



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4371

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JMW

97043792315

April 9, 1996

42

Mr. Kent Cooper  
Public Records Office  
Federal Election Comm.  
999 E. Street, N.W.  
Washington, D.C. 20463

Apr 23 12:40 PM '96

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Mr. Cooper:

I believe Employment Group of Battle Creek Michigan violated election laws when I was employed by them. I worked for them approximately six years. In April of 1990 a letter was sent to all employees strongly suggesting that each of us send a contribution of \$50 to the National Assoc. of Temporary Services' Political Action Committee. We were informed that we would be covertly reimbursed in the form of a "bonus" check. Then we were told to destroy the letter.

I sent N.A.T.S. P.A.C., - State Employees Credit Union check #696 for \$50 on 4-17-90 and was subsequently reimbursed as promised. I believe most or

all of the employees at that time complied with this request. I have since learned that this was indeed illegal and may constitute mail fraud.

I was terminated by this company in January 1992 and have been involved in a dispute with Michigan Employment Security Commission over unemployment ever since. I have reported Employment Groups illegal activity to M.E.S.C. several times over the years and they have disdained to pursue it. I am therefore forwarding the information to you to use as you see fit. If I can be of any further help in this matter, please contact me.

Sincerely

J Ann Dietel  
71 Angus Circle  
Cottonwood, Az 86326

Phone # (520) 639-0274



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

April 25, 1996

Jo Ann Dietel  
71 Agnus Circle  
Cottonwood, AZ 86326

Dear Ms. Dietel:

This is to acknowledge receipt on April 23, 1996, of your letter dated April 9, 1996. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter did not contain a notarization on your signature and was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_\_ day of \_\_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before him/her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

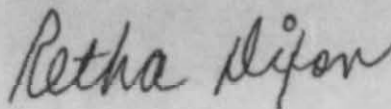
Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

97043792318



If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,



Retha Dixon  
Docket Chief

Enclosure

cc: Employment Group

97043792319

April 30, 1996

Retha Dixon  
Federal Election Committee  
999 E. Street, N.W.  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
MAY 6 12 29 PM '96

Dear Ms. Dixon:

I believe Employment Group of Battle Creek, Michigan violated election laws when I was employed by them. I worked for them approximately six years. In April of 1990 a letter was sent to all employees strongly suggesting that each of us send a contribution of \$50 to National Association of Temporary Services' Political Action Committee. We were informed that we would be covertly reimbursed in the form of bonus checks. Then we were told to destroy the letter.

I sent National Association of Temporary Services, Michigan State Employees Credit Union check # 696 for \$50 on April 17, 1990 and was subsequently reimbursed as promised. I believe most or all of the employees at that time complied with this request. I have since learned that this was indeed illegal and may constitute mail fraud.

I was terminated by this company in January 1992 and have been involved in a dispute with Michigan Employment Security Commission over unemployment ever since. I have reported this illegal activity to M.E.S.C. several times over the years and they have disdained to pursue it. I am therefore forwarding the information to you to use as you see fit. If I can be of any further help in this matter, please contact me.

Sincerely,

Glenn Dietel

71 Angus Circle  
Cottonwood Az  
86326

9704379232

STATE OF ARIZONA } ss.  
COUNTY OF YAVAPAI

This instrument was acknowledged before me this 30 day of APRIL, 1996, by JoAnn Dietel in witness whereof I herewith set my hand and official seal.  
V. J. Fisher NOTARY PUBLIC

Commission Expires June 30, 1997



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

May 8, 1996

Jo Ann Dietel  
71 Angus Circle  
Cottonwood, AZ 86326

Dear Ms. Dietel:

This is to acknowledge receipt of your letter dated April 30, 1996. As we previously notified you on April 25, 1996, the Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. Your most recent letter does not meet these requirements. Although your letter was signed in the presence of a notary public and notarized, it was not sworn to, as required.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_\_ day of \_\_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient.

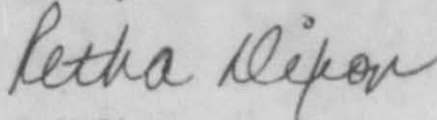
Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

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We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g. If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,



Retha Dixon  
Docket Chief

97043792323

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

May 13, 1996  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Getha Dixon  
Federal Election Committee  
999 E. Street, N.W.  
Washington, D.C. 20463

MAY 24 8 56 AM '96

MUR 4371

Dear Ms Dixon

I believe Employment Group of Battle Creek, Michigan violated election laws when I was employed by them. I worked for them approximately six years. In April of 1990 a letter was sent to all employees strongly suggesting that each of us send a contribution of \$50 to National Assoc. of Temporary Services' Political Action Committee. We were informed that we would be covertly reimbursed in the form of bonus checks. Then we were told to destroy the letter.

I sent National Assoc. of Temporary Services' Political Action Committee, Michigan State Employees Credit Union check # 696 for \$50 on April 17, 1990 and was subsequently reimbursed as promised. I believe most or all of the employees at that time complied with this request. I have since learned that this was indeed illegal and may constitute mail fraud.

I was terminated by this company in January 1992 and have been involved

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2.

in a dispute with Michigan Employment Security Commission over unemployment ever since. I have reported this illegal activity to M.E.S.C. several times over the years and they have disdained to pursue it. I am therefore forwarding the information to you to use as you see fit. If I can be of any further help in this matter, please contact me.

Sincerely  
Glenn Dietel  
71 Angus Circle  
Cottonwood, Az.  
86326

Subscribed and sworn to before me on  
this 14th day of May, 1996.

Notary Public Barbra Fish

My Commission Expires June 30, 1997

97043792325



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

May 29, 1996

JoAnn Dietel  
71 Angus Circle  
Cottonwood, Arizona 86326

RE: MUR 4371

Dear Ms. Dietel:

This letter acknowledges receipt on May 24, 1996, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4371. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Colleen T. Sealander, Attorney  
Central Enforcement Docket

Enclosure  
Procedures

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FEDERAL ELECTION COMMISSION

Washington, DC 20463

May 29, 1996

Ronald R. White, Registered Agent  
Employment Group, Inc.  
200 Beckley Professional Centre  
Battle Creek, Michigan 49017

MUR 4371

Dear Mr. White:

The Federal Election Commission received a complaint which indicates that Employment Group, Inc. may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4371. Please refer to this number in all future correspondence.

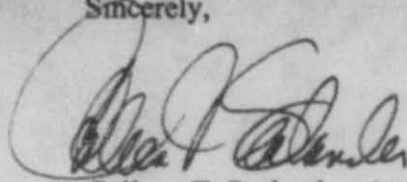
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Employment Group, Inc. in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact a member of the Central Enforcement Docket at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Colleen T. Sealander, Attorney  
Central Enforcement Docket

Enclosures

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

97043792328



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

May 29, 1996

Edward A. Lenz, Treasurer  
National Association of Temporary & Staffing  
Services Political Action Committee  
119 S. St. Asaph Street  
Alexandria, VA 22314

MUR 4371

Dear Mr. Lenz:

The Federal Election Commission received a complaint which indicates that the National Association of Temporary & Staffing Services Political Action Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4371. Please refer to this number in all future correspondence.

