



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1413

Date Filmed 7-23-62 Camera No. --- 2

Cameraman SPC

9 0 9



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

**June 30, 1982**

**Mr. John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Four World Trade Center  
New York, New York 10048**

**.Re: MUR 1413**

**Dear Mr. Morace:**

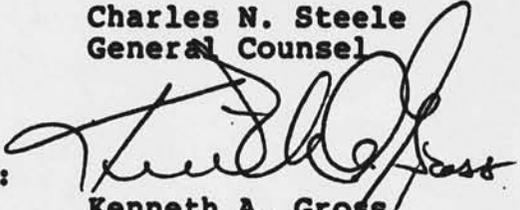
On August 12, 1981, the Commission notified you that a preliminary review of your committee raised questions as to specific contributions and expenditures found in your July and October 1980 Quarterly Report and your 30 Day Post General Election Report for the same year.

The Commission, on June 29, 1982, determined that on the basis of the information in the complaint and information provided by your committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

**Sincerely,**

**Charles N. Steele  
General Counsel**

**BY:**

  
**Kenneth A. Gross  
Associate General Counsel**

02040332910



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

**Mr. John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Four World Trade Center  
New York, New York 10048**

**Re: MUR 1413**

**Dear Mr. Morace:**

On August 12, 1981, the Commission notified you that a preliminary review of your committee raised questions as to specific contributions and expenditures found in your July and October 1980 Quarterly Report and your 30 Day Post General Election Report for the same year.

The Commission, on June , 1982, determined that on the basis of the information in the complaint and information provided by your committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

**Charles N. Steele  
General Counsel**

A handwritten signature in dark ink, appearing to be "CNS", written over the typed name of Charles N. Steele.

**BY:**

**Kenneth A. Gross  
Associate General Counsel**

82040332911

6204033

507-2000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Commodity Exchange Inc. PAC

MUR 1413

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 29, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1413:

1. Find no reason to believe that Commodity Exchange Inc. PAC violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.
2. Approve the letter as submitted with the First General Counsel's Report dated June 24, 1982.
3. Close the File.

Commissioners Aikens, Elliott, Harris, McGarry, McDonald and Reiche voted affirmatively in this matter.

Attest:

6-29-82

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

6-24-82, 4:25  
6-25-82, 2:00

02040332913

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

82 JUN 24 P 4: 25

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 6-24-82

MUR 1413  
STAFF MEMBER  
Duane A. Brown

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

RESPONDENT'S NAME: **Commodity Exchange Inc. PAC**

RELEVANT STATUTE: **2 U.S.C. § 441b(a)**

INTERNAL REPORTS CHECKED: **Respondent**

FEDERAL AGENCIES CHECKED: **None**

**GENERATION OF MATTER**

This matter was generated as the result of a review of the 1980 calendar year reports of the Commodity Exchange Inc., PAC ("respondent") by the Reports Analysis Division.

**SUMMARY OF ALLEGATIONS**

In a referral to the Office of General Counsel, the Reports Analysis Division has determined that \$9,000 in corporate contributions were accepted by the respondent and reported by the latter in its 1980 calendar year reports. Specifically, it appears that the respondent's July Quarterly Report shows the receipt of a \$5,000 contribution from Floor Brokers Associates; its October quarterly Report shows a \$3,500 contribution from Stanley B. Bell Co; and its 30 Day Post-General Election Report

62040332914

shows another \$500 contribution from Floor Brokers Associates. Confirmation from the New York Secretary of State indicated that both Floor Brokers and Stanley Bell Co. are incorporated. A Request for Additional Information was sent on August 12, 1981. A second notice was sent on September 4, 1981.

**FACTUAL AND LEGAL ANALYSIS**

Formal responses from both Floor Brokers Associates and the Stanley B. Bell Co. indicate that each is a partnership having a name identical to a corporation. The responses indicate that it was the partnership which made the \$3,500 and \$500 contributions to the respondents. Each entity is said to maintain a separate legal identity and a separate checking account. (RAD Attachment 1). Further, telephone conversations which RAD staff had with a committee spokesperson revealed that the \$5,000 contribution listed from Floor Brokers Associates was in fact from an individual, Ross Rowland Senior Partner of Floor Brokers (RAD Attachment 7). This was confirmed by the Office of General Counsel. In a telephone conversation with General Counsel staff on June 8, 1982, Ross Rowland indicated that the \$5,000 contribution was from his personal account and not from the partnership account.

Additionally, the Reports of Receipts and Expenditures referred to this office by RAD indicate that Ross Rowland is the sole contributor of the \$5,000 contribution reported in the July quarterly and received by the respondent (RAD Attachment 2). Those same reports also reveal three partners, Stanley B. Bell,

02040332915

Craig Bell and Lawrence Bilello as being the sole contributors responsible for the \$3,500 contribution reported in the October Quarterly (RAD Attachment 2). The final \$500 contribution reported in the respondent's 30 Day Post-General Report in fact was made by Floor Brokers Associates - the partnership. The \$500 contribution is shown to have been divided equally among five of Floor Brokers partners 1/ (RAD Attachment 2).

Based on the aforementioned, it appears that no corporate contributions were accepted by Commodity Exchange Inc. PAC.

**RECOMMENDATION**

1. Find no reason to believe that Commodity Exchange Inc. PAC violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971 as amended.
2. Approve attached letter.
3. Close the file.

Date June 23, 1982

Charles N. Steele  
General Counsel

BY:

Kenneth A. Gross  
Associate General Counsel

1/ It should be noted that Ross Rowland was not one of the partners participating in the \$500 contribution.

Attachments

1. Proposed Letter
2. Referral Materials

62040332916



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

Mr. John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Four World Trade Center  
New York, New York 10048

Re: MUR 1413

Dear Mr. Morace:

On August 12, 1981, the Commission notified you that a preliminary review of your committee raised questions as to specific contributions and expenditures found in your July and October 1980 Quarterly Report and your 30 Day Post General Election Report for the same year.

