



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1463

Date Filmed 6/15/83 Camera No. --- 2

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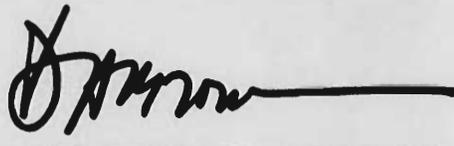
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FEDERAL ELECTION COMMISSION

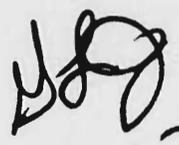
12 Day Rep. Comment Sheets (3)

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):

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

Signed 
Date 4/20/83

FEC 9-21-77


4-22-83

83040393466



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1983

Charles S. Blumenthal
9205 Oxon Hill Road
Fort Washington, Maryland 20744

Re: MUR 1463

Dear Mr. Blumenthal:

This is in reference to the complaint you filed with the Commission on August 19, 1982 concerning a tabloid and sample ballot distributed by Democratic Alliance (District 26).

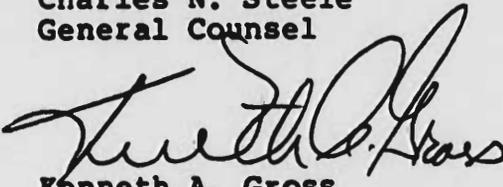
After conducting an investigation in this matter, the Commission determined there was reason to believe that Democratic Alliance (26th District) violated 2 U.S.C. § 433, § 434, but took no action against Citizens for Sarbanes and the Hoyer for Congress Committee. However, after considering the circumstances of this matter the Commission determined to take no further action and close its file. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

The file number in this matter is MUR 1463. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

83040693467



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1983

Charles M. Kerr, Treasurer
Citizens for Sarbanes
1800 Mercantile Bank
& Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

Re: MUR 1463

Dear Mr. Kerr:

On September 24, 1982, the Federal Election Commission notified you of a complaint which alleged that your committee violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

Danny L. McDonald
DANNY L. McDONALD
Chairman

83040393468



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1983

Douglas Bregman, Esquire
The Air Rights Building
7315 Wisconsin Avenue
Suite 800 West
Bethesda, Maryland 20814

Re: MUR 1463

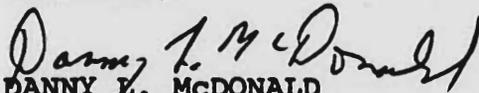
Dear Mr. Bregman:

On September 24, 1982, the Federal Election Commission notified you of a complaint which alleged that your client violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,


DANNY E. McDONALD
Chairman

83040393469



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1983

Douglas Bregman, Esquire
The Air Rights Building
7315 Wisconsin Avenue
Suite 800 West
Bethesda, Maryland 20814

RE: MUR 1463

Dear Mr. Bregman:

On November 9, 1982, the Commission found reason to believe that the Democratic Alliance violated 2 U.S.C. § 433 and, § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your client. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

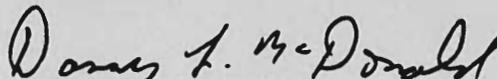
The Commission reminds you, however, that the activity of your client in the federal election process may bring it under the jurisdiction of the Act and subject it to registering and reporting with the Commission pursuant to 2 U.S.C. § 433 and § 434. Further, your client would be subject to all of the other provisions of the Act including the contribution limitations and prohibitions set forth in 2 U.S.C. § 441a. You are also reminded that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

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Douglas Bregman, Esquire
Page Two

If you have any questions, please direct them to Duane A.
Brown at (202)523-5071.

Sincerely,


DANNY L. McDONALD
Chairman

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DAB

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1463
Democratic Alliance (District 26))	
Hoyer for Congress Committee)	
Citizens for Sarbanes Committee)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 15, 1983, the Commission decided by a vote of 6-0 to take no further action and close the file with respect to the Democratic Alliance, Hoyer for Congress Committee and the Citizens for Sarbanes Committee.

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

Attest:

April 15, 1983

Date

Jody C. Pancam

for Marjorie W. Emmons
Secretary of the Commission

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

4-12-83, 3:57
4-13-83, 11:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1463
Democratic Alliance (District 26))	
Hoyer for Congress Committee)	
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April 15, 1983

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Jody C. Pancom

for Marjorie W. Emmons
Secretary of the Commission

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

4-12-83, 3:57
4-13-83, 11:00

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

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In the Matter of)	
)	
Democratic Alliance (District 26))	MUR 1463
Hoyer for Congress Committee)	
Citizens for Sarbanes Committee)	

GENERAL COUNSEL'S REPORT

BACKGROUND

Charles Blumenthal filed a complaint with the Commission on August 19, 1982 alleging that a group calling itself the Democratic Alliance (District 26) and its treasurer, James Searles violated 2 U.S.C. § 441d by distributing a tabloid that failed to include a disclaimer as to who financed the tabloid.

The tabloid consists of pictures of a number of Democratic candidates from Maryland. Several of the individual's pictures are accompanied by what seems to be a synopsis of that individual's political accomplishments. Except for Senator Paul S. Sarbanes, a candidate for the U.S. Senate, and Congressman Steny H. Hoyer, a candidate for the U.S. House of Representatives, all of the individuals whose pictures appear are candidates for state or local offices. It appears that the tabloid is a listing of a slate of candidates which the Democratic Alliance was endorsing for the September 14, 1982 Democratic primary election.

On September 10, 1982 Mr. Blumenthal filed an amendment to the complaint. The amendment contained what appears to be a

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sample ballot which endorses the election of certain candidates including Steny H. Hoyer and Paul S. Sarbanes.

Responses to the complaint and amended complaint were filed by Democratic Alliance (District 26), Hoyer for Congress Committee, and Citizens for Sarbanes Committee.

On November 9, 1982 the Commission found reason to believe that the Democratic Alliance (District 26) violated 2 U.S.C. § 433 and § 434 for failure to register and file reports with the Commission. The Commission deferred action on finding reason to believe that a violation of 2 U.S.C. § 441d occurred. No findings were made as to the Hoyer for Congress Committee and Citizens for Sarbanes Committee.

Democratic Alliance (District 26) responded to the reason to believe notification on January 19, 1983 (Attachment I) and again on January 28, 1983 (Attachment II).

The Office of General Counsel after considering all of the facts in this matter, recommends that the Commission take no further action and close the file.

FACTUAL AND LEGAL ANALYSIS

Democratic Alliance (District 26) is a committee organized in part to support State Democratic candidates in the 26th Legislative District of Prince George's County, Maryland. Democratic Alliance (District 26) has registered and filed reports with the Maryland State Administrative Board of Election Laws. Prior to the Maryland Democratic primary election,

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Democratic Alliance distributed to the general public a tabloid and a sample ballot endorsing a slate of candidates. Except for Paul S. Sarbanes, a candidate for the U.S. Senate, and Steny H. Hoyer, a candidate for the U.S. House of Representatives, all of the individuals who appear on the tabloid and ballot are candidates for state or local offices. The tabloid and ballot contained what is referred to by respondents as an "authority line" which states "Authority: James Searles, Treasurer." The name of the committee, Democratic Alliance (District 26), its address and its telephone number are also contained on the tabloid and ballot.

Democratic Alliance (District 26) claims that it is not a federal committee in that it did not anticipate receiving contributions or making expenditures during the calendar year exceeding \$1,000 for Federal candidates. Democratic Alliance (District 26) is also not a local committee of a political party. Democratic Alliance (District 26) further states that Senator Sarbanes and Congressman Hoyer were featured on the "sample ballot" only insofar as they were on the same ticket with the local candidates (Attachment I).

The facts show that each individual appearing on the sample ballot was assessed a proportionate share of the cost of the publication. Sarbanes made his payment by check from Citizens for Sarbanes to Democratic Alliance. The amount paid was \$700. Hoyer made a \$700 payment by check from the Hoyer for Congress Committee directly to the printer. In a telephone conversation

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with Democratic Alliance (District 26) and the Hoyer Committee, General Counsel staff determined that the cost of postage and dissemination was included in the amount assessed to each participant. It appears that the role of Democratic Alliance (District 26) was limited to organization and dissemination. It does not appear that the Democratic Alliance (District 26) realized any benefit over and above the actual cost paid by the Sarbanes Committee for its proportionate share of the brochure nor does it appear Democratic Alliance (District 26) made any expenditures to the benefit of the Sarbanes committee which went unreimbursed.

When questioned, Democratic Alliance (District 26) answered that it was not affiliated with the other Democratic Alliance committees in Maryland (Attachment II). Democratic Alliance (District 26) stated that the committees are separate and distinct from one another and that the committees do not have a common charter, common officers or common support staff. Democratic Alliance (District 26) states that at no time was there any consultation or coordination between the several committees, since each was formed for the purpose of advancing the campaigns of the state and local candidates in its respective legislative district. The committees almost never endorsed the same candidates since very few candidates were common to the several legislative districts.

2 U.S.C. § 431(4) defines a political committee as an organization which during a calendar year receives contributions

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aggregating in excess of \$1,000 or makes expenditures in excess of \$1,000. The \$700 payment by the Sarbanes Committee (made to Democratic Alliance) could be considered as a contribution to Democratic Alliance (District 26). However, this payment was made specifically so that Sarbanes could be included on the tabloid and ballot. The \$700 payment made by the Hoyer Committee went directly to the printer, however. Accordingly, this payment might be characterized as an expenditure made by Hoyer for Congress for a media expense, rather than as a contribution to Democratic Alliance (District 26). Since both Sarbanes and Hoyer paid a proportionate share of the costs of the tabloid and ballot, in effect, they were participating in a political advertising campaign with Democratic Alliance (District 26).

Although the activity of Democratic Alliance (District 26) raises questions as to whether it is a political committee, the Office of General Counsel recommends that no further action be taken. We make this recommendation because Democratic Alliance (District 26) is a committee organized for state elections purposes, it appears it did not intend to enter into activity which would cause it to become a federal political committee, and, the Hoyer and Sarbanes Committees each paid a proportionate share of the costs for the advertising benefits received. Furthermore, since the Hoyer Committee paid its proportionate share directly to the printer, Democratic Alliance (District 26) can be said to have controlled but \$700 relating to a federal election. Whether the funds paid by Hoyer directly to the

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printer can be attributable to Democratic Alliance (District 26) is questionable.

2 U.S.C. § 441d requires that a disclaimer be affixed to political communications indicating who paid for and authorized the communication. The Hoyer for Congress Committee indicates that the disclaimer was deleted from the tabloid and ballot due to printer inadvertence. The Committee further states that all tabloids and ballots distributed subsequent to those submitted by the complainant had the proper disclaimer. On the other hand, Citizens for Sarbanes asserts that the Act does not require a Federal disclaimer if the expenditures in question are for publications "by a state candidate." In addition, Citizens for Sarbanes states that the "authority line" placed on the tabloid and ballot by Democratic Alliance (District 26) is sufficient in that it is in accordance with state law. Nonetheless, Citizens for Sarbanes indicates that in the future it will require state committees which publish similar literature to include a federal disclaimer.

The "authority line", although possibly meeting the requirements for committees under Maryland state law, does not meet the requirements of 2 U.S.C. § 441d. The "authority line" did not indicate who paid for the communication nor did it state if the communication was authorized by a federal candidate. However, an attempt was made by Democratic Alliance (District 26) to inform the public who was responsible for the tabloid and

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ballot. Democratic Alliance (District 26) listed its name and treasurer and its address and telephone number. Furthermore, the Hoyer for Congress Committee and Citizens for Sarbanes took steps to have a proper 2 U.S.C. § 441d disclaimer affixed to the tabloid and ballot once they found out about the omission. Accordingly, the Office of General Counsel recommends that no further action be taken with regard to a possible 2 U.S.C. § 441d violation.

RECOMMENDATION

The Office of General Counsel recommends that the Commission take no further action and close the file in respect to Democratic Alliance, Hoyer for Congress Committee and Citizens for Sarbanes.

Charles N. Steele
General Counsel

83040393481
April 12, 1983
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Bregman letter of January 19, 1983
2. Bregman letter of January 28, 1983
3. Letter to Doug Bregman
4. Letter to Charles Kerr
5. Letter to Doug Bregman
6. Letter to Charles Blumenthal

ATTACHMENT I

DOUGLAS M. BREGMAN, P.A.
ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

RECEIVED
JAN 20 1983 12

DOUGLAS M. BREGMAN
LAURENCE H. BERBERT

*ADMITTED TO PRACTICE IN MD. DC.
*ADMITTED TO PRACTICE IN MD.

TELEPHONE (301) 656-2707

January 19, 1983

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20681

Duane A. Brown, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1463

Dear Mr. Brown:

Thank you for granting me an extension of time to file this response on behalf of the Democratic Alliance.

I have reviewed all of the materials provided to me by the Democratic Alliance campaign. What I am providing for your review and consideration is information relative to your request.

First, the Democratic Alliance Committee was a small committee registered with the Maryland State Board of Elections. This Committee was a State Committee furthering the candidacies of four specific state officers, a State Senator and three House of Delegates candidates. It was not a federal committee and did not anticipate receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000.00 for Federal candidates. The Committee filed all the required Maryland State reports and reported all contributions and income as required by State law.

Secondly, the Democratic Alliance, when it distributed the brochures in question, did so in the manner of a sample ballot. If you will note on both the large brochure and the small one, all of the candidates have numbered levers by their names. These were specifically placed on this literature as a sample ballot so that the voters would be

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aware of the candidates and their appropriate voting levers when it came time to vote. The two federal candidates, Congressman Hoyer and Senator Sarbanes, were featured only in so far as they were on the same ticket. The committee and its candidates also endorsed a number of other candidates ranging from Governor to court house officials. All of these various office-seekers paid a portion of the pieces of literature endorsing them.

Thirdly, the Democratic Alliance Committee was a separate entity from any other County or State Committee. They did not share staff assistance, office supplies or any other items.

Fourthly, the sample ballot type literature which is in question here was distributed by mailing, door knocking or at the polls. The distribution by door or mailing was done to every registered Democratic household.

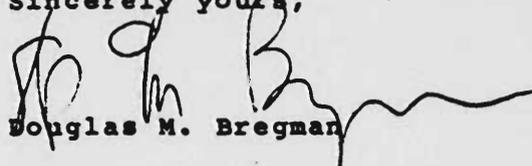
Lastly, both Congressman Hoyer and Senator Sarbanes paid for the cost of their participation in this literature themselves. Mr. Hoyer paid the costs directly to the vendors and Mr. Sarbanes reimbursed the Committee for its costs.

Enclosed are copies of brochures used by the Democratic Alliance which were distributed to all registered Democratic households. As you can see all candidates have lever numbers by their names for voting and were issued as sample type ballots.

If you require any additional information in order to understand this matter, please do not hesitate to contact me. I will be more than happy to assist you with any information available.

Thank you for your cooperation.

Sincerely yours,


Douglas M. Bregman

DMB:pan

cc: Senator Komenda
John McDonough



**ELECT
The 26th District
- DEMOCRATIC
LEGISLATIVE
TEAM**

**CAMPAIGN HEADQUARTERS
6427 Old Branch Ave., Temple Hills, Md. 20748
449-6700**



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☆ VOTE DEMOCRATIC ☆ Democratic Primary Tuesday, September 14, 1982 ☆



State Senator
Frank J. Komenda
Temple Hills

- ☆
- ☆
- ☆
- ☆
- ☆
- ☆
- ☆
- ☆
- ☆
- ☆



Delegate
Frederick Rummage
Camp Springs



Marlan "Midge" Patterson
Candidate
House of Delegates
Temple Hills



Delegate
Chris Jones
Hillcrest Heights

DEMOCRATIC COMMITTEE



Gloria Lawlah
Hillcrest Heights



David Valderrama
Oxon Hill



Bessie Phelps
Oxon Hill

By authority of James Searies, Treasurer

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26th DISTRICT TEAM



STATE SENATE
FRANK KOMENDA



Senator Frank Komenda is a life-long resident of the community comprising the new 26th District. An eight-year veteran in the General Assembly, he was elected to the House of Delegates in 1974, served there until January 1982, and was appointed to fill the unexpired term of retiring Senator Peter Beckett. During his term in the House Frank served on the Economic Matters Committee and chaired the Subcommittee on Interest Rates and Unemployment Insurance.

In the Senate, Frank served on the Budget and Taxation Committee, Automated Income Maintenance Committee and Joint Committee on Energy. For his service in the 1982 session, Frank was honored by the Mental Health Association, the State Fireman's Association and Marlow Heights Elks Club.

Frank has a history of civic service including Jaycees, Sons of Italy, American Legion, Board of Trade, Chamber of Commerce, Cancer Society, Boys Scouts and PTA.

Frank graduated from St. Dominics, Oxon Hill High School, and George Washington University.

HOUSE OF DELEGATES

VOTE FOR ALL THREE



CHRISTINE M. JONES



Christine Jones serves in the House of Delegates, appointed in January 1982. She has been a Democratic precinct chairman, coordinator and delegate to the 1980 Democratic National Convention.

Chris has been a teacher for sixteen years and teaches at Samuel Chase and Clinton Grove Elementary. She is active in the Educator's Association and PTA. She is a member of the National Conference of Christians and Jews, Southern Christian Leadership Conference, Southern Prince George's BPW Club, Delta Sigma Theta and Phi Delta Kappa.

She and her husband, Robert, are members of the Bethlehem Baptist Church and they have a son, Robert, Jr.



MARIAN "MIDGE" PATTERSON



Marian (Midge) Patterson is a member of the Democratic Central Committee and served on the Fourth Congressional District Caucus to select the 1980 National Convention Delegates. She serves on the Board of Review for the State Department of Health and Mental Hygiene, appointed by the Governor in 1980.

Midge, who resides in Temple Hills with her husband, David, is a member of the League of Women Voters, Oxon Hill Democratic Club, John Hanson Women's Democratic Club, the Women's Democratic Club of Prince George's County, the Women's Political Caucus and Southern Maryland BPW Club.



FREDERICK C. RUMMAGE

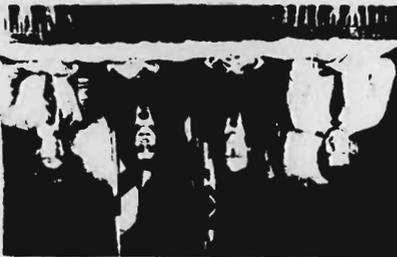


Fred Rummage was first elected to the House of Delegates in 1966 and is seeking his fifth term. Rummage serves as chairman of the Economic Matters Committee, is a key member of the House Leadership and the Rules and Policy Committee and the Governor's advisory group. Rummage served as chairman of the County's House Delegation from 1974 to 1978 and was a member of the Judiciary Committee.

As a committee chairman, Rummage sponsors important bills of the Governor's administration, often consumer protection issues. He resides in Camp Springs with his wife and children.

AUTHORITY: JAMES SEARLES, TREASURER

DEMOCRATIC PRIMARY
SEPTEMBER 14, 1982



DEMOCRATIC
ALLIANCE

FREDERICK C. RUMMAGE
HOUSE OF DELEGATES




MARIAN "MIDGE" PATTERSON
HOUSE OF DELEGATES




CHRISTINE M. JONES
HOUSE OF DELEGATES




FRANK KOMENDA
STATE SENATE




DEMOCRATIC ALLIANCE
26th DISTRICT TEAM



STENY H. HOYER




At age 43, Steny Hoyer is one of Maryland's most energetic and effective political leaders. In 1981, Steny was elected to Congress from Maryland's Fifth District. He served on the House Post Office and Civil Service Committee and House Banking Committee. A resident of Bethesda, Steny is a graduate of the University of Maryland and Georgetown Law Center. Before being elected to Congress, Steny served as State Senator for 12 years. Four years as President of the Maryland Senate.