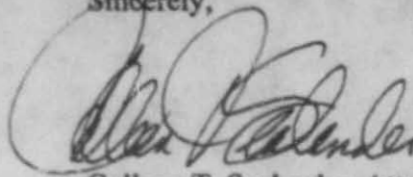
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

97043792329

If you have any questions, please contact a member of the Central Enforcement Docket at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Colleen T. Sealander, Attorney  
Central Enforcement Docket

Enclosures

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

9704379233C



**NATSS PAC**

*National Association of  
Temporary and  
Staffing Services*

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 6 11 06 AM '96

119 South Saint Asaph Street  
Alexandria, Virginia 22314-3119

(703) 549-6287

Fax (703) 549-4808

<http://www.natss.com/staffing/>

June 3, 1996

Colleen T. Sealander, Attorney  
Central Enforcement Docket  
Federal Election Commission  
999 E St., N.W.  
Washington, D.C. 20463

Subject: MUR 4371

Dear Ms. Sealander:

I have received your May 29, 1996 letter advising me that a complaint has been filed with the Federal Election Commission and that the complaint indicates that the National Association of Temporary and Staffing Services Political Action Committee ("NATSS-PAC"), and I, as Treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("Act").

The complainant, JoAnn Dietel, alleges that she is a former employee of Employment Group of Battle Creek, Michigan ("Employment Group"). Ms. Dietel alleges that, in April 1990, Employment Group sent a letter to all of its employees, including Ms. Dietel, "strongly suggesting" that the employees contribute \$50 to NATSS-PAC, and further stating that the employees would be reimbursed by Employment Group for such contributions. She further alleges that she was so reimbursed by Employment Group.

NATSS-PAC is the political action committee of the National Association of Temporary and Staffing Services ("NATSS"), a national trade association made up of firms engaged in supplying temporary help and staffing services throughout the United States. Employment Group was, at the time of the alleged violation, and is now, a member in good standing of NATSS. Employment Group has no relationship with NATSS other than as a voluntary, dues paying member of the Association.

Each year, NATSS-PAC solicits its member companies for political contributions. Such solicitations are addressed to the individual in each member company who is designated by the company as the official NATSS representative and who has authorized NATSS in writing to solicit them. NATSS-PAC does not directly solicit the employees of its member companies (other than the designated representative) but does encourage the member company to

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COUNSEL  
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Colleen T. Sealander  
May 31, 1996  
Page 2

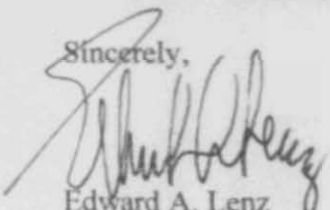
solicit its executive and administrative-level employees to make contributions to NATSS-PAC and provides materials for the company to use for that purpose.

Because the Act does not require political committees to maintain records beyond three years, NATSS does not have copies of the actual solicitation materials sent to its members in 1990, the year of the alleged violation. However, I am enclosing a copy of the solicitation materials sent to members in 1993, the earliest year for which we maintain those materials. To the best of our knowledge, these materials are substantially similar to the materials sent to members in 1990, including the representative of Employment Group. As you will note, these materials do not suggest that employees contribute any particular amount, nor do they state or imply that employees will be reimbursed by their employer for amounts contributed.

Beyond making available to our members suggested solicitation materials, which we have made every effort to ensure conform to FEC rules, neither I nor NATSS-PAC has any knowledge of, nor any control over, the actual method or manner by which its member companies solicit their employees. Nor does NATSS-PAC nor I have any information or knowledge regarding the specific conduct of Employment Group alleged in the complaint.

We welcome any comment or suggestion from the Commission regarding NATSS-PAC's solicitation methods and will cooperate in every way with the Commission's further review of this matter, if such review is deemed necessary. However, based on the allegations set forth in the complaint and the information set forth in this letter, we do not believe that there is any basis for further proceedings against NATSS-PAC, or against me as NATSS-PAC treasurer.

Sincerely,

  
Edward A. Lenz  
Treasurer - NATSS PAC

97043792332

Pac 4 - Mr. G. AIP

April 14, 1993

Kathleen Kern  
ADOW Personnel/Executeam  
36 East Fourth Street  
Suite 1020  
Cincinnati, OH 45202 3816

Dear Kathleen,

The talk about universal health insurance is no longer just academic. Health care reform has become a top priority of the Clinton Administration and a majority in Congress. Because what is likely to emerge is a bill requiring employers to pay health insurance costs, our stake in this debate is enormous.

One very significant way for you to help ensure that our concerns are taken into consideration is to make a contribution to NATS PAC. PAC contributions, of course, do not buy votes. But, over the years I have seen NATS' impact and effectiveness on Capitol Hill grow as a result of the financial support we have given to members of Congress who support the interests of business, especially small business.

Last year, for the first time, NATS PAC money also was used to help support state legislators who support a pro-business environment. With 50 states to cover, in addition to Congress, you can appreciate the magnitude of the challenges facing us.

You've supported NATS PAC generously in the past and we need your continued support. However, before we can ask you to contribute to the PAC or ask you to solicit your employees, we must have your current written approval. Because your approval agreement expired at the end of 1992, we need a renewed agreement for our files. **Therefore, please sign and return the enclosed form as soon as possible.**

I hope you will join me in helping to protect the industry in which we make our living.

Sincerely,

Karla Hertzog  
PAC Chairman

Enclosures: Solicitation Agreement, NATS PAC Brochure, Contribution Card

*P.S. You also can help support NATS' efforts in the health care debate by attending our Government Relations Conference on June 21 & 22 in Washington. You will get a first-hand update from some of the nation's top policy makers and then help take our message on health reform to Capitol Hill. We need a record turnout to show Congress how important this issue is to our industry. Further details will be mailed to you in the next few weeks.*

97043792333

**SAMPLE LETTER TO EMPLOYEES**  
(Retype on your company letterhead)

April \_\_\_\_, 1993

Dear (Executive or Administrative level employees):

With a new Administration in Washington major changes are about to take place. Health care reform has become a top priority of the Clinton Administration and a majority in Congress. The temporary help industry has an enormous stake in this debate.

One way (company name) can have a say in how health care reform and other critical issues are decided is by belonging to our industry's trade group, the National Association of Temporary Services (NATS). NATS represents the temporary help industry's interests throughout the United States and protects it from harmful legislation.

There is also a very important role you and I can play as individuals -- by supporting our industry's "Political Action Committee" (NATS PAC).

As the enclosed brochure explains, NATS PAC is a special fund, authorized by federal law, which was set up by our industry to help political candidates who are sensitive to our concerns. NATS PAC lets us pool our resources and support more candidates than we could individually. PACs were authorized by Congress to prevent a few powerful "fat cats" from controlling the political process. But it's up to us as individuals to support our PAC. Company contributions are not allowed.

While the decision to give is completely voluntarily, I hope you will join me in becoming a NATS "GEM" Club member by contributing to NATS PAC.

Your contribution will be acknowledged with a special certificate from the NATS national office and special recognition at industry functions. Your name also will be listed in *Contemporary Times*, the industry's national magazine. You'll also receive a special year-end report showing how your PAC dollars were used.