The Commission, on June , 1982, determined that on the basis of the information in the complaint and information provided by your committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele  
General Counsel

BY:

Kenneth A. Gross  
Associate General Counsel

02040332917

\*ORIGIN: RAD

DATE December 22, 1981

ANALYST Mark Kleinman MK

TO: Office of General Counsel  
ATTENTION: Victor Sterling

TEAM CHIEF Mike Filler MF

THROUGH: STAFF DIRECTOR DTE

COMPLIANCE REVIEW PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS J.S.

MUR No. 1413

DATE OF ORIGINAL REFERRAL 10-29-81

**\*\*PURPOSE:**

On December 2, 1981, the committee sent in a response indicating that the contributions in question came from partnership accounts. Both Floor Broker Associates and Stanley B. Bell Co. are the names of partnerships and corporations. The response includes letters from the above-mentioned organizations confirming the fact that these contributions came from partnership accounts (Attachment #1).

2040332918

o OUTCOME: (if applicable) N/A

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

REC-73  
KAG  
rec'd 10-30-81

October 29, 1981

TO : CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER  
STAFF DIRECTOR

FROM : JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : REFERRAL OF COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

MUR 1413

Please find attached the referral of the Commodity Exchange Inc. Political Action Committee. According to the non-compliance standards contained in the Review and Referral Procedures, the committee has received and failed to refund corporate contributions (Chart #4), which requires additional examination by your office.

If you have any questions, please contact Mark Kleinman at 357-0026.

Attachment

62040332919

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: October 29, 1981  
ANALYST: Mark Kleinman MK

- I. COMMITTEE: Commodity Exchange Inc. Political Action Committee (C0011211)  
John Morace, Treasurer  
Four World Trade Center  
New York, New York 10048
- II. RELEVANT STATUTE: 2 U.S.C. 441b(a)
- III. BACKGROUND:

Receipt of Corporate Funds - 2 U.S.C. 441b(a)

The committee's reports for 1980 calendar year disclose \$9,000 in corporate contributions. On the July Quarterly Report, there is a \$5,000 contribution from Floor Brokers Associates; on the October Quarterly Report, there is a \$3,500 contribution from Stanley B. Bell Co.; and on the 30 Day Post-General Election Report, there is another \$500 contribution from Floor Brokers Associates (Attachment #2).

On August 10, 1981, the Commission received confirmation from the New York Secretary of State's office that the above-mentioned contributors were incorporated (Attachment #3). A Request for Additional Information was sent on August 12, 1981 (Attachment #4) and a Second Notice was sent on September 4, 1981 (Attachment #5).

In a telephone conversation with a committee spokesperson, which occurred on October 5, 1981, the individual stated that the entries were probably not incorporated since the committee had generally checked with their contributors before accepting any contributions (Attachment #6). On October 7, 1981, the same committee spokesperson called to say that the \$5,000 contribution listed as from Floor Brokers Associates was from an individual, Ross Rowland (Attachment #7).

The committee has not responded to date.

62040332920

REPORTS ANALYSIS REFERRAL TO OFFICE OF GENERAL COUNSEL  
COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE  
PAGE TWO

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information  
or matters requiring to be referred at this time.

62040332921

f

COMMODITY EXCHANGE, INC.

RECEIVED 11/12/81

FOUR WORLD TRADE CENTER

NEW YORK, NY 10048

November 11, 1981

Mr. Mark Kleinman  
Reports Analysis Division  
Federal Election Commission  
Washington, D. C. 20463

Dear Mr. Kleinman:

This letter is in response to your letter of August 12, 1981, to Raymond Nessin, former Treasurer of the Commodity Exchange, Inc. Political Action Committee, in which you stated that a review of the Committee's July 1980 Quarterly Report, October 1980 Quarterly Report and 30 Day Post-General Election Report appeared to disclose the receipt of contributions from corporations. Specifically, in a later conversation with William Seale, Vice President of Commodity Exchange, Inc., the Committee's connected organization, you questioned whether the contributions of Floor Broker Associates and Stanley B. Bell Co. were corporate contributions.

While the Committee had assured itself that the entities in question were partnerships at the time their contributions were received, we recently asked each to certify the same to us again. Enclosed is a copy of their replies. You will note that Floor Broker Associates and Stanley B. Bell Co. are also the names of corporations, a fact which may have led to confusion at the Federal Election Commission.

I trust these letters will be sufficient to allay your concerns. However, if you need any additional information or have any questions, may I ask that you contact Mr. Seale directly (202) 338-5353.

Very truly yours,

*John L. Morace*  
John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee

82040332922  
01032102345

# Floor Broker Associates

BILL 2 P2:42

160 Broadway  
Suite 1704  
New York, New York 10038  
Telephone: 233-7407

November 5, 1981

Mr. John L. Morace  
COMMODITY EXCHANGE, INC.  
POLITICAL ACTION COMMITTEE  
Four World Trade Center  
New York, New York 10048

Dear John:

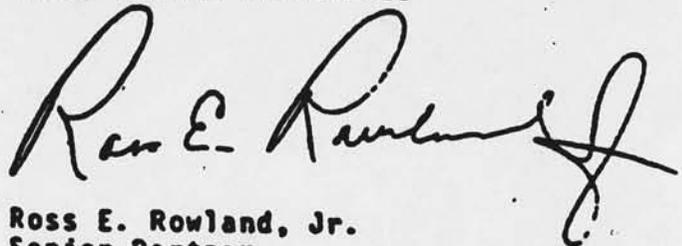
We understand that the Federal Election Commission has written to inquire whether the Commodity Exchange, Inc. Political Action Committee may have accepted a corporate contribution by accepting a contribution from Floor Broker Associates.

Floor Broker Associates is the name of both a corporation and a partnership. Each entity maintains a separate legal identity and a separate checking account. A review of our records confirms that this contribution was drawn on the Floor Broker Associates partnership checking account. (Morgan Guaranty Trust Company Account No. 021 000 238)

If you need any additional information, please do not hesitate to contact me.