U.S. CONGRESS

Harry Hughes campaigned for governor in 1978 on a platform emphasizing restoration of integrity to state government and revitalization of the state economy. Hughes had 25 years of prior state service as a Carroll County member of the General Assembly and Congress of the Department of Transportation. His record as legislator included the passing of civil rights legislation and authorship of fiscal programs to aid Maryland's poorer areas.

As Governor, he has successfully sponsored programs including the biggest tax relief plan in state annals and a crackdown on drunk drivers and drug abuse.

HARRY HUGHES



GOVERNOR



DEMOCRATIC ALLIANCE COURT HOUSE TEAM



STATE'S ATTORNEY
ARTHUR A. MARSHALL, JR.

UNOPPOSED

Arthur Marshall was first elected State's Attorney for Prince George's County in 1962. In 1973 he received the "Distinguished Service Award" from the National District Attorney's Association. Arthur served as Vice President of the National District Attorney's Association from 1977-1979.

SHERIFF
JAMES V. ALUISI

16A



James V. Aluisi was elected Sheriff of Prince George's County in 1978 after serving 11 years as Deputy Sheriff and achieving the rank of Captain. In 1980 he received the first Presidential Award in the nation for the Disabled Veterans' Vocational Rehabilitation Program. He earned the Legion of Valor award from the American Law Enforcement Officers' Association in 1978.



C. PHILIP NICHOLS, JR.

UNOPPOSED



STEVEN I. PLATT

UNOPPOSED



DECATUR W. TROTTER

UNOPPOSED



CALLIE MAE HEFFRON REGISTER OF WILLS

UNOPPOSED

Callie Mae Heffron was first elected Register of Wills in 1978. Four years earlier she was elected Judge of the Orphans' Court and in 1970 was the first woman appointed to the County Zoning and Tax Appeals Board. A former chairman of the Prince George's County Heart Fund, she has also been elected to various Parent-Teacher Association offices during the last 12 years.

Norman L. Pritchett was elected Clerk of the Circuit Court in 1978 after being appointed Clerk in 1975. This year he was a co-recipient of the "National Association of Counties Award" for the Juvenile Court Management Program. He took part in the University of Maryland Court Management Institute in 1978 and last year was program chairman for the Prince George's Board of Trade.

CLERK OF THE COURT **NORMAN L. PRITCHETT**



DEMOCRATIC CENTRAL COMMITTEE

VOTE FOR TWO

VOTE FOR ALL FOUR



GLORIA LAWLAH

23B



BESSIE PHELPS

29C



MEL ALEXANDER



AMIEL BLACKSTONE, JR.

UNOPPOSED



MARIE DAVIS

UNOPPOSED



KAY DAWSON

UNOPPOSED



SUZANNE V. HARRIGAN

20A



JOANNE L. O'BRIEN

19B



DAVID M. WILDERRAMA

21B

26th DISTRICT

AT-LARGE

STATE HOUSE

U.S. SENATE

COUNTY OFFICIALS



LT. GOVERNOR
J. JOSEPH CURRAN

J. Joseph Curran, Jr. is a member of the Maryland State Senate and was elected as Governor Harry Hughes' running mate for Lieutenant Governor. He is a veteran of 20 years in the Maryland State Senate and four years in the House of Delegates. A brother of Baltimore City Councilman Martin M. Curran and son of the late Joseph Curran, Sr., City Council administration floor leader in the administration of Baltimore Mayor William Donald Schaefer, he has been chairman of the Senate Judicial Proceedings Committee for 16 years. He is known for his quiet persistence and political courage in combating racial and religious prejudice, the professional gun lobby and special interest groups.



COMPTROLLER
LOUIS L. GOLDSTEIN

Louis Goldstein has held the post of Comptroller of the State of Maryland since 1969. A World War II veteran of the U.S. Marine Corps, Mr. Goldstein received a B.S. degree from Washington College in Chestertown and a Ph.D. degree from the University of Maryland Law School. Born and raised in Prince Frederick, Mr. Goldstein is married and has three children.



ATTORNEY GENERAL
STEPHEN H. SACHS

Stephen H. Sachs was born in Baltimore on January 31, 1934. In 1954, he received a B.A. Degree from Haverford College, won a Fulbright Scholarship to Oxford University, and graduated from Yale Law School in 1960. He was appointed U.S. Attorney for Maryland by President Johnson in 1967 and worked in a private law practice until elected Attorney General in November 1978. He is active in civic organizations and resides in Baltimore with his wife and children.



U.S. SENATE
PAUL S. SARBANES

Senator Paul Sarbanes was elected to the U.S. Senate in 1976. He currently serves on the Banking, Housing and Urban Affairs Committee, Foreign Relations Committee, and Joint Economic Committee. Previously he served three terms in the U.S. House of Representatives and one term in the Maryland House of Delegates.



COUNTY EXECUTIVE
PARRIS GLENDENING

Parris Glendening resides in University Park with his wife, Frances, and son, Raymond. As a member of the County Council for eight years he has recognized expertise in fiscal management. An educator for 16 years, Parris believes in a first-rate educational system. He is a former police commissioner and has fought for more effective law enforcement and has received an endorsement from the Fraternal Order of Police. His community involvement includes Chamber of Commerce, Kiwanis, Knights of Columbus and Jaycees.

A community leader and businessman for over 25 years, Bill Amonett was first elected to the County Council in 1974, was re-elected in 1978, and served as chairman in 1977 and 1979. He also chaired the Council's Budget Committee and the Special Committee on Programs and Services for Youth. Bill is a veteran of the U.S. Air Force and a graduate of Strayer College of Accountancy. He resides in Brandywine with his wife and three daughters. He is a real estate appraiser.



COUNTY COUNCIL
WILLIAM B. AMONETT

13A

8 3 0 4 0 3 9 3 4 8 7



BIOGRAPHY, IN BRIEF

- 8 years in the Maryland General Assembly
- 8 years, Chairman, Vice Chairman, Bi-County Committee, Prince George's Delegation
- Member, Senate Budget and Taxation Committee
- Vice Chairman, Southern Legislative Conference Transportation Committee

- Past Chairman:
 - Statutory Review Committee, Washington Suburban Sanitary Commission
 - House Subcommittee on Interest Rates
 - House Subcommittee on Unemployment Insurance
 - Joint Committee on Economic Development
 - Prince George's Delegation, State Highway Construction Committee
- Former Prince George's Delegation Representative, County General Plan Administrative Coordinating Committee
- Member, American Legion, South Gate Lions Club, Order of the Sons of Italy, Benevolent & Protective Order of Elks, Prince George's County Board of Trade Chamber of Commerce
- Served in the U.S. Army, 1954-1957, Intelligence Corps, American Embassy, Paris
- Resides in Temple Hills; lived in Prince George's County since 1943

26th Legislative District
Democratic Team
6427 Old Branch Avenue
Temple Hills, Md. 20748

Bulk Rate
#5429
Temple Hills, MD
20748



Keep Frank Komenda in the State Senate.

Authority of James Beartes, Treasurer

7

f.i.c.



**SENATOR
FRANK KOMENDA**

Colleagues and Community Leaders Agree—
Keep him in the State Senate for the good of Maryland
and Prince George's County—District 26

8 3 0 4 0 5 9 3 4 8 3



The 26th District Legislative Team opens campaign headquarters in Temple Hills, which Gov. Harry Hughes visited on August 31. Shown here with Sen. Komenda are delegate-candidate Marian "Midge" Patterson, and incumbent delegates Fred Rummage and Chris Jones, who plan to work closely together on constituent concerns in the next Maryland General Assembly.

"Local Democratic appointments have not always been reason for celebration, but, in our opinion, the party's leaders acted wisely in selecting Frank Komenda to fill the State Senate seat left vacant when Peter Bozick resigned.

"...as a delegate to the Maryland General Assembly he was a hard worker and an intelligent legislator. We believe he will continue to serve the people of the (26th) District well." PRINCE GEORGE'S JOURNAL "OPINION" 1/5/82

"It is almost unheard of for a freshman senator to win appointment to the Budget and Taxation Committee, which is regarded as the most prestigious and important one in the Senate." State Senator Thomas V. "Mike" Miller

"Those of us who serve on the Budget and Taxation Committee are very impressed with the speed with which Sen. Komenda has adapted to his new assignments and responsibilities." State Senator Laurence Levitan

Thank you Sen. Komenda for restoring my faith in politicians...

You have helped a burned-out family restore what was damaged after repeated requests for same were made to the management of their apartment project. You answered a simple question of property ownership after I spoke with 14 different departments within the Park and Planning Commission, and got no answer from them. (I really should have called you first.)

You were able to answer within one hour, whether our local elementary school was on the chopping block in the future. Again I should have called you first.

... you have always made me feel that my problems were very important and they seemed to receive first priority. YOU DEFINITELY GET MY VOTE IN SEPTEMBER AND NOVEMBER...

Margaret McLane
Temple Hills

**LEGISLATORS LISTEN WHEN KOMENDA SPEAKS.
HE IS A LEADER LAUDED FOR HIS INTEGRITY, IDEAS,
SOLUTIONS, AND ABILITY TO WORK WITH OTHERS.**



**Respected
and Responsible—**

FRANK KOMENDA IS THE KIND OF LEADER THAT PRINCE GEORGE'S COUNTY DESERVES

"Sen. Komenda...an invaluable supporter of many of the most important initiatives of the session."
Governor Harry R. Hughes

"SEN KOMENDA...a pragmatic, do-your-homework, conciliatory style of legislating in keeping with the Senate's sense of decorum."
PRINCE GEORGE'S POST

"Most underrated legislator—Gets the job done in a low-key way."
BOWNE BLADE NEWS 8/21/80

"Perfect attendance and third most active member in the Maryland General Assembly."
AP Study, THE SUN 1/11/78

"Komenda has proven himself to his constituents to be *one of the hardest working, most conscientious and honest delegates in Annapolis*. The legislative bills he has introduced have been "consumer oriented."
**Former President Anthony M. Domenico
Prince George's Life Underwriters Association, Inc.**

"... he has been singularly even-handed with insurance bills, never fearing to vote against or chastise industry for producing bills which would give them unfair advantage over consumers."
**Edward J. Birrane
Insurance Commissioner**

"Komenda's international banking zones to improve Maryland's commerce image."
THE DAILY RECORD 3/28/1

SEN. KOMENDA'S ENDORSEMENTS

AFSCME Local 2250
Prince George's County COPE
Metropolitan Washington Labor Council
Maryland State and D.C. AFL/CIO
Maryland State Chamber of Commerce
BIZ PAK Prince George's Chamber of Commerce
United Food and Commercial Workers' Union
Maryland Classified Employees' Association
Prince George's County Educators' Association
Fraternal Order of Police
Maryland Professional Fire Fighters' Association
ABC-Active Ballot Club
Maryland Committee for Affordable Housing

FRANK KOMENDA IS BUILDING FISCAL INTEGRITY IN MARYLAND BECAUSE HE KNOWS THAT AS \$250 MILLION IN FEDERAL FUNDING ARE PULLED FROM THE STATE IN THE NEXT FISCAL YEAR, PROGRAMS FOR SENIOR CITIZENS, THE DISABLED, THE HANDICAPPED AND PROGRAMS IN PUBLIC SAFETY, HEALTH, AND EDUCATION COULD BE SERIOUSLY DIMINISHED.

FRANK KOMENDA CAN BE COUNTED ON TO HELP THE STATE ASSUME RESPONSIBILITY FOR THESE PROGRAMS AND ITS PEOPLE.

From the people to Sen. Komenda...

CITATIONS FOR COMMUNITY SERVICE

Marlow Heights Elks Club
Elks' Lodge #2332
Ft. Washington Marina Award
Greater Southeast Community Hospital
Sons of Italy Certificate of Merit
Young Democratic Club
Chinese American Award for Outstanding
Legislative Achievements
Southern Prince George's County
Conference of Civic Associations—
Outstanding Citizen-Business Award
Maryland Jaycee Outstanding Young
Man—1965
Jaycees Life Member and Jaycee
International Senator
VFW Award
Fraternal Order of Police Appreciation
Award
Hilcrest-Marlow Heights Lions Certificate
of Appreciation
Oxon Hill Kiwanis Club Certificate of
Appreciation

COMMENDATIONS

Mental Health Association for valuable
service on behalf of the mentally ill
Maryland State Firemen's Association for
help during the 1982 legislative session
Maryland State Music Teachers
Association for outstanding contribution
Maryland Hospital Education Institute for
"lasting and significant contributions to
the betterment of community hospital
care for the people of Maryland"
American Cancer Society for service and
appreciation as president, Prince
George's County Unit
Prince George's County Council
Outstanding Service Award for
Chairmanship of Charter Review
Committee
United Cerebral Palsy Humanitarian
Service Award

...a special thanks

For the past year, the Beltway road near our neighborhood had deep pot holes which were causing a great deal of disturbances to our homes.

The Northbound lane, one mile south of the Branch Avenue exit, was so poor that when trucks ran over the pot holes the vibrations would literally shake our houses and cause damage.

In April, the neighbors began calling the State Highway Administration in Greenbelt to have them repair the Beltway. All we received was the "run around" and very little cooperation.

We then decided to contact Sen. Frank Komenda to see if he would assist us. He, in turn, wrote the State Highway Administration and within three weeks the Beltway area was repaired.

The citizens of Prince George's County need more public officials like Sen. Komenda to do their jobs by responding within a reasonable period of time and who follow through on our requests.

Again, a special thanks to Sen. Frank Komenda.

Mr. and Mrs. Delbert R. Smith
Mrs. Virginia Cope
Mr. and Mrs. Kenton Hancock
Mr. and Mrs. Roderick Perry
Mrs. Romona Solomon
Mr. and Mrs. Abel Ortuno

03040393491

207 915
ATTACHMENT II

83 JAN 31 P 2
CCH 9

DOUGLAS M. BREGMAN, P.A.
ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814
TELEPHONE (301) 656-2707

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *
*ADMITTED TO PRACTICE IN MD, DC
*ADMITTED TO PRACTICE IN MD

PRINCE GEORGE'S CO
10210 GREENBELT
SUITE 700
SEABROOK, MARYLAND

January 28, 1983

Duane A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1463

Dear Mr. Brown:

You have recently asked for information in two specific areas. What follows is my response to these requests.

1. What was spent for the dissemination of the ballot-type materials about which we have been talking?

a. Postage

August 31, 1982.....\$1,171.98
September 15, 1982...\$1,171.98

b. Those who delivered and handed out these materials were all volunteers. There was no cost.

2. Did the Democractic Alliance have a common charter with any other political committee?

The simple answer is, NO. The Committee was separate and distinct from other committees. There was no common charter or statement of purpose. Occasionally, Senator Komenda of the Democractic Alliance, 26th District, would speak with other senators in Prince George's County about their campaigns. However, there was no pledge of coordination.

83040393492

JAN 31 P 3: 32

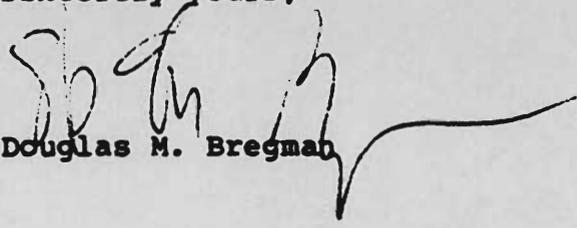
(11)

Page Two

I hope that this information is sufficient to allow you to finalize this matter.

Please let me know if you need anything further.

Sincerely yours,


Douglas M. Bregman

DMB:lsg

cc: John McDonough

83040393473



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas Bregman, Esquire
The Air Rights Building
7315 Wisconsin Avenue
Suite 800 West
Bethesda, Maryland 20814

Re: MUR 1463

Dear Mr. Bregman:

On September 24, 1982, the Federal Election Commission notified you of a complaint which alleged that your client violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202) 523-5071.

Sincerely,

83040393494

Attachment IV



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Charles M. Kerr, Treasurer
Citizens for Sarbanes
1800 Mercantile Bank
& Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

Re: MUR 1463

Dear Mr. Kerr:

On September 24, 1982, the Federal Election Commission notified you of a complaint which alleged that your committee violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

83040393495

(H)

ATTACHMENT V



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas Bregman, Esquire
The Air Rights Building
7315 Wisconsin Avenue
Suite 800 West
Bethesda, Maryland 20814

RE: MUR 1463

Dear Mr. Bregman:

On November 9, 1982, the Commission found reason to believe that the Democratic Alliance violated 2 U.S.C. § 433 and, § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your client. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you, however, that the activity of your client in the federal election process may bring it under the jurisdiction of the Act and subject it to registering and reporting with the Commission pursuant to 2 U.S.C. § 433 and § 434. Further, your client would be subject to all of the other provisions of the Act including the contribution limitations and prohibitions set forth in 2 U.S.C. § 441a. You are also reminded that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

83040393496

(B)

Douglas Bregman, Esquire
Page Two

If you have any questions, please direct them to Duane A.
Brown at (202)523-5071.

Sincerely,

83040393497

ATTACHMENT VI



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Charles S. Blumenthal
9205 Oxon Hill Road
Fort Washington, Maryland 20744

Re: MUR 1463

Dear Mr. Blumenthal:

This is in reference to the complaint you filed with the Commission on August 19, 1982 concerning a tabloid and sample ballot distributed by Democratic Alliance (District 26).

After conducting an investigation in this matter, the Commission determined there was reason to believe that Democratic Alliance (26th District) violated 2 U.S.C. § 433, § 434, but took no action against Citizens for Sarbanes and the Hoyer for Congress Committee. However, after considering the circumstances of this matter the Commission determined to take no further action and close its file. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

The file number in this matter is MUR 1463. If you have any questions, please contact Duane A. Brown, the attorney assigned this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

83040393498

204137

RECEIVED THE FEC
Ccc# 9567

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

(301) 244-7400

RICHARD M. VENABLE (1838-1910)
EDWIN G. BAETJER (1888-1945)
CHARLES McH. HOWARD (1870-1942)

WASHINGTON, D.C. OFFICE
VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004
(202) 783-4300

WRITER'S DIRECT NUMBER IS

244-7544

CHARLES M. KERR

February 23, 1983

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

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

Re: MUR_1463

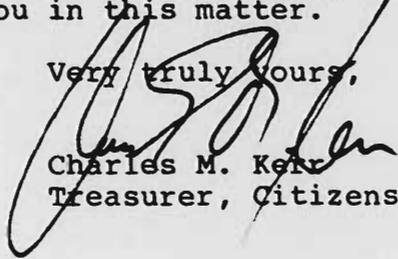
Dear Mr. Brown:

This letter is intended to confirm our telephone conference yesterday with regard to the above FEC Complaint.

You inquired whether the \$700 amount paid by Citizens for Sarbanes to the District 26 Democratic Alliance included reimbursement by the Sarbanes Committee to the Alliance for all costs, including mailing and delivery costs as well as printing costs, or if this sum reflected printing costs only. Our records indicate that the \$700 amount was all-inclusive, i.e., it reflected our Committee's agreed-upon proportionate share of the total cost of the tabloid, door-knocking literature, and sample ballot, including mailing and distribution costs.

Please let me know if our Committee can be of any further assistance to you in this matter.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

83040393479

25 P 2:45

CMK

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

1800 MERCANTILE BANK & TRUST BUILDING

8 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201



CERTIFIED

P 415 942 970

MAIL

**CERTIFIED MAIL/RETURN
RECEIPT REQUESTED**

**Mr. Duane Brown
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463**

8304039100

203 415

RECEIVED THE REC
83 JAN 31 P 2: 32
800 9429

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

*ADMITTED TO PRACTICE IN MD, D.C.
*ADMITTED TO PRACTICE IN MD

TELEPHONE (301) 656-2707

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20681

January 28, 1983

Duane A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1463

Dear Mr. Brown:

You have recently asked for information in two specific areas. What follows is my response to these requests.

1. What was spent for the dissemination of the ballot-type materials about which we have been talking?

a. Postage

August 31, 1982.....\$1,171.98
September 15, 1982...\$1,171.98

b. Those who delivered and handed out these materials were all volunteers. There was no cost.