Please note that contributions are not deductible for federal tax purposes.

over >>>

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*Examples of final paragraphs:*

*Note: Complete the letter with one of the following paragraphs depending on how you wish contributions to be handled:*

(a) Your contribution, along with the enclosed contribution form, should be sent directly to me. I will collect them along with other employee contributions received and mail them to NATS PAC.

or

(b) Your contribution, along with the enclosed contribution form, should be sent directly to:

NATS PAC  
119 South Saint Asaph Street  
Alexandria, Virginia 22314

Thank you for helping to protect our business.

Sincerely,

\_\_\_\_\_  
(Chief Executive Officer)

*Note: We have enclosed a supply of contribution forms. If you need more, please call the NATS office at (703) 549-6287, and we will mail you additional forms immediately.*

97043792335



# NATS PAC

NATIONAL ASSOCIATION OF TEMPORARY SERVICES

119 South Saint Asaph Street

Alexandria, Virginia 22314

703/549-6287

FAX: 703/549-4808

## CORPORATE APPROVAL FOR NATS PAC SOLICITATION (To Be Completed By Headquarters Offices Only)

YES, the National Association of Temporary Services (NATS) is hereby authorized to solicit my company's executive and administrative personnel for contributions to the NATS Political Action Committee in each of the next five years. I understand that such authorization is required by law and can be given to only one national trade association in any calendar year. I also understand that NATS will not solicit my employees directly and that any solicitation shall be done by my company on behalf of NATS.

*(Please Print)*

Name \_\_\_\_\_ Title \_\_\_\_\_

Company \_\_\_\_\_ Phone \_\_\_\_\_

Company Address \_\_\_\_\_

City/State/Zip \_\_\_\_\_

Authorized Signature: *(please sign for each year!)*

\_\_\_\_\_ 1994

\_\_\_\_\_ 1995

\_\_\_\_\_ 1996

\_\_\_\_\_ 1997

\_\_\_\_\_ 1998

*Please return to:*

**NATS PAC Treasurer  
National Association of Temporary Services  
119 South Saint Asaph Street  
Alexandria, Virginia 22314**

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7  
0  
4  
3  
7  
9  
2  
3  
3  
6

Yes, I want to join the NATS Gem Club and help support the temporary help industry's legislative efforts.

Enclosed is my NATS PAC Contribution of \$ 100.00 (Personal checks or Credit Card contributions accepted.)

This entitles me to membership in the Ruby Club.

 **NATS PAC**

**Gem Club**

Diamond: \$1000 and up  
Emerald: \$500 - \$900  
Pearl: \$250 - \$499  
Ruby: \$100 - \$249  
Sapphire: \$99 and under

**Industry Leader**

\$1500 and over. Entitles member to participate in special events.

Name Mickey Echales  
Company EGAI MEDICAL  
Position \_\_\_\_\_  
Home Address \_\_\_\_\_  
Phone \_\_\_\_\_  
MC/Visa \_\_\_\_\_  
Expires \_\_\_\_\_

Personal checks or credit cards only. Corporate contributions cannot be accepted. Contributions are not deductible for tax purposes.

Return form with your contribution to: NATS PAC, 119 South Saint Asaph St., Alexandria, VA 22314

9704



NATIONAL  
ASSOCIATION OF  
TEMPORARY  
SERVICES

★ ★ ★

POLITICAL  
ACTION  
COMMITTEE

Invest in  
Our Industry's  
Future!



National Association of Temporary Services  
119 South West Azalea Street  
Alexandria, Virginia 22314-5175  
(703) 549-6287 FAX: (703) 549-4908

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Recyclable

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NAL-506 (09)

## NATS PAC

*Invest in our industry's future....*

As we all know, government can directly affect how a business operates and whether it operates profitably. We have a lot to lose. For example:

- Will the profits you make be invested in your business to create jobs or on new mandatory government programs?
- Will temporary help companies retain the flexibility to adapt to a changing marketplace or be tied down by government regulations?

NATS is communicating the industry's message on these and many other issues at the state and federal level every day.

Keeping the lines of communication open with government officials is an essential function of NATS. But all of us must be involved as *individuals* in the political process by supporting those candidates who share our values and who are sensitive to our industry's interests and concerns.

One way you and I can be involved is by contributing to the NATS Political Action Committee. NATS PAC allows those of us whose livelihoods depend on a healthy and vigorous temporary help industry to pool our resources and make our voices heard.

Political action is an *ongoing* effort. I hope you will join me in supporting NATS PAC so that we can continue the fight for good government on behalf of our industry.

Sincerely,

*Samuel R. Sacco*  
Samuel R. Sacco  
Executive Vice President





#### ★ What is NATS PAC?

The Federal Election Campaign Act prohibits corporations from making contributions or expenditures in connection with federal elections. However, under the law, trade associations such as NATS can use their funds to establish and administer an organization known as a political action committee which can collect contributions from an eligible group of people and use this money to support candidates for state and federal offices.

In 1981, NATS formed the National Association of Temporary Services Political Action Committee to encourage participation in the political process in the interest of NATS members. Through NATS PAC, eligible employees of NATS' member companies can voluntarily pool their contributions with those of other members. Together, we can have a greater impact on the political process and its effect on our future.

#### ★ Who does NATS PAC solicit?

Federal law permits trade association PACs with prior approval to solicit their corporate members' executive and administrative personnel. Each year, NATS PAC solicits the individual in NATS' member companies who is designated by the company as the official NATS representative. Although NATS encourages its member companies to solicit their employees, NATS itself does not solicit member company employees.

#### ★ How are NATS PAC funds used?

All funds contributed to NATS PAC are used to support candidates for political office. The law permits NATS to pay all of NATS PAC's

administrative expenses. NATS has established a separate "Administrative Fund" to defray these expenses. The Administrative Fund is described below.

The primary purpose of NATS PAC is to support selected candidates for the U.S. House and Senate. NATS PAC also may contribute to candidates for state and local offices in key states as approved by the NATS PAC Committee.

#### ★ Who decides which candidates to support?

Decisions to contribute to a specific candidate are made by the NATS PAC Committee with input from NATS' legislative staff and the NATS Legal/Legislative Committee. The PAC Committee also welcomes input and recommendations from NATS PAC contributors.

The PAC Committee evaluates each recommendation and considers various factors ranging from qualities of the candidate to the potential viability of the campaign. The primary consideration for a contribution is the candidate's political philosophy and performance, which should be consistent with NATS' objectives to preserve and further the interests of the temporary help industry and the free enterprise system.

All NATS PAC contributors will receive a year-end report showing which political candidates received NATS PAC contributions during the year.

#### ★ Does NATS PAC support candidates of both major political parties?

NATS PAC is non-partisan, supporting both Republicans and Democrats since candidates

from both parties may support NATS' interests.

#### ★ How do I contribute?

Simply fill in a NATS PAC "Gem Club" card, indicating the Club category you wish to join for that year and enclose your personal check (by law, corporate checks cannot be accepted). Then mail your check together with the "Gem Club" card directly to NATS at the address indicated. Alternatively, your NATS representative may wish to collect all contributions from your company and mail them together. Be sure to check with your company's NATS representative.

It also may be possible to contribute to NATS PAC through a regular payroll deduction program at your company. Again, check with your company's NATS representative.

#### ★ Is participation voluntary?

Yes. Contributions to NATS PAC are entirely voluntary. Your relationship with your employer cannot be affected in any way by whether or not you contribute.

