound Rd.
Milwaukee, WI 53213

Re: MUR 545 (78)

Dear Mr. Riehl:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your acceptance of a \$500 contribution from Steamfitters' Local #601 on April 20, 1977, violates 2 U.S.C. §441b which prohibits the acceptance of union contributions by a political committee. A copy of your report is attached for your review and clarification. We have numbered this matter MUR 545.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4052.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.



If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

790401-1263

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASELHORST *TH*

FROM: STEVE MIMS *SM*

RE: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
(JULY 10 QUARTERLY)
WYOMING DENTAL POLITICAL ACTION COMMITTEE
(OCTOBER 10 QUARTERLY) *MUN 546*
NORTH TEXAS POLITICAL ACTION COMMITTEE
(YEAR END 1977)

A review of the Reports of Receipts and Expenditures filed by the above captioned committees shows four instances of receipts from union and/or corporate funds other than separate segregated political funds. In keeping with the Commission's decision of November 17, 1977 these apparent violations are referred to your office for immediate consideration.

Should you have any questions in this regard please let me know.

D-29
Tom - In view of Bill O's
memo of 2/22, I am
returning this, since
it appears to cover the
type of cases on which
February 23, 1978
OFC would like to agree
to take further action -

ORP.
4/27.



**Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

LINE NUMBER 15A

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Wisconsin State AFL-CIO Committee on Political Education

Full Name, mailing address and ZIP code Steamfitters' Local #601 4112 West Burleigh Street Milwaukee, Wisconsin 53210		Date (month, day, year) 4/20/77	Amount of each receipt this per 500.00
Principal place of business Same	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this per
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶ \$	
Total this period (last page this line number only)		▶ \$	500.00



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 545

Date Filmed 6/8/79 Camera No. --- 2

Cameraman bpc

790401 J1267

RECEIVED BY THE FEDERAL ELECTION COMMISSION