



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1505

Date Filmed 6/17/83 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 27, 1983

Donald J. Simon, Esquire
Sonosky, Chambers, Sachse & Guido
1050 - 31st Street, N.W.
Washington, D.C. 20007

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

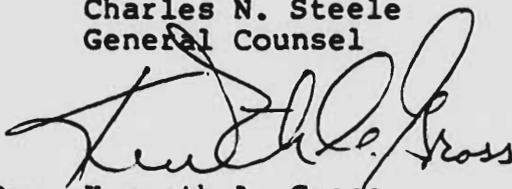
Dear Mr. Simon:

On May 24, 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. §§ 433(a) and 441d(a) provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040402626

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

83040402627

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).

2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982..

3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.

4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.

5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

V. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of ^{one hundred twenty-five dollars} (\$125) , pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

83040402628

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

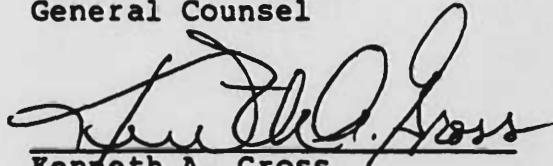
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

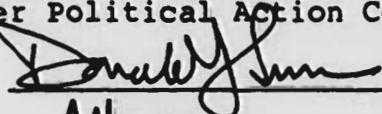
83040402639

Charles N. Steele
General Counsel

May 29, 1983
Date

By: 
Kenneth A. Gross
Associate General Counsel

May 13, 1983
Date

Nuclear Weapons Freeze Voting
Power Political Action Committee
BY: 
ITS: Attorney



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 27, 1983

Paul D. Kamenar, Esquire
Washington Legal Foundation
1612 K Street, N.W., Suite 502
Washington, D.C. 20006

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

Dear Mr. Kamenar:

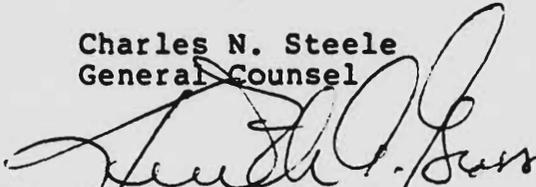
This is in reference to the complaint you filed with the Commission on October 29, 1982, concerning possible violations of the Federal Election Campaign Act of 1971, as amended (the Act) by the Nuclear Weapons Freeze Voting Power Political Action Committee.

After conducting an investigation in this matter, the Commission determined there was reason to believe that the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. §§ 433(a) and 441d(a), provisions of the Act. On May 24, 1983, a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 1549. If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040402630

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

83040402631

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).

2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982.

3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.

4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.

5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

V. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred twenty-five dollars (\$125), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

83040402632

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

By: *Kenneth A. Gross*
Kenneth A. Gross
Associate General Counsel

May 29, 1983
Date

May 13, 1983
Date

Nuclear Weapons Freeze Voting
Power Political Action Committee

BY: *Donald J. Sun*

ITS: Attorney

83040402633

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

8 3 0 4 0 4 0 2 6 3 4
This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).

2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982.

3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.

4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.

5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

V. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred twenty-five dollars (\$125), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

83040402635

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

May 29, 1983
Date

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

May 13, 1983
Date

Nuclear Weapons Freeze Voting
Power Political Action Committee

BY:

Donald J. Sun

ITS:

Attorney

83040402636



FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

Paul D. Kamenar, Esquire
Washington Legal Foundation
1612 K Street, N.W., Suite 502
Washington, D.C. 20006

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

Dear Mr. Kamenar:

This is in reference to the complaint you filed with the Commission on October 29, 1982, concerning possible violations of the Federal Election Campaign Act of 1971, as amended (the Act) by the Nuclear Weapons Freeze Voting Power Political Action Committee.

After conducting an investigation in this matter, the Commission determined there was reason to believe that the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. §§ 433(a) and 441d(a), provisions of the Act. On May 24, 1983, a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 1549. If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement
~~Closing Report~~

5/25/83
SAM

33040402637



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Donald J. Simon, Esquire
Sonosky, Chambers, Sachse & Guido
1050 - 31st Street, N.W.
Washington, D.C. 20007

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

Dear Mr. Simon:

On May , 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. §§ 433(a) and 441d(a) provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040402638

Handwritten signature/initials

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1505
Nuclear Weapons Freeze)
Voting Power Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 24, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1505:

1. Accept the signed conciliation agreement as submitted with the General Counsel's May 19, 1983 Memorandum to the Commission.
2. Accept the letters to the complainant and the respondent as attached to the May 19, 1983 Memorandum to the Commission.
3. Close the file.

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

Attest:

5/24/83
Date

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

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

5-19-83, 2:36
5-20-83, 2:00

833040402639



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CK*
DATE: May 19, 1983
SUBJECT: MUR 1505 - Memo to Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

33040402640

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

93 MAY 19 P 2: 36

May 19, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: MUR 1505 Conciliation Agreement

Attached is a conciliation agreement which has been signed by Donald J. Simon, counsel to the Nuclear Weapons Freeze Voting Power Political Action Committee.

*[exempt from disclosure pursuant to
2 USC. § 437g(a)(4)(B)]*

The Office of General Counsel recommends the acceptance of this agreement and the closing of the file, together with the letters to the complainant and respondent.

Attachments

1. Conciliation agreement
2. Letter to complainant
3. Letter to respondent

830404026411

GCC#50

LAW OFFICES
SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.
WASHINGTON, D.C. 20007

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
KENNETH J. GUIDO, JR.

TELEPHONE
(202) 342-9131

WILLIAM R. PERRY
LOYD BENTON MILLER
KEVIN A. GRIFFIN
MARY V. BARNEY
LOFTUS E. BECKER, JR.
DONALD J. SIMON

May 13, 1983

1983 MAY 13 PM 3:53

Stephen Mims, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Re: MUR 1505

Dear Mr. Mims:

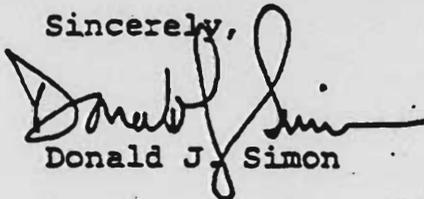
Pursuant to our telephone conversation of May 12, I am enclosing on behalf of Freeze PAC an executed copy of the conciliation agreement proposed by the Commission in MUR 1505.

[exempt from disclosure pursuant to
2 U.S.C. § 437g(a)(4)(B)]

It is my understanding that this conciliation agreement will become effective when executed by the Commission. It is my further understanding that this agreement represents a final resolution of MUR 1505.

Thank you for your cooperation in this matter.

Sincerely,


Donald J. Simon

DJS/m
Enclosure

33040402642



AH .1, p1.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

83040402643

2

Att 1, p 2

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).