Sincerely yours,

FLOOR BROKER ASSOCIATES



Ross E. Rowland, Jr.  
Senior Partner

RER/gef

02040332923  
81032172346

STANLEY BELL CO.  
4 WORLD TRADE CTR.  
NEW YORK, NEW YORK 10048

November 11, 1981

Mr. John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, New York 10048

Dear John:

We understand that the Federal Election Commission has written to inquire whether the Commodity Exchange, Inc. Political Action Committee may have accepted a corporate contribution by accepting a contribution from Stanley B. Bell Co.

Stanley B. Bell Co. is the name of both a corporation and a partnership. Each entity maintains a separate legal identity and a separate checking account. A review of our records confirms that this contribution was drawn on the Stanley B. Bell Co. partnership checking account. (Chemical Bank of New York Account #: 024010340.)

If you need any additional information, please let me know.

Very truly yours,

*Stanley B. Bell*  
Stanley B. Bell

02040332924  
81032102347

NON-PARTY RELATED

COMMITTEE DOCUMENT

8 2 0 4 0 3 3 2 9 2 5

RECEIPTS EXPENDITURES TYPE OF FILER # OF MICROFILM  
COVERAGES DATES PAGES LOCATION

COMMODITY EXCHANGE, INC POLITICAL ACTION COMMITTEE (COMPAC)  
CONNECTED ORGANIZATION: COMMODITY EXCHANGE, INC

NON-PARTY QUALIFIED

ID 9C00112110

DESCRIPTION	RECEIPTS	EXPENDITURES
1979 STATEMENT OF ORGANIZATION		
STATEMENT OF ORGANIZATION - AMENDMENT		1,700
OCTOBER QUARTERLY	8,000	
OCTOBER QUARTERLY - AMENDMENT	8,000	1,700
YEAR-END	0	5,650
1980 STATEMENT OF ORGANIZATION - AMENDMENT		
APRIL QUARTERLY	0	250
APRIL QUARTERLY - AMENDMENT	0	0
JULY QUARTERLY	23,950	15,650
REQUEST FOR ADDITIONAL INFORMATION		
REQUEST FOR ADDITIONAL INFORMATION 2ND		
OCTOBER QUARTERLY	26,450	14,000
REQUEST FOR ADDITIONAL INFORMATION		
REQUEST FOR ADDITIONAL INFORMATION 2ND		
PRE-GENERAL	100	2,000
POST-GENERAL	4,500	15,750
REQUEST FOR ADDITIONAL INFORMATION		
REQUEST FOR ADDITIONAL INFORMATION 2ND		
YEAR-END	1,000	0
YEAR-END - AMENDMENT	1,000	0
<b>TOTAL</b>	<b>64,200</b>	<b>54,750</b>

DATE	DESCRIPTION	PAGES	LOCATION
4AUG79		5	79FEC/134/1768
13AUG79		5	79FEC/134/2919
2AUG79 -30SEP79		6	79FEC/139/1538
2AUG79 -30SEP79		4	79FEC/146/8131
1OCT79 -31DEC79		4	80FEC/147/1891
23MAY80		5	80FEC/157/8101
1JAN80 -31MAR80		4	80FEC/151/2912
1JAN80 -31MAR80		3	80FEC/156/2420
1APR80 -30JUN80		9	80FEC/161/2302
1APR80 -30JUN80		1	81FEC/204/2420
1APR80 -30JUN80		1	81FEC/205/4391
1JUL80 -30SEP80		9	80FEC/169/2778
1JUL80 -30SEP80		1	81FEC/204/2419
1JUL80 -30SEP80		1	81FEC/205/4390
1OCT80 -15OCT80		5	80FEC/172/2309
15OCT80 -24NOV80		6	80FEC/184/5049
15OCT80 -24NOV80		5	81FEC/204/0910
15OCT80 -24NOV80		5	81FEC/205/2132
25NOV80 -31DEC80		5	81FEC/189/3240
25NOV80 -31DEC80		4	81FEC/192/8498

90 TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #1





October 1980

Commodity Exchange, Inc. - Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Stanley B. Bell Co. c/o C.E.C. 212 4 World Trade Center New York, NY 10048 Stanley B. Bell 2,000 Craig Bell 500 Lawrence Bilello 1,000	Stanley B. Bell Co. 8-31-79 Occupation Commodities Trading Brokers Aggregate Year-to-Date-\$ 3,500	9/22/80	\$ 3,500
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
Engelhard Political Action Committee 1221 Ave. of the Americas New York, NY, 10020	Name of Employer N/A Occupation N/A Aggregate Year-to-Date-\$ 4,000	Date (month, day, year) 7/2/80 9/10/80	Amount of Each Receipt This Period 2,000 2,000
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
Federbush & Co. Charles Federbush 4,500 ✓ Ed Goldberg 9,000 ✓ 4 World Trade Center, N.Y., NY (contribution divided equally among partners - \$500 each)	Name of Employer Federbush & Co. Occupation Commodities Trading Brokers Aggregate Year-to-Date-\$ 1,000	Date (month, day, year) 9/22/80	Amount of Each Receipt This Period 1,000
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
Dennis Massa c/o Commodity Exchange Center 4 World Trade Center New York, NY 10048	Name of Employer Mintz-Marcus & Co. Occupation Commodities Trading Broker Aggregate Year-to-Date-\$ 500	Date (month, day, year) 9/22/80	Amount of Each Receipt This Period 500
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
Richard A. Arias c/o Commodity Exchange Center 4 World Trade Center New York, NY 10048	Name of Employer London-Jenkins Polanish & Co., Inc. Occupation Commodities Trading Broker Aggregate Year-to-Date-\$ 500	Date (month, day, year) 9/22/80	Amount of Each Receipt This Period 500
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			\$ 9,500
TOTAL This Period (last page this line number only)			

