



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

THIS IS THE END OF TMR # 1218

Date Filmed 2/11/82 Camera No. --- 2

Cameraman SPC

820101079

820101079

FEDERAL ELECTION COMMISSION

9/19/80 Memo + Certification plus letters + Council agree.

10/24/80 letter from counsel; 10/27/80 Internal Council Rpt; 12/12/80 GC Rpt;

3/12/81 GC Rpt, 4/2/81 letter, 4/23/81 letter, 5/11/81 GC Rpt

9/9/81 Memo, 10/1/81 Memo, 11/23/81 Memo

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed *[Signature]*
date 1/21/82

8201010707

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Pro-Life PAC)

MUR 1218

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 15, 1982, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Close the file in this matter.
2. Approve and send to counsel for respondent the letter identified as Attachment 2 submitted with the FEC General Counsel report dated January 11, 1982.

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

Attest:

1-15-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

92010310710

January 11, 1982

MEMORANDUM TO: Marjorie W Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1218

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

90010110711

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
32 JAN 11 P 1: 46

January 11, 1982

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
BY: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: MUR 1218

On November 27, 1981, the Commission accepted a conciliation agreement with civil penalty of \$1,250 in settlement of this matter. The Office of General Counsel received a check for the civil penalty with letter of counsel dated December 22, 1981 (Attachment 1).

Accordingly, the Office of General Counsel recommends that the Commission close the file in this matter and approve and send the attached closing letter to counsel for the respondent (Attachment 2).

Attachments

1. December 22, 1981 letter of counsel and photocopy of civil penalty check
2. Closing letter to counsel for the respondent

32010110710

① *Perce* 1029-11 RECEIVED
81 DEC 28 AIO: 36
CC# 5977

SMILEY, OLSON & GILMAN
ATTORNEYS AT LAW
1819 H STREET, NORTHWEST
WASHINGTON, D. C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 466-3100

TELEX
WUJ 8474 ROGER

DIRECT DIAL NUMBER

223-9066

DEC 28 P12: 24

December 22, 1981

8 2 0 1 0 3 1 0 7 1 3

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1218

Dear Mr. Gross:

Enclosed please find a check, made payable to the Federal Election Commission, for the agreed upon penalty figure (\$1,250) relating to the above referenced matter.

It is our understanding that 2 U.S.C. §437g(a)(4)(B) provides that only the conciliation agreement will be a matter of public record.

We appreciate your cooperation in reaching a resolution in this matter.

Sincerely yours,

William J. Olson
William J. Olson

ATTACHMENT 1 ①

8 2 0 1 0 3 1 0 7 1 4

66

NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE
OPERATING ACCOUNT
101 PARK WASHINGTON COURT
FALLS CHURCH, VIRGINIA 22046

1669

December 15th 81

68-42450
560

PAY TO THE ORDER OF Federal Election Commission

\$ 1,250.00

-----one thousand two hundred fifty and no cents----- DOLLARS

1st AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA 22102

For

W. B. Lemma, Jr.

⑈00001669⑈ ⑆05600424⑆ 06246860⑈

3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William J. Olson, Esquire
Smiley, Olson & Gilman
1819 H Street, N.W.
Washington, D.C. 20006

MUR 1218

Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of December 22, 1981, which enclosed the civil penalty check from National Pro-Life PAC. Please be advised that the file has been closed.

Thank you for your cooperation in resolving this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

92010310715

ATTACHMENT 2 3

SENSITIVE

Ben
1-12-82
11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

88 JAN 11 P 1: 46

January 11, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: MUR 1218

On November 27, 1981, the Commission accepted a conciliation agreement with civil penalty of \$1,250 in settlement of this matter. The Office of General Counsel received a check for the civil penalty with letter of counsel dated December 22, 1981 (Attachment 1).

Accordingly, the Office of General Counsel recommends that the Commission close the file in this matter and approve and send the attached closing letter to counsel for the respondent (Attachment 2).

Attachments

1. December 22, 1981 letter of counsel and photocopy of civil penalty check
2. Closing letter to counsel for the respondent

82040310716

① *Peace* 102-4-1
SMILEY, OLSON & GILMAN
ATTORNEYS AT LAW
1818 H STREET, NORTHWEST
WASHINGTON, D. C. 20006

81 DEC 28 A10:38

600# 597

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 462-5100

TELEX
WUJ, GATG ROSEN

DIRECT DIAL NUMBER

223-9068

DEC 28
PI 2:24

December 22, 1981

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1218

Dear Mr. Gross:

Enclosed please find a check, made payable to the Federal Election Commission, for the agreed upon penalty figure (\$1,250) relating to the above referenced matter.

It is our understanding that 2 U.S.C. §437g(a)(4)(B) provides that only the conciliation agreement will be a matter of public record.

We appreciate your cooperation in reaching a resolution in this matter.

Sincerely yours,

William J. Olson
William J. Olson

82040310717

ATTACHMENT 1 ①

8 2 0 4 0 3 1 0 7 1 8

3

NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE
OPERATING ACCOUNT
101 PARK WASHINGTON COURT
FALLS CHURCH, VIRGINIA 22046

1669

December 15th 81

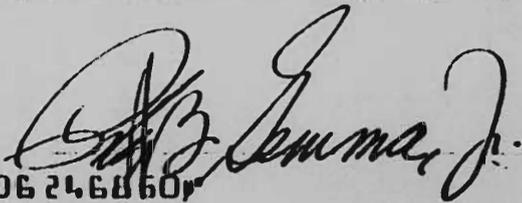
68-42450
560

PAY TO THE ORDER OF Federal Election Commission

\$ 1,250.00

-----one thousand two hundred fifty and no cents----- DOLLARS

1st AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA 22102



For

⑆0000 1669⑆ ⑆056004241⑆ 06246860⑆

3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William J. Olson, Esquire
Smiley, Olson & Gilman
1819 H Street, N.W.
Washington, D.C. 20006

MUR 1218

Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of December 22, 1981, which enclosed the civil penalty check from National Pro-Life PAC. Please be advised that the file has been closed.

Thank you for your cooperation in resolving this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

ATTACHMENT 2

3

82010310719



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

29
1/19/82

William J. Olson, Esquire
Smiley, Olson & Gilman
1819 H Street, N.W.
Washington, D.C. 20006

MUR 1218

Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of December 22, 1981, which enclosed the civil penalty check from National Pro-Life PAC. Please be advised that the file has been closed.

Thank you for your cooperation in resolving this matter.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

82010110720



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 19, 1982

William J. Olson, Esquire
Smiley, Olson & Gilman
1819 H Street, N.W.
Washington, D.C. 20006

MUR 1218

Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of December 22, 1981, which enclosed the civil penalty check from National Pro-Life PAC. Please be advised that the file has been closed.

Thank you for your cooperation in resolving this matter.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

BY: Kenneth A. Gross
Associate General Counsel

92010310721

RECEIVED

81 DEC 28 AIO: 36

CCC# 5977

SMILEY, OLSON & GILMAN
ATTORNEYS AT LAW
1819 H STREET, NORTHWEST
WASHINGTON, D.C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 466-5100

TELEX
WUI 64174 ROGER

DIRECT DIAL NUMBER

223-9066

DEC 28
P12: 24

December 22, 1981

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1218

Dear Mr. Gross:

Enclosed please find a check, made payable to the Federal Election Commission, for the agreed upon penalty figure (\$1,250) relating to the above referenced matter.

It is our understanding that 2 U.S.C. §437g(a)(4)(B) provides that only the conciliation agreement will be a matter of public record.

We appreciate your cooperation in reaching a resolution in this matter.

Sincerely yours,



William J. Olson

82040110722

8 2 0 1 0 3 1 0 7 2 3

NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE
OPERATING ACCOUNT
101 PARK WASHINGTON COURT
FALLS CHURCH, VIRGINIA 22046

1669

December 15, 1981

68-42450
560

Pay TO THE ORDER OF Federal Election Commission

\$ 1,250.00

-----one thousand two hundred fifty and no cents----- DOLLARS

1st AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
M. LEAN, VIRGINIA 22042



For

⑈00001669⑈ ⑆05600424⑆ 06246860⑈

A
2
7
0
1
0
0
0
8

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

1819 H STREET, NORTHWEST
WASHINGTON, D.C. 20006



MAIL EARLY
31 DEC 28 A10:36

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1981

William J. Olson, Esq.
Smiley, Olson & Gilman
1819 H Street N.W.
Washington, D.C. 20006

MUR 1218

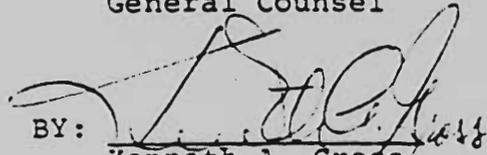
Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of November 16, 1981, enclosing the signed conciliation agreement for National Pro-Life PAC. On November 27, 1981, the Commission accepted the agreement.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. Please note that in accordance with paragraphs IX and X of the agreement, your client has thirty (30) days from the date of the General Counsel's signature in which to pay the civil penalty.

Sincerely,

Charles N. Steele
General Counsel

BY: 

Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

82010610725

May 11, 1981

NOV 17 11:12

In the Matter of)	
)	
National Pro-Life Political)	MUR 1218
Action Committee)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that National Pro-Life Political Action Committee ("Respondent") violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore,

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

- I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 - 1. The respondent, National Pro-Life Political Action Committee, is a multicandidate political committee.

82010726

2. On March 1 and December 27, 1979, the respondent received contributions of \$1,500 and \$3,500 respectively from an individual, Mrs. Pauline Fiore.

3. On August 6, 1979, the respondent secured a loan of \$15,000 from Mrs. Pauline Fiore.

4. Respondent paid back the \$15,000 loan to Mrs. Fiore on the following dates: \$3,800 on December 20, 1979; \$6,557.50 on January 29, 1980; \$4,642.50 on January 31, 1980.

5. 2 U.S.C. § 441a(a)(1)(C) states that no person shall make contributions to a multicandidate political committee in any calendar year aggregating in excess of \$5,000.

6. 2 U.S.C. § 441a(f) states that no political committee shall knowingly accept any contribution in violation of the provisions of § 441a.

WHEREFORE, Respondent agrees:

V. Respondent received contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore, in violation of 2 U.S.C. § 441a(f).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of ~~twelve hundred and fifty dollars~~ (\$1,250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein

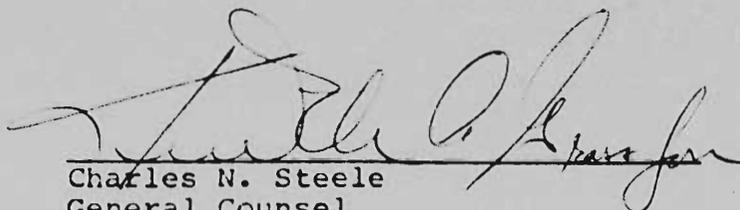
82010110727

or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

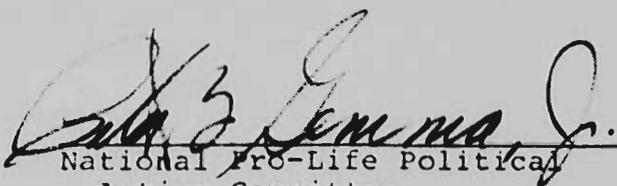
IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Nov. 30, 1981
Date


Charles N. Steele
General Counsel
Federal Election Commission

11/6/81
Date


FOR: National Pro-Life Political
Action Committee
ITS: **PETER B. GEMMA, JR., TREASURER**

82010110709



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

DP 11/30/81

William J. Olson, Esq.
Smiley, Olson & Gilman
1819 H Street N.W.
Washington, D.C. 20006

MUR 1218

Dear Mr. Olson:

This letter is to acknowledge receipt of your letter of November 16, 1981, enclosing the signed conciliation agreement for National Pro-Life PAC. On _____, 1981, the Commission accepted the agreement.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. Please note that in accordance with paragraphs IX and X of the agreement, your client has thirty (30) days from the date of the General Counsel's signature in which to pay the civil penalty.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

82040310729

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1218
National Pro-Life Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 27, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1218:

1. Accept the conciliation agreement as submitted with the General Counsel's November 23, 1981 memorandum.
2. Approve and send the letter and agreement to counsel for the respondent, (Attachment two to the General Counsel's memorandum dated November 23, 1981).