2. Did the Democractic Alliance have a common charter with any other political committee?

The simple answer is, NO. The Committee was separate and distinct from other committees. There was no common charter or statement of purpose. Occasionally, Senator Komenda of the Democractic Alliance, 26th District, would speak with other senators in Prince George's County about their campaigns. However, there was no pledge of coordination.

83040393501

JAN 31 P 3: 32

Page Two

I hope that this information is sufficient to allow you to finalize this matter.

Please let me know if you need anything further.

Sincerely yours,



Douglas M. Bregman

DMB:lsg

cc: John McDonough

83040593502

83040393503

DOUGLAS M. BREGMAN, P.A.
ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814



Dennis A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Occ # 9374
20
p 3: 12

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW

THE AIR RIGHTS BUILDING

7315 WISCONSIN AVENUE

SUITE 800 WEST

BETHESDA, MARYLAND 20814

TELEPHONE (301) 656-2707

January 19, 1983

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

*ADMITTED TO PRACTICE IN MD. D.C.
*ADMITTED TO PRACTICE IN MD

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20801

Duane A. Brown, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1463

Dear Mr. Brown:

Thank you for granting me an extension of time to file this response on behalf of the Democratic Alliance.

I have reviewed all of the materials provided to me by the Democratic Alliance campaign. What I am providing for your review and consideration is information relative to your request.

First, the Democratic Alliance Committee was a small committee registered with the Maryland State Board of Elections. This Committee was a State Committee furthering the candidacies of four specific state officers, a State Senator and three House of Delegates candidates. It was not a federal committee and did not anticipate receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000.00 for Federal candidates. The Committee filed all the required Maryland State reports and reported all contributions and income as required by State law.

Secondly, the Democratic Alliance, when it distributed the brochures in question, did so in the manner of a sample ballot. If you will note on both the large brochure and the small one, all of the candidates have numbered levers by their names. These were specifically placed on this literature as a sample ballot so that the voters would be

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aware of the candidates and their appropriate voting levers when it came time to vote. The two federal candidates, Congressman Hoyer and Senator Sarbanes, were featured only in so far as they were on the same ticket. The committee and its candidates also endorsed a number of other candidates ranging from Governor to court house officials. All of these various office-seekers paid a portion of the pieces of literature endorsing them.

Thirdly, the Democratic Alliance Committee was a separate entity from any other County or State Committee. They did not share staff assistance, office supplies or any other items.

Fourthly, the sample ballot type literature which is in question here was distributed by mailing, door knocking or at the polls. The distribution by door or mailing was done to every registered Democratic household.

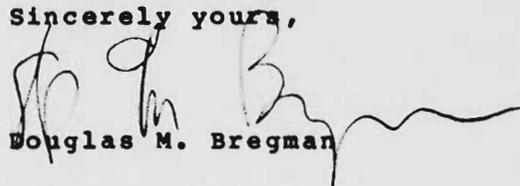
Lastly, both Congressman Hoyer and Senator Sarbanes paid for the cost of their participation in this literature themselves. Mr. Hoyer paid the costs directly to the vendors and Mr. Sarbanes reimbursed the Committee for its costs.

Enclosed are copies of brochures used by the Democratic Alliance which were distributed to all registered Democratic households. As you can see all candidates have lever numbers by their names for voting and were issued as sample type ballots.

If you require any additional information in order to understand this matter, please do not hesitate to contact me. I will be more than happy to assist you with any information available.

Thank you for your cooperation.

Sincerely yours,


Douglas M. Bregman

DMB:pam

cc: Senator Komenda
John McDonough

File



40393545

SENATOR
FRANK KOMENDA

**Colleagues and Community Leaders Agree—
Keep him in the State Senate for the good of Maryland
and Prince George's County—District 26**

★ VOTE DEMOCRATIC ★ Democratic Primary Tuesday, September 14, 1962 ★

8304039380



State Senator
Frank J. Komenda
Temple Hills

- ★
- ★
- ★
- ★
- ★
- ★
- ★
- ★
- ★
- ★



Delegate
Frederick Rammage
Camp Springs



Marian "Midge" Patterson
Candidate
House of Delegates
Temple Hills



Delegate
Chris Jones
Hillcrest Heights

DEMOCRATIC COMMITTEE



Gloria Lawiah
Hillcrest Heights



David Valderrama
Oxon Hill



Bessie Phelps
Oxon Hill

8
9
5
3
4
0
3
0
6



HUNTER
STANLEY
CHAMBER

CHAMBER

CHAMBER

ELECT
The 26th District
DEMOCRATIC
LEGISLATIVE
TEAM

DEMOCRATIC

CAMPAIGN HEADQUARTERS

6427 Old Branch Ave., Temple Hills, Md. 207

449-6700



8 3 0 4 0 3 9 3 5 0 9
DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW

THE AIR RIGHTS BUILDING

7315 WISCONSIN AVENUE

SUITE 800 WEST

BETHESDA, MARYLAND 20814

Duane A. Brown, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Democratic Alliance Committee) MUR 1463

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 14, 1983, the Commission approved by a vote of 5-0 the respondent's request for an extension of time until January 17, 1983, to respond to the Commission's notification.

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

Attest:

1-17-83
Date

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

83040393510

Received in Office of Commission Secretary: 1-12-83, 12:58
Circulated on 48 hour tally basis: 1-12-83, 4:00

January 12, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1463

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

Attachment

cc: Brown

33040393511



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 12 P12: 58

January 12, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: Request for Extension of Time to Respond to
Commission Notification - MUR 1463

SENSITIVE

Douglas Bregman, attorney for the respondent Democratic Alliance Committee submitted a request for an extension of time on January 9, 1983, to respond to the Commission's notification. His request was submitted through a staff paralegal who indicated that Mr. Bregman is presently in Mexico on business and not expected to return before January 13, 1983.

By letter dated December 14, 1982, Mr. Bregman submitted a previous request for an extension of time to respond in order that he could familiarize himself with the facts of this case.

The Office of General Counsel recommends under the circumstances that the Commission grant respondent's request for an extension of time until January 17, 1983.

Attachment
Letter from Respondent's Counsel

33040393510

203742
ATTACHMENT

RECEIVED AT THE FEC
GCC #9300
83 JAN 10 P 3: 27

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW

THE AIR RIGHTS BUILDING

7315 WISCONSIN AVENUE

SUITE 800 WEST

BETHESDA, MARYLAND 20814

TELEPHONE (301) 656-2707

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

* ADMITTED TO PRACTICE IN MD. DC
* ADMITTED TO PRACTICE IN MD

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20681

January 6, 1983

Duane A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1463

Dear Mr. Brown:

I am, on behalf of the law office of Douglas M. Bregman, P.A., requesting that we be granted an extension of time to file a response on behalf of the Democratic Alliance regarding MUR 1463 until January 17, 1983.

Mr. Bregman is out of town on business and will not be back in the office until January 13, 1983. He has other individuals looking into and gathering the information which was requested by Mr. Kenneth Gross last week. He can have all of this information and a response to the complaint in your office by January 17, 1983. If this extension can not be granted, I would greatly appreciate hearing from your office.

If I do not hear from your office in the next few days, I will assume that the extension has been granted and Mr. Bregman will take care of this matter immediately upon his return to the office.

Thank you for your anticipated cooperation in this regard.

Sincerely yours,

Linda S. Mericle
Paralegal

LSM:lsg

83040393515

JAN 10 1983

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600 # 9300
83 JAN 10 10:35 AM

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20801

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

*ADMITTED TO PRACTICE IN MD. D.C.
*ADMITTED TO PRACTICE IN MD

TELEPHONE (301) 656-2707

January 6, 1983

Duane A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1463

Dear Mr. Brown:

I am, on behalf of the law office of Douglas M. Bregman, P.A., requesting that we be granted an extension of time to file a response on behalf of the Democratic Alliance regarding MUR 1463 until January 17, 1983.

Mr. Bregman is out of town on business and will not be back in the office until January 13, 1983. He has other individuals looking into and gathering the information which was requested by Mr. Kenneth Gross last week. He can have all of this information and a response to the complaint in your office by January 17, 1983. If this extension can not be granted, I would greatly appreciate hearing from your office.

If I do not hear from your office in the next few days, I will assume that the extension has been granted and Mr. Bregman will take care of this matter immediately upon his return to the office.

Thank you for your anticipated cooperation in this regard.

Sincerely yours,

Linda S. Mericle
Paralegal

LSM:lsg

63040393514

JAN 10 1983

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW

THE AIR RIGHTS BUILDING

7315 WISCONSIN AVENUE

SUITE 800 WEST

BETHESDA, MARYLAND 20814

RECEIVED AT

83 JAN 10 P 3

James A. Brown, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

8304039315

E3

CCA 9119

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

* ADMITTED TO PRACTICE IN MD. D.C.
* ADMITTED TO PRACTICE IN MD.

TELEPHONE (301) 656-2707

PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE-220
SEABROOK, MARYLAND 20801

December 14, 1982

DEC 14 1982
11:33

Duane A. Brown, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1463

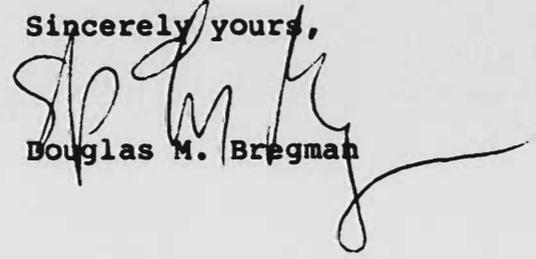
Dear Mr. Brown:

As I explained to you by telephone late last week, I am in the process of familiarizing myself with the activities of the Democratic Alliance (26th District). I do not, at this point, know enough about that group's political involvement to assist in resolving the matter posed in Mr. Reiche's letter dated November 17, 1982.

Accordingly, would you please withhold any further action for a short period of time. Once I have gathered the information needed, I will immediately contact you.

Thank you for your cooperation.

Sincerely yours,



Douglas M. Bregman

DMB:pam
cc: Senator Komenda
James Searles
John McDonough

33040393516

830403925
DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW

THE AIR RIGHTS BUILDING

7315 WISCONSIN AVENUE

SUITE 800 WEST

BETHESDA, MARYLAND 20814

Duane A. Brown, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

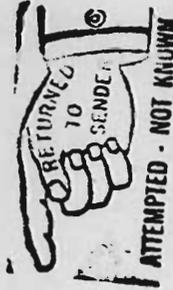
83040393518

6427 Old Branch Avenue

resent 11/30/62

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use: \$300



Mr. James Searles, Treasurer
Democratic Alliance (26th District)
Temple Hills, Maryland 20031



POSTAGE AND FEES PAID

PERSONAL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 17, 1982

James Searles, Treasurer
Democratic Alliance (26th District)
Temple Hills, Maryland 20031

Re: MUR 1463

Dear Mr. Searles:

The Federal Election Commission notified you on September 3, 1982, of a complaint which alleges that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on November 9, 1982, determined that there is reason to believe that your committee has violated 2 U.S.C. § 433 and § 434, provisions of the Act. Specifically, it appears that the activity of your committee in the federal election process may bring it under the Act and, thereby, subject it to the registration and reporting requirements pursuant to 2 U.S.C. §§ 433 and 434.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

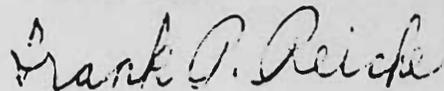
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James Searles
Page Two

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 that you wish the matter to be made public.

If you have any questions, please contact Duane A. Brown, the attorney, assigned to this matter at 523-5071.

Sincerely,



Frank P. Reiche
Chairman, for the
Federal Election Commission

Enclosures
Procedures

83040393521

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Democratic Alliance) MUR 1463
Hoyer for Congress Committee)
Citizens for Sarbanes)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on November 9, 1982, do hereby certify that the Commission took the following actions in MUR 1463:

1. Decided by a vote of 5-0 to
 - a) find reason to believe that Democratic Alliance (District 26) violated 2 U.S.C. §433 and §434;
 - b) request the Office of General Counsel to ascertain what type of Committee the Democratic Alliance is; and
 - c) request the Office of General Counsel to send appropriate letters pursuant to this decision.

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

2. Decided by a vote of 5-0 to defer action with respect to the General Counsel's recommendations for finding reason to believe that violations of 2 U.S.C. §44ld ocured in this matter.

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

Attest:

11-10-82
Date

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

33040393522



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS, *mwe* JAN SAVAGE *J*

DATE: NOVEMBER 5, 1982

SUBJECT: OBJECTION - MUR 1463 First General
Counsel's Report dated October 26, 1982

You were notified previously of an objection by
Commission Harris.

Commissioner Aikens submitted an additional objection
November 5, 1982 at 11:03.

This matter will be discussed in executive session
on Tuesday, November 9, 1982.

83040393520



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS, *MWE* JAN SAVAGE *J*

DATE: NOVEMBER 5, 1982

SUBJECT: COMMENTS RE: MUR 1463

Attached is a copy of Commissioner McDonald
vote sheet with comments regarding MUR 1463.

83040393524

Attachment:
copy of vote sheet



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
SENSITIVE
82 NOV 5 11:11

Date & Time Transmitted: WEDNESDAY, 11-3-82, 11:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY FRIDAY, NOVEMBER 5, 1982, 11:00

SUBJECT: MUR 1463 -- First General Counsel's Report dated
October 26, 1982

() I approve the recommendation in the attached report.

() I object to the recommendation.

COMMENTS: NO VOTE DUE TO ABSENCE ON 11/4 AND HRS MADE QUESTIONS
ON REPORT.

Date: 11-4-82

Signature: D. J. [unclear]

ALL BALLOTS MUST BE SIGNED AND DATED. PLEASE RETURN ONLY THE BALLOT TO THE
COMMISSION SECRETARY. PLEASE RETURN THE BALLOT NO LATER THAN THE DATE AND
TIME SHOWN ABOVE.

From the Office of the Commission Secretary

8504059



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JAN SAVAGE *JS*

DATE: NOVEMBER 3, 1982

SUBJECT: OBJECTION - MUR 1463 First General
Counsel's Report dated October 26, 1982

The above-named document was circulated to the
Commission on November 3, 1982 at 11:00.

Commissioner Harris submitted an objection on this
date.

This matter will be placed on the agenda for the
executive session of Tuesday, November 9, 1982.

83040393526



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JAN SAVAGE *S*

DATE: NOVEMBER 3, 1982

SUBJECT: COMMENTS RE: MUR 1463

Attached is a copy of Commissioner Harris
vote sheet with comments regarding MUR 1463.

83040593527

Attachment:
copy of vote sheet

November 2, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1463

Please have the attached Expedited First General
Counsel's Report distributed to the Commission on PINK
paper in accordance with the expedited compliance procedures.

Thank you.

Attachment

cc: Brown

33040693519

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 NOV 2 8 5: 11

EXPEDITED FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:
10/26/82

MUR 1463
DATE COMPLAINT RECEIVED
BY OGC: 08/19/82
DATE OF NOTIFICATION TO
RESPONDENT: 08/27/82
09/24/82
STAFF MEMBER: Duane A. Brown

COMPLAINANT'S NAME: Charles S. Blumenthal

RESPONDENTS' NAME: Democratic Alliance
Hoyer for Congress Committee
Citizens for Sarbanes

RELEVANT STATUTE: 2 U.S.C. § 433, § 434, § 441d

INTERNAL REPORTS CHECKED: Hoyer and Sarbanes

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Charles Blumenthal filed a complaint with the Commission on August 19, 1982 (Attachment I) alleging that a group calling itself the Democratic Alliance (District 26) and its treasurer, James Searles have violated 2 U.S.C. § 441d by distributing a tabloid that failed to include a disclaimer as to who financed the tabloid. Mr. Blumenthal also alleges that financing of the tabloid may stem in part from corporate contributions.

The tabloid consists of pictures of a number of Democratic candidates from Maryland. Several of the individual's pictures

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are accompanied by what seems to be a synopsis of that individual's political accomplishments. Except for Senator Paul S. Sarbanes, a candidate for the U.S. Senate, and Congressman Steny H. Hoyer, a candidate for the U.S. House of Representatives, all of the individuals whose pictures appear are candidates for state or local offices. It appears that the tabloid is a listing of a slate of candidates which the Democratic Alliance was endorsing for the September 14, 1982 Democratic primary election.

On September 10, Mr. Blumenthal filed an amendment to his complaint (Attachment II). The amendment contained what appears to be a sample ballot which endorses the election of certain candidates including Steny H. Hoyer and Paul S. Sarbanes.

On September 15 we received a response from James Searles, Treasurer of Democratic Alliance (Attachment III). A response was received from the Hoyer for Congress Committee on September 15 (Attachment IV) and from the Citizens for Sarbanes Committee on October 13 (Attachment V). ^{1/}

Although possible violations of the Federal Election Campaign Act of 1971, as amended, may have occurred, the Office of General Counsel recommends that the Commission not pursue this matter. Democratic Alliance is a group organized primarily for state election purposes, there appears to have been a good faith

^{1/} Although counsel responded for the Hoyer for Congress Committee, a designation of counsel statement, has not been filed as required by 11 C.F.R. § 111.23.

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effort to comply with the law, and the amount of money involved appears to be minimal.

FACTUAL AND LEGAL ANALYSIS

Democratic Alliance (District 26) is a state political committee organized in part to support State Democratic candidates in the 26th Legislative District of Prince George's County, Maryland. 2/ Prior to the Maryland Democratic primary election, Democratic Alliance distributed to the general public a tabloid and a sample ballot endorsing a slate of candidates. 3/ Except for Paul S. Sarbanes, a candidate for the U.S. Senate, and Steny H. Hoyer, a candidate for the U.S. House of Representatives, all of the individuals who appear on the tabloid and ballot are candidates for state or local offices. The tabloid and ballot contained what is referred to by respondents as an "authority line" which states "Authority: James Searles,

2/ Office of General Counsel staff called the Maryland State Administrative Board of Election Laws with regard to Democratic Alliance (District 26). The Maryland Election Board stated that Democratic Alliance has registered and files reports with the Election Board.

3/ The response received from the Sarbanes Committee indicates that six other committees organized by legislative districts in Maryland may also have distributed tabloids and ballots similar to the one distributed by Democratic Alliance (District 26). The Maryland Election Board confirms that there are committees which have registered and are reporting as separate entities for Districts 21, 22, 23, 24, 25 and 27. All of the committees are named Democratic Alliance followed by the appropriate district number.

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Treasurer." The name of the committee, Democratic Alliance (District 26), its address and its telephone number are also contained on the tabloid and ballot.

The responses to the complaint indicate that both Mr. Sarbanes and Mr. Hoyer paid for a prorated portion of the printing costs of the tabloid and ballot. ^{4/} Sarbanes made his payment by check from Citizens for Sarbanes to Democratic Alliance. The amount paid was \$700. Hoyer made his payment by check from the Hoyer for Congress Committee directly to the printer. The amount paid is not known.

The issues confronting the Commission are whether for federal election purposes, Democratic Alliance is a political committee required to report and register with the Commission and whether a proper disclaimer was affixed to the tabloid and ballot.

2 U.S.C. § 431(4) defines a political committee as an organization which during a calendar year receives contributions aggregating in excess of \$1,000 or makes expenditures in excess of \$1,000. If the organization is a local committee of a political party it is not a political committee until it receives contributions in excess of \$5,000, or makes payments exempted from the definition of contribution or expenditure by 2 U.S.C.

^{4/} The total printing and distribution costs of the tabloid and ballot are not known.

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§ 431(8) and (9) in excess of \$5,000, 5/ or makes contributions or expenditures aggregating in excess of \$1,000. Mr. Searles does not indicate if Democratic Alliance is a local committee of the Democratic party. However, the nature of the activities of Democratic Alliance, endorsing certain Democratic candidates over other Democratic candidates, suggests that it is not a local committee of the Democratic party.