Commodity Exchange, Inc. Political Action Committee

1. Full Name, Mailing Address and ZIP Code  
**Floor Brokers Associates**  
 160 Broadway - Suite 1204  
 New York, NY 10038 8-30-72  
**Robert Paruch**  
**John Branco**  
**Peter Tuomey**  
**Gerald Westheimer**  
**Ronald LaFroscia**  
 (contribution divided equally among partners, \$100 each)

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Floor Brokers Assoc. 160 Broadway New York, NY 10038	10/17/80	100 3-500 100
Occupation Commodities Floor Brokers		
Aggregate Year-to-Date-\$	500	

Receipt For:  Primary  General  
 Other (specify):

2. Full Name, Mailing Address and ZIP Code  
**George McLaughlin**  
 263 Mercer Road  
 Princeton, N.J. 08540

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mocatta Metals Corp. 4 World Trade Center New York, NY 10048	10/31/80	1,000
Occupation Vice President		
Aggregate Year-to-Date-\$	1,000	

Receipt For:  Primary  General  
 Other (specify):

3. Full Name, Mailing Address and ZIP Code  
**Jerome Lederman**  
 311 E. 23rd Street  
 New York, NY 10010

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mocatta Metals Corp. 4 World Trade Center New York, NY 10048	11/7/80	1,000
Occupation Vice President		
Aggregate Year-to-Date-\$	1,000	

Receipt For:  Primary  General  
 Other (specify):

4. Full Name, Mailing Address and ZIP Code  
**Gregory Apen**  
 c/o Mocatta Metals Corp.  
 4 World Trade Center  
 New York, NY 10048

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mocatta Metals Corp. 4 World Trade Center New York, NY 10048	11/6/80	1,000
Occupation Vice President		
Aggregate Year-to-Date-\$	1,000	

Receipt For:  Primary  General  
 Other (specify):

5. Full Name, Mailing Address and ZIP Code  
**Salvatore Azzara**  
 c/o Mocatta Metals Corp.  
 4 World Trade Center  
 New York, NY 10048

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mocatta Metals Corp. 4 World Trade Center New York, NY 10048	11/6/80	1,000
Occupation Vice President		
Aggregate Year-to-Date-\$	1,000	

Receipt For:  Primary  General  
 Other (specify):

6. Full Name, Mailing Address and ZIP Code

Receipt For:  Primary  General  
 Other (specify):

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation		
Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional) .....	4,500
TOTAL This Period (last page this line number only) .....	\$4,500



STATE OF NEW YORK  
DEPARTMENT OF STATE  
162 WASHINGTON AVENUE  
ALBANY, NEW YORK 12231

August 6, 1981

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

Dear Mr. Kleirman:

Certificate of Incorporation of Floor Broker Associates, Inc.  
was filed August 30, 1972, location NY County. We have no dissolution  
filed.

We have no record of a corporation filed in this office under  
the following:

Carmine Oliverio Co.

John J. Hanemann Co.

Michael Belmont & Co.

Picower Farkas & Co.

Sabin Commodities

Mel Schnell & Co.

Certificate of Incorporation of Stanley B. Bell & Company, Inc.  
was filed August 31, 1979, location NY County. We have no dissolution  
filed.

Certificate of M. Federbush & Co. Inc. was filed January 24, 1924,  
location NY County, changed its name to Premier Luggage Corporation  
on January 17, 1927, and was dissolved by Proclamation of the  
Secretary of State Published December 15, 1938.

Very truly yours,

Joseph E. Cramer  
Head Clerk  
Searching Unit

JEC/nh

02040332930



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

August 12, 1981

Raymond Nessim, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, NY 10048

Identification No: C00112110

Reference: July Quarterly Report (4-1-80 to 6-30-80), October Quarterly Report (7-1-80 to 9-30-80) and 30 Day Post-General Election Report (10-15-80 to 11-24-80)

Dear Mr. Nessim:

This letter is prompted by the Commission's preliminary review of your July Quarterly, October Quarterly and 30 Day Post-General Reports. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your reports (pertinent portion attached) disclose apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b, unless made from separate segregated funds established by the corporations. If you have received corporate contributions, the Commission recommends that you refund the full amounts to the donors. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

If you should find, however, that the receipts in question are not corporate, but are from partnerships, an allocation of the contributions according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

If you find that sources of the contributions are permissible and were disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

62040332931

14



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

September 4, 1981

Raymond Nessim, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, NY 10048

Identification No: C00112110.

Reference: July Quarterly Report (4/1/80-6/30/80), October Quarterly Report (7/1/80-9/30/80) and 30 Day Post-General Election Report (10/15/80-11/24/80)

Dear Mr. Nessim:

This letter is to inform you that as of this date, the Commission has not received your response to our requests for additional information dated August 12, 1981. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

John D. Gibson  
Acting Assist. Staff Director  
Reports Analysis Division

Enclosure

62040332932

TELECON TO THE FILE: COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

FROM : MARK KLEINMAN

DATE : 10-5-81

-----  
RE: Corporate contributions  
-----

I spoke with Bill Seal, Government Representative, at (202) 338-5353. He explained that in all likelihood these contributions were from partnerships. He believes that most of the Commodity Brokers have partnerships. He further stated that the committee never would accept corporate contributions and that they are usually certain that the contributors to their committee are not incorporated.

I reiterated that they were incorporated. He stated that the committee would check these entries out and respond as soon as possible.

Bill Seal, Government Representative  
(202) 338-5353

02040332933

TELECON TO THE FILE: COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

FROM : MARK KLEINMAN

DATE : 10-7-81

-----  
RE: Corporate contributions  
-----

I spoke with Bill Seal, Government Representative, at (202) 338-5353. He explained that the first contribution from Floor Brokers Associates was from an individual Ross Howland. In addition, he stated that they would continue to double-check all of the other entries and provide a response as soon as possible.

Bill Seal, Government Representative  
(202) 338-5353

020403332934

MUR 1413

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Commodity Exchange, Inc. Political	)	81L-73
Action Committee	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on December 15, 1981, do hereby certify that the Commission decided by a vote of 5-0 to open a MUR in the above-captioned matter.