Commissioners Aikens, Harris, Reiche, McGarry, Thomson and Tiernan voted affirmatively in this matter.

Attest:

11-27-81

Date

Gady A. Custer

for Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 11-23-81, 4:06
Circulated on 48 hour vote basis: 11-24-81, 11:00

32710110770

102158

Perce

RECEIVED
Ccc# 5821

81 NOV 17 81:12

SMILEY, OLSON & GILMAN
ATTORNEYS AT LAW
1810 K STREET, NORTHWEST
WASHINGTON, D.C. 20006

ROBERT R. SMILEY III
WILLIAM J. OLSON*
NICHOLAS GILMAN*

*ALSO ADMITTED IN VIRGINIA
*ALSO ADMITTED IN PENNSYLVANIA

TELEPHONE
(202) 466-8100

TELEX
WUI 84174 ROGER

DIRECT DIAL NUMBER

223-9066

November 16, 1981

NOV 18 10:28

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1218

Dear Mr. Gross:

Enclosed is the conciliation agreement with the agreed upon penalty figure (\$1,250) relating to the above referenced matter. It has been signed by the Treasurer of our client.

It is our understanding that under paragraphs IX and X of the agreement, National Pro-Life Political Action Committee has thirty (30) days after the agreement has been fully executed and approved in which to pay the civil penalty. Please let us know the date the agreement becomes effective so that we may inform our client of its obligation.

Sincerely yours,

William J. Olson
William J. Olson

Enclosure

1
3
7
0
1
7
0
1
0
0
2
8

3 2 0 4 9 1 0 7 3 2

SMILEY, OLSON & GILMAN

ATTORNEYS AT LAW

1819 H STREET, NORTHWEST
WASHINGTON, D.C. 20006

NOV 17 11:12
D.C.

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1218
National Pro-Life Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 6, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1218:

1. Accept the conciliation agreement offered by National Pro-Life Political Action Committee as settlement of this matter.
2. Approve and send the letter as submitted with the General Counsel's October 1, 1981 memorandum.

Commissioners Aikens, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

10/6/81

Date

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

Received in Office of the Commission Secretary: 10-1-81, 4:09
Circulated on 48 hour vote basis: 10-2-81, 2:00

92010310733

BEFORE THE FEDERAL ELECTION COMMISSION

August 24, 1981

In the Matter of)	
)	
National Pro-Life Political)	MUR 1218
Action Committee)	
_____)	

RESPONDENT'S BRIEF

For purposes of this conciliation process, the Respondent accepts the Statement of the Case of the General Counsel's Brief of March 31, 1981.

COMMENTS

The Respondent recognizes the seriousness of the violation of the Federal Election Campaign Act that is involved in this matter. Although the Committee, prior to pursuing the action complained of, sought, received and relied upon a legal opinion which later proved to be erroneous, the duty is squarely on the Committee to comply with the letter as well as the spirit of the Act. The Respondent regrets this incident and will take care to be in conformance with federal statutes and regulations in the future. The employees of the Committee are under direction from the Committee's Directors to bring this matter to a fair, responsible and reasonable conclusion, and to see it does not reoccur.

Although a violation of the law did occur, in determining a penalty it should be pointed out that there was no knowing or willful intent to do so. Moreover, the loan in question was partially paid

4
3
2
1
0
1
0
1
0
3
8

25 P 5: 23

25 P 5: 26

back even before the Committee was notified by the Commission of the probable violation; and was fully repaid shortly after the notification. Since the violation herein related, the Committee has had no FEC complaints against it.

It is recognized that the Commission may want to consider each case as a separate and distinct matter. But Respondent requests that the Commission keep in mind past conciliation agreements when arriving at a reasonable civil penalty in this matter, and not treat the Committee less favorably than other similar respondents whose conduct appears to be analogous or much more flagrant when compared with the circumstances of this case.

For example, in MUR 982, a candidate for the U.S. Senate who was an attorney, accepted \$20,000 in loans from his father, which the candidate in turn loaned to the respondent, the principal campaign committee for the candidate. In that matter, as in the instant case, there was no knowing or intentional violation of the law by any of the parties concerned, and the Commission agreed to a civil penalty in the amount of \$250.

In MUR 1055, the respondent, the principal campaign committee for another U.S. Senatorial candidate, knowingly accepted illegal loans from an individual totalling \$20,000 over a nine day period. The civil penalty assessed in that matter was \$500.

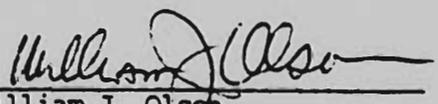
And in MUR 1008, respondent labor organization loaned \$15,000 to respondent political committee, a portion of which was then contributed to candidates for federal office in violation of the Act. The respondents in that matter paid an aggregate civil penalty of \$500. Respondent also requests the Commission to review the following

8204910735

Conciliation Agreements in arriving at a reasonable civil penalty in
this matter: MUR 1114; MUR 1159; MUR 510; MUR 1147; MUR 885; MUR
1173; and MUR 500.

8 2 0 1 0 3 1 0 7 3 5

National Pro-Life Political
Action Committee

By: 
William J. Olson
Smiley, Murphy, Olson & Gilman
1819 H Street, N.W., Suite 500
Washington, D.C. 20006
(202) 466-5100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/LENA STAFFORD
DATE: JULY 8, 1981
SUBJECT: MUR 1218 - Interim Conciliation Report #1;
Dated 7-2-81; Signed 7-6-81; Received in
OCS 7-7-81, 11:34

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, July 7, 1981.

There were no objections to the Interim Conciliation Report at the time of the deadline.

82000410737

July 7, 1981

MEMORANDUM TO: Majjorie W. Emmons

FROM: Elissa T. Sarr

SUBJECT: MUR 1218

Please have the attached Interim Concil Report distributed to the Commission. Thank you.

82010110719

BEFORE THE FEDERAL ELECTION COMMISSION

July 2, 1981

SENSITIVE

In the Matter of)
)
National Pro-Life Political)
Action Committee)

MUR 1218

INTERIM CONCILIATION REPORT # 1

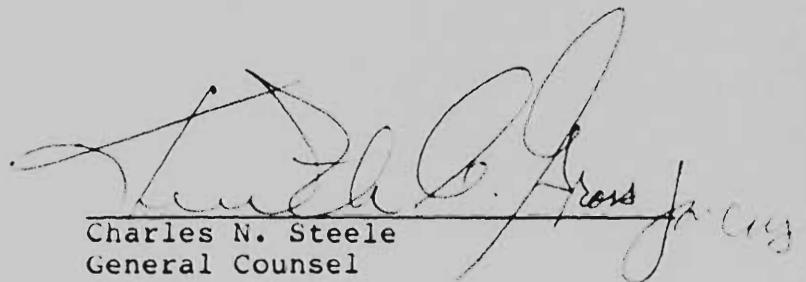
On May 27, 1981, the Commission found probable cause to believe that respondent violated 2 U.S.C. § 441a(f), and on June 3, 1981, the Office of General Counsel sent to Carmen Speranza, counsel for respondent, the conciliation agreement approved by the Commission.

Through phone conversation, Mr. Speranza has informed the Office of General Counsel that a Washington attorney is being retained by respondent. On June 30, 1981, we received a letter from the PAC naming William J. Olson as counsel. Mr. Olson has stated that he will begin negotiations as soon as he has familiarized himself with the background of this matter.

Date

7/6/81

Charles N. Steele
General Counsel



31 JUL 7 11:34

COPY TO OFFICE

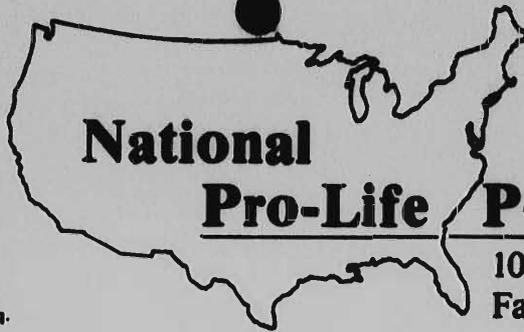
82010739

100967

RECEIVED

GC# 4983

81 JUN 30 P 2: 46



National

Pro-Life

Political Action Committee

Board of Directors

Rev. Charles Flory, O.P.

Chairman

Thomas F. Roemer

Rev. Morris Sheats

Carmen V. Speranza, Esq.

Hon. Harold Froehlich

William J. Isaacson, Esq.

Rev. William Cogan †

Mrs. Susan Armocost

Executive Director

Peter B. Gemma, Jr.

Advisory Committee

Hon. John W. McCormack †

Former Speaker of House (MA)

Hon. E.J. (Jake) Garn

United States Senator (UT)

Hon. Orrin G. Hatch

United States Senator (UT)

Hon. Henry J. Hyde

Congressman 6th Dist. (IL)

Hon. Thomas N. Kindness

Congressman, 8th Dist (OH)

Hon. Larry McDonald, M.D.

Congressman, 7th Dist. (GA)

Hon. Martin A. Russo

Congressman, 3rd Dist. (IL)

Hon. Harold L. Volkmer

Congressman, 9th Dist. (MO)

Hon. Robert K. Dornan

Congressman, 27th Dist. (CA)

Hon. Robert A. Young

Congressman, 2nd Dist. (MO)

Hon. Ron Paul, M.D.

Congressman, 22nd Dist. (TX)

Rev. Harold O.J. Brown

Chm., Christian Action

Council (IL)

Mrs. Randy Engel

Pres., U.S. Coalition for Life (PA)

Professor Victor Rosenblum

Northwestern Univ. Law

School (IL)

Professor Charles E. Rice

Notre Dame Law School (IN)

Rev. Donald M. Parker

Editor, The Christian Citizen (IL)

Hon. Louis (Woody) Jenkins

State Representative (LA)

Anthony J. Lauinger

Chm., Oklahomans for Life (OK)

Mrs. Alice Hartle

Past Ed., Nat'l Right to Life

News (MN)

Donald T. Manion, M.D.

Physician & Surgeon (OR)

John F. Hillabrand, M.D.

Alternatives to Abortion

International (OH)

Herbert J. Ratner, M.D.

Ed., Child & Family Quarterly (IL)

Francis P. Filice, Ph. D.

Biologist, Univ. of San Francisco (CA)

John Finn, Jr.

Business Executive (CA)

Files for identification only

Files for identification only

A copy of our reports on file and may be purchased from The Federal Election Commission, Washington, D.C.

† Deceased

101 Park Washington Court
Falls Church, VA 22046

(703) 536-7650

June 26, 1981

Ms. Dolores Pesche
Office of General Counsel
Federal Election Commission
Washington, DC 20463

Dear Ms. Pesche:

RE: MUR 1218

This is to advise you that we have retained William J. Olson, of the firm of Smiley, Murphy, Olson and Gilman, 1819 H Street, N.W., Suite 500, Washington, D.C., 20006, to represent us with regard to the above captioned matter.

Sincerely,

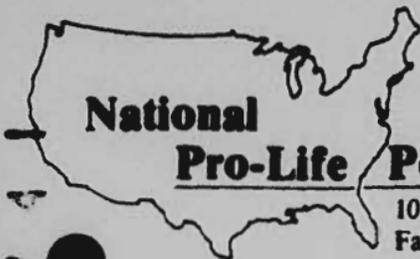
Peter B. Gemma, Jr.
Executive Director

PBG, JR/wab

cc: William J. Olson

1 JUN 30 P 2: 46

8 2 7 1 7 1 0 7 4 1



**National
Pro-Life Political Action Committee**

101 Park Washington Court
Falls Church, VA 22046



RECEIVED



Ms. Dolores Pesche
Office of General Counsel
Federal Election Commission
Washington, DC 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 3, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carmen V. Speranza
Suite 1600
180 N. Michigan Avenue
Chicago, Illinois 60601

Re: MUR 1218

Dear Mr. Speranza:

On May 27, 1981, the Commission determined there was probable cause to believe that your client, the National Pro-Life Political Action Committee, violated the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. § 441a(f).

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

We enclose a conciliation agreement that this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Dolores Pesce, the staff member assigned to this matter, at (202) 523-5071.