2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982.

3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.

4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.

5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

V. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred twenty-five dollars (\$125), pursuant to 2 U.S.C. § 437g(a) (5) (A).

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

3304040264

3

AK1, P3

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

Date

By:

Kenneth A. Gross
Associate General Counsel

Date

Nuclear Weapons Freeze Voting
Power Political Action Committee

BY:

Donald J. ...

ITS:

Attorney

83040402615

(4)

Att 1, p4

8 3 0 4 0 1 0 2 6 1 6

5

BONOSKY, CHAMBERS, SACHSE & GUIDO

1050 1ST STREET, NW
WASHINGTON, DC 20007

1505 1580

May 13 19 83 ~~15 52~~
840

PAY TO THE ORDER OF Treasurer of the United States

\$ 125.00

One Hundred Twenty-five and no/100

DOLLARS

NS&T BANK

WASHINGTON, D.C. 20004

⑆001580⑆⑆054000522⑆

⑆6⑆⑆⑆199180⑆⑆

ATT 1, P 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul D. Kamenar, Esquire
Washington Legal Foundation
1612 K Street, N.W., Suite 502
Washington, D.C. 20006

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

Dear Mr. Kamenar:

This is in reference to the complaint you filed with the Commission on October 29, 1982, concerning possible violations of the Federal Election Campaign Act of 1971, as amended (the Act) by the Nuclear Weapons Freeze Voting Power Political Action Committee.

After conducting an investigation in this matter, the Commission determined there was reason to believe that the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. §§ 433(a) and 441d(a), provisions of the Act. On , 1983, a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 1549. If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

Att. 2 p. 1 of 1

6

83040402617



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Donald J. Simon, Esquire
Sonosky, Chambers, Sachse & Guido
1050 - 31st Street, N.W.
Washington, D.C. 20007

Re: MUR 1505
Nuclear Weapons Freeze Voting
Power Political Action Committee

Dear Mr. Simon:

On May , 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. §§ 433(a) and 441d(a) provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040402648

7

Att. 3/19/81

GCC#50

LAW OFFICES
SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.
WASHINGTON, D.C. 20007

TELEPHONE
(202) 342-9131

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
KENNETH J. GUIDO, JR.

WILLIAM R. PERRY
LLOYD BENTON MILLER
KEVIN A. GRIFFIN
MARY V. BARNEY
LOFTUS E. BECKER, JR.
DONALD J. SIMON

May 13, 1983

Stephen Mims, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Re: MUR 1505

Dear Mr. Mims:

Pursuant to our telephone conversation of May 12, I am enclosing on behalf of Freeze PAC an executed copy of the conciliation agreement proposed by the Commission in MUR 1505.

Exempt from disclosure pursuant to 20 USC 5437(a)(4)(B)

It is my understanding that this conciliation agreement will become effective when executed by the Commission. It is my further understanding that this agreement represents a final resolution of MUR 1505.

Thank you for your cooperation in this matter.

Sincerely,

Donald J. Simon
Donald J. Simon

DJS/m
Enclosure

33040402649

3040102630

1505 1580

~~1582~~
~~840~~

May 13 19 83

SONOSKY, CHAMBERS, SACHSE & GUIDO

1080 31ST STREET, NW
WASHINGTON, DC 20007

PAY TO THE ORDER OF *United States* \$ *125.00*

DOLLARS

One Hundred Twenty-Five and No/100

NET BANK

WASHINGTON, D.C.

[Signature]

16 1991801

10540005221

LAW OFFICES

SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.

WASHINGTON, D.C. 20007

GENERAL COUNSEL

13 MAY 13 P 3: 54

Stephen Mims, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

By Hand

8304042691

83040402632

LAW OFFICES

SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.

WASHINGTON, D.C. 20007

Kenneth Gross, Esq.
General Counsel's Office
Federal Elections Committee
1325 K Street, N.W.
Washington, D.C. 20006

BY HAND

RECEIVED AT THE FEC
Ccc # 9910
83 APR 25 AM: 21

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Ken Gudo / Don Simon
ADDRESS: Sonosky Law Firm 1050 31st St NW
Washington D.C. 20007
TELEPHONE: 202 - 342 - 9131

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

3 APR 25 P 2: 42

4/5/83
Date

Robert C Lewis
Signature

NAME: Robert Lewis / Freeze PAC
ADDRESS: 5825 Telegraph Ave. # 53 Oakland, CA 94609
HOME PHONE: 415 - ~~652-2487~~ 839-8553
BUSINESS PHONE: 415-652-2487

33040402650

830404026
Squeeze PAC

888 Telegraph Avenue, Room 53
Oakland, CA 94609

415 852-3487



Stephen Mims, Esquire
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

89 APR 25 11:21

RECEIVED
Ccc# 9858
83 APR 25 AM: 32

LAW OFFICES
SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.
WASHINGTON, D.C. 20007

TELEPHONE
(202) 342-9131

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
KENNETH J. GUIDO, JR.

WILLIAM R. PERRY
LLOYD BENTON MILLER
KEVIN A. GRIFFIN
MARY V. BARNEY
LOFTUS E. BECKER, JR.
DONALD J. SIMON

April 22, 1983

9:2:05

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

Re: MUR 1505

Dear Mr. Gross:

I am writing in response to your letter of April 20 proposing a conciliation agreement in MUR 1505 involving the activities of the Nuclear Weapons Freeze Voting Power Political Action Committee (Freeze PAC).

Freeze PAC accepts the Commission's findings that it failed to file a timely statement of organization, and that it failed to include a proper disclaimer on its solicitation materials.

[Exempt pursuant to 20 USC § 437g(a)(4)(B)]

First, we believe that it is important to put these violations in a context of the organization's history. Freeze PAC was founded last March to work, on a grass roots level, for passage of a state ballot proposition in California calling for a freeze of nuclear weapons. Freeze PAC received the bulk of its funds from door-to-door canvassing and street solicitations in contributions of no more than a few dollars each. The primary goal of the group was local, grass roots organizing on the nuclear weapons issue. The organization's work was carried on by volunteers and by low paid staff.

Initially, Freeze PAC was devoted solely to working on the state ballot proposition, to general advocacy and organizing on the nuclear weapons issue, and to conducting some non-partisan voter registration activities. Last July, as you know, the Freeze PAC organizers decided to supplement these activities by undertaking an additional effort of making modest independent expenditures in three congressional elections. The organization's activity in congressional campaigns was an outgrowth of, and subsidiary to, its original and primary purpose in campaigning for the state ballot initiative.