Commissioners Aikens, Harris, Reiche, Thomson, and Tiernan voted affirmatively for the decision. Commissioner McGarry was not present at the time of the vote.

Attest:

12/24/81  
Date

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

62040332935

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

DATE December 22, 1981

ANALYST Mark Kleinman MK

TO: Office of General Counsel  
ATTENTION: Victor Sterling

TEAM CHIEF Mike Filler

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW PK

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS gs.

MUR No. 1413

DATE OF ORIGINAL REFERRAL 10-29-81

**\*\*PURPOSE:**

On December 2, 1981, the committee sent in a response indicating that the contributions in question came from partnership accounts. Both Floor Broker Associates and Stanley B. Bell Co. are the names of partnerships and corporations. The response includes letters from the above-mentioned organizations confirming the fact that these contributions came from partnership accounts (Attachment #1).

6  
2  
0  
4  
0  
3  
3  
2  
9  
3  
6

OUTCOME: (if applicable) N/A

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

COMMODITY EXCHANGE, INC.

81882 P2:42

FOUR WORLD TRADE CENTER

NEW YORK, NY 10048

November 11, 1981

NOV 11 1981

Mr. Mark Kleinman  
Reports Analysis Division  
Federal Election Commission  
Washington, D. C. 20463

Dear Mr. Kleinman:

This letter is in response to your letter of August 12, 1981, to Raymond Nessim, former Treasurer of the Commodity Exchange, Inc. Political Action Committee, in which you stated that a review of the Committee's July 1980 Quarterly Report, October 1980 Quarterly Report and 30 Day Post-General Election Report appeared to disclose the receipt of contributions from corporations. Specifically, in a later conversation with William Seale, Vice President of Commodity Exchange, Inc., the Committee's connected organization, you questioned whether the contributions of Floor Broker Associates and Stanley B. Bell Co. were corporate contributions.

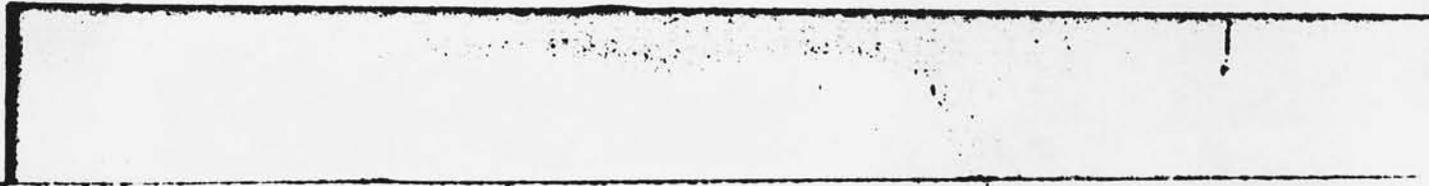
While the Committee had assured itself that the entities in question were partnerships at the time their contributions were received, we recently asked each to certify the same to us again. Enclosed is a copy of their replies. You will note that Floor Broker Associates and Stanley B. Bell Co. are also the names of corporations, a fact which may have led to confusion at the Federal Election Commission.

I trust these letters will be sufficient to allay your concerns. However, if you need any additional information or have any questions, may I ask that you contact Mr. Seale directly (202) 338-5353.

Very truly yours,

*John L. Morace*  
John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee

7 62040332937  
81032102345



STANLEY BELL CO.  
4 WORLD TRADE CTR.  
NEW YORK, NEW YORK 10048

November 11, 1981

Mr. John L. Morace, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, New York 10048

Dear John:

We understand that the Federal Election Commission has written to inquire whether the Commodity Exchange, Inc. Political Action Committee may have accepted a corporate contribution by accepting a contribution from Stanley B. Bell Co.

Stanley B. Bell Co. is the name of both a corporation and a partnership. Each entity maintains a separate legal identity and a separate checking account. A review of our records confirms that this contribution was drawn on the Stanley B. Bell Co. partnership checking account. (Chemical Bank of New York Account #: 024010340.)

If you need any additional information, please let me know.

Very truly yours,

*Stanley B. Bell*  
Stanley B. Bell

02040332938  
01032102347

# Floor Broker Associates

RECEIVED  
BILL 2 P2: 42

100 Broadway  
Suite 1201  
New York, New York 10038  
Telephone: 212-7077

November 5, 1981

Mr. John L. Morace  
COMMODITY EXCHANGE, INC.  
POLITICAL ACTION COMMITTEE  
Four World Trade Center  
New York, New York 10048

Dear John:

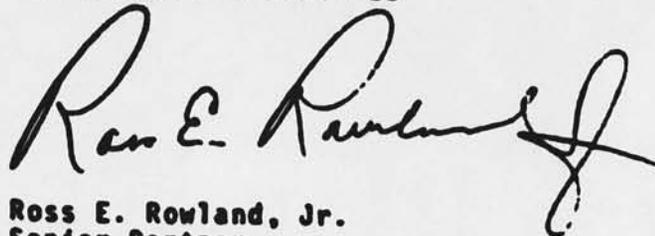
We understand that the Federal Election Commission has written to inquire whether the Commodity Exchange, Inc. Political Action Committee may have accepted a corporate contribution by accepting a contribution from Floor Broker Associates.

Floor Broker Associates is the name of both a corporation and a partnership. Each entity maintains a separate legal identity and a separate checking account. A review of our records confirms that this contribution was drawn on the Floor Broker Associates partnership checking account. (Morgan Guaranty Trust Company Account No. 021 000 238)

If you need any additional information, please do not hesitate to contact me.

Sincerely yours,

FLOOR BROKER ASSOCIATES



Ross E. Rowland, Jr.  
Senior Partner

RER/gef

81032102346  
02040332939



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

HUR 1413

October 29, 1981

TO : CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER  
STAFF DIRECTOR

FROM : JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : REFERRAL OF COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

Please find attached the referral of the Commodity Exchange Inc. Political Action Committee. According to the non-compliance standards contained in the Review and Referral Procedures, the committee has received and failed to refund corporate contributions (Chart #4), which requires additional examination by your office.