Assuming that the prorated share contributed by the Hoyer for Congress Committee was at least equal to the \$700 contributed by Citizens for Sarbanes, Democratic Alliance would have received in excess of \$1,000 in contributions. Democratic Alliance would also have made expenditures for printing and distribution costs associated with the tabloid and ballot in excess of \$1,000. 6/ Accordingly, Democratic Alliance, by receiving contributions and making expenditures in excess of \$1,000, was required to register

5/ Certain exceptions to the definitions of contributions and expenditures relevant to activities of a local committee of a political party are contained in 2 U.S.C. § 431(8)(B)(v) and 2 U.S.C. § 431(9)(B)(iv). Those exceptions deal with the payment by a local committee of a political party of the costs associated with a printed slate card or sample ballot. Generally, this type of activity occurs in a general election, but the Act and regulations do not restrict it from also occurring in a primary election.

6/ It should be noted that the \$700 amount paid by the Sarbanes campaign represents its valuation of the costs of printing alone. Presumably, there were some preparation and postage costs as well. Although the extent of distribution of the tabloid and sample ballot is unknown, these additional costs may have been enough so that, coupled with the \$700 amount expended on behalf of Sarbanes alone, the \$1,000 threshold for political committee status was reached.

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and report with the Commission. 7/ Thus, we recommend that the Commission find reason to believe that Democratic Alliance violated 2 U.S.C. § 433 and § 434. 8/ However, since Democratic Alliance appears to have been operating in good faith, since it was organized for state election purposes, and since the amount

7/ Citizens for Sarbanes contends that the "coat tails" exemption of 2 U.S.C. § 431(8)(B)(xi) would permit Democratic Alliance to incur expenses for campaign materials which include information on or reference to Federal candidates without triggering the registration or limitation provisions of the Act. The Office of General Counsel is of the position that 2 U.S.C. § 431(8)(B)(xi) does not apply, however. It appears that the activities of Democratic Alliance go beyond the scope intended by 2 U.S.C. § 431(8)(B)(xi). The activities of Democratic Alliance are those of a committee and not just a coalition of candidates for state and local office who have joined together to publicize their respective elections. Further, it is questionable whether the tabloid and ballot were campaign materials used solely in connection with volunteer activities and which were not distributed through direct mail or similar types of general public communication.

8/ If Democratic Alliance received contributions in excess of \$5,000 or corporate monies there are also potential violations of 2 U.S.C. § 441a(f) and 2 U.S.C. § 441b respectively. Further, if Democratic Alliance made contributions to an authorized political committee of a candidate in excess of \$1,000 or to another political committee in excess of \$5,000 a potential 2 U.S.C. § 441a(a)(1) violation exists. This is a possibility since the printing and distribution costs prorated to each of the Hoyer and Sarbanes campaigns may have exceeded \$1,000. Because of the coordination between Democratic Alliance and the Hoyer and Sarbanes committees the expenditures made by Democratic Alliance would be considered in-kind contributions pursuant to 11 C.F.R. § 109.1. Also, if Democratic Alliance has made an excessive in-kind contribution then the Sarbanes and Hoyer committees would have violated 2 U.S.C. § 441a(f) for receipt of such contributions. Further, if all of the Democratic Alliance (legislative district) committees registered with the Maryland Election Board are political committees as defined by 2 U.S.C. § 431(4) the possibility exists that they are affiliated pursuant to 2 U.S.C. § 441a(a)(5) and their aggregate activity is subject to the limitations applied to a single committee. 2 U.S.C. § 441a(a).

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of money involved in federal election activity is minimal we recommend that no further action be taken.

2 U.S.C. § 441d requires that a disclaimer be affixed to political communications indicating who paid for and authorized the communication. The responses to the complaint indicate that although Democratic Alliance included an "authority line" for itself on the tabloid and ballot, no disclaimers were included for the Hoyer or Sarbanes campaigns. The Hoyer for Congress Committee and Citizens for Sarbanes explain that their disclaimers were inadvertently left off the tabloid and ballot because of a printer's error, but were reinserted when the error was discovered.

The "authority line" mentioned by Democratic Alliance does not meet the requirements of 2 U.S.C. § 441d. It merely states "Authority: James Searles, Treasurer." It does not indicate who paid for the communication nor does it state if the communication was authorized by a federal candidate. Accordingly, we recommend that the Commission find reason to believe that Democratic Alliance violated 2 U.S.C. § 441d. However, we also recommend that the Commission take no further action with regard to this violation. Although the disclaimer affixed by Democratic Alliance may have been inadequate, an attempt was made to inform the public who was responsible for the tabloid and ballot. This is especially true since the committee not only listed its name and treasurer but also listed its address and telephone number.

B 3 0 4 0 3 9 3 5 3 6

8 3 0 4 0 3 9 3 5 3 7

With regard to Citizens for Sarbanes and the Hoyer for Congress Committee we also recommend that the Commission find reason to believe that 2 U.S.C. § 441d was violated, but take no further action. Since the printing of the tabloid and ballot was a joint effort between Democratic Alliance and the Sarbanes and Hoyer campaigns, and since the Sarbanes and Hoyer committees paid for their prorated share of the printing costs, 9/ the Sarbanes and Hoyer Committees were responsible to assure that a proper disclaimer was affixed to the communications indicating that they authorized and paid for them. However since the disclaimers were left off due to a printer's error and since Citizens for Sarbanes and the Hoyer for Congress Committee took steps to correct this situation when they found out about it, we recommend that the matter not be pursued.

CONCLUSION

In sum, although potential violations of the Act may have occurred in this matter we are recommending that the Commission not take action against the parties involved. Democratic Alliance appears to be a state committee which by its actions has unwittingly brought itself under the jurisdiction of Federal campaign laws. The amount of money involved is minimal. Enforcement of the Act

9/ It could be argued that if Democratic Alliance is a political committee and the Sarbanes and Hoyer pro rata payments were simply contributions to it the only disclaimer necessary would be one affixed by Democratic Alliance.

is better served by notifying respondents of the consequences of their actions and requesting that they take steps to assure that such activity does not occur in the future.

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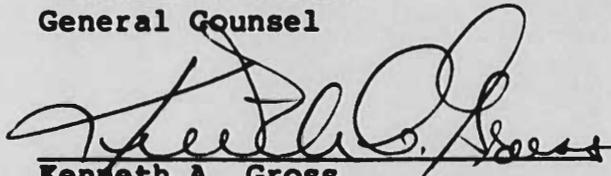
RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. find reason to believe that Democratic Alliance (District 26) violated 2 U.S.C. § 433 and § 434, but take no further action;
2. find reason to believe that Democratic Alliance (District 26), Citizens for Sarbanes and the Hoyer for Congress Committee violated 2 U.S.C. § 441d, but take no further action; and,
3. approve and authorize the sending of the attached letters.

Nov. 2, 1982
Date

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Complaint
2. Amendment to Complaint
3. Response from Democratic Alliance
4. Response from Hoyer Committee
5. Response from Sarbanes Committee
6. Letter to Complainant
7. Letter to Respondents

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, hereby certify that the Commission, on November , 1982, by a vote of to , adopted the above recommendation of the General Counsel in MUR 1463.

Voting For the Recommendation: _____

Voting Against the Recommendation: _____

Absences or Abstentions (Indicate): _____

Date: _____

Secretary of the Commission

83040393519

600# 8297



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

ATTACHMENT I

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Rensid Hill

Democratic Central
Committee Delegates
20th District At-Large
Napoleon Lechoo

28th District
Rosalee Blumenthal

R: 00

August 19, 1982

Charles N. Steele, Esq., Gen. Council
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Enclosed herewith is a brochure by a group called Democratic Alliance whose treasurer is James Searles and they have filed reports with the State Board of Elections in Annapolis, Maryland. There are Federal candidates on the brochure (U.S. Senator Sarbanes and U.S. Representative Hoyer) and there appears to be a disclaimer violation because there isn't any Federal Authority Line.

It also appears that there is an additional violation because the State candidates who have paid for this through Mr. Searles may have received corporate donations as provided for under Maryland law and many of these candidates may have transferred funds from their own treasurers to Mr. Searles. I understand that corporate donations, the use of which, are prohibited for Federal candidates.

Please inform me at your earliest convenience should your Agency take this matter under review for possible-corrective action.

Sincerely yours,

Charles S. Blumenthal

Charles S. Blumenthal

State of Maryland)
County of Prince George's) ss.

Subscribed and sworn to before me, in my presence, this 19th day of August 1982, a Notary Public in and for the County of Prince George's, State of Maryland.
My commission expires July 1, 1986.

Betsy Ann Godbey
Notary Public

Chairperson
June White Dillard

Treasurer
Betsy A. Godbey

(1)

33040393540



DEMOCRATIC ALLIANCE



COURT HOUSE TEAM



STATE'S ATTORNEY
ARTHUR A. MARSHALL, JR.

UNOPPOSED

Arthur Marshall was first elected State's Attorney for Prince George's County in 1952. In 1973 he received the "Distinguished Service Award" from the National District Attorney's Association. Arthur served as Vice President of the National District Attorney's Association from 1977-1979.

ORPHAN'S COURT



C. PHILIP NICHOLS, JR.
UNOPPOSED



STEVEN L. PLATT
UNOPPOSED



DECATUR W. TROTTER
UNOPPOSED

SHERIFF
JAMES V. ALUISI

16A



James V. Alusi was elected Sheriff of Prince George's County in 1978 after serving 11 years as Deputy Sheriff and achieving the rank of Captain. In 1980, he received the first "Presidential Award" in the nation for the "Disabled Veterans Vocational Rehabilitation Program." He earned the "Legion of Valor" award from the American Law Enforcement Officers' Association in 1978.



CALLIE MAE HEFFRON REGISTER OF WILLS
UNOPPOSED

Callie Mae Heffron was first elected Register of Wills in 1978. Four years earlier she was elected Judge of the Orphan's Court and in 1970 was the first woman appointed to the County Zoning and Tax Appeals Board. A former chairman of the Prince George's County Heart Fund, she has also been elected to various Parent-Teacher Association offices during the last 12 years.

Norman L. Pritchett was elected Clerk of the Circuit Court in 1978 after being appointed Clerk in 1975. This year he was a co-recipient of the "National Association of Counties Award" for the Juvenile Court Management Program. He took part in the University of Maryland Court Management Institute in 1978 and last year was program chairman for the Prince George's Board of Trade.



CLERK OF THE COURT **NORMAN L. PRITCHETT**
15C

DEMOCRATIC CENTRAL COMMITTEE

VOTE FOR TWO



GLORIA LAWLAH 23B



BESSIE A. PHELPS 23C

26th DISTRICT

VOTE FOR ALL FOUR



GARY ALEXANDER 22A



JAMES B. BLACKSTONE, JR. UNOPPOSED



MARY E. DAVIS UNOPPOSED



KEN DAWSON UNOPPOSED



SUZANNE M. HARRIGAN 20A



JANICE L. O'BRIEN 19B



DAVID D. WALDERRAMA 21B

AT-LARGE

STATE HOUSE



LT. GOVERNOR
J. JOSEPH CURRAN 1A

J. Joseph Curran, Jr., selected as Governor Ham Hughes' running mate for Lieutenant Governor, is a veteran of 20 years in the Maryland State Senate and four years in the House of Delegates. A brother of Baltimore City Councilman Martin (Mike) Curran and son of the late Joseph Curran, Sr., City Council administration floor leader in the administration of Baltimore Mayor William Donald Schaefer, he has been chairman of the Senate Judicial Proceedings Committee for 16 years. He is known for his quiet persuasion and political courage in combating racial and religious prejudice, the professional gun lobby and special interest groups.

UNOPPOSED



COMPTROLLER
LOUIS L. GOLDSTEIN

Louis Goldstein has held the position of State Comptroller since 1958 and is nationally recognized as a state fiscal expert. He served in the Maryland Senate from 1947-1959. A World War II veteran of the U.S. Marine Corps, Mr. Goldstein received a B.S. degree from Washington College in Chestertown and a J.D. degree from the University of Maryland Law School. Born and raised in Prince Frederick, Mr. Goldstein is married and has three children.

U.S. SENATE



ATTORNEY GENERAL
STEPHEN H. SACHS

Stephen H. Sachs was born in Baltimore on January 31, 1934. In 1954, he received a B.A. Degree from Haverford College, won a Fulbright Scholarship to Oxford University, and graduated from Yale Law School in 1960. He was appointed U.S. Attorney for Maryland by President Johnson in 1967, and worked in a private law practice until elected Attorney General in November 1978. He is active in civic organizations and resides in Baltimore with his wife and children.

UNOPPOSED



U.S. SENATE
PAUL S. SARBANES 5A

Senator Paul Sarbanes was elected to the U.S. Senate in 1976. He currently serves on the Banking, Housing and Urban Affairs Committee, Foreign Relations Committee, and Joint Economic Committee. Previously he served three terms in the U.S. House of Representatives and one term in the Maryland House of Delegates.

COUNTY EXECUTIVE



PARRIS GLENDENING

Parris Glendening resides in University Park with his wife, Frances, and son, Raymond. As a member of the County Council for eight years he has recognized expertise in fiscal management. An educator for 16 years, Parris believes in a first-rate educational system. He is a former police commissioner and has fought for more effective law enforcement and has received an endorsement from the Fraternal Order of Police. His community involvement includes Chamber of Commerce, Kiwanis, Knights of Columbus and Jaycees.

18C



83040393541

26th DISTRICT TEAM



STATE SENATE

FRANK KOMENDA



Senator Frank Komenda is a life-long resident of the community comprising the new 26th District. An eight-year veteran in the General Assembly, he was elected to the House of Delegates in 1984, served there until January 1988, and was appointed to fill the unexpired term of retiring Senator Peter Bookst. During his term in the House Frank served on the Economic Matters Committee and chaired the Subcommittee on Interest Rates and Unemployment Insurance.

In the Senate, Frank served on the Budget and Taxation Committee, Automated Income Maintenance Committee and Joint Committee on Energy. For his service in the 1982 session, Frank was honored by the Mental Health Association, the State Fireman's Association and Marlow Heights Elks Club.

Frank has a history of civic service including Jaycees, Sons of Italy, American Legion, Board of Trade, Chamber of Commerce, Cancer Society, Boys Scouts and PTA. Frank graduated from St. Dominics, Oxon Hill High School, and George Washington University.

HOUSE OF DELEGATES

VOTE FOR ALL THREE



CHRISTINE M. JONES



Christine Jones serves in the House of Delegates, appointed in January 1982. She has been a Democratic precinct chairman, coordinator and delegate to the 1980 Democratic National Convention.

Chris has been a teacher for sixteen years and teaches at Samuel Chase and Clinton Grove Elementary. She is active in the Educator's Association and PTA. She is a member of the National Conference of Christians and Jews, Southern Christian Leadership Conference, Southern Prince George's BPW Club, Delta Sigma Theta and Phi Delta Kappa.

She and her husband, Robert, are members of the Bethlehem Baptist Church and they have a son, Robert, Jr.



MARIAN "MIDGE" PATTERSON



Marian (Midge) Patterson is a member of the Democratic Central Committee and served on the Fourth Congressional District Caucus to select the 1980 National Convention Delegates. She serves on the Board of Review for the State Department of Health and Mental Hygiene, appointed by the Governor in 1980.

Midge, who resides in Temple Hills with her husband, David, is a member of the League of Women Voters, Oxon Hill Democratic Club, John Hanson Women's Democratic Club, the Women's Democratic Club of Prince George's County, the Women's Political Caucus and Southern Maryland BPW Club.



FREDERICK C. RUMMAGE



Fred Rummage was first elected to the House of Delegates in 1966 and is seeking his fifth term. Rummage serves as chairman of the Economic Matters Committee, is a key member of the House Leadership and the Rules and Policy Committee and the Governor's advisory group. Rummage served as chairman of the County's House Delegation from 1974 to 1978 and was a member of the Judiciary Committee.

As a committee chairman, Rummage sponsors important bills of the Governor's administration, often consumer protection issues. He resides in Camp Springs with his wife and children.

3 5 0 4 0 6 9 3

AUTHORITY: JAMES SEARLES, TREASURER

DEMOCRATIC PRIMARY
SEPTEMBER 14, 1982



DEMOCRATIC ALLIANCE

HOUSE OF DELEGATES
FREDERICK C. RUMMAGE
10D

HOUSE OF DELEGATES
MARIAN "MIDGE" PATTERSON
10B

HOUSE OF DELEGATES
CHRISTINE M. JONES
10A

STATE SENATE
FRANK KOMENDA
7C

STENY H. HOYER
Maryland Senate
four years as President of the Senate for 12 years.
Congress, Steny being elected to Law Center, Baltimore Maryland and Georgetown
Berniere, Steny is a graduate of the University of
Committee and House Banking Committee. A resident of
He served on the House Post Office and Civil Service
was elected to Congress from Maryland's Fifth District
in 1981. Steny is energetic and effective political leader.
At age 43, Steny Hoyer is one of Maryland's most

U.S. CONGRESS

the state economy. Hughes had 25 years of prior state and revitalization of state government restoration of integrity platform emphasizing governor in 1978 on a campaigned for

HARRY HUGHES
1A

GOVERNOR

DEMOCRATIC ALLIANCE
26th DISTRICT TEAM





**GOVERNOR
HARRY
HUGHES**

Harry Hughes campaigned for governor in 1978 on a platform emphasizing restoration of integrity to state government and revitalization of the state economy. Hughes had 25 years of prior state service as a Caroline County member of the General Assembly and Secretary of the Department of Transportation. His record as legislator included the pioneering of civil rights legislation and authorship of fiscal programs to aid Maryland's poorer areas.

As Governor, he has successfully sponsored programs including the biggest tax relief plan in state annals and crackdowns on drunk drivers and drug abuse.



1A



**U.S. CONGRESS
STENY H.
HOYER**

At age 43, Steny Hoyer is one of Maryland's most energetic and effective political leaders. In 1981, Steny was elected to Congress from Maryland's Fifth District. He serves on the House Post Office and Civil Service Committee and House Banking Committee. A resident of Berkshire, Steny is a graduate of the University of Maryland and Georgetown Law Center. Before being elected to Congress, Steny served as State Senator for 12 years, four years as President of the Maryland Senate.



6A



**COUNTY EXECUTIVE
PARRIS
GLENDENING**

Parris Glendening resides in University Park with his wife, Francie, and son, Raymond. As a member of the County Council for eight years, he has recognized expertise in fiscal management. An educator for 16 years, Parris believes in a first rate educational system. He is a former police commissioner and has fought for more effective law enforcement and has received an endorsement from the Fraternal Order of Police. His community involvement includes Chamber of Commerce, Kiwanis, Knights of Columbus and Jaycees.



12C



**COUNTY COUNCIL
WILLIAM B.
AMONETT**

A community leader and businessman for over 25 years, Bill Amonett was first elected to the County Council in 1974, was re-elected in 1978, and served as chairman in 1977 and 1979. He also chaired the Council's Budget Committee and the Special Committee on Programs and Services for Youth. Bill is a veteran of the U.S. Air Force and a graduate of Strayer College of Accountancy. He resides in Brandywine with his wife and three daughters. He is a real estate appraiser.