83040402655

Kenneth A. Gross
April 22, 1983
Page Two

As local grass roots organizers, the leaders of Freeze PAC were untutored in the requirements of the federal campaign finance laws. Further, they were unrepresented by counsel. Consequently, when Freeze PAC undertook to make some expenditures in federal elections, its organizers were unaware that they thereby triggered the requirements of the federal election laws. The inadvertent violations that are the subject of this MUR then followed. As two of Freeze PAC's officers said in a letter to Commissioner Elliot on February 14:

We realize that, because of our ignorance of the Federal Election Code and our inexperience in the realm of federal campaigning, we did not fully comply with the Code. We are making great efforts to acquaint ourselves with every aspect of federal and state campaign law so that we can ensure our compliance with all regulations in our future work. . . . We recognize the seriousness of our past incidents of non-compliance with the Code but ask that you recognize that any incidents of non-compliance were unintentional on our part.

Indeed, upon learning of the violations at issue, Freeze PAC's officers have taken all reasonable steps to cooperate with the Commission, to provide all requested information to the Commission, to admit their past failure to comply, to take immediate steps to bring themselves in compliance with the law, to retain counsel to advise them on compliance matters and to try to resolve this matter amicably with the Commission. As soon as Freeze PAC was informed by the Commission of the pending complaint which prompted this MUR, it filed a statement of organization with the Commission, and has since filed the periodic reports required by law. There are, as you know, additional questions which have arisen from those reports, but Freeze PAC is continuing to provide all requested information to the Commission in an effort to resolve these remaining matters.

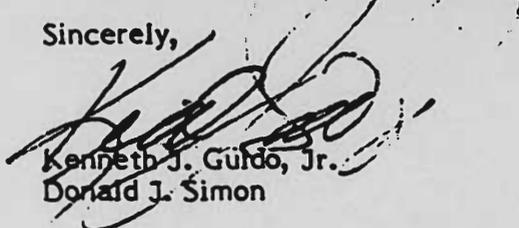
[exempt from disclosure pursuant to
2 USC §437g (a)(4)(B)]

83040402656

Kenneth A. Gross
April 22, 1983
Page Three

I look forward to hearing from you on this matter. I hope you will contact me at your earliest convenience so we can conclude the conciliation agreement.

Sincerely,



Kenneth J. Guldo, Jr.
Donald J. Simon

KJG:DJS:vww

cc: Stephen Mims, Esq.

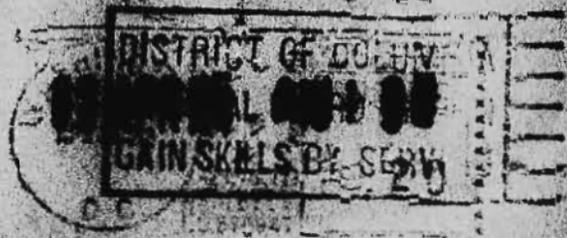
83040402657

LAW OFFICES

8 SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.

WASHINGTON, D.C. 20007



Stephen Mims, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

8
3
0
4
0
4
0
6
3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1983

Kenneth Guido, Esquire
Sonosky, Chambers, Sachse & Guido
1050 31st Street, N.W.
Suite 200
Washington, D.C. 20007

RE: MUR 1505
Nuclear Weapons Freeze
Voting Power Political
Action Committee

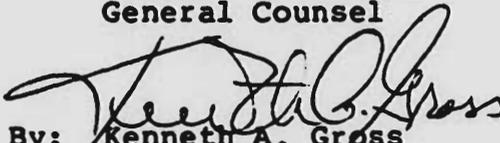
Dear Mr. Guido:

On January 25, 1983, the Commission found reason to believe that your client, the Nuclear Weapons Freeze Voting Power Political Action Committee ("Freeze PAC") violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i) and 441d(a). The Commission, on April 19, 1983, determined to take no further action regarding the issue of the untimely filing of the October, 1982, quarterly Report of Receipts and Disbursements, 2 U.S.C. § 434(a)(4)(A)(i), and, at the request of your clients, agreed to enter into negotiations directed towards reaching conciliation agreement in settlement of the remaining issues involved only in this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

83040102659



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Kenneth Guido, Esquire
Sonosky, Chambers, Sachse & Guido
1050 31st Street, N.W.
Suite 200
Washington, D.C. 20007

RE: MUR 1505
Nuclear Weapons Freeze
Voting Power Political
Action Committee

Dear Mr. Guido:

On January 25, 1983, the Commission found reason to believe that your client, the Nuclear Weapons Freeze Voting Power Political Action Committee ("Freeze PAC") violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i) and 441d(a). The Commission, on April 19, 1983, determined to take no further action regarding the issue of the untimely filing of the October, 1982, quarterly Report of Receipts and Disbursements, 2 U.S.C. § 434(a)(4)(A)(i), and, at the request of your clients, agreed to enter into negotiations directed towards reaching conciliation agreement in settlement of the remaining issues involved only in this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

33040402660

4/20/83
SM

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

63040402661

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).
2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982.
3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.
4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.
5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

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

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

B 3 0 4 0 4 0 2 6 6 6 2

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

By:

Date

Kenneth A. Gross
Associate General Counsel

Date

Nuclear Weapons Freeze Voting
Power Political Action Committee

BY: _____

ITS: _____

83040102663

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze Voting)
Power Political Action) MUR 1505
Committee (AKA Freeze PAC))
Sharon B. Delugach)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on April 19, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1505:

1. Approve and send the proposed Conciliation Agreement attached to the General Counsel's April 11, 1983 report.
2. Approve and send the proposed cover letter attached to the General Counsel's April 11, 1983 report, as amended during the meeting.

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

Attest:

4-19-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040402664



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*
DATE: APRIL 14, 1983
SUBJECT: OBJECTION - MUR 1505 General Counsel's
Report signed April 11, 1983

The above-named document was circulated to the
Commission on Tuesday, April 12, 1983 at 11:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u> X </u>
Commissioner Elliott	<u> </u>
Commissioner Harris	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Reiche	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, April 19, 1983.

83040402663

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
)
Nuclear Weapons Freeze Voting)
Power Political Action)
Committee (AKA Freeze PAC))
Sharon B. Delugach)

83 APR 11 P 3: 51
MUR 1505

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 11, 1982, the Office of General Counsel received a complaint which named the Nuclear Weapons Freeze Voting Power Political Action Committee (Freeze PAC) and Sharon B. Delugach (Regional Director of Freeze PAC) as respondents. Complainant alleged that Freeze PAC failed to register and file reports as a political committee. 2 U.S.C. §§ 433(a) and 434(a)(4)(A)(i). Complainant concluded, therefore, that it was also likely that Freeze PAC had failed to meet the recordkeeping requirements of 2 U.S.C. § 432(c). In addition, complainant cited Freeze PAC's failure to provide the proper disclaimer on solicitation materials which advocated the defeat of three clearly identified candidates. 2 U.S.C. § 441d(a).

