



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 28, 1980

MEMORANDUM

TO: FRED EILAND
PRESS OFFICE

THROUGH: BOB COSTA *pt For R.J.C.*

FROM: JUDY HAWKINS *JH*

SUBJECT: PUBLIC ISSUANCE OF FINAL AUDIT REPORT -
INDEPENDENCE CLUB POLITICAL COMMITTEE

Attached please find a copy of the final audit report of the Independence Club Political Committee which was approved by the Commission on March 14, 1980.

Informational copies of this report have been received by all parties involved and this report may be released to the public as of today, March 28, 1980.

Attached as stated

cc: FEC Library
RAD
✓ Public Record

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REPORT OF THE AUDIT DIVISION ON THE INDEPENDENCE CLUB POLITICAL COMMITTEE

I. Background

A. Overview

This report is based on an audit of the Independence Club Political Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2 of the United States Code which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the Comptroller General of the United States on October 16, 1972 as an affiliated organization of the Independence Club. The Independence Club was originally formed as a legal defense fund in 1962 by voluntary contributions from members of Teamsters Local #688. Over the years, the Committee's purpose changed to that of supporting local, state, and federal candidates. The Committee maintains its headquarters in St. Louis, Missouri. The audit covered the period January 1, 1977 through September 30, 1979.

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.

B. Key Personnel

The principal officers during the period covered by the audit were Mr. Ronald F. Gamache, Chairman, and Mr. Paul Akers, Treasurer.

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C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation and analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

II. Finding and Recommendation

Based upon examination of the reports and statements filed and the records presented, the Independence Club Political Committee is not a political committee as defined by Section 431(d) of Title 2 of the United States Code and therefore not subject to the reporting requirements of the Act. This opinion is based on the fact that the Committee had less than \$1,000 of receipts or expenditures in connection with Federal elections in any year covered by the audit. The Committee did not wish to be administratively terminated by the Commission.

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