#### ★ Is participation confidential?

The specific amount of your NATS PAC contribution is handled confidentially. No disclosure of specific contribution amounts is made, except to the extent required by law, e.g., reports to the Federal Election Commission and state election offices.

#### ★ How much should I contribute?

In the past, annual contributions have ranged from just a few dollars up to \$1,500 per year (federal law limits individual PAC contribu-

tions to \$5,000). The NATS PAC "Gem Club" categories are: *Sapphire* (\$99 and under); *Ruby* (\$100-249); *Pearl* (\$250-499); *Emerald* (\$500-999); *Diamond* (\$1000-1499); and *Industry Leaders* (\$1500 or more). "Industry Leaders" are eligible to participate in special gala events held each year.

Because one of NATS' goals is to encourage the greatest possible number of people to join NATS PAC, any amount you would like to contribute or can afford will be appreciated.

#### ★ What is the tax treatment of political contributions?

Contributions to NATS PAC are not deductible as charitable contributions for federal income tax purposes. Partial tax credits or deductions on state income tax returns may be allowed in some states (You should check the laws that apply in your particular area).

#### ★ What is the NATS "Administrative Fund"?

The Administrative Fund is a special account, separate from NATS PAC, that helps us defray the considerable cost of our PAC fund-raising activities, including special events to encourage individuals to contribute. Unlike the PAC, Administrative Fund monies may not be used to support candidates directly, so corporate contributions are allowed.

We strongly encourage NATS member companies to make annual contributions to the Administrative Fund. Contributions may be deductible as a business expense.



LAW OFFICES OF  
**MILLER, CANFIELD, PADDOCK AND STONE**  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
ONE MICHIGAN AVENUE, SUITE 900  
LANSING, MICHIGAN 48933-1609

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

JUL 1 3 30 PM '96

SIDNEY T. MILLER (1884-1940)  
GEORGE L. CANFIELD (1886-1928)  
LEWIS H. PADDOCK (1866-1936)  
FERRIS D. STONE (1882-1946)

ANN ARBOR, MICHIGAN  
BLOOMFIELD HILLS, MICHIGAN  
DETROIT, MICHIGAN  
GRAND RAPIDS, MICHIGAN  
KALAMAZOO, MICHIGAN  
LANSING, MICHIGAN  
MONROE, MICHIGAN  
WASHINGTON, D.C.

AFFILIATED OFFICES:  
PENSACOLA, FLORIDA  
ST. PETERSBURG, FLORIDA  
GDAŃSK, POLAND  
WARSAW, POLAND

SHERRY L. KATZ-CRANK  
(517) 483-4913

TELEPHONE (517) 487-2070  
FAX (517) 374-6304

June 27, 1996

Ms. Colleen T. Sealander, Atty.  
Central Enforcement Docket  
Federal Election Commission  
Washington, DC 20463

Re: The EmploymentGroup; MUR 4371

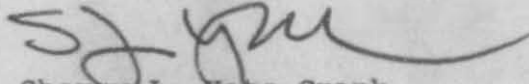
Dear Ms. Sealander:

Please find enclosed The EmploymentGroup's Statement of Designation of Counsel in the above-captioned matter. As we have only recently been retained as counsel, we are hereby requesting an extension through and including July 30, 1996, within which to respond to the Complaint received by the Federal Election Commission in this matter.

We appreciate your consideration of our request. If you have any questions or concerns, please do not hesitate to contact either Michael J. Hodge or myself at (517) 487-2070.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE



Sherry L. Katz-Crank

SLKC/pmb  
Enclosure

cc: Ron White (w/encl.)  
Michael J. Hodge (w/o encl.)

LAFS146348.1(026657-0003)

9704379234C

STATEMENT OF DESIGNATION COUNSEL

MUR 4371

Michael J. Hodge (P25146)  
Sherry L. Katz-Crank (P40500)

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

FIRM: Miller, Canfield, Paddock and Stone

ADDRESS: One Michigan Avenue, Suite 900

Lansing, MI 48933

TELEPHONE: (517 ) 487-2070

FAX: (517 ) 374-6304

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6-24-96  
Date

  
Signature

RESPONDENT'S NAME: EmploymentGroup

ADDRESS: 200 Beckley Professional Centre

Battle Creek, MI 49017

TELEPHONE: HOME(        ) N/A

BUSINESS( 616 ) 979-6101

9 7 0 . 4 3 7 9 2 3 4 1



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 9, 1996

Sherry L. Katz-Crank, Esquire  
Miller, Canfield, Paddock and Stone  
One Michigan Avenue, Suite 900  
Lansing, MI 48933

RE: MUR 4371  
Employment Group

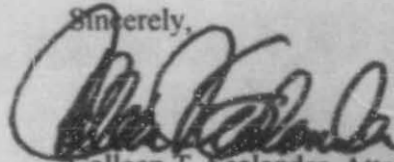
Dear Ms. Katz-Crank:

This is in response to your letter dated June 27, 1996, requesting an extension of time until July 30, 1996 to respond to the complaint in this matter, and pursuant to our telephone conversation this morning.

Considering the Federal Election Commission's responsibilities to act expeditiously in the conduct of investigations, the Office of the General Counsel cannot grant your extension request because it was made well after the response period had elapsed. However, as we discussed, you may submit your response late and it will be taken to the Commission at the first opportunity.

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,



Colleen T. Sealander, Attorney  
Central Enforcement Docket

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LAW OFFICES OF  
**MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.**

A PROFESSIONAL LIMITED LIABILITY COMPANY  
ONE MICHIGAN AVENUE, SUITE 900  
LANSING, MICHIGAN 48933-1609

SIDNEY T. MILLER (1884-1940)  
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KALAMAZOO, MICHIGAN  
LANSING, MICHIGAN  
MONROE, MICHIGAN

NEW YORK, N.Y.  
WASHINGTON, D.C.

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ST. PETERSBURG, FLORIDA  
GDAŃSK, POLAND  
WARSAW, POLAND

TELEPHONE (517) 487-2070  
FAX (517) 374-6304

SHERRY L. KATZ-CRANK  
(517) 483-4913

July 18, 1996

Colleen P. Sealander  
Attorney at Law  
Central Enforcement Docket  
Federal Election Commission  
999 E Street NW  
Washington, D. C. 20463

Re: M.U.R. 4371

Dear Ms. Sealander:

As you know, our firm has been retained by The EmploymentGroup in the above-referenced matter. This letter constitutes The EmploymentGroup's response to the complaint filed with the Federal Election Commission ("FEC") on May 24, 1996 by JoAnn Dietel, a former employee of The EmploymentGroup.

In her complaint, Ms. Dietel alleges that in April, 1990, The EmploymentGroup sent a letter to all its employees "strongly suggesting" that each employee contribute \$50 to the National Association of Temporary Services Political Action Committee ("NATSS-PAC"). Ms. Dietel also alleges that the employees were informed that they would be "covertly reimbursed" for any such contribution in the form of bonus checks. She maintains that she subsequently made a contribution of \$50 and was reimbursed as promised.

BACKGROUND

NATSS-PAC is the Political Action Committee for the National Association of Temporary and Staffing Services, a national trade association made up of firms engaged in supplying temporary assistance and staffing services throughout the United States. The EmploymentGroup was at the time of the alleged violation, and is now, a member in good standing of NATSS.