Upon the recommendation of the Office of General Counsel, the Commission, on January 25, 1983, determined there was no reason to believe Freeze PAC violated 2 U.S.C. § 432(c). 1/ The Commission did determine, however, that due to the untimely submission of its Statement of Organization and late receipt of its October, 1982, quarterly Report of Receipts and Disburse-

1/ Freeze PAC did file a Statement of Organization with the Clerk of the House on September 22, 1982, with an effective date of July 9, 1982. Prior to that time, Freeze PAC had registered and filed reports with California authorities.

83040402666

ments 2/ there was reason to believe Freeze PAC violated 2 U.S.C. §§ 433(a) and 434(a)(4)(A)(i). The Commission also concluded that due to the failure to provide the proper disclaimer on its solicitation materials, Freeze PAC violated 2 U.S.C. § 441d(a). No finding was made regarding Ms. Delugach (who was neither treasurer nor custodian of the books).

On February 23, 1983, Freeze PAC submitted a response to the Commission's reason to believe notification. 3/ That response admitted the violations and requested pre-probable cause conciliation. Respondents did assert, however, that the report had been sent by certified mail, but that it was not delivered to the Post Office until after business hours on the fifteenth. (The post mark on the envelope is illegible.) We do not believe any further inquiry into this matter is necessary and conclude that respondent's request for pre-probable cause conciliation is appropriate.

II. LEGAL ANALYSIS

A. Late Registration, 2 U.S.C. § 433(a)

The October, 1982, quarterly Report of Receipts and Disbursements clearly indicated that Freeze PAC met the

2/ This report, due by October 15, 1982, was not received by the Commission until October 19, 1982.

3/ Attachment 1

83040402657

definition of a political committee as early as July 9, 1982, when it spent \$5,001 in independent expenditures. 2 U.S.C. § 431(4)(A). 2 U.S.C. § 433(a) requires such a political committee to file a Statement of Organization within 10 days after becoming a political committee. Freeze PAC's Statement of Organization, filed on September 22, 1982, was over two months late. Indeed, by the time the Statement of Organization was filed, the committee had spent \$9,532.50 in independent expenditures. The committee's response admits that the Statement of Organization was delinquent by ten weeks.

B. Late filing of a quarterly Report, 2 U.S.C. § 434(a)(4)(A)(i)

2 U.S.C. § 434(a)(4)(A)(i) requires each non-authorized political committee to file "quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter" except as otherwise provided. The Commission's regulations at 11 C.F.R. § 104.5(c) provides, in relevant part, that when a report is sent by certified mail, it is to be deemed as filed on the date of the U.S. post mark. As previously noted, Freeze PAC's October, 1982, quarterly Report was received four days after the due date, but was sent by certified mail. Although Respondents do not contest the Commission's reason to believe determination, it appears that the report was more likely only one day late. The Office of General Counsel recommends, therefore, that the Commission take no further action regarding this issue.

83040402659

C. Failure to provide proper disclaimer, 2 U.S.C. § 441d(a)(3)

2 U.S.C. § 441d(a)(3), in pertinent part, requires that whenever any such political committee "makes an expenditure for the purpose of financing communications expressly advocating the ... defeat of a clearly identified candidate ... through any direct mailing, or any other type of general public political advertising, such communication, if not authorized by a candidate ... shall clearly state the name of the person who paid for the communication and state the communication is not authorized by any candidate" Nowhere in the sample of solicitation materials used by Freeze PAC (as submitted with the complaint) is any reference made to who paid for the communication nor that it was not authorized by a candidate (this would be appropriate in the case of independent expenditures). Again, Freeze PAC does not contest the Commission's earlier reason to believe determination in this regard.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

There is no evidence from the facts presented by complainant or other FEC record of reports and statements filed, that Freeze PAC knowingly and willfully violated the Act. Indeed, Freeze PAC was heretofore active in California referenda campaigns and registered and filed reports with the California Secretary of State. Freeze PAC does admit the violations but suggests that the violations were due merely to their lack of experience "in

83040402659

the realm of federal campaigning."

The Office of General Counsel would view a civil penalty in
[exempt pursuant to 2 USC § 437g(a)(4)(B)]
the amount of _____ to be appropriate under the circumstances.

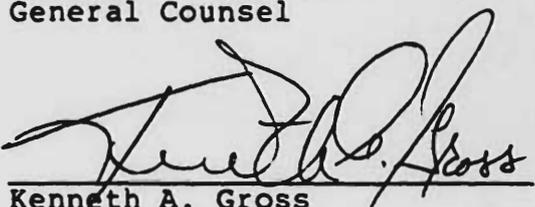
The failure by Freeze PAC to follow the precise requirements of
2 U.S.C. § 441d(a) is mitigated by language in the body of the
communications included in the complaint which identifies Freeze
PAC as the force behind the solicitation. There is, however, no
language tending to provide the statement required of the
candidate portion of the disclaimer. The civil penalty would
consider the good faith efforts by Freeze PAC to resolve this
matter and further consideration that it was at least making
efforts to comply with state election laws.

IV. RECOMMENDATION

Approve and send the attached proposed Conciliation
Agreement and cover letter.

April 11, 1983
Date

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - Response by Freeze PAC, received February 22, 1983
- 2 - Cover letter to Freeze PAC
- 3 - Proposed Conciliation Agreement

83040102670

209115
Freeze PAC

99 P3:23

Mims

February 14, 1983

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

Re: MUR 1505

Dear Mr. Mims:

Enclosed is a copy of our response to the above referenced case. I very much appreciated your helpfulness during our telephone conversation of February 4th.

Please contact me at your earliest convenience if there is any information I can provide to General Counsel which will expedite the resolution of this complaint.

Again, thank you for your cooperation and willingness to clarify Federal Election Commission procedures.

Sincerely,

Susan M. Higginbotham

Susan M. Higginbotham
Financial Manager
(415)549-2297

8 3 0 4 0 4 0 2 6 7 2

Freeze PAC

February 14, 1983

Ms. Lee Ann Elliott
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1505

Dear Ms. Elliott:

In the above-referenced complaint, we, as the Nuclear Weapons Freeze Voting Power Political Action Committee (Freeze-PAC), have been informed that the Commission has determined that there is reason to believe we have violated certain provisions of the Federal Campaign Act of 1971. Our response to each of the alleged violations is as follows:

1. Failure to timely file our Statement of Organization: As set forth in our correspondence of October 15, 1982 and November 19, 1982 (attached), we acknowledge that we were delinquent by ten weeks in the filing of our Statement of Organization.

2. Failure to timely file October quarterly report due October 15, 1982: According to our records (attached), our report was mailed on the evening of October 15, 1982, by certified mail. Since we did not mail the report until after postal business hours on the 15th, our receipt of certification is not validated by a postal clerk. We, therefore, have no records verifying our date of mailing.