Also, the Commission accepted the conciliation agreement signed by you on behalf of Mrs. Fiore and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in the matter of Mrs. Fiore,

82919; 10742

Carmen V. Speranza
Page Two

and it will become part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,



Charles N. Steele
General Counsel

Enclosures
Conciliation Agreements

8 2 0 4 0 1 0 7 4 3

6/3/01

FORM 3811, JAN. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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.....0
- Show to whom, date and address of delivery.....0
- RESTRICTED DELIVERY Show to whom and date delivered.....0
- RESTRICTED DELIVERY Show to whom, date, and address of delivery.....0

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Carmen V. Speranza

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
80882h

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 6-8-81

5. ADDRESS (Complete only if 4 is checked)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

1218 Reese

7500-1078-210-01



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DP
6/1/81

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carmen V. Speranza
Suite 1600
180 N. Michigan Avenue
Chicago, Illinois 60601

Re: MUR 1218

Dear Mr. Speranza:

On May 27, 1981, the Commission determined there was probable cause to believe that your client, the National Pro-Life Political Action Committee, violated the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. § 441a(f).

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

We enclose a conciliation agreement that this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Dolores Pesce, the staff member assigned to this matter, at (202) 523-5071.

Also, the Commission accepted the conciliation agreement signed by you on behalf of Mrs. Fiore and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in the matter of Mrs. Fiore,

82010310744

Carmen V. Speranza
Page Two

and it will become part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Conciliation Agreements

82010110715

BEFORE THE FEDERAL ELECTION COMMISSION

August 19, 1980

In the Matter of
Mrs. Pauline Fiore

)
)
)

MUR 1218

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that Mrs. Pauline Fiore ("Respondent") violated 2 U.S.C. § 441a(a)(1) (C) by making contributions aggregating in excess of \$5,000 to the National Pro-Life Political Action Committee.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4) (A)(i).

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

III. Respondent enters voluntarily into this Agreement with the Commission.

82010310716

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

1. The respondent, Mrs. Pauline Fiore, contributed \$1,500 and \$3,500 on March 1 and December 27, 1979 respectively to the National Pro-Life Political Action Committee, a multi-candidate political committee.

2. The respondent made a loan of \$15,000 to the National Pro-Life Political Action Committee on August 6, 1979.

3. The National Pro-Life Political Action Committee paid back the \$15,000 loan to respondent on the following dates: \$3,800 on December 20, 1979; \$6,557.50 on January 29, 1980; \$4,642.50 on January 31, 1980.

4. 2 U.S.C. § 441a(a)(1)(C) states that no person shall make contributions to a multicandidate political committee in any calendar year aggregating in excess of \$5,000.

WHEREFORE, Respondent agrees:

V. Respondent made contributions aggregating in excess of \$5,000 to the National Pro-Life Political Action Committee, in violation of 2 U.S.C. § 441a(a)(1)(C).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred dollars (\$100), pursuant to 2 U.S.C. § 437g(a)(6)(B).

VII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

82040310717

GENERAL CONDITIONS

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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

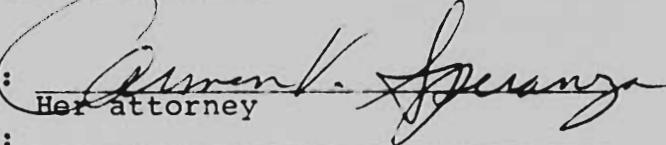
8 2 0 1 7 3 1 7 4 8

3 June 1981
Date


Charles N. Steele
General Counsel
Federal Election Commission

April 22, 1981
Date

Mrs. Pauline Fiore
Respondent's Name

BY: 
Her attorney

ITS: _____

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Mrs. Pauline Fiore)
National Pro-Life Political)
Action Committee)

MUR 1218

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on May 27, 1981, do hereby certify that the Commission decided in a vote of 6-0 to take the following actions regarding MUR 1218:

1. Accept the conciliation agreement submitted on behalf of Mrs. Pauline Fiore.
2. Close the file in the matter of Mrs. Pauline Fiore.
3. Find probable cause to believe that National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.
4. Approve and send the letter and conciliation agreement to counsel for the Committee attached to the General Counsel's Report dated May 11, 1981.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

5-28-81
Date

Lena L. Stafford
Recording Secretary

8 2 0 1 7 3 1 7 4 7

GC# 4581
100337

BEFORE THE FEDERAL ELECTION COMMISSION

31 APR 29 P 3: 35

CLARENCE B. ...

In The Matter Of)
)
National Pro-Life Political) MUR 1218
Action Committee.)

RESPONDENT'S BRIEF

I. Statement of Case

On January 21, 1980, Respondent received notification from the Reports Analysis Division (hereinafter "RAD"), that it had discovered in an audit of Respondent's accounts that it had received excess contributions from an individual in violation of Section 441(a). Respondent, based on an investigation of its records, determined that contributions had been received from a Mrs. Pauline Fiore as follows:

03/01/79	received	\$ 1,500.00	contribution
08/06/79	secured	\$15,000.00	loan
12/20/79	repaid	\$ 3,800.00	of loan
12/27/79	received	\$ 3,500.00	contribution
01/29/80	repaid	\$ 6,557.50	of loan
01/30/80	repaid	\$ 4,642.50	balance of loan

Having been informed that it in fact received contributions in excess of the \$5,000.00 limit, Respondent thereupon voluntarily repaid the excess amounts to Mrs. Fiore.

03201301028

As is pointed out in the brief submitted by the General Counsel, the initial acceptance of the \$15,000.00 loan had occurred on the advice of counsel and with no intention to violate any aspect of the law.

FROM RESPONSE.

II. Legal Analysis

2 U.S.C. Section 441(a)(1)(C) provides that no person shall make contributions which in the aggregate exceed the sum of \$5,000.00. Subsection (f) further provides that no committee shall knowingly accept any contribution or make any expenditure in violation of said section. It may be argued however that a loan of \$15,000.00 is not a contribution of \$15,000.00, although it is an item of value upon which actuarially some value can be attributed, such a loan is intended to be repaid cannot and should not be valued at the fact amount of the Note. Any such valuation would be purely arbitrary. Regarding the repayment, it can be seen by the fact that on December 20, 1979, a full month prior to any notification by RAD, the sum of \$3,800.00 had in fact been paid to Mrs. Fiore. Thus, the violation of an

82010310751

excessive contribution over the limit of \$5,000.00 should not include the total sum of \$15,000.00, but some sum less.

Even assuming arguendo that the total \$15,000.00 should in fact be considered, the General Counsel seems to take the position that every violation of the Act should be treated in the same vein. This has not been the history of this organization. As a most recent example, I call your attention to MUR 1114, reported in the Federal Election Register, Volume 7, Number 4 of April 1981, at page 5, wherein a technical violation of the Act occurred and the Commission agreed to accept the imposition of a civil penalty in the amount of \$500.00. In that case, \$40,000.00 in corporate contributions had been made to a political committee in technical violation of the law. Apparently, an error was committed by a bank which was acting in behalf of the political committee. In this report it is noted "The General Counsel further stated that, even though the bank had erred, it was the committee's responsibility to insure that its assets had been properly secured". Thus, although the General Counsel in that case took the same position as it is now taking regarding a technical violation of the Act, the Commission recognizing that no knowing or wilful intent to violate any law was shown, acted fairly to redress the technical violation.

In addition thereto, Respondent submits the latest report of receipts and disbursements filed with the Commission

and points out that Item 8 indicates total cash on hand at the
time of the report is \$2,659.44.

By:

Armen V. Spassov

DATED:

April 27, 1981

82040310753

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

(Summary Page)

1. Name of Committee (in Full)
National Pro-Life Political Action Committee

Address (Number and Street)
101 Park Washington Court

City, State and ZIP Code
Falls Church, VA 22046

Check if address is different than previously reported.

2. FEC Identification Number
C 00084483

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 1/1/81 Through 3/31/81

6. (a) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

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

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

	Column A This Period	Column B Calendar Year-to-Date
		\$ 3,487.10
	\$ 3,487.10	
	\$59,615.81	\$59,615.81
	\$63,102.91	\$63,102.91
	\$60,443.47	\$60,443.47
	\$ 2,659.44	\$ 2,659.44
	\$	
	\$	

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

For further information, contact:

Peter B. Gemma, Jr.
Type or Print Name of Treasurer:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

SIGNATURE OF TREASURER

4/14/81
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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

FEC FORM 3X (3/80)

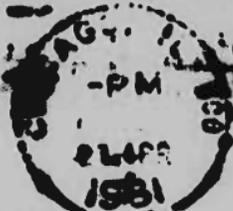
82010310754

6
7
0
1
0
1
0
4
0
2
0
8

**SPERANZA
AND
VEVERKA**

ATTORNEYS AT LAW
180 North Michigan Avenue
Chicago, Illinois 60601

*Federal Election Committee
Office of the General Counsel
Washington, D.C. 20463
ATTN: Ms. Dolores Pesce*





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carmen V. Speranza
Suite 1600
180 N. Michigan Avenue
Chicago, Illinois 60601

Re: MUR 1218

Dear Mr. Speranza:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 4, 1980, found reason to believe that your client, The National Pro-Life PAC, had violated section 441a(f) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

82010310757

Letter to Carmen V. Speranza
Page Two

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

Should you have any questions, please contact Dolores Pesce at (202) 523-5071.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

8 2 0 1 0 1 0 7 5 3

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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.....
 Show to whom, date and address of delivery.....
 RESTRICTED DELIVERY
Show to whom and date delivered.....
 RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Carmen V. Speranza

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
949638

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE Addressee Authorized agent
F. B. Balcer

4. DATE OF DELIVERY
4/16/88

5. ADDRESS (Complete only if requested)

61 APR 8 11:00 AM
CHICAGO ILL
POSTAL PLAZA
CENTRAL
APR 15 1988

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

RECEIVED
12/18 Pesce

☆GPO : 1979-288-248

April 2, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: : MUR 1218

Please have the attached Memo and Brief distributed to the Commission on an informational basis. Thank you.

3 2 0 1 0 1 1 0 7 5 9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 APR 2 All: 29

April 2, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1218

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of the brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on April 2, 1981. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondent

R 2 7 1 0 7 6 0

BEFORE THE FEDERAL ELECTION COMMISSION
March 31, 1981

In the Matter of)
) MUR 1218
National Pro-Life Political)
Action Committee)

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On March 31, 1980, the Reports Analysis Division (hereinafter "RAD") forwarded a referral to the Office of General Counsel. The referral alleges that the National Pro-Life Political Action Committee (hereinafter "the Committee") violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

During its review of the Committee's 1979 reports, RAD noted that the Committee had accepted over \$5,000 in contributions from Mrs. Fiore. She had contributed a total of \$5,000 to the Committee and additionally loaned it \$15,000. A personal loan is considered a contribution pursuant to 2 U.S.C. § 431(8)(A)(i).

On January 21, 1980, RAD notified the Committee that it appeared to have received excess contributions from an individual, in violation of § 441a, and further recommended that the Committee refund contributions over the \$5,000 limit. The Committee responded to this notification by letter dated January

8201010751

30, 1980. The response sets out the dates on which Mrs. Fiore made contributions and the dates on which the Committee made refunds as follows:

03/01/79	received	\$ 1,500	contribution
08/06/79	secured	\$ 15,000	loan
12/20/79	repaid	\$ 3,800	of loan
12/27/79	received	\$ 3,500	contribution
01/29/80	repaid	\$ 6,557.50	of loan
01/30/80	repaid	\$ 4,642.50	balance of loan

The refunds total \$15,000 which was the amount of contribution in excess of the \$5,000 limit.^{1/}

In both the January 30 response and in a phone conversation with a RAD representative on January 24, the Committee stated that it had accepted the \$15,000 loan from Mrs. Fiore on the advice of counsel. Counsel advised that a loan was different from a contribution and did not count against a person's contribution limitation.

On March 31, RAD forwarded the referral to the Office of General Counsel. On June 4, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from Mrs. Fiore. The Commission notified the Committee of its reason to believe finding by letter dated June 5.

Counsel for both the Committee and Mrs. Fiore responded to reason to believe notification by letter dated July 7. Counsel states that he is the same legal counsel on whose advice the

^{1/} The 01/30/80 repayment of \$4,642.50 appears on the Committee's April 15 Quarterly Report dated 01/31/80, while the same report shows a \$5,000 contribution by Mrs. Fiore to the Committee on 01/30/80.