If you have any questions, please contact Mark Kleinman at 357-0026.

Attachment

62040332940

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 29, 1981

ANALYST: Mark Kleinman MK

I. COMMITTEE: Commodity Exchange Inc. Political Action Committee (C00112110)  
John Morace, Treasurer  
Four World Trade Center  
New York, New York 10048

II. RELEVANT STATUTE: 2 U.S.C. 441b(a)

III. BACKGROUND:

Receipt of Corporate Funds - 2 U.S.C. 441b(a)

The committee's reports for 1980 calendar year disclose \$9,000 in corporate contributions. On the July Quarterly Report, there is a \$5,000 contribution from Floor Brokers Associates; on the October Quarterly Report, there is a \$3,500 contribution from Stanley B. Bell Co.; and on the 30 Day Post-General Election Report, there is another \$500 contribution from Floor Brokers Associates (Attachment #2).

On August 10, 1981, the Commission received confirmation from the New York Secretary of State's office that the above-mentioned contributors were incorporated (Attachment #3). A Request for Additional Information was sent on August 12, 1981 (Attachment #4) and a Second Notice was sent on September 4, 1981 (Attachment #5).

In a telephone conversation with a committee spokesperson, which occurred on October 5, 1981, the individual stated that the entries were probably not incorporated since the committee had generally checked with their contributors before accepting any contributions (Attachment #6). On October 7, 1981, the same committee spokesperson called to say that the \$5,000 contribution listed as from Floor Brokers Associates was from an individual, Ross Rowland (Attachment #7).

The committee has not responded to date.

62040332941

REPORTS ANALYSIS REFERRAL TO OFFICE OF GENERAL COUNSEL  
COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE  
PAGE TWO

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information  
or matters requiring to be referred at this time.

62040332942

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)  
 0 2 0 4 0 3 3 2 9 4 3  
 NON-PARTY RELATED

DATE 6OCT81  
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
COMMODITY EXCHANGE, INC POLITICAL ACTION COMMITTEE (COMPAC) CONNECTED ORGANIZATION: COMMODITY EXCHANGE, INC				NON-PARTY QUALIFIED		ID 0C00112110
1979	STATEMENT OF ORGANIZATION			4AUG79	5	79FEC/134/1748
	STATEMENT OF ORGANIZATION - AMENDMENT			13AUG79	5	79FEC/134/2919
	OCTOBER QUARTERLY	8,000	1,700	2AUG79 -30SEP79	6	79FEC/139/1538
	OCTOBER QUARTERLY - AMENDMENT	8,000	1,700	2AUG79 -30SEP79	6	79FEC/140/0131
	YEAR-END	0	5,450	1OCT79 -31DEC79	4	80FEC/147/1891
1980	STATEMENT OF ORGANIZATION - AMENDMENT			23MAY80	5	80FEC/157/0101
	APRIL QUARTERLY	0	250	1JAN80 -31MAR80	4	80FEC/151/2912
	APRIL QUARTERLY - AMENDMENT	0	0	1JAN80 -31MAR80	3	80FEC/156/2420
	JULY QUARTERLY	23,950	15,450	1APR80 -30JUN80	9	80FEC/161/2302
	REQUEST FOR ADDITIONAL INFORMATION			1APR80 -30JUN80	1	81FEC/204/2420
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR80 -30JUN80	1	81FEC/205/4391
	OCTOBER QUARTERLY	26,450	14,000	1JUL80 -30SEP80	9	80FEC/169/2778
	REQUEST FOR ADDITIONAL INFORMATION			1JUL80 -30SEP80	1	81FEC/204/2419
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL80 -30SEP80	1	81FEC/205/4391
	PRE-GENERAL	100	2,000	1OCT80 -15OCT80	5	80FEC/172/2209
	POST-GENERAL	4,500	15,750	15OCT80 -24NOV80	6	80FEC/184/5049
	REQUEST FOR ADDITIONAL INFORMATION			15OCT80 -24NOV80	5	81FEC/204/0910
	REQUEST FOR ADDITIONAL INFORMATION 2ND			15OCT80 -24NOV80	5	81FEC/205/2122
	YEAR-END	1,000	0	25NOV80 -31DEC80	5	81FEC/189/3240
	YEAR-END - AMENDMENT	1,000	0	25NOV80 -31DEC80	4	81FEC/192/0498
	TOTAL	64,200	0		90	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #1

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 6OCT81  
 PAGE 1

0 2 0 4 0 3 6 2 9 4 4  
 NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
COMMODITY EXCHANGE, INC POLITICAL ACTION COMMITTEE (COMPAC) CONNECTED ORGANIZATION: COMMODITY EXCHANGE, INC				NON-PARTY QUALIFIED		ID 000112110
	1981 STATEMENT OF ORGANIZATION - AMENDMENT MID-YEAR REPORT	178,350	14,700	23HARS1 1JAN81 -30JUN81	4	81FEC/193/0484 29 81FEC/203/0484
	TOTAL	178,350	0 14,700	0	24	TOTAL PAGES