3. Failure to include on solicitation materials the appropriate disclaimer required by the Act: Although our committee name is printed on each piece of our literature, we did not explicitly state that the committee paid for the literature and that the committee was not authorized by any candidate or candidate's committee.

In summary, we agree to the facts of our apparent violations as set forth in your letter of January 26, 1983. We also agree that the Commission has jurisdiction over this matter. We realize that, because of our ignorance of the Federal Election Code and our inexperience in the realm of federal campaigning, we did not fully comply with the Code. We are making great efforts to acquaint ourselves with every aspect of federal and state campaign law so that we can ensure our compliance with all

Ms. Lee Ann Elliott
February 14, 1983
Page 2.

regulations in our future work.

We recognize the seriousness of our past incidents of non-compliance with the Code but ask that you recognize that any incidents of non-compliance were unintentional on our part. We respectfully request that this matter be resolved as simply as possible and that MUR 1505 be subject of a pre-probable cause conciliation. We will cooperate with General Counsel and the Federal Election Commission as fully as possible in order that the burden imposed on you to investigate this case be relieved.

Please inform us of the status of this matter.

Sincerely,

Robert C. Lavis

Robert C. Lavis
Treasurer

Sharon B. Delugach

Sharon B. Delugach
Regional Director

cc: Mr. Stephen Mims

8304040267

Att 1, p3

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

Freeze PAC

November 19, 1982

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received the I.D. #C00152412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

3
3
0
4
0
4
0
2
6
7
8

We have enclosed a copy of the cover letter which was sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C. Lavis, Treasurer

Sharon B. Delugach, Regional Director

Encls.

cc: Charles N. Steele,
Stephen Mims

P 271 794 393

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Sec of state <i>Do Clerk of the House</i>	
POSTAGE	
CERTIFIED FEE	\$
SPECIAL DELIVERY	c
RESTRICTED DELIVERY	c
OPTIONAL SERVICES	
RETURN RECEIPT SERVICE	c
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE <i>10/15/82</i> <i>FEL Quarterly Report</i>	

PS Form 3800, Apr. 1976

83040402677

Att 1, PG



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kenneth Guido, Esquire
Sonosky, Chambers, Sachse & Guido
1050 31st Street, N.W.
Suite 200
Washington, D.C. 20007

RE: MUR 1505
Nuclear Weapons Freeze
Voting Power Political
Action Committee

Dear Mr. Guido:

On January 25, 1983, the Commission found reason to believe that your client, the Nuclear Weapons Freeze Voting Power Political Action Committee ("Freeze PAC") violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i) and 441d(a). The Commission, on 1983, determined to take no further action regarding the issue of the untimely filing of the October, 1982, quarterly Report of Receipts and Disbursements, 2 U.S.C. § 434(a)(4)(A)(i), and, at the request of your clients, agreed to enter into negotiations directed towards reaching conciliation agreement in settlement of the remaining issues involved in this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Att. 2

83040402678

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nuclear Weapons Freeze)
Voting Power Political) MUR 1505
Action Committee)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Washington Legal Foundation. An investigation has been conducted, and reason to believe has been found that the Nuclear Weapons Freeze Voting Power Political Action Committee ("Respondent") violated 2 U.S.C. § 433(a) by its failure to timely file its Statement of Organization. The Commission also determined there was reason to believe the Respondent violated 2 U.S.C. § 441d(a) by its failure to provide the required disclaimer on its solicitations.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

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

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

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

83040402679

Att 3, p1

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

1. The Nuclear Weapons Freeze Voting Power Political Action Committee is a political committee as defined by 2 U.S.C. § 431(4).

2. The Nuclear Weapons Freeze Voting Power Political Action Committee became a political committee subject to the registration and reporting requirements of the Federal Election Campaign Act not later than July 9, 1982.

3. The Nuclear Weapons Freeze Voting Power Political Action Committee filed its Statement of Organization on September 22, 1982.

4. The October, 1982, Quarterly Report of Receipts and Disbursements shows independent expenditures totaling \$5,001 having been made on July 9, 1982.

5. Solicitation materials provided as exhibits to the complaint which were used by the Respondent did not contain the appropriate disclaimer required by 2 U.S.C. § 441d(a).

V. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of ^[exempt pursuant to 2 USC § 437g(a)(4)(B)] dollars, pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

83040402680

AHach 3, p2

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

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

Date

By: _____
Kenneth A. Gross
Associate General Counsel

Date

Nuclear Weapons Freeze Voting
Power Political Action Committee

BY: _____

ITS: _____

83040402681

Att 3, P3

204639

RECEIVED AT THE FBI
Ccc# 9877

83 APR 13 P 1: 00

LAW OFFICES
SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.
WASHINGTON, D.C. 20007

TELEPHONE
(202) 342-9131

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
KENNETH J. GUIDO, JR.

WILLIAM R. PERRY
LLOYD BENTON MILLER
KEVIN A. GRIFFIN
MARY V. BARNEY
LOFTUS E. BECKER, JR.
DONALD J. SIMON

April 13, 1983

10:00:15

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

Re: MUR 1505

Dear Mr. Mims:

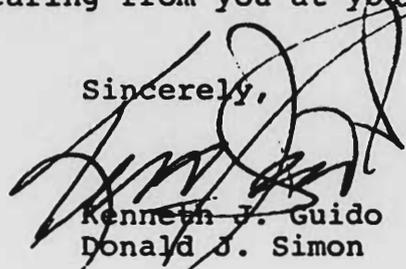
I am writing on behalf of Freeze PAC in the above referenced matter to request the initiation of pre-probable cause conciliation pursuant to 2 U.S.C. sec.437g(a)(4).

This firm has been only recently retained by Freeze PAC to represent the committee in this matter. Before this point, as you are aware, the committee was unrepresented in its dealings with the Commission. We have acted expeditiously to acquaint ourselves with the legal and factual bases of this matter, and request that the General Counsel's office now begin conciliation discussions with us. We hope to resolve this matter quickly and amicably.

This request supplements the request made by Freeze PAC on February 14, 1983 for the initiation of pre-probable cause conciliation. That request was made by letter from Robert Lavis, Treasurer, and Sharon Delugach, Regional Director of Freeze PAC, to Vice Chairman Lee Ann Elliot, with a copy to yourself.

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

Sincerely,



Kenneth J. Guido
Donald J. Simon

KJG:DJS/m

cc: Kenneth Gross
Assistant General Counsel

33040402682

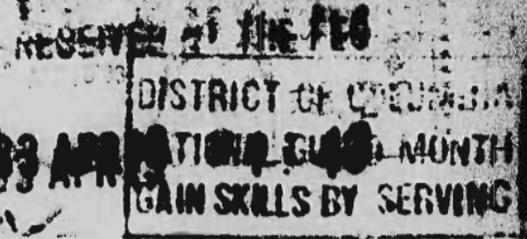
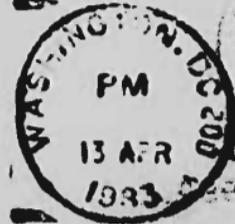
8 3 0 4 0 4 2 6 8 3

LAW OFFICES

SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.