92010310762

Committee accepted the \$15,000 loan from Mrs. Fiore, and acknowledges that his opinion was in error. He further states, "As soon as the error was brought to the attention of the Committee, it was corrected expeditiously and I believe that the Committee and Mrs. Fiore have shown that they did not intend to violate any regulation of the FEC or any other statutory law."

82040310753

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(C) provides that no person shall make contributions to a multi-candidate political committee which, in the aggregate, exceed \$5,000. Subsection (f) further provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of section 441a.

Counsel for the Committee argues that his client accepted excessive contributions from Mrs. Fiore as a result of a misunderstanding of the Act, and thus, there was no deliberate intent on the Committee's part to commit a violation. A mistake of law is not a defense to a violation. However, in the event that a respondent's activities are on the periphery of election law, a mistake of law would be understandable and perhaps mitigate the seriousness of the violation.

The Committee filed its first report with the Federal Election Commission on December 31, 1977. Since the Committee has had continuous obligations to keep records and make reports to the Commission since that time, it seems reasonable to expect that the Committee has understanding of election law. Further, the contribution and expenditure limitations of § 441a, here under consideration, are among the most prominent and basic provisions of the Act, as are those under § 431, wherein are contained the definitions of contribution and expenditure.

82010310764

I. General Counsel's Recommendation

Find probable cause to believe that National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

1 April 1981

ate

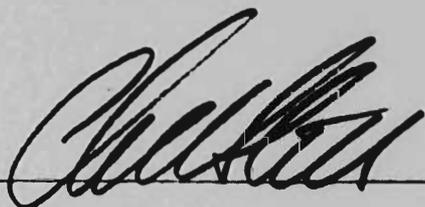


Charles N. Steele
General Counsel

III. General Counsel's Recommendation

Find probable cause to believe that National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

1 April 1981
Date


Charles N. Steele
General Counsel

82040310765

**SPERANZA
AND
VEVERKA**
ATTORNEYS AT LAW

Carmen V. Speranza
Donald J. Veverka
Richard S. Rosen
Michael A. Haugh

Suite 1800
180 North Michigan Avenue
Chicago, Illinois 60601
(312) 372-3666

RECEIVED
GOC-#
1881
JUL 9 PM 12 07

July 7, 1980

Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463

908978

ATTN: Ms. Dolores Pesce
Mr. Lee Andersen

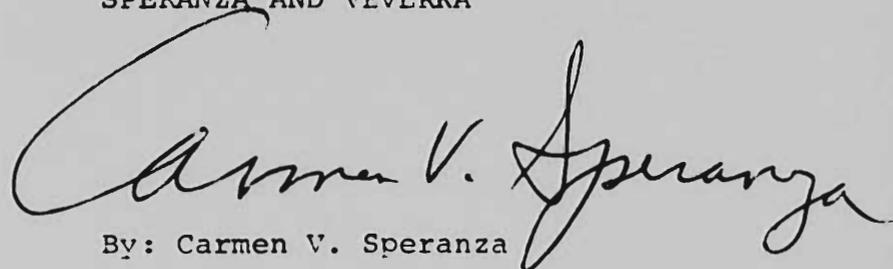
RE: MUR - 1218

Dear Ms. Pesce and Mr. Andersen:

Please be advised that we have been retained to represent Mrs. Pauline Fiore regarding the above captioned matter. Please forward all other correspondence and communiques to this office.

Very truly yours,

SPERANZA AND VEVERKA



By: Carmen V. Speranza

CVS/db

JUL 9 PM 12:58

82010755

8 2 0 4 0 3 1 0 7 6 7

**SPERANZA
AND
VEVERKA**

ATTORNEYS AT LAW
180 North Michigan Avenue
Chicago, Illinois 60601

Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463
ATTN: Ms. Dolores Pesce
Mr. Lee Andersen



GCC* 1877

RECEIVED

**SPERANZA
AND
VEVERKA**
ATTORNEYS AT LAW

Carmen V. Speranza
Donald J. Veverka
Richard S. Rosen
Michael A. Haugh

Suite 1600
180 North Michigan Avenue
Chicago, Illinois 60601
(312) 372-3665

JUL 9 PM 12:03

July 7, 1980

Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463

ATTN: Ms. Dolores Pesce
Mr. Lee Andersen

RE: MUR - 1218

Dear Ms. Pesce and Mr. Andersen:

Pursuant to my telephone conversation with Mr. Andersen today in which he advised me that the Commission had sent a letter regarding the violation as set forth in the June 5, 1980 correspondence to Mrs. Fiore to National Pro-Life Political Action Committee, please be advised that I have also been retained to represent National Pro-Life Political Action Committee.

The factual and legal analysis set forth in your Notification of Reason to Believe Finding dated June 5, 1980 regarding Mrs. Fiore is substantially correct and it applies to both clients. Both clients have instructed me to request informal conciliation at this time.

The additional fact that I wish to advise the Commission is that when the contribution was made, it was made after consultation with legal counsel who had advised the Committee that it would be acceptable to receive the \$15,000.00 loan from Mrs. Fiore. Unfortunately, I am the same legal counsel who gave that opinion at the time and regretably, that opinion was in error. As soon as the error was brought to the attention of the Committee, it was corrected expeditiously and I believe that the Committee and Mrs. Fiore have shown that they did not intend to violate any regulation of the FEC or any other statutory law. On the contrary, they have always attempted

82040310758

**SPERANZA
AND
VEVERKA**

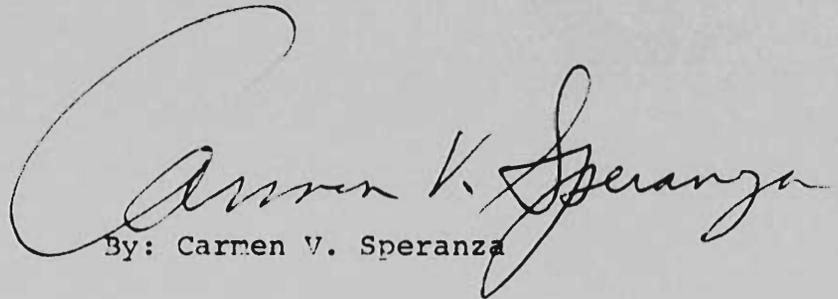
Federal Election Commission
July 7, 1980
Page Two

to comply with the rules and regulations, not only of the
FEC, but of all other legal bodies.

It is my opinion that the Commission has sufficient facts
to enter into informal conciliation and I believe that

Very truly yours,

SPERANZA AND VEVERKA



By: Carmen V. Speranza

CVS/db

82040310759

01770
1100008

**SPERANZA
AND
VEVERKA**

ATTORNEYS AT LAW
180 North Michigan Avenue
Chicago, Illinois 60601

Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463
ATTN: Ms. Dolores Pesce
Mr. Lee Andersen





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: JULY 1, 1980
SUBJECT: MUP 1218 - Interim Investigative Report
dated 6-27-80; Received in OCS
6-30-80, 12:34

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, June 30, 1980.

There were no objections to the Interim Investigative Report.

8201011771

June 30, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1218

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

8201011772

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

June 27, 1980

80 JUN 30 P12: 34

In the Matter of)	
)	
National Pro-Life Political)	MUR 1218
Action Committee)	
Mrs. Pauline Fiore)	

INTERIM INVESTIGATIVE REPORT

On June 5, 1980, Reason to Believe notification letters were sent to respondents National Pro-Life Political Action Committee and Mrs. Pauline Fiore. On June 17, we received a response from Father Charles Fiore, O.P. on behalf of his mother, Mrs. Pauline Fiore. On the same date, the post office sent back the letter addressed to National Pro-Life PAC with "Unable to Forward" stamped on it. We contacted a spokesman for the committee who informed us that the letter should have been forwarded to the committee's new address.

On June 20, we resent the letter to the new address:

101 Park Washington Court
Falls Church, Virginia 22046

In order to give National Pro-Life PAC an opportunity to respond to the reason to believe finding in this matter, the Office of General Counsel will delay presenting a second GC report to the Commission until the requisite 15 days for response have elapsed.

6/27/80
DATE

Charles N. Steele
CHARLES N. STEELE
GENERAL COUNSEL
by KAC

82040310773



FEDERAL ELECTION COMMISSION

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

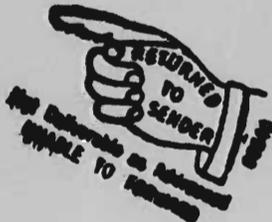
MEMORANDUM TO: File
FROM: Dolores Pesce
DATE: June 20, 1980
RE: MUR ~~1198~~ 1218

Our notification of RTB finding to National Pro-Life Political Action Committee was sent back with "Unable to Forward" stamped on it. I telephoned Father Fiore, and he informed me there is a new headquarters, but that our letter should have been forwarded by the post office. I resent the letter this date to the new address:

101 Park Washington Court
Falls Church, Virginia 22046

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



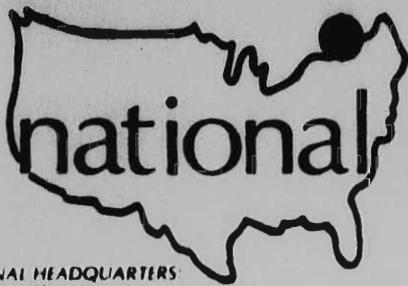
A

National Pro-Life Political
Action Committee
Peter Gemma, Treasurer
4848 N. Clark Street
Chicago, Illinois 60640

UNKNOWN

CERTIFIED

245061



national pro-lifepac

RECEIVED

CCF 7694

'80 JUN 17 AM 8:52

June 12, 1980

NATIONAL HEADQUARTERS:

4848 North Clark Street
Chicago, Illinois 60640
(312) 728-2844

PROJECT OFFICE:

253 Main Street
Northport, New York 11768
(516) 754-1447

BOARD OF DIRECTORS:

Rev. Charles Fiore, O.P.
Chairman

Rev. Morris Sheats
Thomas F. Roeser
Carmen V. Speranza, Esq.
William J. Isaacson, Esq.
Hon. Harold Froehlich
Rev. Harold O. J. Brown
John Finn, Jr.

EXECUTIVE DIRECTOR:

Peter B. Gemma, Jr.

ADVISORY COMMITTEE:

- Hon. John W. McCormack, MA
Former Speaker of House
- Hon. E. J. (Jake) Garn, UT
United States Senator
- Hon. Orrin G. Hatch, UT
United States Senator
- Hon. Robert E. Bauman, MD
Congressman, 1st Dist
- Hon. Henry J. Hyde, IL
Congressman, 6th Dist
- Hon. Thomas N. Kindness, OH
Congressman, 8th Dist
- Hon. Larry McDonald, M.D., GA
Congressman, 7th Dist
- Hon. Martin A. Russo, IL
Congressman, 3rd Dist
- Hon. Robert K. Dornan, CA
Congressman, 27th Dist
- Hon. Harold L. Volkmer, MO
Congressman, 9th Dist
- Hon. Robert A. Young, MO
Congressman, 2nd Dist
- Hon. Ron Paul, M.D., TX
Congressman, 22nd Dist
- Randy Engel, PA
Pres., U.S. Coalition for Life
- Professor Victor Rosenblum, IL
Northwestern Univ. Law School
- Professor Charles E. Rice, IN
Notre Dame Univ. Law School
- Rev. Donald M. Parker, IL
Editor, The Christian Citizen
- Jay Bowman, GA
Nat'l. Right to Life Comm.
- Kenneth VanDerhoef, Esq., WA
Nat'l. Right to Life Comm.
- Alice Hartle, MN
Past Ed., Nat'l. RTL News
- Donald T. Manion, M.D., OR
Physician & Surgeon
- John F. Hillabrand, M.D., OH
Alternatives to Abortion, Int'l
- Herbert J. Ratner, M.D., IL
Ed., Child & Family Quarterly
- Francis P. Filice, Ph.D., CA
Biologist, Univ. of San Francisco

Federal Election Commission
Office of the General Counsel
Washington, D. C. 20463

008493

Attn: Ms. Dolores Pesce

Re: MUR - 1218

Dear Ms. Pesce:

Upon receipt of notification from the FEC several days ago by my mother, Mrs. Pauline Fiore of Middleton, Wisconsin, in the above matter, I telephoned your office.