13A

DEMOCRATIC ALLIANCE



26th DISTRICT TEAM



**STATE SENATE
FRANK
KOMENDA**



7C



**HOUSE OF DELEGATES
CHRISTINE M.
JONES**

10A



**HOUSE OF DELEGATES
MARIAN 'MIDGE'
PATTERSON**

10B



**HOUSE OF DELEGATES
FREDERICK C.
RUMMAGE**

10D

VOTE FOR ALL THREE



**DEMOCRATIC ALLIANCE
26th DISTRICT**

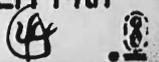
HEADQUARTERS:
6427 Old Branch Avenue
Temple Hills, Maryland 20748
449-6700

Full Rate
U.S. Postage Paid
Democratic Alliance
26th District

THE BLUMENTHAL FAMILY 1203 09
319 BARRYMORE DR
OXON HILL, MD 20743

VOTE HUGHES•HOYER•KOMENDA
AUTHORITY: JAMES SEARLES, TREASURER

TUESDAY, SEPTEMBER 14th



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DEMOCRATIC ALLIANCE



STATE HOUSE

U.S. SENATE



J. Joseph Curran, Jr., selected as Governor Harry Hughes' running mate for Lieutenant Governor, is a veteran of 20 years in the Maryland State Senate and four years in the House of Delegates. He has been chairman of the Senate Judicial Proceedings Committee for 16 years. He is known for his quiet persuasion and political courage in combating racial and religious prejudice, the professional gun lobby and special interest groups.

LT. GOVERNOR
J. JOSEPH
CURRAN, JR.



1A



Stephen H. Sachs was born in Baltimore on January 31, 1934. In 1954 he graduated from Haverford College, won a Fulbright Scholarship to Oxford University, and graduated from Yale Law School in 1960. He was appointed U.S. Attorney for Maryland by President Johnson in 1967. From 1970 until his election as Attorney General in November, 1978, he was in private law practice in Baltimore.

He is active in civic organizations, is a fellow of The American College of Trial Lawyers, and resides in Baltimore with his wife and children.

ATTORNEY GENERAL
STEPHEN H.
SACHS

UNOPPOSED



Louis L. Goldstein has held the position of State Comptroller since 1958 and is nationally recognized as a state fiscal expert. He served in the Maryland Senate from 1947-1959. A World War II veteran of the U.S. Marine Corps, Mr. Goldstein received a B.S. degree from Washington College in Chestertown and a J.D. degree from the University of Maryland Law School. Born and raised in Prince Frederick, Mr. Goldstein is married and has three children.

COMPTROLLER
LOUIS L.
GOLDSTEIN

UNOPPOSED



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U.S. SENATE
PAUL S.
SARBANES



5A

DEMOCRATIC ALLIANCE



COURT HOUSE



JAMES V.
ALUSI
SHERIFF



16A

James V. Alusi was elected Sheriff of Prince George's County in 1978 after serving 11 years as Deputy Sheriff and achieving the rank of Captain. In 1980, he received the first "Presidential Award" in the nation for the Disabled Veterans Vocational Rehabilitation Program. He earned the "Legion of Valor" award from the American Law Enforcement Officers' Association in 1978.



NORMAN L.
PRITCHETT
CLERK OF
THE COURT



15C

Norman L. Pritchett was elected Clerk of the Circuit Court in 1978, after being appointed Clerk in 1975. This year, he was a co-recipient of the "National Association of Counties Award" for the Juvenile Court Management Program. Last year he was program chairman for the Prince George's Board of Trade.



ARTHUR A.
MARSHALL,
JR.
STATE'S
ATTORNEY

UNOPPOSED

Arthur Marshall was first elected State's Attorney for Prince George's County in 1962. In 1973 he received the "Distinguished Service Award" from the National District Attorney's Association. Arthur served as Vice President of the National District Attorney's Association from 1977-1979.



CALLIE MAE
HEFFRON
REGISTER
OF
WILLS

UNOPPOSED

Callie Mae Heffron was first elected Register of Wills in 1978. She was elected Judge of the Orphans' Court in 1974 and was the first woman appointed to the County Zoning and Tax Appeals Board in 1970.



ORPHAN'S COURT
C. PHILIP
NICHOLS, JR.

UNOPPOSED

Philip Nichols, Jr., was elected Judge of the Orphans' Court in 1978 and designated Chief Judge this year. He is now President of the Maryland Association of Judges of the Orphans' Court.



ORPHAN'S COURT
STEVEN I.
PLATT

UNOPPOSED

Steven I. Platt was first elected Judge of the Orphans' Court in 1978. He has served on the County Human Relations Commission and the Prince George's County Labor Law Revision Task Force.



ORPHAN'S COURT
DECATUR W.
TROTTER

UNOPPOSED

Decatur W. Trotter was appointed Judge of the Orphans' Court in 1962. He served in the Maryland House of Delegates from 1975-1979 and was Glenarden Mayor from 1971-1975.

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STATE SENATE

FRANK KOMENDA



Senator Frank Komenda is a life-long resident of the community comprising the new 26th District. An eight-year veteran in the General Assembly, he was elected to the House of Delegates in 1974, served there until January 1982, and was appointed to fill the unexpired term of retiring Senator Peter Bozick. During his term in the House, Frank served on the Economic Matters Committee and chaired the Subcommittee on Interest Rates and Unemployment Insurance.

In the Senate, Frank served on the Budget and Taxation Committee, Automated Income Maintenance Committee and Joint Committee on Energy. For his service in the 1982 session, Frank was honored by the Mental Health Association, the State Fireman's Association and Marlow Heights Elks Club.

Frank has a history of civic service including Jaycees, Sons of Italy, American Legion, Board of Trade, Chamber of Commerce, Cancer Society, Boy Scouts and PTA.

Frank graduated from St. Dominics, Oxon Hill High School, and George Washington University.

HOUSE OF DELEGATES

VOTE FOR FOR ALL THREE

3 3 0 4 0 3 9 3 5 4 5



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Midge, who resides in Temple Hills with her husband, David, is a member of the League of Women Voters, Oxon Hill Democratic Club, John Hanson Women's Democratic Club, the Women's Democratic Club of Prince George's County, the Women's Political Caucus and Southern Maryland BPW Club.



FREDERICK C. RUMMAGE



Fred Rummage was first elected to the House of Delegates in 1966 and is seeking his fifth term. Rummage serves as chairman of the Economic Matters Committee, is a key member of the House leadership and the Rules and Policy Committee and the Governor's advisory group.

Rummage served as chairman of the County's House Delegation from 1974 to 1978 and was a member of the Judiciary Committee. Before that he served on many committees including the Ways and Means Committee.

As a committee chairman, Rummage sponsors important bills of the Governor's administration, often consumer protection issues. He resides in Camp Springs with his wife and children.

DEMOCRATIC ALLIANCE 26th DISTRICT



CENTRAL COMMITTEE

VOTE FOR TWO



GLORIA LAWLAH 23B

Gloria Lawlah resides in Hillcrest Heights. She serves as Officer of the Southern Prince George's Coalition and is an Officer of the County Branch NAACP and precinct chairperson of Election District 06.



BESSIE A. PHELPS 23C

Bessie Phelps was a charter member of the Oxon Hill Democratic Club and served as its President for four years. She is a past president of the Ladies Auxiliary of the Oxon Hill Fire Department, and is active in community groups. She is a life-time resident of Oxon Hill.

AT-LARGE



GARY R. ALEXANDER 22A



JAMES B. BLACKSTONE, JR. UNOPPOSED



MARY R. DAVIS UNOPPOSED



KIM M. DAWSON UNOPPOSED



SUZANNE M. HARRIGAN 20A



JOANNE L. O'BRIEN 19B



DAVID M. WALDERRAMA 21B

VOTE FOR ALL

LT. G J. JC CUF

COL. LOU GO

DE

Callie of W. Orp. won Tax.

DEMOCRATIC ALLIANCE



HUGHES  HOYER  KOMENDA  GLENDENING



03040693516



STATE SENATE
FRANK KOMENDA



7C



HOUSE OF DELEGATES
CHRISTINE M. JONES



10A



HOUSE OF DELEGATES
• MARIAN "MIDGE"
PATTERSON



10B



HOUSE OF DELEGATES
FREDERICK C.
RUMMAGE



100

ATTACKMENT II

DEMOCRATS
82

RECEIVED AT THE FEC
Ccc # 8433
82 SEP 10 P 1: 06

Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

Democratic Central
Committee Delegates
28th District At-Large
Napoleon Lechoo

28th District
Roscoe Blumenthal

September 9, 1982

Mr. Steven Barndollar
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

Dear Mr. Barndollar:

Enclosed herewith is the latest missive from the DEMOCRATIC ALLIANCE whose Treasurer is James Searles. You will note that again there appears to be defective Federal Disclaimer on the back of the Voting Guide.

Please, also, note that the Bulk Rate Postage Permit is paid for by the DEMOCRATIC ALLIANCE and under U.S. Postal Regulations the Permit holder is required to pay for the entire cost of the postage. Here again is a possible co-mingling of corporate funds and a potential violation of the Federal statutes.

Should you require any additional information or if I can be of additional service to you, please do not hesitate to call upon me.

Sincerely yours,

Charles S. Blumenthal

Charles S. Blumenthal

State of Maryland)
Counof Prince George's) ss.

Subscribed and sworn to before me, in my presence, this 9th day of September 1982, a Notary Public in and for the County of Prince George's, State of Maryland.
My commission expires July 1, 1986.

Betsy A. Godbey
Notary public

Chairperson
June White Dillard

Treasurer
Betsy A. Godbey

33040393547

12 SEP 10 P 4: 56

OFFICE OF THE CLERK
FEDERAL ELECTIONS COMMISSION

8

GVERNOR
ARRY
HUGHES  1A

LT. GOVERNOR
J. JOSEPH
CURRAN JR.  1A

S. SENATE
LUL S.
ARBANES  5A

U.S. CONGRESS
STENY H.
HOYER
5th CD Only

COMPTROLLER
L
OLDSTEIN
MOCRATIC
NOMINEE

ATTORNEY
GENERAL
STEPHEN H.
SACHS
DEMOCRATIC
NOMINEE



GENERAL ASSEMBLY

STATE SENATE
ANK J.
KOMENDA  7C

HOUSE OF DELEGATES
KRISTINE M.  10A
JONES

HOUSE OF DELEGATES
MARIAN L.  10B
PATTERSON

HOUSE OF DELEGATES
FREDERICK CHARLES  10D
RUMMAGE



COUNTY EXECUTIVE
PARRIS
GLENDENING  12C

COUNTY COUNCIL

WILLIAM B.
AMONETT  13A

COURT HOUSE

SHERIFF
JAMES V.
ALUISI  16A

CLERK OF THE COURT
NORMAN L.
PRITCHETT  15C

STATE'S ATTORNEY
ARTHUR A.
MARSHALL, JR.
DEMOCRATIC NOMINEE

REGISTER OF WILLS
CALLIE MAE
HEFFRON
DEMOCRATIC NOMINEE

ORPHAN'S COURT
C. PHILIP NICHOLS STEVEN L. PLATT DECATUR W. TROTTER
DEMOCRATIC NOMINEES

CENTRAL COMMITTEE

GLORIA LAWLAH  23B BESSIE A. PHELPS  23C

AT-LARGE

GARY R. ALEXANDER  22A KIM M. DAWSON DEMOCRATIC NOMINEE
JAMES B. BLACKSTONE, JR. DEMOCRATIC NOMINEE SUZANNE M. HARRIGAN  20A
MARY R. DAVIS JOANNE L. O'BRIEN  19B

LINE A	LINE B	LINE C
1A HUGHES & CURRAN	10B PATTERSON	7C KOMENDA
5A SARBANES	19B O'BRIEN	12C GLENDENING
10A JONES	21B VALDERRAMA	15C PRITCHETT
13A AMONETT	23B LAWLAH	23C PHELPS
16A ALUISI		
20A HARRIGAN		
22A ALEXANDER		
		LINE D
		10D RUMMAGE

DEMOCRATIC ALLIANCE

FOR QUICK ACCURATE VOTING — FOLLOW CHART

LINE A	1A	5A	10A	13A	16A	20A	22A
LINE B	10B	19B	21B	23B			
LINE C	7C	12C	15C	23C			
LINE D	10D						

VOTE HUGHES • HOYER • KOMENDA • GLENDENING

AUTHORITY: JAMES SEARLES, TREASURER
HOYER FOR CONGRESS WILLIAM I. GARNER, JR.

8 3 0 4 0 3 9 3 5 5 0

DEMOCRATIC SAMPLE BALLOT

4th Congressional District — 26th Legislative District

PRINCE GEORGE'S COUNTY, MD.
Polls Open 7 a.m. to 8 p.m.

IC



ALLIANCE

11 Rep. Frank Jones	12 Rep. Frank B.B.	13 Rep. Frank Amos	14 Rep. Frank Thompson, Jr.	15 Rep. Frank Abel	16	17	18	19 Rep. Frank Henderson	20 Rep. Frank Harrison	21 Rep. Frank Lechere	22 Rep. Frank Alexander	23 Rep. Frank Blumenthal	24	25 Rep. Frank Baker
100 Rep. Frank Patterson	101 Rep. Frank Fuller	102 Rep. Frank Anderson	103 Rep. Frank Knox	104 Rep. Frank Underwood	105	106	107	108 Rep. Frank O'Brien	109 Rep. Frank Perry	110 Rep. Frank Valderama	111 Rep. Frank Argonne	112 Rep. Frank Lusk	113	114 Rep. Frank Conroy
115	116 Rep. Frank Glendening	117 Rep. Frank Hickson	118 Rep. Frank Pritchett	119	120	121	122	123	124	125 Rep. Frank St. Louis	126 Rep. Frank Phelps	127	128	129 Rep. Frank Greenwald
130	131	132	133	134	135	136	137	138	139	140	141	142	143	144 Rep. Frank Patterson

**School Board
District 5**

IF YOU RESIDE IN THE DISTRICT AND PREPARE TO VOTE IN THE ELECTIONS ON 02 03 04 05 06 07 08 09 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

These candidates' names will appear on the ballot in your polling place:

26A Milton J. Baker
26B Nancy E. Cummings
26C Mr. Al D. Greenwald, Jr.
26D Ed H. Baker

**School Board
Districts 2 & 3**

8 3 0 4 0 3 9 3 5 5 1

26th LEGISLATIVE DISTRICT

LINE A	LINE B	LINE C
A HUGHES & CURRAN	10B PATTERSON	7C KOMENDA
1A SARBANES	19B O'BRIEN	12C GLENDENING
1A JONES	21B VALDERRAMA	15C PRITCHETT
3A AMONETT	23B LAWLAH	23C PHELPS
1A ALUISI		
1A HARRIGAN		
2A ALEXANDER		
		LINE D
		10D RUMMAGE

DEMOCRATIC ALLIANCE SAMPLE BALLOT



HUGHES



HOYER

26th DISTRICT



KOMENDA



GLENDENIN



DEMOCRATIC ALLIANCE



FOR QUICK ACCURATE VOTING — FOLLOW CHART

LINE A	1A	5A	10A	13A	16A	20A	22A	
LINE B	10B	19B	21B	23B				
LINE C	7C	12C	15C	23C				
LINE D	10D							

12

VOTE HUGHES, HOYER, KOMENDA, GLENDENING



DEMOCRATIC ALLIANCE



26th LEGISLATIVE DISTRICT
OFFICIAL VOTING MACHINE GUIDE

EC

TURN TO BACK PAGE FOR EASY VOTING GUIDE

HEADQUARTERS:
8427 Old Branch Avenue
Temple Hills, Maryland 20748
449-8700
James Searles, Treasurer

BULK MAIL
U.S. POST
PAID
DEMOCRATIC
ALLIANCE
26th DISTRICT

SEP 10 4:59

1203 04 08

ATTACHMENT III

RECEIVED AT THE FEC
CCT# 8470

6427 Old Branch Avenue
Temple Hills, Maryland 20748
September 13, 1982

82 SEP 15
11:58
SEP 15
P 2:03

Dwayne Brown, Esquire
Federal Elections Commission
Franklin Square Building
1325 K Street N.W.
Washington, DC 20463

Dear Mr. Brown,

I am writing in response to recent allegations made to the Federal Elections Commission regarding the misuse of authority lines on recently printed 26th District Alliance brochures.

As you may know, there was absolutely no comingling of federal and state funds used in the printing of these brochures, as suggested by Mr. Blumenthal. Congressman Hoyer paid separately for his prorated portion of the brochure and his check came directly from the Hoyer for Congress Committee and was paid directly to the printer.

Inadvertently, the literature only contained a by authority line for the 26th District Democratic Alliance. When contacted about this, the printer began printing the Hoyer (and Sarbanes) by authority lines on the remaining literature of the campaign.

Thank you for your interest in this matter and I hope this adequately addresses your concerns.

Sincerely,



James Searles, Treasurer
26th District Democratic Alliance

JS/jlj

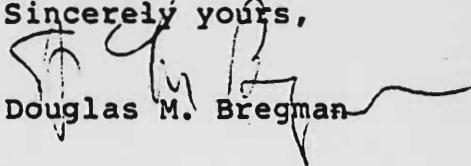
3304059355

was noticed by the campaign staff that the line was left off. The printer was immediately notified of the error. When the brochure came out the Authority Line was still not there. Publication was halted immediately. All the brochures now being distributed have the Authority Line included. The printer has blamed the proofreader for the error and vice versa. The Committee is now taking every precaution to not let this type of incident occur again.

I would ask that the Federal Election Commission take into consideration the information which I have outlined above. I have enclosed a sworn statement by Mr. William I. Garner, Jr., Treasurer for Steny Hoyer's Campaign, which includes verification of all of the statements made above. I sincerely believe that there is no reason to process further the complaint filed by Mr. Blumenthal. Accordingly, I would ask that the Commission close the file on this matter.

If your office requires any additional information or would like to discuss this matter with my office, please feel free to contact me.

Sincerely yours,


Douglas M. Bregman

DMB:lsg
Enclosures

83040393554

STATE OF MARYLAND :

COUNTY OF PRINCE GEORGE'S :

I, WILLIAM I. GARNER, JR., Treasurer for Hoyer for Congress Committee, do solemnly declare and affirm under the penalties of perjury that the following facts and information are true to the best of my knowledge, information and belief:

1. There has been no co-mingling of funds from monies donated by corporations to Mr. Hoyer's campaign. I have been the treasurer for the Committee since the beginning and I can verify that there has been no co-mingling of funds from donations from corporations to Mr. Hoyer's campaign.

2. Mr. Hoyer's campaign committee paid for its portion of the printing costs of the brochure printed by the Democratic Alliance with separate checks from its campaign money directly to the printer for the material in question. I, personally, wrote the checks to pay the printer directly for Mr. Hoyer's portion of the brochure. The campaign office has the cancelled checks as verification.

3. The Federal Authority Line was inadvertently left off of the Democratic Alliance brochure and was not done intentionally. The brochure was printed without the Authority Line by mistake. I have advised all of the campaign staff of this oversight and have taken every precaution to be sure that this type of incident does not occur again.

4. As Treasurer of the Hoyer campaign I can verify that the campaign has been run strictly under the

33040393555

guidelines set up by the FEC and wherever there has been a question as to requirements or legality, we have contacted the appropriate source to be sure that we have stayed within the guidelines and the law.

5. I believe that the Commission should take all of this information into consideration and find that there is no cause to process the complaint of Charles Blumenthal any further.

WILLIAM I. GARNER, JR.
Treasurer for the Steny Hoyer
for Congress Campaign

Date: 9/9/82 William I. Garner, Jr.