WASHINGTON, D.C. 20007



Kenneth Gross, Esquire
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

20 463

204600

Call # 9855

83 APR 14 P 4: 07

LAW OFFICES
SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.
WASHINGTON, D.C. 20007

TELEPHONE
(202) 342-9131

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
KENNETH J. GUIDO, JR.

WILLIAM R. PERRY
LLOYD BENTON MILLER
KEVIN A. GRIFFIN
MARY V. BARNEY
LOFTUS E. BECKER, JR.
DONALD J. SIMON

April 13, 1983

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

Re: MUR 1505

Dear Mr. Mims:

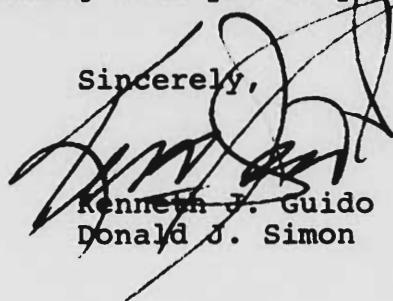
I am writing on behalf of Freeze PAC in the above referenced matter to request the initiation of pre-probable cause conciliation pursuant to 2 U.S.C. sec.437g(a)(4).

This firm has been only recently retained by Freeze PAC to represent the committee in this matter. Before this point, as you are aware, the committee was unrepresented in its dealings with the Commission. We have acted expeditiously to acquaint ourselves with the legal and factual bases of this matter, and request that the General Counsel's office now begin conciliation discussions with us. We hope to resolve this matter quickly and amicably.

This request supplements the request made by Freeze PAC on February 14, 1983 for the initiation of pre-probable cause conciliation. That request was made by letter from Robert Lavis, Treasurer, and Sharon Delugach, Regional Director of Freeze PAC, to Vice Chairman Lee Ann Elliot, with a copy to yourself.

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

Sincerely,



Kenneth F. Guido
Donald J. Simon

KJG:DJS/m

cc: Kenneth Gross
Assistant General Counsel

3304010263

8304040635

LAW OFFICES

SONOSKY, CHAMBERS, SACHSE & GUIDO

1050 31ST STREET, N.W.

WASHINGTON, D. C. 20007

RECEIVED
83 APR 14 P 4:07

**Stephen Mins, Esquire
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463**

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Ken Guido / Don Simon
ADDRESS: Sonosky Law Firm 1050 31st St NW
Washington DC 20007
TELEPHONE: 202-342-9131

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

3 AM 11
PM: 24

8304010263

4/5/83
Date

Robert C. Lavis
Signature

NAME: Robert Lavis / Freeze PAC
ADDRESS: 5825 Telegraph Ave #53 Oakland, CA 94609
HOME PHONE: 415-839-8553
BUSINESS PHONE: 415-652-2487

7
6
2
6
0
4
0
0
0
3
8
GROSS PAC

225 Telegraph Avenue, Room 53
Oakland, CA 94609
(415) 882-3487

OAKLAND, CA 946
PM
8 APR
1983

SAVE
YOUR VIS
WEEK

KENNETH GROSS
ASSOCIATE GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

83 APR 11 4:00

Exc# 9538

Freeze PAC

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 FEB 22 P 3: 59

February 14, 1983

83 FEB 22 P 5: 00

Ms. Lee Ann Elliott
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1505

Dear Ms. Elliott:

In the above-referenced complaint, we, as the Nuclear Weapons Freeze Voting Power Political Action Committee (Freeze-PAC), have been informed that the Commission has determined that there is reason to believe we have violated certain provisions of the Federal Campaign Act of 1971. Our response to each of the alleged violations is as follows:

1. Failure to timely file our Statement of Organization:
As set forth in our correspondence of October 15, 1982 and November 19, 1982 (attached), we acknowledge that we were delinquent by ten weeks in the filing of our Statement of Organization.

2. Failure to timely file October quarterly report due October 15, 1982: According to our records (attached), our report was mailed on the evening of October 15, 1982, by certified mail. Since we did not mail the report until after postal business hours on the 15th, our receipt of certification is not validated by a postal clerk. We, therefore, have no records verifying our date of mailing.

3. Failure to include on solicitation materials the appropriate disclaimer required by the Act: Although our committee name is printed on each piece of our literature, we did not explicitly state that the committee paid for the literature and that the committee was not authorized by any candidate or candidate's committee.

In summary, we agree to the facts of our apparent violations as set forth in your letter of January 26, 1983. We also agree that the Commission has jurisdiction over this matter. We realize that, because of our ignorance of the Federal Election Code and our inexperience in the realm of federal campaigning, we did not fully comply with the Code. We are making great efforts to acquaint ourselves with every aspect of federal and state campaign law so that we can ensure our compliance with all

83040402699

Ms. Lee Ann Elliott
February 14, 1983
Page 2.

regulations in our future work.

We recognize the seriousness of our past incidents of non-compliance with the Code but ask that you recognize that any incidents of non-compliance were unintentional on our part. We respectfully request that this matter be resolved as simply as possible and that MUR 1505 be subject of a pre-probable cause conciliation. We will cooperate with General Counsel and the Federal Election Commission as fully as possible in order that the burden imposed on you to investigate this case be relieved.

Please inform us of the status of this matter.

Sincerely,

Robert C. Lavis

Robert C. Lavis
Treasurer

Sharon B. Delugach

Sharon B. Delugach
Regional Director

cc: Mr. Stephen Mims

33040402688

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

33040402690

Freeze PAC

November 19, 1982

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received the I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

We have enclosed a copy of the cover letter which was sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C. Lavis, Treasurer

Sharon B. Delugach, Regional Director

Encls.

cc: Charles N. Steele
Stephen Mins

83040402692

P 271 794 393
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		See of state		
RECEIVED BY		Po Clerk of the House		
POST OFFICE		PO STATE AND ZIP CODE		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		c	
	SPECIAL DELIVERY		c	
	RESTRICTED DELIVERY		c	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	c
			SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY	c
			SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	c
			SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	c
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				
10/15/82 FEL Quarterly Report				

PS Form 3800, Apr. 1976

Freeze PAC

5225 Telegraph Avenue, Room 53
Oakland, CA 94609

(415) 652-3487

8304040269



CERTIFIED
P 457 820 445
MAIL

Ms. Lee Ann Elliott
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**RETURN RECEIPT
REQUESTED**

03 FEB 93 10:00

204113

Case 9542

99 P3:23

Freeze PAC

February 14, 1983

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

Re: MUR 1505

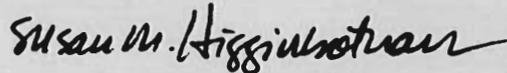
Dear Mr. Mims:

Enclosed is a copy of our response to the above referenced case. I very much appreciated your helpfulness during our telephone conversation of February 4th.