My mother is 77 years old and in poor physical health, and I reside with her.

Since you were unavailable, I spoke with Mr. Lee Andersen, who was most helpful, and who called me back the following day with more details.

In the light of my conversations with Mr. Andersen, this will notify you that, pending consultation with our attorney, my mother will likely enter into conciliation on this matter, inasmuch as the loan in question was made in good faith and under the mistaken impression that such loans are not considered as contributions.

Furthermore, as you know, when the error was called to NPLPAC's attention, the entire amount was repaid to Mrs. Fiore.

If you have any questions, please call me at 608-271-2681. I shall be in contact with you again within the next several weeks.

Sincerely,

17:00 Father Charles Fiore, O. P.,
Chairman

CCF/si

2040610706



national pro-lifepac 4848 N. Clark Street
Chicago, Il. 60640



Federal Election Commission
Office of the General Counsel
Washington, D. C. 20463

Attn: Ms. Dolores Pesce

2040610706
FEB 17 1982
CHICAGO, ILL.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Pro-Life Political
Action Committee
Peter Gemma, Treasurer
4848 N. Clark Street
Chicago, Illinois 60640

Re: MUR 1218

Dear Mr. Gemma:

The Federal Election Commission notified you in a letter dated January 21, 1980, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on June 4, 1980, that there is reason to believe that you violated 2 U.S.C. § 441a(f). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

82010110777

Letter to: Peter Gemma
Page: Two

If you have any questions, please contact Dolores
Pesce or Lee Andersen, the staff members assigned to this
matter at (202)523-4039.

Sincerely,



Max L. Friedersdorf
Chairman

82040110773

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Pro-Life Political
Action Committee
Peter Genna, Treasurer
4848 N. Clark Street
Chicago, Illinois 60640

RWD

Re: MUR 1218

Dear Mr. Genna:

The Federal Election Commission notified you in a letter dated January 21, 1980, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980, that there is reason to believe that you violated 2 U.S.C. § 441a(f). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

82049310779

Letter to: Peter Gemma
Page: Two

If you have any questions, please contact Dolores
Pesce or Lee Andersen, the staff members assigned to this
matter at (202)523-4039.

Sincerely,

82010110730

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: June 5, 1980

MUR # 1218
STAFF MEMBER(S) & TEL. NO.
Dolores Pesce &
Lee Andersen
(202)523-4039

RESPONDENT: National Pro-Life Political Action Committee

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

BACKGROUND

On March 31, 1980, the Reports Analysis Division forwarded a referral to the Office of General Counsel. The referral alleges that the National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

FACTUAL AND LEGAL ANALYSIS

During its review of National Pro-Life Political Action Committee reports, RAD became aware that the committee had accepted over \$5,000 in contributions from an individual, Mrs. Pauline Fiore. She had contributed a total of \$5,000 to the PAC and additionally loaned it \$15,000. A personal loan is considered a contribution pursuant to 2 U.S.C. § 431(8)(A)(i).

On January 21, 1980, RAD sent the committee a notification letter informing it that it appeared to have received excess contributions from an individual, in violation of § 441a, and recommending that refunds of contributions over the \$5,000 limit be made. A letter from the committee treasurer on January 30, 1980 clarified the dates on which Mrs. Fiore made contributions and the dates on which the National Pro-Life Political Action Committee made refunds. The transactions are set out below:

03/01/79	received	\$ 1,500	contribution
08/06/79	secured	\$15,000	loan
12/20/79	repaid	\$ 3,800	of loan
12/27/79	received	\$ 3,500	contribution
01/29/80	repaid	\$ 6,557.50	of loan
01/30/80	repaid	\$ 4,642.50	balance of loan

8 2 0 4 0 3 1 0 7 8 1

The refunds total \$15,000, which was the amount of contribution in excess of the \$5,000 limit.

In the January 30 letter and in a phone conversation with a RAD representative on January 24, the committee indicated that there had been a misconception regarding the status of loans under the Act. The committee thought that a loan was different than a contribution and did not count against an individual's contribution limitations.

Based upon the above analysis, the Federal Election Commission has found reason to believe that the National Pro-Life Political Action Committee violated 2 U.S.C. §441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

82010310793



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Pauline G. Fiore
4521 Fox Bluff Lane
Middleton, Wisconsin 53562

Re: MUR 1218

Dear Mrs. Fiore:

On June 4, 1980, the Commission found reason to believe that you violated the Federal Election Campaign Act of 1971, as amended (the "Act"), specifically 2 U.S.C. § 441a(a)(1)(C). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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 have any questions, please contact Dolores Pesce or Lee Andersen, the staff members assigned to this matter at (202)523-4039.

Sincerely,

Max L. Friedersdorf
Chairman

82040310733

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

8201010731

PS Form 3875, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Public Trial
4521 Fox Hill Lane
Middleton, WI 53562

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *025060* |

4. (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
P. Jure

5. DATE OF DELIVERY
6/9/80

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE:

MIDDLETON, WI
 JUN 9
 A. M.
 1980
 CLERK
 6541

MU 1218

Ben Hadwin

U.S. GPO: 1979-22-505

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Pauline G. Fiore
4521 Fox Bluff Lane
Middleton, Wisconsin 53562

PA

Re: MUR 1218

Dear Mrs. Fiore:

On 1980, the Commission found reason to believe that you violated the Federal Election Campaign Act of 1971, as amended (the "Act"), specifically 2 U.S.C. § 441a(a)(1)(C). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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 have any questions, please contact Dolores Pesce or Lee Andersen, the staff members assigned to this matter at (202)523-4039.

Sincerely,

82010310785

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: June 5, 1980

MUR # 1218
STAFF MEMBER(S) & TEL. NO.
Dolores Pesce &
Lee Andersen
(202)523-4039

RESPONDENT: Mrs. Pauline Fiore

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

SUMMARY OF ALLEGATIONS

On March 31, 1980, the Reports Analysis Division forwarded a referral to the Office of General Counsel. The referral alleges that Mrs. Pauline Fiore violated 2 U.S.C. § 441a(a)(1)(C) by making contributions aggregating in excess of \$5,000 to a political committee.

FACTUAL AND LEGAL ANALYSIS

During its review of National Pro-Life Political Action Committee reports, RAD became aware that the committee had accepted over \$5,000 in contributions from an individual, Mrs. Pauline Fiore. She had contributed a total of \$5,000 to the PAC and additionally loaned it \$15,000. A personal loan is considered a contribution pursuant to 2 U.S.C. § 431(8)(A)(i).

On January 21, 1980, RAD sent the committee a notification letter informing it that it appeared to have received excess contributions from an individual, in violation of § 441a, and recommending that refunds of contributions over the \$5,000 limit be made. A letter from the committee treasurer on January 30, 1980 clarified the dates on which Mrs. Fiore made contributions and the dates on which the National Pro-Life Political Action Committee made refunds. The transactions are set out below:

03/01/79	received	\$ 1,500	contribution
08/06/79	secured	\$15,000	loan
12/20/79	repaid	\$ 3,800	of loan
12/27/79	received	\$ 3,500	contribution
01/29/80	repaid	\$ 6,557,50	of loan
01/30/80	repaid	\$ 4,642,50	balance of loan

The refunds total \$15,000, which was the amount of contribution in excess of the \$5,000 limit.

82010110795

In the January 30 letter and in a phone conversation with a RAD representative on January 24, the committee indicated that there had been a misconception regarding the status of loans under the Act. The committee thought that a loan was different than a contribution and did not count against the individual's contribution limitations.

Based on the above analysis, the Federal Election Commission has found reason to believe that Mrs. Pauline Fiore violated 2 U.S.C. § 441a(a)(1)(C) by making contributions aggregating in excess of \$5,000 to a political committee.

82010310737

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1218
National Pro-Life Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 4, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1218:

1. Find REASON TO BELIEVE that National Pro-Life Political Action Committee violated 2 U.S.C. §441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.
2. Find REASON TO BELIEVE that Mrs. Pauline Fiore violated 2 U.S.C. §441a(a)(1)(C) by making contributions aggregating in excess of \$5,000 to a political committee.
3. Approve and send the letters and Notification of Reason to Believe finding to Respondents, (Attachments to the First General Counsel's Report dated June 2, 1980.

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

Attest:

6/5/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 6-2-80, 11:03
Circulated on 48 hour vote basis: 6-2-80, 4:00

82010310733

June 2, 1980

MEMORANDUM TO: Marjotte W. Emmons
FROM: Jane Colby
SUBJECT: MUR 1218

Please have the attached First General Counsel's Report on MUR 1218 distributed to the Commission on a 48 hour tally basis.

Thank youj.

9201911737

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

80 JUN 2 11:03

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JUN 2 1980

MUR # 1218
DATE COMPLAINT RECEIVED
BY OGC:
STAFF MEMBER(S):
Dolores Pesce &
Lee Andersen

I N T E R N A L L Y G E N E R A T E D

COMPLAINANT'S NAME:

RESPONDENT'S NAME: National Pro-Life Political Action Committee

RELEVANT STATUTE: 2 U.S.C. §§ 441a(a)(1)(C), 441a(f)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On March 31, 1980, the Reports Analysis Division forwarded the attached referral to the Office of General Counsel (Attachment 1). The referral alleges that the National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore. Accordingly, Mrs. Fiore would be in violation of 2 U.S.C. § 441a(a)(1)(C) for making contributions aggregating in excess of \$5,000 to a political committee.

FACTUAL AND LEGAL ANALYSIS

During its review of National Pro-Life Political Action Committee reports, RAD became aware that the committee had accepted over \$5,000 in contributions from an individual, Mrs. Pauline Fiore. She had contributed a total of \$5,000 to the PAC and additionally loaned it \$15,000. A personal loan is considered a contribution pursuant to 2 U.S.C. § 431(8)(A)(i).

On January 21, 1980, RAD sent the committee a notification letter informing it that it appeared to have received excess contributions from an individual, in violation of § 441a, and

82049310700

recommending that it refund contributions over the \$5,000 limit. A letter from the committee treasurer on January 30, 1980 clarified the dates on which Mrs. Fiore made contributions and the dates on which the National Pro-Life Political Action Committee made refunds (Attachment 1, #4). The transactions are set out below:

03/01/79	received	\$ 1,500	contribution
08/06/79	secured	\$15,000	loan
12/20/79	repaid	\$ 3,800	of loan
12/27/79	received	\$ 3,500	contribution
01/29/80	repaid	\$ 6,557.50	of loan
01/30/80	repaid	\$ 4,642.50	balance of loan

The refunds total \$15,000, which was the amount of contribution in excess of the \$5,000 limit.^{1/}

In the January 30 letter and in a phone conversation with a RAD representative on January 24 (Attachment 1, #3), the committee indicated that there had been a misconception regarding the status of loans under the Act. The committee thought that a loan was different than a contribution and did not count against an individual's contribution limitations.

Based on the above analysis, the Office of General Counsel recommends that the Commission find reason to believe that National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore. The OGC further recommends that the Commission find reason to believe that Mrs. Pauline Fiore violated 2 U.S.C. § 441a (a)(1)(C) by making contributions aggregating in excess of \$5,000 to a political committee.

RECOMMENDATIONS

1. Find reason to believe that National Pro-Life Political Action Committee violated 2 U.S.C. § 441a(f) by receiving contributions aggregating in excess of \$5,000 from an individual, Mrs. Pauline Fiore.

2. Find reason to believe that Mrs. Pauline Fiore violated 2 U.S.C. § 441a(a)(1)(C) by making contributions aggregating in excess of \$5,000 to a political committee.

^{1/} The 12/20/79 refund appears on the committee's Year End Report (Attachment 1, #5), while the 01/29 and 01/30/80 refunds appear on the April 15 Quarterly Report (Attachment 2).

82040110791

3. Approve and send the attached letters and Notification of Reason to Believe finding to Respondents.

Attachments

1. RAD Referral
2. April 15 Quarterly Report, line 20c, page 1 of 1.
3. Letters and Notification of Reason to Believe finding to Respondents.