83040393536

ATTACHMENT V

RECEIVED AT THE FED

64 8686

VENABLE, BAETJER AND HOWARD

OCT 15 2:20

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

(301) 244-7400

WASHINGTON, D. C. OFFICE

VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704

1301 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20004

(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS

244-7544

October 13, 1982

Brown
OCT 15
F 41
07

EDMUND P. SANDRIDGE, JR.
ARTHUR W. MAGNEN, JR., P. C.
ROBERT M. THOMAS, P. C.
A. SAMUEL COOK, P. C.
ROBERT R. BAIR, P. C.
JACQUES T. SCHLESNER, P. C.
CHARLES S. REEVES, JR.
WILLIAM J. MCCARTHY, P. C.
RUSSELL R. RENO, JR., P. C.
THOMAS P. PERKINS, III, P. C.
BENJAMIN R. CIVILETTI, P. C.
GERALD M. RAYZ, P. C.
LEE HARBURY
STUART H. ROHE, P. C.
C. VAN LEUVEN STEWART, P. C.
LAWRENCE B. WESCOTT, P. C.
GEORGE C. BOUB, JR.
JOHN HENRY LEWIN, JR., P. C.
ALAN D. VAREIRO
NEAL D. BORDEN
ROBERT A. SHELTON
JACOB L. FRITZEL
HARRY S. SHAPIRO
STANLEY MAZAROFF
LEE H. MILLER
FRANCIS THOMAS COLEMAN, JR.
THOMAS J. KENNEY, JR.
N. PETER LARSAU
DOUGLAS D. CONNAN, JR.
HARVEY R. CLAPP, III
BENJAMIN ROSENBERG
ROBERT S. SMITH
JAMES S. WRIGHT
ALEXANDER I. LEWIS, III

MAX STUL OPPENHEIMER
TERRY F. HALL
CRAIG E. SMITH
THOMAS S. MARTIN
BRYSON L. COOK
CHARLES M. KERR
BENSON E. LESS
ROBERT G. AMES
NELL S. STRACHAN
RICHARD L. WASSERMAN

COUNSEL
JOHN HENRY LEWIN
NORWOOD S. ORRICK
RICHARD W. SHROY
WILBUR E. SIMMONS, JR.
PARTNER EMERITUS
JOSEPH FRANCE

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1886-1948)
CHARLES McH. HOWARD (1870-1942)

LAWRENCE J. MERWIN
JOHN W. SCHEFFLEN
BARBARA E. SCHLAFF
FREDRIC A. PRESS
RONALD S. SHEFF
JAMES H. ARCHIBALD
CONSTANCE H. BAKER
G. STEWART WEBB, JR.
GEORGE W. JOHNSTON
F. DUDLEY STAPLES, JR.
EDWARD L. WENDER
DAVID M. FLEISHMAN
GEORGE R. REYNOLDS, III
JANA HOWARD
MARGARET LEE QUINN
MITCHELL KOLKIN
JEAN E. MILPATRICK
SARA F. SHYSEL
VIGOR L. HAWKINS
STEPHEN L. OWEN
PETER P. MARVIS
WILLIAM W. FITZPATRICK, JR.
JEFFREY W. AYRES
KENNETH R. HOFFMAN
BRIGID E. KENNEY
PHYLLIS COLE FRIEDMAN
FRANK L. KOLLMAN
ASSE DAVID LOWELL
BRUCE R. SPECTOR
ELLEN S. WALKER
JOHN M. MORRIS, JR.
EARL L. MEYHENY
LESLIE A. VIAL
MAURICE SABRIN

M. LUCINDA HOTSKO
RICHARD J. SAFRANEK
ROBERT A. RAPP
ANN N. BOSSE
DAVID S. ABRAMOFF
JACK L. HARVEY
CAROL E. GREENFELD
JOAN FISHBIN FELDMAN
CHARITY SCOTT
PETER B. SAUCIER
ELLYN L. BROWN
CHRISTOPHER R. MELLOTT
CYNTHIA ANN ROSS
CHARLES J. HABIT
CHRISTOPHER J. FRITZ
PETER E. REITH
MARIANNE MORRIS HELLAUER
W. ROBERT ZINKHAM
KATHLEEN MORRIS McDONALD
CYNTHIA MEYERS HANN
YAKOV S. NEUBERGER
MITCHELL W. SHAPIRO
JOHN S. WAYRINE, II
ELIZABETH R. HUGHES
JAMES A. DUNBAR
RONALD W. TAYLOR
STEPHEN F. BIRDBEE
ALISON D. ROHLER
PAUL D. SHELTON
WILLIAM F. FITZGERALD, JR.
STEPHEN P. CARNEY
FRANCIS R. LAWS

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1463

Dear Mr. Gross:

This letter is written in response to your letter of September 24, 1982, advising me, as treasurer of Citizens for Sarbanes (the "Committee"), of the above referenced Complaint, and is intended to serve as the Committee's response.

As best we can determine from the materials you sent to me, the brochure, to which reference is made in Mr. Blumenthal's complaint, was a tabloid publication paid for by a Maryland state campaign committee known as the "District 26 Democratic Alliance," which is registered, in accordance with the Maryland law, as a campaign committee for State Democratic candidates in the 26th Legislative District of Prince George's County, Maryland, having as its treasurer James Searles of 6427 Old Branch Avenue, Temple Hills, Maryland 20748. To the best of our knowledge, the facts relevant to this publication and the Sarbanes' Committee are as follows:

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18

Kenneth A. Gross, Esquire
October 13, 1982
Page Two

1. In late July - early August, 1982, the Sarbanes Committee was advised that the campaign committees of seven Democratic State Senatorial candidates in Prince George's County were contemplating publications to be used in each of these seven legislative districts on behalf of slates of candidates at the local, county, state, and federal levels. The seven state campaign committees were prepared to include references to Senator Sarbanes in these publications. Discussions were held, and, on or about August 2, 1982, it was agreed that the proportionate share of the cost of these publications allocable to the Sarbanes campaign would be \$700 per district. A copy of the letter of that date from John McDonough, campaign manager of Congressman Hoyer's congressional campaign, to the Sarbanes' Committee, reflecting that agreement is attached hereto as Exhibit 1.

2. In accordance with that agreement, our Committee, on August 16, 1982, issued seven checks (nos. 1112-1118) to the treasurers of each of the seven committees to reimburse them for the share of these expenses allocable to Senator Sarbanes. Copies of six of the cancelled checks are attached hereto as Exhibit 2. The seventh cancelled check, no. 1116, payable to the District 25 Democratic Alliance, has not yet been returned to the Committee by our bank. These seven payments were reported as disbursements in our FEC report dated September 2, 1982, on Schedule B, at page 3 of 9.

3. In each of the seven districts a tabloid, similar in format to the one attached to Mr. Blumenthal's complaint, was published and distributed prior to the Maryland primary election, and, so far as we have been able to determine, the tabloids utilized in each district carried the authority line of the treasurer for the state senatorial campaign committee in each district.

4. It is also our understanding that, after Mr. Blumenthal made public the filing of his complaint, and because of the uncertainty of federal requirements for disclaimers on publications of this kind, the subsequent "door-knocking literature," and sample ballot publications published by these state committees did carry the authority lines of the Hoyer and Sarbanes federal campaign committees, as well as the authority lines of the respective treasurers of the seven state senatorial campaign committees.

83040393558

Kenneth A. Gross, Esquire
October 13, 1982
Page Three

As we understood the requirements of the Federal Election Campaign Act of 1971, as amended, and the applicable FEC regulations, both of Mr. Blumenthal's complaints about this tabloid publication are without foundation:

A. Under 11 C.F.R. §§ 100.7(a)(16) and 100.8(a)(17), where a state or local candidate, or his authorized committee, pays for campaign materials which make reference to a candidate for federal office, such a payment does not constitute either a "contribution" or an "expenditure" within the meaning of the Act, although the cost of such a payment allocable to the federal candidate is to be paid out of contributions subject to the limitations and prohibitions of the Act. Even in that instance, however, where the federal candidate reimburses the state candidate for that allocable share, out of funds from the federal candidate's committee, the requirements of the Act are met, and there can be no violation of the Act and the applicable regulation. Consequently, there simply is no basis for Mr. Blumenthal's suggestion that the Sarbanes campaign in some fashion benefitted from corporate contributions in violation of the Act, since we reimbursed, out of our Committee's funds, each of these state committees for our allocable share of the costs they incurred.

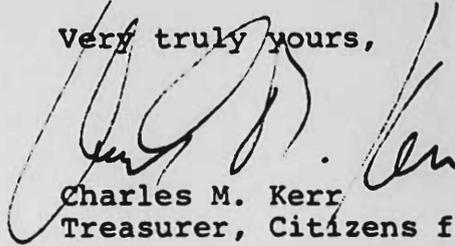
B. The federal disclaimer provision to which Mr. Blumenthal apparently refers is 11 C.F.R. § 110.11. First, it should be noted that the provision in question applies to "expenditures," and, as stated above, publications by a state candidate are not "expenditures," as that term is defined in the regulations. Second, the tabloid in question did clearly identify the state campaign committees which paid for these tabloids by carrying the authority lines of their respective treasurers, as required by state law. Consequently, even if § 110.11 is applicable, the disclaimer requirement of § 110.11 (a)(1)(iv) has been satisfied. Nonetheless, our Committee is now requiring state committees, which publish similar literature and which we reimburse for our allocable share, to include a federal disclaimer for our Committee as well as their state authority line, and we will continue to do so, if the Commission believes that to be the better practice. Quite frankly, however, appending multiple authority line/disclaimers to literature of this kind may hinder rather than help the underlying purpose of Section 110.11, which is "to give the reader ... adequate notice of the identity of persons who paid for or who authorized the communication."

83040393539

Kenneth A. Gross, Esquire
October 13, 1982
Page Four

Please let me know, at the address and telephone number set forth on the letterhead, if our Committee can provide any further information you require in considering this complaint.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

Enclosure

83304033933560

HOYER

for Congress



Headquarters
401 Corporate Drive
Metro-Plex—Suite 180
Landover, Maryland 20785
459-8484

August 2, 1982

83040393561

Mr. Peter Marudis
Citizens for Sarbanes
3240 Greenmount Avenue
Baltimore, MD 21218

Dear Peter:

As per our conversations, please find the name and address of each of the individual campaign treasurers for each Senator's legislative ticket in Prince George's County. As per our agreement, please have your treasurer make a transfer of funds of seven hundred dollars (\$700.00) per District for Sarbanes' participation in the tabloid mailing, door knocking literature, sample ballot mailing, and sample ballot on election day.

777-7070

If you have any questions, contact me at 459-8484. It would be best to send all seven checks to my attention at: Hoyer for Congress, 8401 Corporate Drive, Metro-Plex-Suite 180, Landover, MD 20785.

Sincerely,

John McDonough

JM:br
encl.

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1112

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 21, Timothy Lynch, Treas. \$ 1700.00
Seven hundred and 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY 03
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21286

FOR Tabloid mailing, leafletting
Ticket mailing

Sebastian Swales
Asst. Treasurer

⑈00001112⑈ • ⑆052000618⑆

⑈6171958⑈ ⑆0000070000⑆

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1113

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 22, Linda Thornberry, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY 03
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21286

FOR _____

Sebastian Swales
Asst. Treasurer

⑈00001113⑈ • ⑆052000618⑆

⑈6171958⑈ ⑆0000070000⑆

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1114

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 23, Nancy O'Brien, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY 03
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21286

FOR _____

Sebastian Swales
Asst. Treasurer

⑈00001114⑈ • ⑆052000618⑆

⑈6171958⑈ ⑆0000070000⑆

Wm. H. Williams - 81st District for Deposit Only

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AUG

AG '02' 25
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AGRICULTURAL BANK

AG '02' 18
SUN
AGRICULTURAL BANK

01131

83040393564

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*for deposit
only
J. J. Donnell
J. J. Donnell
J. J. Donnell*

AG '02' 19
SUN
AGRICULTURAL BANK

1 2 3 4 5 6 7 8 9 0

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

EXHIBIT 2

1115

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 24, Norma Lindsey \$ 700.00
Seven hundred and 00/100 DOLLARS



OR _____ Sebastian Soles
"00001115" • 1:05 20006 181: "617195 8" Asst. Treasurer "0000070000"

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1117

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 26, James Searle, Treas \$ 700.00
Seven hundred and 00/100 DOLLARS



OR _____ Sebastian Soles
Asst. Treasurer
"00001117" • 1:05 20006 181: "617195 8" "0000070000"

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1118

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 27, Walter Meier-Lerdit, Treas \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR AD _____ Sebastian Soles
Asst. Treasurer
"00001118" • 1:05 20006 181: "617195 8" "0000070000"

James T. ...

FOR DEPOSIT ONLY
James T. ...

064 2635

AG '82' 18
PAY ANY BANK
LLOYD NATIONAL BANK
COSTA MESA, CALIF.
0000000000

91-1
PAY ANY BANK
LLOYD NATIONAL BANK
COSTA MESA, CALIF.
0000000000

1805888 18 12 1980

8 3 0 4 0 3 9 3 5 6 6 6

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12506888

AUG 20 1982 013717340

FOR DEPOSIT IN THE
CITIZENS BANK & TRUST CO.
OF MARYLAND
TO THE CREDIT OF THE
WITHIN NAMED PAYEE

65-296
PAY ANY
BANK OR TR CO. PEG
CITIZENS BANK & TRUST CO.
of MARYLAND
RIVERDALE, MARYLAND 65-296

12506888

12506888



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Charles S. Blumenthal
9205 Oxon Hill Road
Fort Washington, Maryland 20744

Re: MUR 1463

Dear Mr. Blumenthal:

This is in reference to the complaint you filed with the Commission on August 19, 1982 concerning a tabloid and sample ballot distributed by Democratic Alliance (District 26).

After conducting an investigation in this matter, the Commission determined there was reason to believe that Democratic Alliance (25th District) violated 2 U.S.C. § 433, § 434, and § 441d, that Citizens for Sarbanes violated 2 U.S.C. § 441d, and that the Hoyer for Congress Committee violated 2 U.S.C. § 441d. However, after considering the circumstances of this matter the Commission determined to take no further action and close its file. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

The file number in this matter is MUR 1463. If you have any questions, please contact Duane A. Brown, the attorney assigned to this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

830403933557

28



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James Searles, Treasurer
Democratic Alliance (26th District)
6427 Old Branch Avenue
Temple Hills, Maryland 20748

Re: MUR 1463

Dear Mr. Searles:

On November , 1982, the Commission found reason to believe that your committee had violated 2 U.S.C. § 433, § 434, and § 441d, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to you. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you, however, that the activity of your committee in the federal election process brings it under the jurisdiction of the Act and subjects it to registering and reporting with the Commission pursuant to 2 U.S.C. § 433 and § 434. Further, your committee would be subject to all of the other provisions of the Act including the contribution limitations and prohibitions set forth in 2 U.S.C. § 441a. You are also reminded that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

83040393568

James Searles
Page Two

If you have any questions, please direct them to Duane A.
Brown at (202) 523-5071.

Sincerely,

83040393569



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Charles M. Kerr, Treasurer
Citizens for Sarbanes
1800 Mercantile Bank
& Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

Re: MUR 1463

Dear Mr. Kerr:

On November , 1982, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202) 523-5071.

Sincerely,

83040393570



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas M. Bregman
The Air Rights Building
7315 Wisconsin Avenue
Suite 800 West
Bethesda, Maryland 20814

Re: MUR 1463

Dear Mr. Bregman:

On November , 1982, the Commission found reason to believe that your client the Citizens for Hoyer Committee, had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that pursuant to 2 U.S.C. § 441d any communication expressly advocating the election or defeat of a federal candidate must contain a notice indicating who paid for the communication and whether it was authorized by the candidate. You should take immediate steps to insure that activity which is in violation of the Act does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at (202)523-5071.

Sincerely,

83040393571



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: George Demougeot *GD*
SUBJECT: MUR 1463 - Expedited

Please have the attached First General Counsel's Report distributed to the Commission on pink paper per expedited procedures. Thank you.

Attachment

83040393572

Docket Copy

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

82 OCT 28 A 9: 49

October 28, 1982

MEMORANDUM TO: Marjorie Emmons
FROM: George Demougeot *GD*
SUBJECT: MUR 1463 - First G.C. Report

Please have the above mentioned Report withdrawn
from circulation. Thank you.

8304039357



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: OCTOBER 27, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1463 First
General Counsel's Report dated
October 26, 1982; Received in OCS,
10-26-82, 11:56

You were notified previously of an objection by
Commissioner Reiche.

Commissioner Aikens submitted an additional objection
at 4:31, October 27, 1982.

This matter will be discussed in executive session
on ~~Tuesday, November 2, 1982.~~ ?

83040393574



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 1982

MEMORANDUM TO: Marjorie Emmons
FROM: George Demougeot *GD*
SUBJECT: MUR 1463 - First G.C. Report

Please have the above mentioned Report withdrawn
from circulation. Thank you.

83040593575



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: OCTOBER 27, 1982

SUBJECT: OBJECTION - MUR 1463 First General
Counsel's Report dated October 26, 1982,
Received in OCS, 10-26-82, 11:56

The above-named report was circulated to the Commission at 4:00, October 26, 1982 on a 24 hour no-objection basis.

Commissioner Reiche submitted an objection at 11:31, October 27, 1982.

This matter will be placed on the Executive Session Agenda for Tuesday, November 2, 1982.

33040393576



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: OCTOBER 27, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1466 First General
Counsel's Report dated October 25, 1982;
Received in OCS, 10-25-82, 12:26

You were notified previously of an objection by
Commissioner Reiche.

Commissioner Aikens submitted an additional objection
at 11:51, October 27, 1982.

This matter will be discussed in executive session
on Tuesday, November 2, 1982.

83040393577



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMM. SECRETARY

82 OCT 26 All: 56

October 26, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: George Demougeot *GD*

SUBJECT: MUR 1463

Please have the attached First General Counsel's Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

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203169

RECEIVED AT THE FEC
GCC # 8782

VENABLE, BAETJER AND HOWARD 82 OCT 27 P12: 23

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201
(301) 244-7400

WASHINGTON, D. C. OFFICE
VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704
1301 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20004
(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS
244-7544

October 22, 1982

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

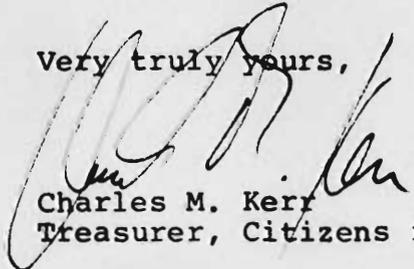
Re: MUR 1463

Dear Mr. Gross:

Supplementing my letter to you of October 13, 1982, with regard to the above-referenced complaint, enclosed please find a copy of the Sarbanes Committee's check no. 1116 payable to the District 25 Democratic Alliance. The check was deposited by the District 25 committee and has now cleared our bank, as you will note from the reverse side of the copy. Reference to this check is made at paragraph 2, page 2 of my October 13th letter.

Please let me know if I can be of further assistance with regard to this matter.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:km
Enclosure

83040393579

200127 P2:00

CITIZENS FOR SARBANES
P. O. BOX 10644
BALTIMORE, MD 21204

1116

August 16, 1982

7-61/520

PAY TO THE
ORDER OF

Democratic Alliance District 25, Joseph Italiano, Treasurer

\$ 700.00

Seven hundred and

00/100 DOLLARS



MERCANTILE-SAFE DEPOSIT
& TRUST COMPANY 03
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21284

FOR _____

Sebastian Soolos

Post Treasurer

⑈00001116⑈ • ⑆052000618⑆

⑈6171958⑈ ⑆0000070000⑆

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VENABLE, BAETJER AND HOWARD

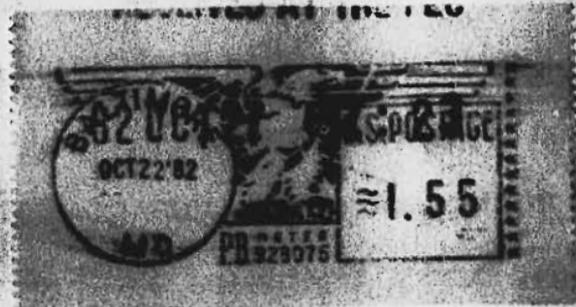
ATTORNEYS AT LAW

1500 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

JHM, JR.



**Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463**

cert P304 620 387

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VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201
(301) 244-7400

WASHINGTON, D. C. OFFICE
VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704
1301 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20004
(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS
244-7544

October 13, 1982

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1463

Dear Mr. Gross:

This letter is written in response to your letter of September 24, 1982, advising me, as treasurer of Citizens for Sarbanes (the "Committee"), of the above referenced Complaint, and is intended to serve as the Committee's response.