Please contact me at your earliest convenience if there is any information I can provide to General Counsel which will expedite the resolution of this complaint.

Again, thank you for your cooperation and willingness to clarify Federal Election Commission procedures.

Sincerely,



Susan M. Higginbotham
Financial Manager
(415) 549-2297

33040402674

Freeze PAC

February 14, 1983

Ms. Lee Ann Elliott
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1505

Dear Ms. Elliott:

In the above-referenced complaint, we, as the Nuclear Weapons Freeze Voting Power Political Action Committee (Freeze-PAC), have been informed that the Commission has determined that there is reason to believe we have violated certain provisions of the Federal Campaign Act of 1971. Our response to each of the alleged violations is as follows:

1. Failure to timely file our Statement of Organization: As set forth in our correspondence of October 15, 1982 and November 19, 1982 (attached), we acknowledge that we were delinquent by ten weeks in the filing of our Statement of Organization.

2. Failure to timely file October quarterly report due October 15, 1982: According to our records (attached), our report was mailed on the evening of October 15, 1982, by certified mail. Since we did not mail the report until after postal business hours on the 15th, our receipt of certification is not validated by a postal clerk. We, therefore, have no records verifying our date of mailing.

3. Failure to include on solicitation materials the appropriate disclaimer required by the Act: Although our committee name is printed on each piece of our literature, we did not explicitly state that the committee paid for the literature and that the committee was not authorized by any candidate or candidate's committee.

In summary, we agree to the facts of our apparent violations as set forth in your letter of January 26, 1983. We also agree that the Commission has jurisdiction over this matter. We realize that, because of our ignorance of the Federal Election Code and our inexperience in the realm of federal campaigning, we did not fully comply with the Code. We are making great efforts to acquaint ourselves with every aspect of federal and state campaign law so that we can ensure our compliance with all

Ms. Lee Ann Elliott
February 14, 1983
Page 2.

regulations in our future work.

We recognize the seriousness of our past incidents of non-compliance with the Code but ask that you recognize that any incidents of non-compliance were unintentional on our part. We respectfully request that this matter be resolved as simply as possible and that MUR 1505 be subject of a pre-probable cause conciliation. We will cooperate with General Counsel and the Federal Election Commission as fully as possible in order that the burden imposed on you to investigate this case be relieved.

Please inform us of the status of this matter.

Sincerely,

Robert C. Lavis

Robert C. Lavis
Treasurer

Sharon B. Delugach

Sharon B. Delugach
Regional Director

cc: Mr. Stephen Mims

83040402696

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

83040402697

Freeze PAC

November 19, 1982

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received the I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

We have enclosed a copy of the cover letter which was sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C. Lavis, Treasurer

Sharon B. Delugach, Regional Director

Encls.

cc: Charles N. Steele,
Stephen Mims

P 271 794 393

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

CITY AND STATE <i>See of state</i>	
POST OFFICE <i>Post Clerk of the House</i>	
POST OFFICE STATE AND ZIP CODE	
POSTAGE	\$
CERTIFIED FEE	c
OPTIONAL DELIVERY	c
RESTRICTED DELIVERY	c
OPTIONAL SERVICES	
RETURN RECEIPT SERVICE	
SHOW TO WHOM AND DATE OF DELIVERY	c
SHOW TO WHOM DATE AND TIME OF DELIVERY	c
SHOW TO WHOM DATE AND TIME OF DELIVERY WITH RESTRICTED DELIVERY	c
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE <i>10/15/82</i> <i>FEL Quarterly Report</i>	

PS Form 3800, Apr. 1976

83040402699

Freeze PAC

5825 Telegraph Avenue, Room 53
Oakland, CA 94609

(415) 662-3487

83040402700

CERTIFIED
P 457 820 446
MAIL

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

**NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES**

BERKELEY
FEB 17 1983
CALIF.
U.S. POSTAGE
\$1.72



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 1983

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting
Power Political Action Committee
5825 Telegraph Avenue, #53
Oakland, CA 94609

RE: MUR 1505

Dear Mr. Lavis:

The Federal Election Commission notified you on November 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 January 25, 1983, determined that there is reason to believe that your committee has violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), and 441d(a), provisions of the Act. Specifically, it appears that the Nuclear Weapons Freeze Voting Power Political Action Committee: (1) failed to timely file its Statement of Organization; (2) failed to timely file its October Quarterly Report of Receipts and Disbursements due October 15, 1982; and (3) failed to include on its solicitation materials the appropriate disclaimer required by the Act. The Commission further determined that there was no reason to believe your committee violated 2 U.S.C. § 432(c).

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.

83040402701

Letter to Robert C. Louis
Page 2

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

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,



Lee Ann Elliott
Vice Chairman

Enclosure
Procedures

83040402702

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	MUR 1505
)	
Nuclear Weapons Freeze Voting)	
Power Political Action Committee)	
(Freeze PAC))	
Sharon B. Delugach)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 25, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1505:

1. Find no reason to believe the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. § 432(c).
2. Find reason to believe the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), and 441d(a).
3. Approve the letter as attached to the First General Counsel's Report dated January 21, 1983.

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

Attest:

1-26-83
Date

Marjorie W Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	1-21-83, 10:23
Circulated on 48 hour tally basis:	1-21-83, 4:00

83040402703

January 21, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1505

Please have the attached First General Counsel's Report distributed to the Commission on a 48 hour tally basis. asThasensitive matter. Thank you.

Attachment

cc: Mims

3304040270

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S ^{83 JAN 21} REPORT AIO: 23

DATE AND TIME OF TRANSMITTAL BY MUR NO. 1505
OGC TO THE COMMISSION 1-21-83 DATE COMPLAINT RECEIVED
BY OGC 11/1/82
DATE OF NOTIFICATION TO
RESPONDENT 11/3/82
STAFF MEMBER Mims

COMPLAINANT'S NAME: Washington Legal Foundation
RESPONDENTS' NAMES: Nuclear Weapons Freeze Voting
Power Political Action Committee
(Freeze PAC)
Sharon B. Delugach
RELEVANT STATUTE: 2 U.S.C. §§ 432(c), 433(a),
434(a)(4)(A)(i) and 441d(a)
INTERNAL REPORTS CHECKED: All Reports/Statements Through
January 19, 1983
FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

In its complaint, the Washington Legal Foundation alleges the failure of the Nuclear Freeze Voting Power Political Action Committee (Freeze PAC) to register and file reports as a political committee. In addition, exhibits to the complaint include a copy of a fundraising letter which advocates the defeat of three clearly identified federal candidates, yet no disclaimer appears on the material required by 2 U.S.C. § 441d(a).