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COUNSEL  
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MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Colleen P. Sealander

-2-

July 18, 1996

Each year, NATSS-PAC solicits its member companies, including The EmploymentGroup, for political contributions. Such solicitations are addressed to the individual in each member company who is designated as the official NATSS-PAC representative and who is authorized by NATS to solicit the member executive and administrative level employees. At all times relevant hereto, Ronald R. White, Chief Executive Officer of The EmploymentGroup, was the designated representative. NATSS-PAC does not directly solicit the employees of its member companies, but rather encourages its member companies to solicit their executive and administrative level employees to make contributions to NATSS-PAC and provides the materials to the companies to use for that purpose.

SOLICITATION MATERIALS

The Federal Election Campaign Act, CFR 102.9; 104.14 (2) and (3) requires separate segregated funds to maintain records for a period of three years. Ms. Dietel's complaint pertains to an event which allegedly occurred in 1990 -- six years ago. NATSS-PAC on May 31, 1996, as part of its response to Ms. Dietel's complaint, provided copies of the 1993 solicitation materials sent to its members, including The EmploymentGroup, the earliest year for which records were maintained. NATSS-PAC has indicated and Mr. White of The EmploymentGroup has confirmed that these materials are substantially similar to the materials sent to NATSS' members in 1990. Mr. White has also confirmed that, to the best of his knowledge, only the materials provided by NATSS-PAC were forwarded to its executive and administrative level employees. In other words, The EmploymentGroup did not create any unique solicitation materials. As you will note, the materials provided by NATSS-PAC do not suggest that employees contribute any particular amount nor do they state or imply that employees will be reimbursed by their employer for the amounts contributed.

BONUS CHECKS

The EmploymentGroup was incorporated in 1958. In 1990, consistent with past and current practice, The EmploymentGroup gave every employee a \$100 bonus. At that time, The EmploymentGroup had approximately 35-40 employees\*. The bonus was not limited to those individuals who contributed to NATSS-PAC. Indeed, the

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\*The EmploymentGroup now employs approximately 1,600 full and part-time employees.

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MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Colleen P. Sealander

-3-

July 18, 1996

EmploymentGroup lacks knowledge of which employees contribute and which do not as employees are provided with a form and an envelope and instructed to send any contribution directly to NATSS-PAC. As such, no list of contributors or other documentation is kept which would even allow The EmploymentGroup to reimburse an individual for a contribution.

MS. DIETEL'S EMPLOYMENT HISTORY

As indicated in Ms. Dietel's complaint, her employment was terminated by The EmploymentGroup for reasons unrelated to the issue at hand. Ms. Dietel was terminated by The EmploymentGroup for, among other things, insubordination. Ms. Dietel subsequently applied for unemployment benefits with the Michigan Employment Security Commission ("MESC"). Her application for benefits was subsequently denied on the ground that she was terminated for good cause. As also indicated in her complaint, since 1992, Ms. Dietel has made numerous complaints to the MESC all of which were ultimately found to lack merit. The EmploymentGroup has no desire to delve into the details of Ms. Dietel's discharge. However, it is clear that Ms. Dietel is a disgruntled former employee who six years after the fact is still seeking some form of retribution. We are unaware of any complaint by any other current or former employee.

We do not believe that there is any factual or legal basis for further proceedings against The EmploymentGroup. However, we would be happy to cooperate in any way with the FEC'S investigation of this matter. If you require further information or have any questions, please do not hesitate to contact either Sherry Katz-Crank or Michael J. Hodge at (517) 487-2070.

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MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Colleen P. Sealander

-4-

July 18, 1996

I hereby declare that the matters stated herein are true to the best of my knowledge, information, and belief.

*Ronald R. White*

Ronald R. White  
Chief Executive Officer of  
The Employment Group

Subscribed and sworn to before me this 18<sup>th</sup> day of July,  
A.D., 1996.

SUSAN A. KASEL, NOTARY PUBLIC  
INGHAM COUNTY, STATE OF MICHIGAN  
MY COMMISSION EXPIRES 2-23-97

*Susan A. Kasel*

Notary Public  
Ingham County, Michigan  
My Comm. expires: \_\_\_\_\_

Submitted by:

MILLER, CANFIELD, PADDOCK AND STONE  
Michael J. Hodge (P25146)  
Sherry L. Katz-Crank (P40500)

*Sherry L. Katz-Crank*  
Sherry L. Katz-Crank

SLKC/bb

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LAW OFFICES OF  
**MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.**

A PROFESSIONAL LIMITED LIABILITY COMPANY  
ONE MICHIGAN AVENUE, SUITE 900  
LANSING, MICHIGAN 48933-1609

SIDNEY T. MILLER (1984-1940)  
GEORGE L. CANFIELD (1986-1929)  
LEWIS H. PADDOCK (1986-1936)  
FERRIS D. STONE (1982-1946)

ANN ARBOR, MICHIGAN  
BLOOMFIELD HILLS, MICHIGAN  
DETROIT, MICHIGAN  
GRAND RAPIDS, MICHIGAN  
KALAMAZOO, MICHIGAN  
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MONROE, MICHIGAN

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PENSACOLA, FLORIDA  
ST. PETERSBURG, FLORIDA  
GDANSK, POLAND  
WARSAW, POLAND

SHERRY L. KATZ-CRANK  
(517) 483-4913

TELEPHONE (517) 487-2070  
FAX (517) 374-8304

July 23, 1996

VIA FEDERAL EXPRESS

Colleen P. Sealander  
Attorney at Law  
Central Enforcement Docket  
Federal Election Commission  
999 E Street NW  
Washington, D. D. 20463

Re: M.U.R. 4371

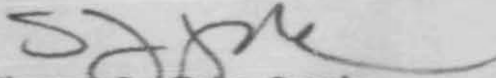
Dear Ms. Sealander:

Enclosed is supplemental information supporting The EmploymentGroup's response to the complaint in the above-captioned matter. Enclosed is the payroll journal for 7/6/90 showing that every employee, except owners of The EmploymentGroup, received a bonus of \$162.43 gross, net of \$150. In addition, the four pay periods from 4/17/90 to 7/6/90 demonstrate that Ms. Dietel was paid only for her hours worked. As you can see, again, everyone with the exception of owners, received the same bonus amount. Interestingly, the bonus received is three times the amount claimed by the complainant.