As best we can determine from the materials you sent to me, the brochure, to which reference is made in Mr. Blumenthal's complaint, was a tabloid publication paid for by a Maryland state campaign committee known as the "District 26 Democratic Alliance," which is registered, in accordance with the Maryland law, as a campaign committee for State Democratic candidates in the 26th Legislative District of Prince George's County, Maryland, having as its treasurer James Searles of 6427 Old Branch Avenue, Temple Hills, Maryland 20748. To the best of our knowledge, the facts relevant to this publication and the Sarbanes' Committee are as follows:

8304039350

EDMUND P. DANDRIDGE, JR.
ARTHUR W. MACHEN, JR., P.C.
ROBERT H. THOMAS, P.C.
A. SAMUEL COOK, P.C.
ROBERT R. SAIR, P.C.
JACQUES T. SCHLENGER, P.C.
CHARLES B. REEVES, JR.
WILLIAM J. MCCARTHY, P.C.
RUSSELL R. RENO, JR., P.C.
THOMAS P. PERKINS, III, P.C.
BENJAMIN R. CIVILETTI, P.C.
GERALD M. KATZ, P.C.
LUKE HARBURY
STUART H. ROME, P.C.
C. VAN LEUVEN STEWART, P.C.
LAWRENCE S. WESCOTT, P.C.
GEORGE C. DOUB, JR.
JOHN HENRY LEWIN, JR., P.C.
ALAN D. YARBRO
NEAL D. BORDEN
ROBERT A. SHELTON
JACOB L. FRIEDEL
HARRY G. SHAPIRO
STANLEY MAZAROFF
LEE M. MILLER
FRANCIS THOMAS COLEMAN, JR.
THOMAS J. KENNEY, JR.
H. PETER LAREAU
DOUGLAS D. CONNAN, JR.
HARVEY R. CLAPP, III
BENJAMIN ROSENBERG
ROBERT G. SMITH
JAMES D. WRIGHT
ALEXANDER I. LEWIS, III

MAX STUL OPPENHEIMER
TERRY F. HALL
CRAIG E. SMITH
THOMAS S. MARTIN
BRYSON L. COOK
CHARLES M. KERR
BENSON E. LEGG
ROBERT G. AMES
NELL S. STRACHAN
RICHARD L. WASSERMAN

COUNSEL
JOHN HENRY LEWIN
NORWOOD S. ORRICK
RICHARD W. EMOY
WILBUR E. SIMMONS, JR.
MARTIN EMERITUS
JOSEPH FRANCE

RICHARD M. VENABLE (1838-1910)
EDWIN G. BAETJER (1888-1948)
CHARLES McH. HOWARD (1870-1942)

LAWRENCE J. MERWIN
JOHN W. SCHEFFLER
BARBARA E. SCHLAFF
FREDRIC A. PRESS
RONALD B. SHEFF
JAMES H. ARCHIBALD
CONSTANCE H. BAKER
G. STEWART WEBB, JR.
GEORGE W. JOHNSTON
F. DUDLEY STAPLES, JR.
EDWARD L. WENGER
DAVID M. FLEISHMAN
GEORGE H. REYNOLDS, III
JANA HOWARD
MARGARET LEE QUINN
MITCHELL HOLKIN
JEAN E. KILPATRICK
SANA F. SHTABEL
VICKI L. HAWKINS
STEPHEN L. OWEN
PETER R. PARVIS
WILLIAM M. FITZPATRICK, JR.
JEFFREY R. AYRES
KENNETH R. HOFFMAN
BRIGID E. HENNEY
PHYLLIS COLE FRIEDMAN
FRANK L. SOLLMAN
ASBE DAVID LOWELL
BRUCE R. SPECTOR
ELLEN S. WALKER
JOHN H. MORRIS, JR.
EARL L. NETHENY
LESLIE A. VIAL
MAURICE BASKIN

M. LUCINDA NOTSRO
RICHARD J. SAFRANEK
ROBERT A. RAPP
ANN H. BOBSE
DAVID B. ABRAHOFF
JACK L. HARVEY
CAROL E. GREENFELD
JOAN FISHERIN FELDMAN
CHARITY SCOTT
PETER M. SAUCIER
ELVIN L. BROWN
CHRISTOPHER R. HELLOTT
CYNTHIA ANN ROSS
CHARLES J. NABIT
CHRISTOPHER J. FRITZ
PETER E. KEITH
MARIANNE SCHMITT HELLAUER
W. ROBERT ZINKHAM
KATHLEEN MORRIS McDONALD
CYNTHIA MEYERS HANN
YAAHOV B. NEUBERGER
MITCHELL W. SHAPIRO
JOHN S. WATKINS, X
ELIZABETH R. HUGHES
JAMES A. DUNBAR
RONALD W. TAYLOR
STEPHEN F. BIBBEE
ALISON D. KOHLER
PAUL D. SHELTON
WILLIAM T. FITZGERALD, JR.
STEPHEN T. CARNEY
FRANCIS R. LAWS

Kenneth A. Gross, Esquire
October 13, 1982
Page Two

1. In late July - early August, 1982, the Sarbanes Committee was advised that the campaign committees of seven Democratic State Senatorial candidates in Prince George's County were contemplating publications to be used in each of these seven legislative districts on behalf of slates of candidates at the local, county, state, and federal levels. The seven state campaign committees were prepared to include references to Senator Sarbanes in these publications. Discussions were held, and, on or about August 2, 1982, it was agreed that the proportionate share of the cost of these publications allocable to the Sarbanes campaign would be \$700 per district. A copy of the letter of that date from John McDonough, campaign manager of Congressman Hoyer's congressional campaign, to the Sarbanes' Committee, reflecting that agreement is attached hereto as Exhibit 1.

2. In accordance with that agreement, our Committee, on August 16, 1982, issued seven checks (nos. 1112-1118) to the treasurers of each of the seven committees to reimburse them for the share of these expenses allocable to Senator Sarbanes. Copies of six of the cancelled checks are attached hereto as Exhibit 2. The seventh cancelled check, no. 1116, payable to the District 25 Democratic Alliance, has not yet been returned to the Committee by our bank. These seven payments were reported as disbursements in our FEC report dated September 2, 1982, on Schedule B, at page 3 of 9.

3. In each of the seven districts a tabloid, similar in format to the one attached to Mr. Blumenthal's complaint, was published and distributed prior to the Maryland primary election, and, so far as we have been able to determine, the tabloids utilized in each district carried the authority line of the treasurer for the state senatorial campaign committee in each district.

4. It is also our understanding that, after Mr. Blumenthal made public the filing of his complaint, and because of the uncertainty of federal requirements for disclaimers on publications of this kind, the subsequent "door-knocking literature," and sample ballot publications published by these state committees did carry the authority lines of the Hoyer and Sarbanes federal campaign committees, as well as the authority lines of the respective treasurers of the seven state senatorial campaign committees.

83040393533

Kenneth A. Gross, Esquire
October 13, 1982
Page Three

As we understood the requirements of the Federal Election Campaign Act of 1971, as amended, and the applicable FEC regulations, both of Mr. Blumenthal's complaints about this tabloid publication are without foundation:

A. Under 11 C.F.R. §§ 100.7(a)(16) and 100.8(a)(17), where a state or local candidate, or his authorized committee, pays for campaign materials which make reference to a candidate for federal office, such a payment does not constitute either a "contribution" or an "expenditure" within the meaning of the Act, although the cost of such a payment allocable to the federal candidate is to be paid out of contributions subject to the limitations and prohibitions of the Act. Even in that instance, however, where the federal candidate reimburses the state candidate for that allocable share, out of funds from the federal candidate's committee, the requirements of the Act are met, and there can be no violation of the Act and the applicable regulation. Consequently, there simply is no basis for Mr. Blumenthal's suggestion that the Sarbanes campaign in some fashion benefitted from corporate contributions in violation of the Act, since we reimbursed, out of our Committee's funds, each of these state committees for our allocable share of the costs they incurred.

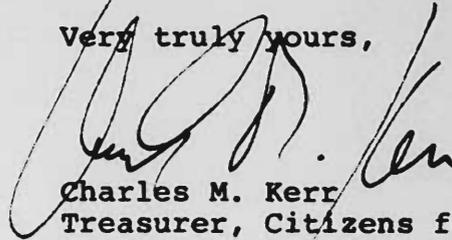
B. The federal disclaimer provision to which Mr. Blumenthal apparently refers is 11 C.F.R. § 110.11. First, it should be noted that the provision in question applies to "expenditures," and, as stated above, publications by a state candidate are not "expenditures," as that term is defined in the regulations. Second, the tabloid in question did clearly identify the state campaign committees which paid for these tabloids by carrying the authority lines of their respective treasurers, as required by state law. Consequently, even if § 110.11 is applicable, the disclaimer requirement of § 110.11 (a)(1)(iv) has been satisfied. Nonetheless, our Committee is now requiring state committees, which publish similar literature and which we reimburse for our allocable share, to include a federal disclaimer for our Committee as well as their state authority line, and we will continue to do so, if the Commission believes that to be the better practice. Quite frankly, however, appending multiple authority line/disclaimers to literature of this kind may hinder rather than help the underlying purpose of Section 110.11, which is "to give the reader ... adequate notice of the identity of persons who paid for or who authorized the communication."

83040393534

Kenneth A. Gross, Esquire
October 13, 1982
Page Four

Please let me know, at the address and telephone number set forth on the letterhead, if our Committee can provide any further information you require in considering this complaint.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

Enclosure

830405933599

Hoyer

for Congress



Headquarters
8401 Corporate Drive
Metro-Plex—Suite 180
Landover, Maryland 20785
459-8484

August 2, 1982

8 3 0 4 0 3 9 3 5 8 6
Mr. Peter Marudis
Citizens for Sarbanes
3240 Greenmount Avenue
Baltimore, MD 21218

Dear Peter:

As per our conversations, please find the name and address of each of the individual campaign treasurers for each Senator's legislative ticket in Prince George's County. As per our agreement, please have your treasurer make a transfer of funds of seven hundred dollars (\$700.00) per District for Sarbanes' participation in the tabloid mailing, door knocking literature, sample ballot mailing, and sample ballot on election day.

If you have any questions, contact me at 459-8484. It would be best to send all seven checks to my attention at: Hoyer for Congress, 8401 Corporate Drive, Metro-Plex-Suite 180, Landover, MD 20785.

777-7070
Sincerely,

John McDonough

JM:br
encl.

DEMOCRATIC ALLIANCE

County Executive

DISTRICT

21 3517 Marlborough Way
College Park, Md. 20740
935-5093

Timothy Lynch, Treasurer

22 5707 East West Hwy.
Riverdale, Md. 20737
779-2700

Linda Thornberry, Treasurer

23 14300 Gallant Fox Lane
Bowie, Maryland 20715

Nancy O'Brien, Treasurer

24 5611 A Landover Road
Landover, Md. 20784

Norma Lindsey, Treasurer

25 8900 Edgeworth Drive
Capitol Heights, Md. 20027
420-7050

Joseph Italiano, Treasurer

26 6427 Old Branch Avenue
Temple Hills, Md. 20748
449-6700

James Searles, Treasurer

27 P.O. Box 218
Clinton, Md. 20735
868-5550

Walter Meinhardt, Treasurer
(Russell Butler - contact person)

6222 Branch Avenue
Camp Springs, Md. 20748
423-6624

Beltway Plaza Mall
6212 Greenbelt Road
Greenbelt, Md. 20770
474-3476

Hervey Machen, Treasurer

83040393597

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1112

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 21, Timothy Lynch, Treas. \$ 1700.00
Seven hundred and 00/100 DOLLARS



FOR Tabloid making, leafletting
Ticket mailing

Sebastian Swales

⑈00001112⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1113

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 22, Linda Thornberry, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR _____

Sebastian Swales

⑈00001113⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1114

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 23, Nancy O'Brien, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR _____

Sebastian Swales

⑈00001114⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

EXHIBIT 2

1115

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 24, Norma Lindsey \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR _____

Sebastian Soles

⑈00001115⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1117

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 26, James Searle, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR _____

Sebastian Soles

⑈00001117⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

CITIZENS FOR SARBANES
P. O. Box 10644
BALTIMORE, MD 21204

1118

August 16, 1987

7-61/520

PAY TO THE ORDER OF Democratic Alliance District 27, Walter Meier-Lerdit, Treas. \$ 700.00
Seven hundred and 00/100 DOLLARS



FOR A11

Sebastian Soles

⑈00001118⑈ • ⑆052000618⑆

⑈6171958⑈ Asst. Treasurer ⑈0000070000⑈

James T. Hendley

FOR DEPOSIT ONLY
James T. Hendley Trust

064 2635

333 2457

FOR DEPOSIT IN THE
CITIZENS BANK & TRUST CO.
OF MARYLAND
TO THE CREDIT OF THE
WITHIN NAMED PAYEE

AUG 20 '82 013717340

65-296 PAY ANY BANK 65-296
BANK OF MARYLAND & TRUST CO. P.E.C.
CITIZENS BANK & TRUST CO.
OF MARYLAND
RAVERDALE, MARYLAND 65-296

AG '82' 18
PAY ANY BANK
BALTIMORE NATIONAL BANK
COLLEGE PARK, MD.
65-297

91-1
PAY ANY BANK
BALTIMORE NATIONAL BANK
BALTIMORE, MD.
652000100

8 3 0 4 0 3 9 3 5 9 1

1805588 15

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VENABLE, BAETJER, AND HOWARD

ATTORNEYS-AT-LAW

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

CMK

TO:

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

83040393592
CERTIFIED

P 260 267 632

MAIL

RECEIVED AT THE FBI

600# 8470

6427 Old Branch Avenue
Temple Hills, Maryland 20748
September 13, 1982

SEP 15 11:03 AM '82
P 2: 03

Dwayne Brown, Esquire
Federal Elections Commission
Franklin Square Building
1325 K Street N.W.
Washington, DC 20463

Dear Mr. Brown,

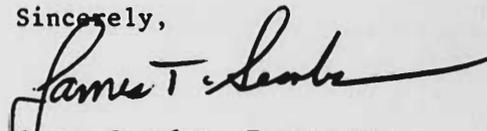
I am writing in response to recent allegations made to the Federal Elections Commission regarding the misuse of authority lines on recently printed 26th District Alliance brochures.

As you may know, there was absolutely no comingling of federal and state funds used in the printing of these brochures, as suggested by Mr. Blumenthal. Congressman Hoyer paid separately for his prorated portion of the brochure and his check came directly from the Hoyer for Congress Committee and was paid directly to the printer.

Inadvertently, the literature only contained a by authority line for the 26th District Democratic Alliance. When contacted about this, the printer began printing the Hoyer (and Sarbanes) by authority lines on the remaining literature of the campaign.

Thank you for your interest in this matter and I hope this adequately addresses your concerns.

Sincerely,

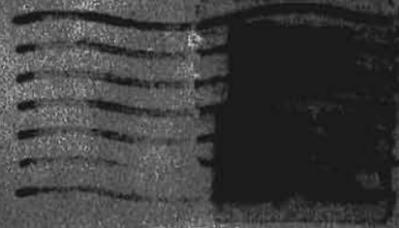

James Searles, Treasurer
26th District Democratic Alliance

JS/jlj

83040593570

DEMOCRATIC ALLIANCE
25th DISTRICT

HEADQUARTERS:
1417 Old Branch Avenue
Temple Hills, Maryland 20748



8304039



RECEIVED AT THE FPO
02 SEP 15 All: 00

By Authority: James Scaria, Treasurer

202744

600#8460

DOUGLAS M. BREGMAN, P.A.

ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

DOUGLAS M. BREGMAN *
LAURENCE H. BERBERT *

* ADMITTED TO PRACTICE IN MD, D.C.
* ADMITTED TO PRACTICE IN MD

TELEPHONE (301) 656-2707

225
PRINCE GEORGE'S COUNTY OFFICE
10210 GREENBELT ROAD
SUITE 720
SEABROOK, MARYLAND 20801

September 10, 1982

PT: 58

Duane Brown, Esq.
General Counsel's Office of
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1463
Democratic Alliance
Brochure Complaint

Dear Mr. Brown:

I am the attorney who has been asked to represent Steny Hoyer regarding a complaint filed by Charles Blumenthal arising out of a brochure printed and circulated by the Democratic Alliance. A letter from Steny Hoyer's Campaign Committee authorizing me to represent the Congressman in this matter is being forwarded to your office under separate cover. It also authorizes me to receive any notifications and other communications from the Commission pertaining to this case.

First, I would like to address the allegation that there may be co-mingling of funds from monies donated by corporations. This is not true in Mr. Hoyer's case. Mr. Hoyer's campaign has never accepted corporate donations. Additionally, there has been no co-mingling of funds in this matter either. In fact, Mr. Hoyer's campaign committee paid for its portion of the printing costs of this brochure with separate checks from its campaign money directly to the printer for the material in question.

Secondly, Mr. Blumenthal's charge that the Federal candidates on the brochure failed to have any Federal Authority Line printed on their brochures is unfortunately true. This line being deleted from the brochures was due to printer inadvertence. Before the brochure was printed it

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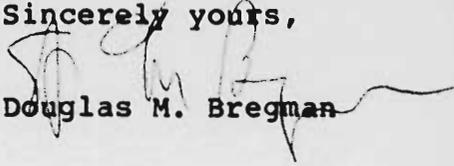
Page Two

was noticed by the campaign staff that the line was left off. The printer was immediately notified of the error. When the brochure came out the Authority Line was still not there. Publication was halted immediately. All the brochures now being distributed have the Authority Line included. The printer has blamed the proofreader for the error and vice versa. The Committee is now taking every precaution to not let this type of incident occur again.

I would ask that the Federal Election Commission take into consideration the information which I have outlined above. I have enclosed a sworn statement by Mr. William I. Garner, Jr., Treasurer for Steny Hoyer's Campaign, which includes verification of all of the statements made above. I sincerely believe that there is no reason to process further the complaint filed by Mr. Blumenthal. Accordingly, I would ask that the Commission close the file on this matter.

If your office requires any additional information or would like to discuss this matter with my office, please feel free to contact me.

Sincerely yours,


Douglas M. Bregman

DMB:lsg
Enclosures

83040693576

STATE OF MARYLAND :
COUNTY OF PRINCE GEORGE'S :

I, WILLIAM I. GARNER, JR., Treasurer for Hoyer for Congress Committee, do solemnly declare and affirm under the penalties of perjury that the following facts and information are true to the best of my knowledge, information and belief:

1. There has been no co-mingling of funds from monies donated by corporations to Mr. Hoyer's campaign. I have been the treasurer for the Committee since the beginning and I can verify that there has been no co-mingling of funds from donations from corporations to Mr. Hoyer's campaign.

2. Mr. Hoyer's campaign committee paid for its portion of the printing costs of the brochure printed by the Democratic Alliance with separate checks from its campaign money directly to the printer for the material in question. I, personally, wrote the checks to pay the printer directly for Mr. Hoyer's portion of the brochure. The campaign office has the cancelled checks as verification.

3. The Federal Authority Line was inadvertently left off of the Democratic Alliance brochure and was not done intentionally. The brochure was printed without the Authority Line by mistake. I have advised all of the campaign staff of this oversight and have taken every precaution to be sure that this type of incident does not occur again.

4. As Treasurer of the Hoyer campaign I can verify that the campaign has been run strictly under the

guidelines set up by the FEC and wherever there has been a question as to requirements or legality, we have contacted the appropriate source to be sure that we have stayed within the guidelines and the law.

5. I believe that the Commission should take all of this information into consideration and find that there is no cause to process the complaint of Charles Blumenthal any further.

WILLIAM I. GARNER, JR.
Treasurer for the Steny Hoyer
for Congress Campaign

Date: 9/9/82 William I. Garner, Jr.