8 2 0 4 0 3 1 0 7 9 2

REPORTS ANALYSIS REFERRAL SHEET

DATE March 31, 1980 ANALYST Mark Kleinman MK
TO: Office of General Counsel TEAM CHIEF Steve Mims SM
THROUGH: STAFF DIRECTOR JAP COMPLIANCE REVIEW CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

CANDIDATE/COMMITTEE: National Pro-Life Political Action Committee
TREASURER: Peter Gemma
ADDRESS: 4348 N. Clark Street
Chicago, IL 60640
AFFILIATE(S): None

ALLEGATION(S): Receipt of excessive contributions from an individual. CITE: 2 U.S.C. 461a ATTACHMENT(S) #2

DATE INITIATED: 1-21-80

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment: 1.

PERIOD COVERED FROM 1-1-79 TO 12-31-79
TOTAL RECEIPTS \$ 107012 TOTAL EXPENDITURES \$ 93827
CASH ON HAND \$ 20055 DEBTS \$ to 0/ by 11200

HISTORY:

RESULTS OF REVIEW: SV sent 1-21-80 contribution and loan ATTACHMENT #2
Response 1-31-80 #4
Loan repayment-refund on Year End Report #5
partial amount.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon: 1-24-80 ATTACHMENT #3

REASON(S) FOR REFERRAL:

Exceeds threshold ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD:

None ATTACHMENT

OTHER RELEVANT INFORMATION:

Additional contribution ATTACHMENT
refunds to be shown on April SEE ATTACHMENT #4
10 Quarterly Report - 1980

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

ATTACHMENT 1

ATTACHMENT #1

82040310704

8 2 0 1 0 3 1 0 7 9 5

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-78)

DATE 25MAR80
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL PRO-LIFE PAC						ID 8C000C4483
CONNECTED ORGANIZATION:	NONE					
	1977 YEAR END	223	0			7 78FEC/078/0030
	1978 STATEMENT OF ORGANIZATION			6 JAN 78		4 78FEC/063/2793
	APRIL 10 QUARTERLY	11,401	990			15 78FEC/070/1674
	APRIL 10 QUARTERLY - AMENDMENT	11,170	1,448	1 JAN 78 - 31 MAR 78		9 78FEC/078/0045
	APRIL 10 QUARTERLY - AMENDMENT	-	-	1 JAN 78 - 31 MAR 78		4 80FEC/148/0948
	REQUEST FOR ADDITIONAL INFORMATION			1 JAN 78 - 31 MAR 78		4 78FEC/074/2899
	REQUEST FOR ADDITIONAL INFORMATION			1 JAN 78 - 31 MAR 78		3 79FEC/135/1093
	JULY 10 QUARTERLY	3,524	1,430	1 APR 78 - 30 JUN 78		17 78FEC/079/3230
	OCTOBER 10 QUARTERLY	0	724	1 JUL 78 - 30 SEP 78		5 78FEC/088/2887
	OCTOBER 10 QUARTERLY - AMENDMENT	0	724	1 JUL 78 - 30 SEP 78		3 80FEC/148/0957
	10 DAY PRE-GENERAL	18,820	24,855	1 OCT 78 - 23 OCT 78		3 78FEC/093/0072
	10 DAY PRE-GENERAL - AMENDMENT	-	-	1 OCT 78 - 23 OCT 78		3 78FEC/094/3054
	10 DAY PRE-GENERAL - AMENDMENT	18,820	24,855	1 OCT 78 - 23 OCT 78		4 80FEC/148/0960
	REQUEST FOR ADDITIONAL INFORMATION			1 OCT 78 - 23 OCT 78		3 79FEC/136/1096
	30 DAY POST-GENERAL	22,155	1,399	28 OCT 78 - 28 NOV 78		8 78FEC/116/2115
	YEAR END	3,324	22,495	28 NOV 78 - 31 DEC 78		4 79FEC/116/5258
	TOTAL	59,224	0			102 TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

8 2 0 4 0 3 1 0 7 9 5

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (79-80)DATE 25MAR80
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	ORIGINAL PRO-LIFE LIAISON CONNECTED ORGANIZATION: NONE					ID #C00084483
1979	STATEMENT OF ORGANIZATION - AMENDMENT			13FEB79	5	79FEC/120/2913
	MISCELLANEOUS REPORT			2MAR79 TO FEC	2	79FEC/121/2685
	STATEMENT OF ORGANIZATION - AMENDMENT			13MAY79	3	79FEC/127/3399
	MISCELLANEOUS REPORT			15OCT79 TO FEC	2	79FEC/139/2778
	APRIL 10 QUARTERLY	24,541	22,892	1JAN79 -31MAR79	6	79FEC/123/1297
	10 DAY PRE-SUN-OFF	-	-	15DEC79 -11DEC79	3	80FEC/148/0952
	JULY 10 QUARTERLY	13,044	16,116	1APR79 -30JUN79	12	79FEC/133/0271
	JULY 10 QUARTERLY - AMENDMENT	13,014	16,116	1APR79 -30JUN79	2	80FEC/148/0943
	OCTOBER 10 QUARTERLY	31,927	33,422	1JUL79 -30SEP79	13	79FEC/139/3449
	OCTOBER 10 QUARTERLY - AMENDMENT	31,927	33,422	1JUL79 -30SEP79	3	80FEC/148/0945
	OCTOBER 10 QUARTERLY - AMENDMENT	-	-	1JUL79 -30SEP79	6	80FEC/148/2834
	OCTOBER 10 QUARTERLY - AMENDMENT	-	-	1JUL79 -30SEP79	4	80FEC/150/2962
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL79 -30SEP79	5	80FEC/145/1757
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL79 -30SEP79	9	80FEC/149/1578
	YEAR END	37,500	21,397	1OCT79 -31DEC79	16	80FEC/148/0927
1980	STATEMENT OF ORGANIZATION - AMENDMENT			28FEB80	2	80FEC/150/2251
	10 DAY PRE PRIMARY	-	-	26JUN79 -27FEB80	3	80FEC/150/1466
	TOTAL	107,012	0		96	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

82040310707

ATTACHMENT #2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 21, 1980

Frances Watson, Treasurer
National Pro-Life Political
Action Committee
253 Main Street
Northport, New York 11768

Dear Mrs. Watson:

This letter is prompted by the Commission's review of your disclosure report undertaken in the normal course of carrying out its supervisory responsibilities under the Federal Election Campaign Act (FECA). Based on the requirements of the FECA and appropriate Regulations, the review indicated possible prohibited activity, errors and/or omitted information.

Your receipt schedule (Schedule A) discloses the acceptance of contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act prohibits a political committee from accepting contributions from individuals or other political committees that exceed \$5,000 in the calendar year. If you have received excessive contributions, the Commission recommends that you refund the amount in excess of \$5,000.

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with clarifying information.

Although the acceptance of excessive contributions may warrant further legal action by the Commission, your prompt refund of the contributions to the donors will be taken into consideration. Please inform the Commission of your determination in this matter within 15 days of receipt of this letter. If you have any questions, you may contact Mark Kleinman in our Reports Analysis Division toll free 800-424-9530. Our local number is (202)357-0026.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas J. Haselhorst".

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

9 3 8 9 1 3 7 5 3 1

SENTELLA
 REVISED
 January, 1979
 Federal Election Commission
 1375 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED RECEIPTS
 (Contributions, Transfers, Contributions in-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1
 Line Number 14a

Use Separate Schedules for
 each numbered line

Name of Candidate or Committee in Full			
NATIONAL REPUBLICAN POLITICAL ACTION COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
William A. Jungman 101 E. Wheelock Pkwy. St. Paul, MN 55117	Burlington Norther Rail- road, St. Paul, MN	7/7/79	\$ 50.00
	Occupation	7/9/79	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$ 125.00			
Rev. Martin J. Scholaky 36 Griswold St. Manchester, CT	St. Bartholemew Church Manchester, CT	7/7/79	50.00
	Occupation priest	9/22/79	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$ 144.00			
Rev. George McKeon 76 Adams St. Cohoes, NY 12047	Diocese of Albany, NY	9/22/79	25.00
	Occupation priest		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$ 115.00			
Bob Perry 18630 Barbuda Lane Houston, TX 77058	Bob Perry Homes, Inc. Houston, TX	7/6/79	5,000.00
	Occupation builder		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$ 5,000.00			
Mrs. Robert J. Perry 18630 Barbuda Lane Houston, TX 77058	N/A	7/6/79	5,000.00
	Occupation homemaker		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$ 5,000.00			
Mrs. Pauline G. Fiore 4521 Fox Bluff Lane Middleton, WI 53562	Fiore Coal & Oil Co., Inc. Madison, WI	8/6/79	15,000.00 (see schedule C)
	Occupation president		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Appropriate Year-To-Date ... \$			
SUBTOTAL of receipts this year (optional)			

October 10, 1979
 7/1/79 - 9/30/79

19031:03451

SCHEDULE C
REVISED
January, 1978
 Federal Election Commission
 1370 K Street, N.W.
 Washington, D.C. 20543

DEBTS AND OBLIGATIONS

Support Line Numbers 12 and 13

C 120 P 0101

(Indicate Primary or General Section for each Entry)

Page 2 of 2

Line Number 13

Also Refer to Section 101
with Schedule C

Name of Candidate and Committee in Full

NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE

October 10, 1979
9/17/79 - 6/30/79

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Infomat 708 Silver Spur Road Rolling Hills Estates, CA 90274 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	4/5/79	\$6,964.20	\$2,000.00	\$4,964.20

NATURE OF OBLIGATION (Details of Debt):

The balance of \$6,964.20 for direct mail services incurred late in 1978 was mistakenly not billed to NPLPAC by Infomat until April, 1979.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Mrs. Pauline G. Fiore 4521 Fox Bluff Lane Middleton, WI 53562 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	8/6/79	\$15,000.-	\$-0-	\$15,000.-

NATURE OF OBLIGATION (Details of Debt):

\$15,000.00 loan for 3 years @ 6% per annum

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
 <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional).....	\$	\$	\$
TOTAL this period (last page this line number only).....	\$	\$	\$

FORM 4
 1980
 rev. 10/78
 and Election Commission
 11 K Street, N.W.
 Washington, D.C. 20043

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 16b, 18c, 18a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 2 to
 Line Number 19

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full		APRIL TO QUARTERLY 1-1-79 to 3-31-79	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
NATIONAL PRO-LIFE-PAC CHARLES C. FIORE OP P.O. BOX 119 ELMWOOD PARK, ILL 50635	ELMWOOD PARK, ILL Occupation PRIEST	3/1/79	5,000.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 5,000.00		
FRANCES F. EVERSON 20TH CENTURY MARKETS 4716 VERONA RD MADISON WI 53711	MADISON WISC Occupation VICE-PRES.	3/1/79	5,000.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 5,000.00		
MRS. PAULINE G. FIORE FIORE COAL & OIL CO 452L FOX BLUFF-MIDDLETON WISC	MIDDLETON WISC 53562 Occupation PRESIDENT	3/L/79	2,500.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 2,500.00		
ROBERT HOFACRE KY. RIGHT TO LIFE COVINGTON, KY	COVINGTON, KY Occupation TREASURER	3/1/79	200.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 200.00		
LEON GRIZZYCH LEON FABRICATION 8550 PARRISH SCHERERVILLE IND	SCHERERVILLE IND Occupation OWNER	3/1/79	125.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 125.00		
JAMES J. KOLENICH, M.D. 7 EASTWOOD DRIVE GREENVILLE PA	GREENVILLE, PA Occupation SURGEON	3/1/79	200.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ 200.00		

790101099

NOTE: AN ADDITIONAL CONTRIBUTION BY PAULINE FIORE
WAS DISCLOSED ON THE YEAR END REPORT (SEE NEXT PAGE).
THE YEAR END REPORT WAS FILED AFTER THE SURFACE
VIOLATION LETTER WAS SENT.

8 2 0 1 0 3 1 0 8 0 0 ?