If you have any other questions or concerns, please do not hesitate to contact me.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

  
Sherry L. Katz-Crank

SLKC/bb  
Enclosure

c.c. Ronald R. White  
Chief Executive Officer  
The EmploymentGroup

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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EmploymentGroup Holdings Corp

PAGE 1

P390

PAYROLL JOURNAL

EMPLOYEE NUMBER	NAME	OFFICE	L/C	REGHRS	REGPAY	OTHR5	OTPAY	OTHR5	OTPAY	OTHR5	OTPAY	PAYRATE	TRMLIFE	DISABLE
GROSS WAGE/A	FEDERAL UNILIFE	FICA UTD/WAY	STATE HNB	CITY C/RAL	INSUR AUTOM	MISC3 GR VAL	MISC2 UTD/HTY	MISC3 ADNT1	MISC4 ADT1	WCANT ADNT2	PREMED ADT2	PRECHLD NETPAY	PREINS CHKDTE	ADJGROSS CHKS
[REDACTED]	JO ANN DIETEL	115	08810	.00	.00	.00	.00	.00	.00	.00	.00	6.25	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10579
[REDACTED]	[REDACTED]	115	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10580

JUN 1990

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Employment Group Holdings Corp

P390

PAYROLL JOURNAL

EMPLOYEE NUMBER	NAME	STATE	OFFICE	W/C	REGHRS	REGPAY	OTHR	OTPAY	OTHR	OTPAY	PAYRATE	TRFLIFE	DISABLE	
GROSS WAGE/A	FEDERAL UNILIFE	FICA UTD/WAY	NUMB	CITY C/RAL	INSUR AUTOM	MISC1 OR VAL	MISC2 UTD/MTY	MISC3 ADT1	MISC4 ADT1	WCAMT ADT2	PREMED ADT2	PRECHLD NETPAY	PREINSB CHKDT	ADJGRS CHK6
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10593
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10593
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10594
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10595
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10596
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10597
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10598
[REDACTED]	[REDACTED]	[REDACTED]	131	[REDACTED]	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10599

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Employment Group Holdings Corp

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P390

PAYROLL JOURNAL

PERIOD ENDING: 7/06/90

EMPLOYEE NUMBER	NAME	STATE	OFFICE	W/C	REGHRS	REGPAY	OTHRS	OTPAY	OTHRS	DTPAY	PAYRATE	TRMLIFE	DISABLE	
GROSS WAGE/A	FEDERAL UNILIFE	FICA UTD/WAY	MNS	CITY C/R/L	INSUR AUTOM	MISC1 OR VAL	MISC2 UTD/MTY	MISC3 ADNT1	MISC4 ADT1	WCAMT ADNT2	PREMED ADT2	PRECHLD NETPAY	PREINS CHDTE	ADJGROSS CHKE
[REDACTED]			131		08810	.00	.00	.00	.00	.00	8.00	.00	.00	
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	162.43	
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10589
[REDACTED]			131		08810	.00	.00	.00	.00	.00	8.00	.00	.00	
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	162.43	
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10590
[REDACTED]			131		08810	.00	.00	.00	.00	.00	7.75	.00	.00	
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	162.43	
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10591

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EmploymentGroup Holdings Corp

PAGE 1 8

P390

PAYROLL JOURNAL

PERIOD ENDING: 7/06/90

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTHR5	OTPAY	DTHRS	DTPAY	FAYRATE	TRNLIFE	DISABLE		
GROSS WAGE/A	FEDERAL UN/LIFE	FICA UTD/WAY	STATE PNB	CITY C/RAL	INSUR AUTOM	MISC1 OR VAL	MISC2 UTD/MTY	MISC3 ADNT1	MISC4 ADT1	WCAHT ADNT2	PREMED ADT2	PRECHLD NETPAY	PREINS CHKDTE	ADJ.GROS CHK9
[REDACTED]	[REDACTED]	121	08810	.00	.00	.00	.00	.00	.00	7.00	.00	.00		
162.43	.00	12.43	.00	3.57	.00	.00	.00	.00	1.13	.00	.00	162.43		
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	146.43	7/10/90	10584
[REDACTED]	[REDACTED]	121	08810	.00	.00	.00	.00	.00	.00	7.00	.00	.00		
162.43	.00	12.43	.00	3.57	.00	.00	.00	.00	1.13	.00	.00	162.43		
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	146.43	7/10/90	10585
[REDACTED]	[REDACTED]	121	08810	.00	.00	.00	.00	.00	.00	7.00	.00	.00		
162.43	.00	12.43	.00	3.57	.00	.00	.00	.00	1.13	.00	.00	162.43		
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	146.43	7/10/90	10587
[REDACTED]	[REDACTED]	121	08810	.00	.00	.00	.00	.00	.00	7.00	.00	.00		
162.43	.00	12.43	.00	3.57	.00	.00	.00	.00	1.13	.00	.00	162.43		
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	146.43	7/10/90	10588

18112 L.A.

EmploymentGroup Holdings Corp

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EmploymentGroup Holdings Corp

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P390

PAYROLL JOURNAL

PERIOD ENDING 7/06/90

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTHR	OTPAY	DTHR	DTPAY	PAYRATE	TRFLIFE	DISABLE		
GROSS	FEDERAL	FICA	STATE	CITY	INSUR	MISC1	MISC2	MISC3	MISC4	WCAMT	PREMED	PRECLD	PREINS	ADJRO6
WAGE/A	UNILIFE	UTD/WAY	HRB	C/RAL	AUTOM	GR VAL	UTD/MTY	ADT1	ADT1	ADT2	ADT2	NETPAY	CHKDTE	CHK#
				118	08810	.00	.00	.00	.00	.00	.00	10.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.60	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10583

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Employment Group Holdings Corp

P390

PAYROLL JOURNAL

PERIOD ENDING: 7/06/90

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTHR	OTPAY	DTHRS	DTPAY	PAYRATE	TRMLIFE	DISABLE		
GROSS WAGE/A	FEDERAL UNILIFE	FICA UNLIFE	STATE HNB	CITY C/RAL	INSUR AUTOM	MISC1 OR VAL	MISC2 LTD/HTY	MISC3 ADNT1	MISC4 ADT1	WCANT ADT2	PREMED ADT2	PRECHLD NETPAY	PREINS CHKDTE	ADJGRS CHK#
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	112	08810	.00	.00	.00	.00	.00	.00	8.75	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10571
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	112	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10572
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	112	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10572

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Employment Group Holdings Corp

P390

PAYROLL JOURNAL

PERIOD ENDING

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTHR	OTPAY	DTHRS	DTPAY	PAYRATE	TRMLIFE	DISABLE		
GROSS	FEDERAL	FICA	STATE	CITY	INSUR	MISC1	MISC2	MISC3	MISC4	WCAMT	PREMED	PRECHLD	PREINS	ADJGROS
WAGE/A	UNILIFE	UTD/WAY	MNB	C/HAL	AUTOM	GR VAL	UTD/MTY	ADNT1	ADT1	ADNT2	ADT2	NETPAY	CHKDTE	CHK#
				113	08810	.00	.00	.00	.00	.00	.00	8.50	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10573

JUN 190



P390

PAYROLL JOURNAL

PERIOD ENDING: 7/06/90

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTRS	DTPAY	DTHRS	DTPAY	PAYRATE	TRNLIFE	DISABLE
GROSS WAGE/A	FEDERAL LNLIFE	FICA STATE MNB	CITY C/RAL	INSUR AUTOM	MISC1 GR VAL	MISC2 MISC3 ADNT1	MISC4 ADT1	WCAMT ADNT2	PREMED ADT2	PAYCHLD NETPAY	PREING CHKQTE	ADJGROS CHKG
[REDACTED]	[REDACTED]	[REDACTED]	114	08810	.00	.00	.00	.00	.00	11.50	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10574
[REDACTED]	[REDACTED]	[REDACTED]	114	08810	.00	.00	.00	.00	.00	8.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10575
[REDACTED]	[REDACTED]	[REDACTED]	114	08810	.00	.00	.00	.00	.00	7.50	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10576
[REDACTED]	[REDACTED]	[REDACTED]	114	08810	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10577
[REDACTED]	[REDACTED]	[REDACTED]	114	08810	.00	.00	.00	.00	.00	9.25	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10578