ENDING CASH-ON-HAND 6/30/81 = \$173,100

DEBTS = 0

Information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

July Quarterly NY

Name of Committee (in Full)		Name of Employer		Date (month, day, year)	Amount of Each Receipt This Period
<b>Commodity Exchange, Inc. Political Action Committee</b> A. Full Name, Mailing Address and ZIP Code <b>Floor Brokers Associates</b> <b>160 Broadway - Suite 1204</b> <b>New York, NY 10038</b> <b>Ross Rowland</b>		<b>Floor Brokers Associates</b> <b>160 Broadway, NY, NY</b> Occupation Commodities <b>Floor Broker</b>		4/27/80	5,000
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 5,000			
B. Full Name, Mailing Address and ZIP Code <b>Andrew Napoletano</b> <b>428 Mountainview Avenue</b> <b>Staten Island, NY 10314</b>		<b>Self employed</b> <b>4 World Trade Center</b> <b>New York, NY 10048</b> Occupation Commodities <b>Trading Broker</b>		4/30/80	1,500
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 1,500			
C. Full Name, Mailing Address and ZIP Code    		Name of Employer  Occupation  		Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$			
D. Full Name, Mailing Address and ZIP Code <b>Robert J. Fisher</b> <b>4024 Fulton Avenue</b> <b>Seaford, NY 11783</b>		<b>Klein &amp; Co.</b> <b>4 World Trade Ctr.</b> <b>N.Y., NY 10048</b> Occupation Commodities <b>Trading Broker</b>		5/1/80	750
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 750			
E. Full Name, Mailing Address and ZIP Code <b>James M. McHale</b> <b>70 Boone Street</b> <b>Staten Island, NY 10314.</b>		<b>Self employed</b> <b>4 World Trade Ctr.</b> <b>N.Y., NY</b> Occupation Commodities <b>Trading Broker</b>		5/6/80	1,000
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 1,000			
F. Full Name, Mailing Address and ZIP Code <b>John L. Morace</b> <b>457 Ridge Road</b> <b>Mahwah, N.J. 07430</b>		<b>Silgo Corp.</b> <b>4 World Trade Ctr.</b> <b>New York, NY 10048</b> Occupation Commodities <b>Trading Broker</b>		5/6/80	1,000
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 1,000			
G. Full Name, Mailing Address and ZIP Code <b>Carmine Oliverio Co.</b> <b>Carmine Oliverio</b> <b>3 Troyden Court</b> <b>Homedale, NJ</b>		<b>Carmine Oliverio Co.</b> <b>4 World Trade Ctr.</b> <b>New York, NY 10048</b> Occupation Commodities <b>Trading Broker</b>		5/6/80	1,000
Receipt For: <input checked="" type="radio"/> Primary <input type="radio"/> General <input type="checkbox"/> Other (specify): N/A		Aggregate Year-to-Date-\$ 1,000			
SUBTOTAL of Receipts This Page (optional) .....					10,250
TOTAL This Period (last page this line number only) .....					

Information copied from such reports or books may not be sold or used for any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

October Quarterly

Commodity Exchange, Inc. - Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<p>Stanley B. Bell Co. c/o C.E.C. 212 4 World Trade Center New York, NY 10048</p> <p><i>(P)</i></p> <p><del>Stanley B. Bell 2,000</del> <del>Craig Bell 500</del> <del>Lawrence Bilello 1,000</del></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>Stanley B. Bell Co.</p> <p>8-31-79</p> <p>Occupation Commodities Trading Brokers</p> <p>Aggregate Year-to-Date-\$ 3,500</p>	<p>9/22/80</p>	<p>\$ 3,500</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>Aggregate Year-to-Date-\$</p>		
<p>Engelhard Political Action Committee 1221 Ave. of the Americas New York, NY, 10020</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>N/A</p> <p>Occupation N/A</p> <p>Aggregate Year-to-Date-\$ 4,000</p>	<p>7/2/80 9/10/80</p>	<p>2,000 2,000</p>
<p>Federbush &amp; Co. Charles Federbush Ed Goldberg 4 World Trade Center, N.Y., NY</p> <p><i>4500 ✓</i> <i>9-11 ✓</i></p> <p>(contribution divided equally among partners - \$500 each)</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>Federbush &amp; Co.</p> <p>Occupation Commodities Trading Brokers</p> <p>Aggregate Year-to-Date-\$ 1,000</p>	<p>9/22/80</p>	<p>1,000</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>Aggregate Year-to-Date-\$</p>		
<p>Dennis Massa c/o Commodity Exchange Center 4 World Trade Center New York, NY, 10048</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>Mintz-Marcus &amp; Co.</p> <p>Occupation Commodities Trading Broker</p> <p>Aggregate Year-to-Date-\$ 500</p>	<p>9/22/80</p>	<p>500</p>
<p>Richard A. Arias c/o Commodity Exchange Center 4 World Trade Center New York, NY 10048</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): N/A</p>	<p>London-Jenkins Polanish &amp; Co., Inc.</p> <p>Occupation Commodities Trading Broker</p> <p>Aggregate Year-to-Date-\$ 500</p>	<p>9/22/80</p>	<p>500</p>
<p>SUBTOTAL of Receipts This Page (optional) .....</p>			<p>\$ 9,500</p>
<p>TOTAL This Period (last page this line number only) .....</p>			

Receipts or Statements may not be sold or used by any person for the purpose of soliciting contributions or for other than using the name and address of any political committee to solicit contributions from such committee.

30 Day Post-General MK

Commodity Exchange, Inc. Political Action Committee

Full Name, Mailing Address and ZIP Code  
**Floor Brokers Associates**  
 160 Broadway - Suite 1204  
 New York, NY 10038 8-30-72  
**Robert Paruch**  
**John Branco**  
**Peter Tuomey**  
**Gerald Westheimer**  
**Ronald LaFroscia**  
 (contribution divided equally among partners, \$100 each)

Name of Employer <b>Floor Brokers Assoc.</b> 160 Broadway New York, NY 10038	Date (month, day, year) <b>10/17/80</b>	Amount of Each Receipt This Period 100 3-500 X
Occupation <b>Commodities Floor Brokers</b>		
Aggregate Year-to-Date-\$	<b>500</b>	

Receipt For:  Primary  General  
 Other (specify):

Full Name, Mailing Address and ZIP Code  
**George McLaughlin**  
 263 Mercer Road  
 Princeton, N.J. 08540

Name of Employer <b>Mocatta Metals Corp.</b> 4 World Trade Center New York, NY 10048	Date (month, day, year) <b>10/31/80</b>	Amount of Each Receipt This Period <b>1,000</b>
Occupation <b>Vice President</b>		
Aggregate Year-to-Date-\$	<b>1,000</b>	