GENERAL A
 REVISED
 JANUARY, 1978
 Federal Election Commission
 1225 K Street, N.W.
 Washington, D.C. 20540

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in-Kind,
 Other Income, Loans, Referrals)

Supporting Lines 14a, 15a, 15b, 15c, 15d, 17a, and/or 18a
 of FEC FORM 3

Form number of _____
 Line Number _____
 Use Separate Schedules for
 each numbered line

Name of Candidate or Committee in Full			
NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Genevieve B. Crowley 900 Palmer Rd. Brookville, NY 10708	n/a	12/10/79	\$ 20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 110.00			
Pauline G. Fiore 4521 Fox Bluff Lane Middleton, WI 53562	Fiore Coal & Oil Co., Inc. Madison, WI	12/27/79	3,500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 5,000.00			
James Burke 308 W. 34th St. New York, NY 10001	St. John's Church New York, NY	12/10/79 12/24/79	50.00 50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 162.40			
Rev. George Fox Montello, WI 53949	Diocese of Madison Madison, WI	12/11/79	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 125.00			
Henry M. Lucas 118 1/2 43rd St. Pittsburgh, PA 15201	St. Regis Paper Co. Pittsburgh, PA	12/14/79 12/24/79	40.00 25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 140.00			
Joseph D. Moriarty, M.D. 1261 97th Ave., N.W. Coon Rapids, MN 55433	Occupation physician	12/16/79	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 110.00			
Ronald Kelsey 9001 Warren Wichita, KS 67212	Burroughs, Inc. Wichita, KA	12/16/79	30.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 130.00			
SUBTOTAL of receipts (this page repeated)			\$ 3,840.00
TOTAL (this period last page (the line number only)			\$

(SEE ATTACHED LETTER LETTER) is Attachment

44
MK

82040310804

ATTACHMENT #3

TELECON TO THE FILE: NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 1-24-80

RE: Excessive contributions from an individual

I spoke with Peter Gemma, then Executive Director and now Treasurer, (516) 754-1447, regarding \$15000 loan and a \$1500 contribution by Mrs. Pauline Fiore. He indicated that he thought a loan was different than a contribution and did not count against a person's limitations. I indicated that a loan was contribution to the extent that it is outstanding. I told him that he should refund the excessive amount. He stated that he would do so and respond to that effect. In addition, he should show the refunds on the next report that needed to be filed.

Peter Gemma, then Executive Director
now Treasurer
(516) 754-1447

at the time I was talking to
Mr. Gemma the Year-End Report
had not been filed showing
the additional \$3,500.

MK

820471087

ATTACHMENT #4

82047510806

national pro-lifepac

RECEIVED
FEDERAL ELECTION
COMMISSION

'80 FEB 4 PM 2:40

NATIONAL HEADQUARTERS
4848 North Clark Street
Chicago, Illinois 60640
(312) 728-2644

PROJECT OFFICE
251 Main Street
Northport, New York 11768
(516) 754-1447

BOARD OF DIRECTORS

Rev. Charles Fiore, O.P.
Chairman

Thomas F. Rowser

Vice-Chairman

Fran Watson

Secretary-Treasurer

Carmen V. Speranza, Esq.

William J. Isaacson, Esq.

Of Counsel

Hon. Harold Frachlich

Rev. Harold O. J. Brown

Joseph M. Schudler

John Finn, Jr.

EXECUTIVE DIRECTOR

Peter B. Gemma, Jr.

ADVISORY COMMITTEE

Hon. John W. McCormack, R-A

Former Speaker of House

Hon. E. J. (Jake) Garn, UT

United States Senator

Hon. Orrin G. Hatch, UT

United States Senator

Hon. Robert E. Bauman, MD

Congressman, 1st Dist

Hon. Henry J. Hyde, IL

Congressman, 6th Dist

Hon. Thomas N. Kindness, OH

Congressman, 8th Dist

Hon. Larry McDonald, MD, GA

Congressman, 7th Dist

Hon. Martin A. Russo, IL

Congressman, 3rd Dist

Hon. Robert K. Dornan, CA

Congressman, 27th Dist

Hon. Harold L. Volkmer, MO

Congressman, 9th Dist

Hon. Robert A. Young, MO

Congressman, 2nd Dist

Hon. Ron Paul, MD, TX

Congressman, 22nd Dist

Ellen McCormack, NY

Pro-Life Presidential Cand

Kandy Engel, PA

Pres., U.S. Coalition for Life

Professor Victor Rosenbium, IL

Northwestern Univ. Law School

Professor Charles E. Rice, IN

Notre Dame Univ. Law School

Rev. Donald M. Parker, IL

Editor, The Christian Citizen

Jay Bowman, GA

Nat'l. Right to Life Comm

Kenneth VanDerhoel, Esq., WA

Nat'l. Right to Life Comm

Alice Hartle, MN

Past Ed., Nat'l. RTL News

Donald T. Manion, MD, OR

Physician & Surgeon

John F. Hillabrand, MD, OH

Alternatives to Abortion, Inc.

Herbert J. Ratner, MD, IL

Ed., Child & Family Quarterly

Francis P. Falice, Ph.D., CA

Biologist, Univ. of San Francisco

January 30, 1980

Mr. Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Haselhorst:

In reference to your letter of January 21, 1980, (2SV1/80-0009), this is to inform you that the National Pro-Life PAC has refunded the over-the-\$5000-limit contribution to Mrs. Pauline Fiore, 4521 Fox Bluff Lane, Middleton, WI 53562.

Our attorney had wrongly advised us on the matter of receiving loans from individuals, so that on 8/6/79 National Pro-Life PAC did in fact secure a \$15,000 loan from Mrs. Fiore in addition to her \$5,000 contribution during the calendar year 1979.

For your records, here is the sequence of events:

3/1/79	received \$1,500 contribution
8/6/79	secured \$15,000 loan
12/20/79	repaid \$3,800 of loan (check # 1095)
12/27/79	received \$3,500 contribution
1/29/80	repaid \$6,557.50 of loan (check #1103)
1/30/80	repaid \$4,642.50 balance of loan (check #1105)

We regret this error and assure you of our intentions to carefully comply with FEC regulations. Please note that this situation was corrected within seven days after receiving your letter.

Very truly yours,



Francis F. Watson
Treasurer

cc: Rev. Charles C. Fiore, O.P.
Carmen V. Speranza, Esq.
Mrs. Pauline Fiore
file

ATTACHMENT #5

82040310809

FORM 280
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20045

ITEMIZED EXPENDITURES
 (Operating, Travel, Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 4 of 6 for
 Line Number 20(a)

Also Complete Schedule for
 each numbered line

Name of Candidate or Committee to File			
NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Illinois Bell Telephone Chicago, IL	Dec. Chicago phone	12/18/79	\$ 64.18
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ADMS 253 Main Street Northport, NY 11768	reimburse phone expenses	12/17/79	243.53
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ACTA Foundation 4848 N. Clark St. Chicago, IL 60640	addressing & shipping envelopes	12/18/79	373.36
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ADMS 253 Main Street Northport, NY 11768	direct mail fund raising expenses	12/20/79	400.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Frances Watson 53 Cold Spring Hills Rd. Huntington, NY 11743	June-Dec. consulting fee	12/20/79	700.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Peter B. Genza, Jr. 2070 Broad St. Cranston, RI 02905	Oct-Dec. consulting fee	12/20/79	600.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mrs. Pauline Fiore 4521 Fox Bluff Lane Middleton, WI 53562	partial loan repayment (SEE ATTACHED LETTER)	12/20/79	3,800.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ADMS 253 Main Street Northport, NY 11768	direct mail fund raising expenses	12/28/79	1,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (reverse)			87,181.07
TOTAL this period (last page this line number only)			8

SCHEDULE C
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

Page 1 of 2 for

Line Number 202

(Use Separate Schedules for
 each numbered title)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
National Tax-Plan Political Action Committee				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Pauline G. Fione 4821 Fox Staff Lane Middleton, WI 53562	1/20/78	\$11,200.00	\$667.50	\$10,532.50
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$
NATURE OF OBLIGATION (Details of Debt)				
SEE ATTACHMENT				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Pauline G. Fione 4821 Fox Staff Lane Middleton, WI 53562	1/20/78	\$4,950.00	\$4,950.00	\$0.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$
NATURE OF OBLIGATION (Details of Debt)				
SEE ATTACHMENT				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS (this period this page (optional))		\$	\$	\$
TOTAL (this period last page this line number only)		\$	\$	\$
Carry outstanding balance only to appropriate line of summary				

8201010817
 0001141664

ATTACHMENT 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Pro-Life Political
Action Committee
Peter Gemma, Treasurer
4848 N. Clark Street
Chicago, Illinois 60640

Re: MUR 1218

Dear Mr. Gemma:

The Federal Election Commission notified you in a letter dated January 21, 1980, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980, that there is reason to believe that you violated 2 U.S.C. § 441a(f). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

82040310811

Letter to: Peter Gemma
Page: Two

If you have any questions, please contact Dolores
Pesce or Lee Andersen, the staff members assigned to this
matter at (202)523-4039.

Sincerely,

8 2 0 1 0 3 1 0 8 1 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Pauline G. Fiore
4521 Fox Bluff Lane
Middleton, Wisconsin 53562

Re: MUR 1218

Dear Mrs. Fiore:

On 1980, the Commission found reason to believe that you violated the Federal Election Campaign Act of 1971, as amended (the "Act"), specifically 2 U.S.C. § 441a(a)(1)(C). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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 have any questions, please contact Dolores Pesce or Lee Andersen, the staff members assigned to this matter at (202)523-4039.

Sincerely,

8 2 0 1 0 3 1 0 8 1 3

REPORTS ANALYSIS REFERRAL SHEET

DATE March 31, 1980 ANALYST Mark Kleinman MK
 TO: Office of General Counsel TEAM CHIEF Steve Mims SM
 THROUGH: STAFF DIRECTOR JP COMPLIANCE REVIEW CB
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: National Pro-Life Political Action Committee
 TREASURER: Peter Gemma
 ADDRESS: 4348 N. Clark Street
 Chicago, IL 60640
 AFFILIATE(S): None

ALLEGATION(S): Receipt of excessive contributions from an individual. CITE: 2 U.S.C. 441a ATTACHMENT(S) #2

DATE INITIATED: 1-21-80

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1-1-79 TO 12-31-79

TOTAL RECEIPTS \$ 107012 TOTAL EXPENDITURES \$ 93827

CASH ON HAND \$ 20055 DEBTS \$ to 0/ by 11200

HISTORY:

RESULTS OF REVIEW: SV sent 1-21-80 contribution and loan Response 1-31-80 Loan repayment-refund on Year End Report partial amount. ATTACHMENT #2 #4 #5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: Telecon: 1-24-80 ATTACHMENT #3

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Additional contribution refunds to be shown on April 10 Quarterly Report - 1980 ATTACHMENT SEE ATTACHMENT #4

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

ATTACHMENT #1

82010310815

8 2 0 1 0 3 1 0 8 1 6

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-78)

DATE 25MAR90
 PAGE :

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL PRO-LIFE PAC						ID 8C000C4483
CONNECTED ORGANIZATION:	NONE					
	1977 YEAR END	223	0			7 78FEC/078/0030
	1978 STATEMENT OF ORGANIZATION			6JAN78		4 78FEC/063/2793
	APRIL 10 QUARTERLY	11,401	990			16 78FEC/070/1674
	APRIL 10 QUARTERLY - AMENDMENT	11,170	1,443	1JAN78 -31MAR78		9 78FEC/078/0045
	APRIL 10 QUARTERLY AMENDMENT	-	-	1JAN78 -31MAR78		4 80FEC/148/0948
	REQUEST FOR ADDITIONAL INFORMATION				31MAR78	4 79FEC/074/2399
	REQUEST FOR ADDITIONAL INFORMATION			1JAN78 -31MAR78		3 79FEC/135/1093
	JULY 10 QUARTERLY	3,524	1,430	1APR78 -30JUN78		17 78FEC/079/3230
	OCTOBER 10 QUARTERLY	0	721	1JUL78 -30SEP78		5 79FEC/088/2887
	OCTOBER 10 QUARTERLY - AMENDMENT	0	724	1JUL78 -30SEP78		3 80FEC/148/0957
	10 DAY PRE-GENERAL	18,820	24,855	1OCT78 -23OCT78		8 78FEC/093/0072
	10 DAY PRE-GENERAL - AMENDMENT	-	-	1OCT78 -23OCT78		3 78FEC/094/3056
	10 DAY PRE-GENERAL - AMENDMENT	18,820	24,855	1OCT78 -23OCT78		4 80FEC/148/0960
	REQUEST FOR ADDITIONAL INFORMATION			1OCT78 -23OCT78		3 79FEC/136/1096
	30 DAY POST-GENERAL	22,155	1,399	28OCT78 -28NOV78		6 78FEC/116/2115
	YEAR END	3,324	22,495	28NOV78 -31DEC78		4 79FEC/116/5268
	TOTAL	59,224	0	52,351	0	102 TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