14112 0-1

P390

PAYROLL JOURNAL

PERIOD ENDING: 7/06/90

EMPLOYEE NUMBER	NAME	OFFICE	W/C	REGHRS	REGPAY	OTHR	DTPAY	DTHRS	DTPAY	DTHRS	PAYRATE	TRN LIFE	DISABLE	
GROSS WAGE/A	FEDERAL UNILIFE	FICA UTD/WAY	STATE INRS	CITY C/RAL	INSUR AUTOM	MISC1 GR VAL	MISC2 UTD/MTY	MISC3 ADNT1	MISC4 ADT1	MCANT ADNT2	PREHEP ADT2	PRECHLD NETPAY	PREINS CHKDTE	ADJGROS CHKS
██████████	██████████	116	08810	.00	.00	.00	.00	.00	.00	.00	8.50	.00	.00	
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	162.43	
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10581
██████████	██████████	116	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	.00	1.13	.00	.00	162.43	
.00	.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10582

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PAYROLL JOURNAL

PERIOD ENDING: 7/08/90

EMPLOYEE NUMBER	NAME	STATE	OFFICE CITY	W/C INSUR AUTOM	REGHRS MISC1 OR	REGPAY MISC2 UTD/MTY	OTHRB MISC3 ADMT1	OTPAY MISC4 ADT1	OTHRB WCAHT ADMT2	OTPAY PREHEB ADT2	PAYRATE PRECHLD. NETPAY	TRNLIFE PREINS CHKDTE	DISABLE ADJGROS CHKB
[REDACTED]	[REDACTED]	[REDACTED]	111	08810	.00	.00	.00	.00	.00	.00	14.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10565
[REDACTED]	[REDACTED]	[REDACTED]	111	08810	.00	.00	.00	.00	.00	.00	8.50	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10566
[REDACTED]	[REDACTED]	[REDACTED]	111	08810	.00	.00	.00	.00	.00	.00	12.75	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10567
[REDACTED]	[REDACTED]	[REDACTED]	111	08810	.00	.00	.00	.00	.00	.00	.00	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10568
[REDACTED]	[REDACTED]	[REDACTED]	111	08810	.00	.00	.00	.00	.00	.00	5.50	.00	.00
162.43	.00	12.43	.00	.00	.00	.00	.00	.00	1.13	.00	.00	.00	162.43
.00	.00	.00	.00	.00	.00	.00	.00	162.43	.00	.00	150.00	7/10/90	10569

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MAR 5 11 40 AM '97

In the Matter of

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ENFORCEMENT PRIORITY

**SENSITIVE**

GENERAL COUNSEL'S REPORT

MAR 11 1997

**EXECUTIVE SESSION**

I. INTRODUCTION

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing such cases permits the Commission to focus its limited resources on more important cases presently pending before it. Based upon this review, we have identified 25 cases which do

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not warrant further action relative to other pending matters.<sup>1</sup> Attachment 1 to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

#### B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more remote and consequently more difficult to develop. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community.

<sup>1</sup> These cases are: MUR 4332 (*Bill Thomas Campaign Committee*); MUR 4347 (*Anonymous Respondent*); MUR 4354 (*Brian Steel for Congress*); MUR 4367 (*Philipstown Republicans*); MUR 4371 (*Employment Group*); MUR 4373 (*Cannon for Congress*); MUR 4374 (*Mark Stodola for Congress Primary Committee*); MUR 4375 (*Westchester County Conservative Party*); MUR 4377 (*Braxton for Congress*); MUR 4379 (*Teamsters Local Union No. 135*); MUR 4383 (*Pauken for Congress*); MUR 4384 (*Willie Colon for U.S. Congress*); MUR 4388 (*Bill Witt for Senate and Congress*); MUR 4390 (*Kolbe 96*); MUR 4391 (*Pat Roberts for Congress Committee*); MUR 4393 (*Cecil J. Banks*); MUR 4397 (*AFL-CIO*); MUR 4405 (*Katz for Congress Committee*); MUR 4411 (*First Evangelical Presbyterian Church*); MUR 4414 (*Turietta-Koury for Congress Committee*); MUR 4418 (*Bell Atlantic*); MUR 4421 (*Butler for Mayor*); MUR 4448 (*Friends for Jim Rapp*); Pre-MUR 334 (*Kinnamon for Congress*); and Pre-MUR 335 (*Davis for Congress*).

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We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale 12 are not worthy of further action, and merit closure.<sup>4</sup>

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective April 1, 1997. Closing these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

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<sup>4</sup> These cases are: MUR 4139 (*Enid 94*); MUR 4150 (*Frank Fasi*); MUR 4257 (*DSCC*); MUR 4258 (*NRSC*); MUR 4260 (*Packwood & Auto Dealers*); MUR 4261 (*NRA Institute for Legis.*); MUR 4262 (*Oregon Republican Party*); MUR 4265 (*NRSC; Sen. Phil Gramm*); MUR 4272 (*Bishop for Congress*); MUR 4279 (*Russ Berrie Co.*); MUR 4284 (*United We Stand America*); and Pre-MUR 322 (*Royal Hawaiian Country Club*).

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

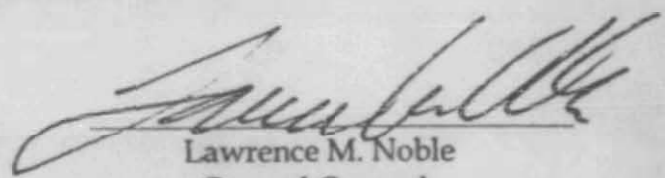
- 1. Pre-MUR 322
- 2. Pre-MUR 334
- 3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- |              |              |              |
|--------------|--------------|--------------|
| 1. MUR 4139  | 13. MUR 4347 | 25. MUR 4390 |
| 2. MUR 4150  | 14. MUR 4354 | 26. MUR 4391 |
| 3. MUR 4257  | 15. MUR 4367 | 27. MUR 4393 |
| 4. MUR 4258  | 16. MUR 4371 | 28. MUR 4397 |
| 5. MUR 4260  | 17. MUR 4373 | 29. MUR 4405 |
| 6. MUR 4261  | 18. MUR 4374 | 30. MUR 4411 |
| 7. MUR 4262  | 19. MUR 4375 | 31. MUR 4414 |
| 8. MUR 4265  | 20. MUR 4377 | 32. MUR 4418 |
| 9. MUR 4272  | 21. MUR 4379 | 33. MUR 4421 |
| 10. MUR 4279 | 22. MUR 4383 | 34. MUR 4448 |
| 11. MUR 4284 | 23. MUR 4384 |              |
| 12. MUR 4332 | 24. MUR 4388 |              |

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3/5/97  
Date

  
Lawrence M. Noble  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Enforcement Priority ) Agenda Document #X97-16

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matter:

A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322;
2. Pre-Mur 334;
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- |              |               |
|--------------|---------------|
| 1. MUR 4139; | 10. MUR 4279; |
| 2. MUR 4150; | 11. MUR 4284; |
| 3. MUR 4257; | 12. MUR 4332; |
| 4. MUR 4258; | 13. MUR 4347; |
| 5. MUR 4260; | 14. MUR 4354; |
| 6. MUR 4261; | 15. MUR 4367; |
| 7. MUR 4262; | 16. MUR 4371; |
| 8. MUR 4265; | 17. MUR 4373; |
| 9. MUR 4272; | 18. MUR 4374; |