8304039359

DOUGLAS M. BREGMAN, P.A.
ATTORNEY AT LAW
THE AIR RIGHTS BUILDING
7315 WISCONSIN AVENUE
SUITE 800 WEST
BETHESDA, MARYLAND 20814

WASHINGTON, DC 200
PM
11 SEP
1982



Duane Brown, Esq.
General Counsel's Office of
Federal Election Commission
Washington, D.C. 20463



HOYER

for Congress

802726

RECEIVED AT THE FBI
82 SEP 14 1982

Headquarters
8401 Corporate Drive
Metro-Plex—Suite 180
Landover, Maryland 20785
459-8484

September 10, 1982

Duane Brown, Esq.
General Counsel's Office of
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1463
Democratic Alliance
Brochure Complaint

12 SEP 14 1982
GENERAL INVESTIGATIVE
DIVISION

83040393600

Dear Mr. Brown:

Please be advised that Steny Hoyer and his campaign committee is authorizing you, by this letter, to accept Mr. Bregman as the attorney representing this office in the above captioned matter. Mr. Bregman is to receive any notifications and/or other communications from the Commission regarding this case.

If you have any questions concerning this matter you can contact Mr. Bregman's office or myself.

Sincerely yours,

William I. Garner, Jr.
William I. Garner, Jr.
Treasurer for Steny Hoyer's
Campaign

63040300

Postage
Paid
100
28785

WASHINGTON, DC
PM
13 SEP
1963



John W. ... Esq.
Federal Council's Office of
General Election Commission
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas M. Bregman, Esq.
The Air Rights Building
7315 Wisconsin Avenue, Suite 800 West
Bethesda, MD 20814

Re: MUR 1463

Dear Mr. Bregman:

This letter is to notify you that on September 10, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1463. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Since your client, Congressman Hoyer, was not originally a respondent in this matter, we did not send the committee a copy of the complaint. We do note, however, that we have received your letter to Mr. Duane Brown dated September 10, 1982.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040593602

If you have any questions, please contact Duane Brown, the staff member assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,


Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

83040393600

Enclosures

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

cc: Mr. William Garner, Jr.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles M. Kerr, Treasurer
Citizens for Sarbanes
P.O. BOX 10644
Baltimore, MD 21204

Re: MUR 1463

Dear Mr. Kerr:

This letter is to notify you that on September 10, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1463. Please refer to this number in all future correspondence.

You were not previously notified as you were not clearly identified as a respondent in the complaint. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

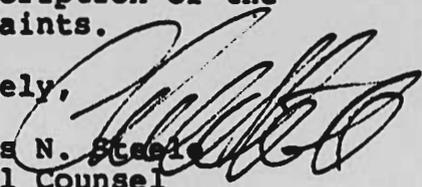
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

3304059360

If you have any questions, please contact Duane Brown, the staff member assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,


Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

83040393605

Enclosures

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

RECEIVED AT THE FEG
Ccc # 8433
82 SEP 10 P 1: 06



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

Democratic Central
Committee Delegates
26th District At-Large
Napoleon Lechoo

26th District
Rosalee Blumenthal

September 9, 1982

Mr. Steven Barndollar
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

Dear Mr. Barndollar:

Enclosed herewith is the latest missive from the DEMOCRATIC ALLIANCE whose Treasurer is James Searles. You will note that again there appears to be defective Federal Disclaimer on the back of the Voting Guide.

Please, also, note that the Bulk Rate Postage Permit is paid for by the DEMOCRATIC ALLIANCE and under U.S. Postal Regulations the Permit holder is required to pay for the entire cost of the postage. Here again is a possible co-mingling of corporate funds and a potential violation of the Federal statutes.

Should you require any additional information or if I can be of additional service to you, please do not hesitate to call upon me.

Sincerely yours,

Charles S. Blumenthal

Charles S. Blumenthal

State of Maryland)
Counof Prince George's) ss.

Subscribed and sworn to before me, in my presence, this 9th day of September 1982, a Notary Public in and for the County of Prince George's, State of Maryland.
My commission expires July 1, 1986.

Betsy A. Godbey
Notary Public

Chairperson
June White Dillard

Treasurer
Betsy A. Godbey

33040393606

12 SEP 10 P 4: 56

COMMUNICATIONS

YOU MAY TAKE THIS INTO THE VOTING BOOTH

DEMOCRATIC ALLIANCE SAMPLE BALLOT



HUGHES



HOYER

26th DISTRICT



KOMENDA



GLENDENING



DEMOCRATIC ALLIANCE



26th LEGISLATIVE DISTRICT

ECC # 8435

OFFICIAL VOTING MACHINE GUIDE

TURN TO BACK PAGE FOR EASY VOTING GUIDE

BULK RATE
US POSTAGE
PAID
DEMOCRATIC
ALLIANCE
26th DISTRICT

HEADQUARTERS:

6427 Old Branch Avenue
Temple Hills, Maryland 20748
449-6700
James Searles, Treasurer

65:78 01435

1205 04 09
THE BLUMENTHAL FAMILY
517 BARRYMORE DR
ORON HILLS, MD 20745

EASY VOTING GUIDE

26th LEGISLATIVE DISTRICT

LINE A	LINE B	LINE C
1A HUGHES & CURRAN	10B PATTERSON	7C KOMENDA
5A SARBANES	19B O'BRIEN	12C GLENDENING
10A JONES	21B VALDERRAMA	15C PRITCHETT
13A AMONETT	23B LAWLAN	23C PHELPS
16A ALUISI		
20A HARRIGAN		
22A ALEXANDER		
		LINE D
		10D RUMMAGE

830403936

DEMOCRATIC ALLIANCE

FOR QUICK ACCURATE VOTING — FOLLOW CHART

LINE A	1A	5A	10A	13A	16A	20A	22A	
LINE B	10B	19B	21B	23B				
LINE C	7C	12C	15C	23C				
LINE D	10D							

VOTE HUGHES•HOYER•KOMENDA•GLENDENING

AUTHORITY: JAMES SEARLES, TREASURER
 HOYER FOR CONGRESS, WILLIAM I. GARNER, JR.
 CITIZENS FOR SARBANES, CHARLES M. KERR



83040393609



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744



Mr. Steven Barndollar
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

02 SEP 10 P 1: 00

RECEIVED AT THE FEED

RECEIVED
CLERK OF THE HOUSE

62 SEP 11 1982

1982 SEP -8 PM 2:42
Headquarters
9205 Oxon Hill Rd.
Washington, Md. 20744
567-0700, 0701, 0702

Democratic Central
Committee Delegate
28th District At Large
Rep. Charles Blumenthal
28th District
Rep. Charles Blumenthal

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

September 3, 1982

The Hon. Paul S. Sarbanes
2327 Dirksen Senate Office Bldg.
Washington, D.C. 20510

Dear Senator Sarbanes:

Paul

May I take this opportunity to inform you that I have filed a formal complaint with the Federal Elections Commission concerning the manner in which a slate calling itself the Democratic Alliance under the authority of James Searles, Treasurer, has endorsed your candidacy, but has failed to indicate any Federal disclaimer or available report with the Federal Elections Commission.

Since the candidates on that slate have indicated in their own reports the receipt of corporate donations, there is a distinct possibility that there could be a co-mingling of those federally prohibited donations. Our people also desired to endorse you publicly on our literature, but we did not wish to go through the problems of maintaining a separate reporting system or run the risk of co-mingling corporate donations. I hope and trust that you will take the necessary steps to protect your campaign from well meaning friends who may be unaware of the severe restrictions placed upon your campaign financing by the federal statutes.

I wish you a most successful Primary and look forward to working with you in the General Election under a properly organized financial reporting system.

With kindest personal regards to you and your family, I remain

Sincerely yours,

Charles

Charles S. Blumenthal

CSB:bg

✓ cc: Federal Elections Commission

Chairperson
June White Dillard

Treasurer
Betsy A. Godbey

0 2 0 4 0 3 9 3 6 1 0

SEP 4 1982
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

Democratic Central
Committee Delegate
26th District At-Large
Napoleon Lechase

26th District
Charles Blumenthal

September 3, 1982

The Hon. Steny Hoyer
House of Representatives
Washington, D.C. 20515

Dear Representative Hoyer:

May I take this opportunity to inform you that I have filed a formal complaint with the Federal Elections Commission concerning the manner in which a slate calling itself the Democratic Alliance under the authority of James Searles, Treasurer, has endorsed your candidacy, but has failed to indicate any Federal disclaimer or available report with the Federal Elections Commission.

Since the candidates on that slate have indicated in their own reports the receipt of corporate donations, there is a distinct possibility that there could be a co-mingling of those federally prohibited donations. Our people also desired to endorse you publicly on our literature, but we did not wish to go through the problems of maintaining a separate reporting system or run the risk of co-mingling corporate donations. I hope and trust that you will take the necessary steps to protect your campaign from well meaning friends who may be unaware of the severe restrictions placed upon your campaign financing by the federal statutes.

I wish you a most successful Primary and look forward to working with you in the General Election under a properly organized financial reporting system.

With kindest personal regards to you and your family, I remain

Sincerely yours,

Charles S. Blumenthal

CSB:bg

✓ cc: Federal Elections Commission

Chairperson
June White Dillard



Treasurer
Betsy A. Godbey

83040393611

830403612

Headquarters
9305 Oxon Hill Rd.
Ft. Washington, Md. 20744



RECEIVED AT THE

07 SEP 7

Federal Election Commission
Attn: Mr. Steven Barndollar
1325 K St., N.W.
Washington, D.C. 20463

James Searles

Treasurer

Democratic Alliance

6427 Old Branch Ave

Temple Hills, Md 20748

~~MUR 1463~~
MUR 1463

83040393613



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Searles, Treasurer
Democratic Alliance
6427 Old Branch Ave.
Temple Hills, MD 20748

Re: MUR 1463

Dear Mr. Searles:

This letter is to notify you that on August 19, 1982 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1463. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

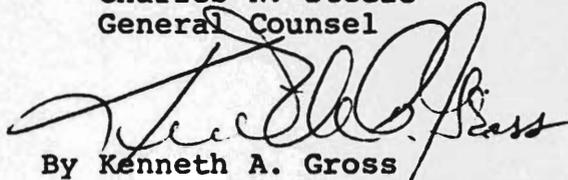
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040393614

If you have any questions, please contact Duane Brown the attorney assigned to this matter at (202)-523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

83040393615

Enclosures

43

GENERAL DELIVERY FORM

1. The following service is requested:

Show to whom and date delivered

Show to whom, date, and address delivered

RESTRICTED DELIVERY
(The restricted delivery fee is charged to addressee for return receipt fee.)

2. SERVICE ADDRESS TO:
James Seales
Pan Allina
Knapville, MO 207

3. TYPE OF SERVICE:
 Registered Insured
 Certified COD

4. I have received the article described above.
SIGNATURE Addressee Agent

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if required)

7. UNABLE TO DELIVER REASON:

4381





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1982

Mr. Charles S. Blumenthal
Democrats '82
9205 Oxon Hill Road
Fort Washington, Maryland 20744

Dear Mr. Blumenthal:

This letter is to acknowledge receipt of your complaint of August 19, 1982, and your follow-up letter of August 25, 1982, against Democratic Alliance which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

The confidentiality provisions in the Federal Election Campaign Act preclude us from informing you as an investigation progresses. Thus, you should not infer that we are not proceeding on a matter if you do not hear from us. We will, of course, inform you of any dispositive action taken by the Commission.

As to your request for advice on whether to file your own action in this matter, I refer you to the provisions of 2 U.S.C. § 437c(b)(1) which vest the Commission with exclusive primary jurisdiction in pursuing violations of the Federal Election Campaign Act. Thus, the court would lack jurisdiction to hear an action directly against a respondent without first bringing it before the Federal Election Commission.

Should you have or receive any additional information in this matter, please forward it to this Office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling

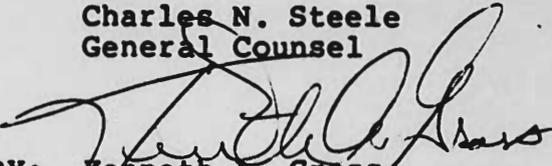
83040393616

Letter to Charles S. Blumenthal
Page Two

complaints. If you have any questions, please contact Steven
Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure

83040393617

Doc# 8329



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

2
AUG 26
AIO: 37
Democratic Central
Committee Delegates
28th District At-Large
Napoleon Lechoo
28th District
Rosalee Blumenthal

August 25, 1982

Charles N. Steele, Esq., Gen. Council
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Reference is made to my letter of August 19, 1982, in which I filed a complaint concerning a group of candidates identified as DEMOCRATIC ALLIANCE with a Mr. James Searles as Treasurer. Attached to that complaint I had enclosed a brochure which was being distributed. Since then I have received on this date a copy of the enclosed brochure addressed to my family and delivered by the U.S. Postal Service. This one appears to be a variance of the original brochure, as you will note, it contains Federal candidates without a Federal Authority or disclaimer line. It also contains the same possibility of co-mingling corporate funds in behalf of Federal candidates.

In the event that your office may be inundated with many complaints of violations and cannot investigate this complaint in a propitious manner so as to cause a secession of these continuing violations, would you deem it advisable for me to proceed against these violations in the Federal courts? I personally have a reluctance to do so in as much as your Commission appears to be a proper procedure and does have the administrative capability to cause corrective action.

May I have an acknowledgment from your office that you have received this material and may be taking the necessary steps toward correction action.

I look forward to hearing from you at your earliest convenience. I remain

Sincerely yours,

Charles S. Blumenthal
Charles S. Blumenthal

CSB:bg

State of Maryland)
County of Prince George's) ss.

Subscribed and sworn to before me, in my presence, this 25th day of August 1982, a Notary Public in and for the County of Prince George's, State of Maryland.

Chairperson
June White Dillard

My commission expires July 1, 1986.

Treasurer
Betsy A. Godbey

Betsy Ann Godbey
Notary Public

83040393619

83040

*Barryman Dr
Hill, Md.*



Charles N. Steele, Esq., Gen. Council
Federal Elections Commission
1325 K Street, N. W.
Washington, D.C. 20463

CC# 8297



Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744
567-0700, 0701, 0702

Senate Candidate
Charles S. Blumenthal

House of Delegates Candidates
Stephen A. Armhold
Marilyn Harrell
Ronald Hill

Democratic Central
Committee Delegates
7th District At-Large
Napoleon Lathrop

18th District
Charles Blumenthal

August 19, 1982

12:00

Charles N. Steele, Esq., Gen. Council
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Enclosed herewith is a brochure by a group called Democratic Alliance whose treasurer is James Searles and they have filed reports with the State Board of Elections in Annapolis, Maryland. There are Federal candidates on the brochure (U.S. Senator Sarbanes and U.S. Representative Hoyer) and there appears to be a disclaimer violation because there isn't any Federal Authority Line.

It also appears that there is an additional violation because the State candidates who have paid for this through Mr. Searles may have received corporate donations as provided for under Maryland law and many of these candidates may have transferred funds from their own treasurers to Mr. Searles. I understand that corporate donations, the use of which, are prohibited for Federal candidates.

Please inform me at your earliest convenience should your Agency take this matter under review for possible corrective action.

Sincerely yours,

Charles S. Blumenthal

State of Maryland)
County of Prince George's) ss.

Subscribed and sworn to before me, in my presence, this 19th day of August 1982, a Notary Public in and for the County of Prince George's, State of Maryland.
My commission expires July 1, 1986.

Notary Public

Treasurer

Betsy A. Godbey

Chairperson
June White Dillard

33040393610

GOVERNOR



HARRY HUGHES 1A

Harry Hughes campaigned for governor in 1978 on a platform emphasizing restoration of integrity to state government and revitalization of

the state economy. Hughes had 25 years of prior state service as a Caroline County member of the General Assembly and Secretary of the Department of Transportation. His record as legislator included the pioneering of civil rights legislation and authorship of fiscal programs to aid Maryland's poorer areas.

As Governor, he has successfully sponsored programs including the biggest tax relief plan in state annals and a crackdown on drunk drivers and drug abuse.

U.S. CONGRESS

Age 43. Steny Hoyer is one of Maryland's most energetic and effective political leaders. In 1981, Steny was elected to Congress from Maryland's Fifth District. He serves on the House Post Office and Civil Service Committee and House Banking Committee. A resident of Berkshire, Steny is a graduate of the University of Maryland and Georgetown Law Center. Before being elected to Congress, Steny served as State Senator for 12 years, four years as President of the Maryland Senate.

STENY H. HOYER



6A



DEMOCRATIC ALLIANCE 26th DISTRICT TEAM



STATE SENATE
FRANK KOMENDA 7C



HOUSE OF DELEGATES
CHRISTINE M. JONES 10A



HOUSE OF DELEGATES
MARIAN "MIDGE" PATTERSON 10B



HOUSE OF DELEGATES
FREDERICK C. RUMMAGE 10D

DEMOCRATIC ALLIANCE



DEMOCRATIC PRIMARY
SEPTEMBER 14, 1982

AUTHORITY JAMES SEARLES TREASURER



DEMOCRATIC ALLIANCE



26th DISTRICT TEAM



STATE SENATE

FRANK
KOMENDA



Senator Frank Komenda is a life-long resident of the community comprising the new 26th District. An eight-year veteran in the General Assembly, he was elected to the House of Delegates in 1974, served there until January 1982, and was appointed to fill the unexpired term of retiring Senator Peter Bozick. During his term in the House Frank served on the Economic Matters Committee and chaired the Subcommittee on Interest Rates and Unemployment Insurance.

In the Senate, Frank served on the Budget and Taxation Committee, Automated Income Maintenance Committee and Joint Committee on Energy. For his service in the 1982 session, Frank was honored by the Mental Health Association, the State Fireman's Association and Marlow Heights Elks Club.

Frank has a history of civic service including Jaycees, Sons of Italy, American Legion, Board of Trade, Chamber of Commerce, Cancer Society, Boys Scouts and PTA.

Frank graduated from St. Dominics, Oxon Hill High School, and George Washington University.

HOUSE OF DELEGATES

VOTE FOR ALL THREE



CHRISTINE M.
JONES



Christine Jones serves in the House of Delegates, appointed in January 1982. She has been a Democratic precinct chairman, coordinator and delegate to the 1980 Democratic National Convention.

Chris has been a teacher for sixteen years and teaches at Samuel Chase and Clinton Grove Elementary. She is active in the Educator's Association and PTA. She is a member of the National Conference of Christians and Jews, Southern Christian Leadership Conference, Southern Prince George's BPW Club, Delta Sigma Theta and Phi Delta Kappa.

She and her husband, Robert, are members of the Bethlehem Baptist Church and they have a son, Robert, Jr.



MARIAN "MIDGE"
PATTERSON



Marian (Midge) Patterson is a member of the Democratic Central Committee and served on the Fourth Congressional District Caucus to select the 1980 National Convention Delegates. She serves on the Board of Review for the State Department of Health and Mental Hygiene, appointed by the Governor in 1980.

Midge, who resides in Temple Hills with her husband, David, is a member of the League of Women Voters, Oxon Hill Democratic Club, John Hanson Women's Democratic Club, the Women's Democratic Club of Prince George's County, the Women's Political Caucus and Southern Maryland BPW Club.



FREDERICK C.
RUMMAGE



Fred Rummage was first elected to the House of Delegates in 1966 and is seeking his fifth term. Rummage serves as chairman of the Economic Matters Committee, is a key member of the House Leadership and the Rules and Policy Committee and the Governor's advisory group. Rummage served as chairman of the County's House Delegation from 1974 to 1978 and was a member of the Judiciary Committee.

As a committee chairman, Rummage sponsors important bills of the Governor's administration, often consumer protection issues. He resides in Camp Springs with his wife and children.

3304069361

83040336
82

Headquarters
9205 Oxon Hill Rd.
Ft. Washington, Md. 20744



Charles N. Steele, Esq., General Council
Federal Elections Commission
1325 K St., N.W.
Washington, D.C. 20463

82 AUG 23 4:19 PM '82

NEW YORK



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1463

Date Filmed 6/15/83 Camera No. --- 2

Cameraman SPE