8 2 0 1 0 3 1 0 8 1 7

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)

DATE 25MAR80
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL PRO-LIFE FUND						ID #C00084483
CONNECTED ORGANIZATION: NONE						
1979	STATEMENT OF ORGANIZATION - AMENDMENT			13FEB79	5	79FEC/120/2913
	MISCELLANEOUS REPORT			2MAR79 TO FEC	2	79FEC/121/2685
	STATEMENT OF ORGANIZATION - AMENDMENT			13MAY79	3	79FEC/127/3399
	MISCELLANEOUS REPORT			15OCT79 TO FEC	2	79FEC/139/2778
	APRIL 10 QUARTERLY	24,541	22,892	1JAN79 -31MAR79	6	79FEC/123/1297
	10 DAY PRE-RUN-OFF	-	-	1DEC79 -11DEC79	3	80FEC/148/0952
	JULY 10 QUARTERLY	13,044	16,116	1APR79 -30JUN79	12	79FEC/133/6271
	JULY 10 QUARTERLY - AMENDMENT	13,014	16,116	1APR79 -30JUN79	2	80FEC/149/0943
	OCTOBER 10 QUARTERLY	31,927	33,422	1JUL79 -30SEP79	13	79FEC/139/3449
	OCTOBER 10 QUARTERLY - AMENDMENT	31,927	33,422	1JUL79 -30SEP79	3	80FEC/148/0945
	OCTOBER 10 QUARTERLY - AMENDMENT	-	-	1JUL79 -30SEP79	4	80FEC/150/2962
	OCTOBER 10 QUARTERLY - AMENDMENT	-	-	1JUL79 -30SEP79	5	80FEC/145/1757
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL79 -30SEP79	9	80FEC/149/1578
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10CT79 -31DEC79	16	80FEC/148/0927
	YEAR END	37,500	21,397	28FEB80	2	80FEC/150/2251
1980	STATEMENT OF ORGANIZATION - AMENDMENT			26JUN79 -27FEB80	3	80FEC/150/1466
	10 DAY PRE-PRIMARY	-	-			
	TOTAL	107,012	93,827		96	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

82010310819

ATTACHMENT #2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1980

Frances Watson, Treasurer
National Pro-Life Political
Action Committee
253 Main Street
Northport, New York 11768

Dear Mrs. Watson:

This letter is prompted by the Commission's review of your disclosure report undertaken in the normal course of carrying out its supervisory responsibilities under the Federal Election Campaign Act (FECA). Based on the requirements of the FECA and appropriate Regulations, the review indicated possible prohibited activity, errors and/or omitted information.

Your receipt schedule (Schedule A) discloses the acceptance of contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act prohibits a political committee from accepting contributions from individuals or other political committees that exceed \$5,000 in the calendar year. If you have received excessive contributions, the Commission recommends that you refund the amount in excess of \$5,000.

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with clarifying information.

Although the acceptance of excessive contributions may warrant further legal action by the Commission, your prompt refund of the contributions to the donors will be taken into consideration. Please inform the Commission of your determination in this matter within 15 days of receipt of this letter. If you have any questions, you may contact Mark Kleinman in our Reports Analysis Division toll free 800-424-9530. Our local number is (202)357-0026.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

8 4 8 0 3 1 5 6 7 5 7

GENERAL
 RECEIVED
 January, 1979
 Federal Election Commission
 1275 K Street, N.W.
 Washington, D.C. 20543

DEBTS AND OBLIGATIONS

Support Line Numbers 12 and 13
 CIPED FORM 114

(Indicate Primary or General Election for each Entry)

Page 2 of 2

Date Printed 11/1/79

See General Election by
 each candidate's name.

Name of Candidate and Committee in Full

NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE

October 10, 1979
 11/1/79 - 11/30/79

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Infomat 708 Silver Spur Road Rolling Hills Estates, CA 90274	4/5/79	\$6,964.20	\$2,000.00	\$4,964.20
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):
 The balance of \$6,964.20 for direct mail services incurred late in 1978 was mistakenly not billed to NPLPAC by Infomat until April, 1979.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Mrs. Pauline G. Fiore 4521 Fox Bluff Lane Middleton, WI 53562	8/6/79	\$15,000.	\$-0-	\$15,000.
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):
 \$15,000.00 loan for 3 years @ 6% per annum

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

NOTE: AN ADDITIONAL CONTRIBUTION BY PAULINE FIORE
WAS DISCLOSED ON THE YEAR END REPORT (SEE NEXT PAGE).
THE YEAR END REPORT WAS FILED AFTER THE SURFACE
VIOLATION LETTER WAS SENT.

82040310823

CONTROL 8 A
 REVISED
 January, 1979
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20004

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 14b, 15a, 15b, 16a, 17a, and/or 18a
 of FEC FORM 3

Page _____ of _____
 Line Number _____
 See General Instructions for
 Form 3

Name of Candidate or Committee in Full			
NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date Received (day, year)	Amount of each Receipt (day, year)
Genevieve B. Crowley 900 Palmer Rd. Bronxville, NY 10708	n/a	12/10/79	\$ 20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 110.00			
Pauline G. Fiore 4521 Fox Bluff Lane Middleton, WI 53562	Fiore Coal & Oil Co., Inc. Madison, WI	12/27/79	3,900.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 5,000.00			
James Burke 308 W. 34th St. New York, NY 10001	St. John's Church New York, NY	12/10/79 12/24/79	50.00 50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 162.00			
Rev. George Fox Montello, WI 53949	Diocese of Madison Madison, WI	12/11/79	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 125.00			
Henry M. Lucas 118 1/2 43rd St. Pittsburgh, PA 15201	St. Regis Paper Co. Pittsburgh, PA	12/14/79 12/24/79	40.00 25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 140.00			
Joseph D. Moriarty, N.D. 1261 97th Ave., N.W. Coon Rapids, MN 55433	physician	12/16/79	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 110.00			
Ronald Kelsey 9001 Warren Wichita, KS 67212	Burroughs, Inc. Wichita, KA	12/16/79	30.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check of Contributor is self-employed	
Aggregate Year-To-Date ... \$ 130.00			
SUBTOTAL of receipts (the page total)			\$ 3,840.00
TOTAL (the period last page the line number only)			\$

SEE ATTACHED LETTER (SEE ATTACHED LETTER) IS A WORKING

84
AK

82010310827

ATTACHMENT #3

ATTACHMENT #4

82040310827

national pro-lifepac

RECEIVED
FEDERAL ELECTION COMMISSION

'80 FEB 4 PM 2:40

NATIONAL HEADQUARTERS
4848 North Clark Street
Chicago, Illinois 60630
(312) 728-2644

PROF. OFFICE
253 Main Street
Northport, New York 11768
(516) 754-1447

BOARD OF DIRECTORS

Rev. Charles Fiore, O.P.
Chairman
Thomas F. Roemer
Vice-Chairman
Fran Watson
Secretary-Treasurer
Carmen V. Speranza, Esq.
William J. Isaacson, Esq.
Of Counsel
Hon. Harold H. Schlich
Rev. Harold O. J. Brown
Joseph M. Schudler
John Linn, Jr.

EXECUTIVE DIRECTOR

Peter B. Gemma, Jr.

ADVISORY COMMITTEE

Hon. John W. McCormack, R-A
Former Speaker of House
Hon. E. J. (Jake) Garn, UT
United States Senator
Hon. Orrin G. Hatch, UT
United States Senator
Hon. Robert E. Bauman, MD
Congressman, 1st Dist
Hon. Henry J. Hyde, IL
Congressman, 6th Dist
Hon. Thomas N. Kindness, OH
Congressman, 8th Dist
Hon. Larry McDonald, MD, GA
Congressman, 7th Dist
Hon. Martin A. Russo, IL
Congressman, 3rd Dist
Hon. Robert K. Dornan, CA
Congressman, 27th Dist
Hon. Harold L. Volkmer, MO
Congressman, 9th Dist
Hon. Robert A. Young, MO
Congressman, 2nd Dist
Hon. Ron. Paul, MD, TX
Congressman, 22nd Dist
Ellen McCormack, NY
Pro-Life Presidential Cand
Randy Engel, PA
Pres., US Coalition for Life
Professor Victor Rosenblum, IL
Northwestern Univ. Law School
Professor Charles E. Rice, IN
Notre Dame Univ. Law School
Rev. Donald M. Parker, IL
Editor, The Christian Citizen
Jay Bowman, GA
Nat'l. Right to Life Comm
Kenneth VanDerhoet, Esq., WA
Nat'l. Right to Life Comm
Alice Hantle, MN
Past Ed., Nat'l. RTL News
Donald T. Manion, MD, OR
Physician & Surgeon
John F. Hillabrand, MD, OH
Alternatives to Abortion, Intl
Herbert J. Rafter, MD, IL
Ed., Child & Family Quarterly
Francis P. Elice, Ph.D., CA
Biologist, Univ. of San Francisco

January 30, 1980

Mr. Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Haselhorst:

In reference to your letter of January 21, 1980, (2SV1/80-0009), this is to inform you that the National Pro-Life PAC has refunded the over-the-\$5000-limit contribution to Mrs. Pauline Fiore, 4521 Fox Bluff Lane, Middleton, WI 53562.

Our attorney had wrongly advised us on the matter of receiving loans from individuals, so that on 8/6/79 National Pro-Life PAC did in fact secure a \$15,000 loan from Mrs. Fiore in addition to her \$5,000 contribution during the calendar year 1979.

For your records, here is the sequence of events:

3/1/79	received \$1,500 contribution
8/6/79	secured \$15,000 loan
12/20/79	repaid \$3,800 of loan (check # 1095)
12/27/79	received \$3,500 contribution
1/29/80	repaid \$6,557.50 of loan (check #1103)
1/30/80	repaid \$4,642.50 balance of loan (check #1105)

We regret this error and assure you of our intentions to carefully comply with FEC regulations. Please note that this situation was corrected within seven days after receiving your letter.

Very truly yours,

Frances F. Watson

Frances F. Watson
Treasurer

cc: Rev. Charles C. Fiore, O.P.
Carmen V. Speranza, Esq.
Mrs. Pauline Fiore
file

ATTACHMENT #5

82042310822

RECEIVED
 January, 1979
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20540

ITEMIZED EXPENDITURES

(Reporting, Transition Out, Contributions to Fund,
 Loans, Loan Repayments and Refund to Made)
 Supporting Lines 20a, 21a, and 22a, 23a, and 23b
 of FEC FORM 2

Page 1 of 1
 Line Number 20(a)

Date Report Submitted for
 each numbered line

Name of Candidate or Committee to Full			
NATIONAL PRO-LIFE POLITICAL ACTION COMMITTEE			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of cash expenditure this period
Illinois Bell Telephone Chicago, IL	Dec. Chicago phone	12/18/79	\$ 64.18
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
ADMS 253 Main Street Northport, NY 11768	reimburse phone expenses	12/17/79	243.53
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
ACTA Foundation 4848 N. Clark St. Chicago, IL 60640	addressing & shipping envelopes	12/18/79	373.36
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
ADMS 253 Main Street Northport, NY 11768	direct mail fund raising expenses	12/20/79	400.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Frances Watson 63 Cold Spring Hills Rd. Huntington, NY 11743	June-Dec. consulting fee	12/20/79	700.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Peter B. Genna, Jr. 2070 Broad St. Cranston, RI 02905	Oct-Dec. consulting fee	12/20/79	600.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Mrs. Pauline Fiore 4521 Fox Bluff Lane Middleton, WI 53562	partial loan repayment (SEE ATTACHED LETTER)	12/20/79	3,800.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
ADMS 253 Main Street Northport, NY 11768	direct mail fund raising expenses	12/28/79	1,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			87,181.07
TOTAL this period (last page this line number only)			8

3 2 7 1 3 1 0 3 1 7



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1218

Date Filmed

2/11/82

Camera No. --- 2

Cameraman

BPC

8 2 0 1 0 6 1 7 8 1 1