(continued)

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Federal Election Commission  
Certification: Enforcement Priority  
March 11, 1997

Page 2

- |               |               |
|---------------|---------------|
| 19. MUR 4375; | 27. MUR 4393; |
| 20. MUR 4377; | 28. MUR 4397; |
| 21. MUR 4379; | 29. MUR 4405; |
| 22. MUR 4383; | 30. MUR 4411; |
| 23. MUR 4384; | 31. MUR 4414; |
| 24. MUR 4388; | 32. MUR 4418; |
| 25. MUR 4390; | 33. MUR 4421; |
| 26. MUR 4391; | 34. MUR 4448. |

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

Attest:

3-12-97  
Date

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

97043792363



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 1, 1997

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

JoAnn Dietl  
71 Angus Circle  
Cottonwood, AZ 86326

RE: MUR 4371

Dear Ms. Dietl:

On May 24, 1996, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on April 1, 1997. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

F. Andrew Turley  
Supervisory Attorney  
Central Enforcement Docket

Attachment  
Narrative

97043792364

**MUR 4371  
EMPLOYMENT GROUP**

Complainant JoAnn Dietl alleges that in 1990 her former employer, The Employment Group, wrote a letter to its employees in April 1990 "strongly suggesting" that they contribute \$50 each to the National Association of Temporary and Staffing Services PAC (NATSS-PAC), and that the company would reimburse the employees for their donation. She asserts that she contributed \$50 to NATSS-PAC and was reimbursed by way of a "bonus" paid by the employer. Complainant acknowledges in her complaint that she was terminated by the company in January 1992 and has been involved with disputes over this action since that time.

Respondents EmploymentGroup and Mr. White deny that they engaged in any illegal solicitation on behalf of NATSS-PAC, and assert that PAC-supplied solicitation materials were forwarded only to executive and administrative level employees within the company. Respondents further state that they did not promise any reimbursement for donations made by any employees, and that the \$150 net bonus paid to all employees in 1990 was wholly unrelated to donations any of them may have made to NATSS-PAC; respondents further point out that they did not know who may have contributed, since contributions were made directly to the PAC. Though records are no longer available for the 1990 solicitation, respondents advise that the 1990 solicitation materials were substantially similar to those used in 1993, the last year for which records are available.

Respondent Edward A. Lenz, Treasurer, and NATSS-PAC state that NATSS-PAC solicits its member companies by addressing the solicitations to one individual in each who has been designated the official NATSS representative for this purpose. That individual is encouraged to solicit his executive and administrative-level employees using recommended "form" solicitation letters which the company may customize. Respondents point out that they have no further information or knowledge regarding the specific conduct of Employment Group alleged in the complaint. Respondents appended copies of its 1993 solicitation materials to the response, which they maintain are the oldest available records, and certify that they are substantially similar to those sent in 1990.

This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 1, 1997

Sherry L. Katz-Crank, Esq.  
Miller, Canfield, Paddock and Stone  
One Michigan Avenue, Suite 900  
Lansing, MI 48933

RE: MUR 4371  
The EmploymentGroup

Dear Ms. Katz-Crank:

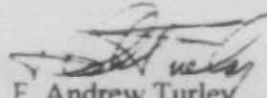
On May 29, 1996, the Federal Election Commission notified your client of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on April 1, 1997.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Jennifer Henry at (202) 219-3400.

Sincerely

  
F. Andrew Turley  
Supervisory Attorney  
Central Enforcement Docket

Attachment  
Narrative

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**MUR 4371**  
**EMPLOYMENT GROUP**

Complainant JoAnn Dietl alleges that in 1990 her former employer, The Employment Group, wrote a letter to its employees in April 1990 "strongly suggesting" that they contribute \$50 each to the National Association of Temporary and Staffing Services PAC (NATSS-PAC), and that the company would reimburse the employees for their donation. She asserts that she contributed \$50 to NATSS-PAC and was reimbursed by way of a "bonus" paid by the employer. Complainant acknowledges in her complaint that she was terminated by the company in January 1992 and has been involved with disputes over this action since that time.

Respondents EmploymentGroup and Mr. White deny that they engaged in any illegal-solicitation on behalf of NATSS-PAC, and assert that PAC-supplied solicitation materials were forwarded only to executive and administrative level employees within the company. Respondents further state that they did not promise any reimbursement for donations made by any employees, and that the \$150 net bonus paid to all employees in 1990 was wholly unrelated to donations any of them may have made to NATSS-PAC; respondents further point out that they did not know who may have contributed, since contributions were made directly to the PAC. Though records are no longer available for the 1990 solicitation, respondents advise that the 1990 solicitation materials were substantially similar to those used in 1993, the last year for which records are available.

Respondent Edward A. Lenz, Treasurer, and NATSS-PAC state that NATSS-PAC solicits its member companies by addressing the solicitations to one individual in each who has been designated the official NATSS representative for this purpose. That individual is encouraged to solicit his executive and administrative-level employees using recommended "form" solicitation letters which the company may customize. Respondents point out that they have no further information or knowledge regarding the specific conduct of Employment Group alleged in the complaint. Respondents appended copies of its 1993 solicitation materials to the response, which they maintain are the oldest available records, and certify that they are substantially similar to those sent in 1990.

This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 1, 1997

Edward A. Lenz, Treasurer  
National Association of Temporary and Staffing Services  
119 South Saint Asaph Street  
Alexandria, VA 22314-3119

RE: MUR 4371

Dear Mr. Lenz:

On May 29, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you, as treasurer, and NATSS PAC. See attached narrative. Accordingly, the Commission closed its file in this matter on April 1, 1997.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Jennifer Henry at (202) 219-3400.

Sincerely,

F. Andrew Turley  
Supervisory Attorney  
Central Enforcement Docket

Attachment  
Narrative

97043792368

**MUR 4371**  
**EMPLOYMENT GROUP**

Complainant JoAnn Dietl alleges that in 1990 her former employer, The Employment Group, wrote a letter to its employees in April 1990 "strongly suggesting" that they contribute \$50 each to the National Association of Temporary and Staffing Services PAC (NATSS-PAC), and that the company would reimburse the employees for their donation. She asserts that she contributed \$50 to NATSS-PAC and was reimbursed by way of a "bonus" paid by the employer. Complainant acknowledges in her complaint that she was terminated by the company in January 1992 and has been involved with disputes over this action since that time.

Respondents EmploymentGroup and Mr. White deny that they engaged in any illegal-solicitation on behalf of NATSS-PAC, and assert that PAC-supplied solicitation materials were forwarded only to executive and administrative level employees within the company. Respondents further state that they did not promise any reimbursement for donations made by any employees, and that the \$150 net bonus paid to all employees in 1990 was wholly unrelated to donations any of them may have made to NATSS-PAC; respondents further point out that they did not know who may have contributed, since contributions were made directly to the PAC. Though records are no longer available for the 1990 solicitation, respondents advise that the 1990 solicitation materials were substantially similar to those used in 1993, the last year for which records are available.

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This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4371

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JM

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