Receipt For:  Primary  General  
 Other (specify):

Full Name, Mailing Address and ZIP Code  
**Jefone Lederman**  
 311 E. 23rd Street  
 New York, NY 10010

Name of Employer <b>Mocatta Metals Corp.</b> 4 World Trade Center New York, NY 10048	Date (month, day, year) <b>11/7/80</b>	Amount of Each Receipt This Period <b>1,000</b>
Occupation <b>Vice President</b>		
Aggregate Year-to-Date-\$	<b>1,000</b>	

Receipt For:  Primary  General  
 Other (specify):

Full Name, Mailing Address and ZIP Code  
**Gregory Apen**  
 c/o Mocatta Metals Corp.  
 4 World Trade Center  
 New York, NY 10048

Name of Employer <b>Mocatta Metals Corp.</b> 4 World Trade Center New York, NY 10048	Date (month, day, year) <b>11/6/80</b>	Amount of Each Receipt This Period <b>1,000</b>
Occupation <b>Vice President</b>		
Aggregate Year-to-Date-\$	<b>1,000</b>	

Receipt For:  Primary  General  
 Other (specify):

Full Name, Mailing Address and ZIP Code  
**Salvatore Azzara**  
 c/o Mocatta Metals Corp.  
 4 World Trade Center  
 New York, NY 10048

Name of Employer <b>Mocatta Metals Corp.</b> 4 World Trade Center New York, NY 10048	Date (month, day, year) <b>11/6/80</b>	Amount of Each Receipt This Period <b>1,000</b>
Occupation <b>Vice President</b>		
Aggregate Year-to-Date-\$	<b>1,000</b>	

Receipt For:  Primary  General  
 Other (specify):

Full Name, Mailing Address and ZIP Code

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation		
Aggregate Year-to-Date-\$		

Receipt For:  Primary  General  
 Other (specify):

SUBTOTAL of Receipts This Page (optional) .....	<b>4,500</b>
TOTAL This Period (last page this line number only) .....	<b>\$4,500</b>



STATE OF NEW YORK  
**DEPARTMENT OF STATE**  
162 WASHINGTON AVENUE  
ALBANY, NEW YORK 12231

August 6, 1981

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

Dear Mr. Kleirman:

Certificate of Incorporation of Floor Broker Associates, Inc.  
was filed August 30, 1972, location NY County. We have no dissolution  
filed.

We have no record of a corporation filed in this office under  
the following:

Carmine Oliverio Co.

John J. Hanemann Co.

Michael Belmont & Co.

Picower Farkas & Co.

Sabin Commodities

Mel Schnell & Co.

Certificate of Incorporation of Stanley B. Bell & Company, Inc.  
was filed August 31, 1979, location NY County. We have no dissolution  
filed.

Certificate of M. Federbush & Co. Inc. was filed January 24, 1924,  
location NY County, changed its name to Premier Luggage Corporation  
on January 17, 1927, and was dissolved by Proclamation of the  
Secretary of State Published December 15, 1938.

Very truly yours,

Joseph E. Cramer  
Head Clerk  
Searching Unit

JEC/hh

62040332948



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

August 12, 1981

Raymond Nessim, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, NY 10048

Identification No: C00112110

Reference: July Quarterly Report (4-1-80 to 6-30-80), October Quarterly Report (7-1-80 to 9-30-80) and 30 Day Post-General Election Report (10-15-80 to 11-24-80)

Dear Mr. Nessim:

This letter is prompted by the Commission's preliminary review of your July Quarterly, October Quarterly and 30 Day Post-General Reports. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your reports (pertinent portion attached) disclose apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b, unless made from separate segregated funds established by the corporations. If you have received corporate contributions, the Commission recommends that you refund the full amounts to the donors. (Any refund itemized on Schedule B should be reported on Line 26 of the Detailed Summary Page of your next report.)

If you should find, however, that the receipts in question are not corporate, but are from partnerships, an allocation of the contributions according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

If you find that sources of the contributions are permissible and were disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

82040332949



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

September 4, 1981

Raymond Nessim, Treasurer  
Commodity Exchange, Inc.  
Political Action Committee  
Four World Trade Center  
New York, NY 10048

Identification No: C00112110

Reference: July Quarterly Report (4/1/80-6/30/80), October Quarterly Report (7/1/80-9/30/80) and 30 Day Post-General Election Report (10/15/80-11/24/80)

Dear Mr. Nessim:

This letter is to inform you that as of this date, the Commission has not received your response to our requests for additional information dated August 12, 1981. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

*John D. Gibson*

John D. Gibson  
Acting Assist. Staff Director  
Reports Analysis Division

Enclosure

62040332950

TELECON TO THE FILE: COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

FROM : MARK KLEINMAN

DATE : 10-5-81

-----  
RE: Corporate contributions  
-----

I spoke with Bill Seal, Government Representative, at (202) 338-5353. He explained that in all likelihood these contributions were from partnerships. He believes that most of the Commodity Brokers have partnerships. He further stated that the committee never would accept corporate contributions and that they are usually certain that the contributors to their committee are not incorporated.

I reiterated that they were incorporated. He stated that the committee would check these entries out and respond as soon as possible.

Bill Seal, Government Representative  
(202) 338-5353

02040332951

TELECON TO THE FILE: COMMODITY EXCHANGE INC. POLITICAL ACTION COMMITTEE

FROM : MARK KLEINMAN

DATE : 10-7-81

-----  
RE: Corporate contributions  
-----

I spoke with Bill Seal, Government Representative, at (202) 338-5353. He explained that the first contribution from Floor Brokers Associates was from an individual Ross Howland. In addition, he stated that they would continue to double-check all of the other entries and provide a response as soon as possible.

Bill Seal, Government Representative  
(202) 338-5353

02040332952



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1413

Date Filmed 7-23-82 Camera No. --- 2

Cameraman SPC