FACTUAL AND LEGAL ANALYSIS

I. Whether Freeze PAC Violated
2 U.S.C. §§ 432(c) and 433(a)

A response to the complaint was received on November 19, 1982. See Attachment 1. Respondent explained that on September 22, 1982, Freeze PAC filed a Statement of Organization

83040402705

with the Clerk of the U.S. House of Representatives. The effective date of the registration statement is indicated as July 9, 1982. 1/ The committee's first Report of Receipts and Disbursements was received by the Commission on October 19, 1982, and covered the period from July 9, 1982 through September 30, 1982. That report clearly reflected independent expenditures having been made opposing three candidates as early as July 9, 1982. 2/ (Total independent expenditures for the period totaled \$9,532.50, while total receipts were in the amount of \$68,235 and disbursements totaled \$83,046.50.) It appears, therefore, that Freeze PAC became a political committee on July 9, 1982, and should have registered within 10 days thereafter.

The letter referred to in note 1, supra, indicated that the committee had previously registered and filed reports with the California Secretary of State with its primary purpose of encouraging voter support of that state's Proposition 12 (the Bilateral Nuclear Weapons Freeze Initiative). Registration as a political committee was apparently prompted by a decision to make expenditures in opposition to federal candidates. The

1/ In a letter to the Commission dated October 15, 1982, the Committee explained the significance of this date: "On July 9, 1982, Freeze PAC announced its intention to target three federal Congressional candidates who do not support the Nuclear Weapons freeze." See Attachment 1, p. 3.

2/ On July 9, 1982, alone, a total of \$5,001.00 was reported as having been spent as independent expenditures.

85040402706

letter further states: "Freeze PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5.00 or less." Thus, it appears that Freeze PAC has been meeting the recordkeeping requirements of 2 U.S.C. § 432(c), but that it violated 2 U.S.C. § 433(a) by its failure to submit its Statement of Organization within 10 days after becoming a political committee.

II. Whether Freeze PAC Violated
2 U.S.C. § 434

As previously noted, Freeze PAC submitted an October, 1982 Quarterly Report of Receipts and Disbursements. Such reports are due by October 15. The report was not received by the Commission until October 19, 1982. Because the report was submitted four days late, the General Counsel recommends that the Commission find reason to believe Freeze PAC violated 2 U.S.C. § 434(a)(4)(A)(i).

III. Whether Freeze PAC Violated
2 U.S.C. § 441d(a)

The exhibit submitted by complainant does not carry the disclaimer required by 2 U.S.C. § 441d(a). The materials solicit contributions and plainly advocate the defeat of clearly identified candidates. It appears that the materials were used as part of a direct mail campaign. No explanation is provided by the committee in its response.

The General Counsel recommends, therefore, that the Commission determine there is reason to believe Freeze PAC violated 2 U.S.C. § 441d(a).

33040102707

IV. Whether Sharon Delugach
Violated the Act

Complainant names Delugach in her capacity as Regional Director of the PAC. According to the committee's Statement of Organization, Ms. Delugach is neither the Treasurer (Robert C. Lavis is) nor Custodian of Records (Susan Higginbotham is). There is no basis, we believe, for making separate findings that Delugach violated the provisions of the Act.

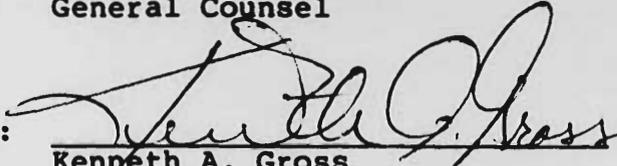
RECOMMENDATIONS

1. Find no reason to believe the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. § 432(c).
2. Find reason to believe the Nuclear Weapons Freeze Voting Power Political Action Committee violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), and 441d(a).
3. Approve the attached letter.

Charles N. Steele
General Counsel

January 20, 1983
Date

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - Response of Freeze PAC
- 2 - Proposed letter

83040402708

203 726

Freeze PAC

REC'D
Ccc# 8990
82 NOV 22 P 2: 47

November 19, 1982

12 NOV 22 P 3: 55

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received acknowledgement of receipt of the statement and we were assigned I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

Enclosed is a copy of the cover letter sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C Lavis
Robert C. Lavis, Treasurer

Sharon B. Delugach
Sharon B. Delugach, Regional Director
(415)652-2487; (415)549-2297

Encls.

cc: Mr. Charles M. Steele
✓ Mr. Stephen Mims

Attachment 1, page 1 of 4

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. 2. Date
Nuclear Weapons Freeze Voting Power Political Action Committee 7-9-82

(b) Address (Number and Street) 3. FEC Identification Number
5825 Telegraph Ave. #53

(c) City, State and ZIP Code 4. Is this an amended Statement? YES NO
Oakland, California 94609

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

(c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

(d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
SUSAN M. HIGGINBOTHAM	5825 TELEGRAPH AVE #53, OAKLAND CA 94609	FINANCIAL MANAGER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
ROBERT C. LAUIS	5825 TELEGRAPH AVE. #53, OAKLAND CA 94609	TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
SECURITY PACIFIC NATIONAL BANK	1401 WILSHIRE BLVD. SANTA MONICA CA 90401
SECURITY PACIFIC NATIONAL BANK	2301 SHATTUCK AVE., BERKELEY CA 94704
FIRST ENTERPRISE BANK	1632 FRANKLIN ST., OAKLAND CA 94612

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

ROBERT C. LAUIS Robert C. LaUIS 9/20/82
 Type or Print Name of Treasurer SIGNATURE OF TREASURER Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4088

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

83040402711

3 3 0 4 0 4 0 2 7 1 2



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

ACKNOWLEDGEMENT OF RECEIPT
OF

Statement Of Organization

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting Power Political Action Committee
5825 Telegraph Ave. #53
Oakland, CA 94609

DATE: 9/27/82

NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00162412

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 18)
GPO 500-000

Attachment 1, page 484



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting
Power Political Action Committee
5825 Telegraph Avenue, #53
Oakland, CA 94609

RE: MUR 1505

Dear Mr. Lavis:

The Federal Election Commission notified you on November 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 , 1983, determined that there is reason to believe that your committee has violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), and 441d(a), provisions of the Act. Specifically, it appears that the Nuclear Weapons Freeze Voting Power Political Action Committee: (1) failed to timely file its Statement of Organization; (2) failed to timely file its October Quarterly Report of Receipts and Disbursements due October 15, 1982; and (3) failed to include on its solicitation materials the appropriate disclaimer required by the Act. The Commission further determined that there was no reason to believe your committee violated 2 U.S.C. § 432(c).

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.

Attachment 2, page 1 of 2

33040402713

Letter to Robert C. Louis
Page 2

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

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Procedures

B 3 0 4 0 4 0 2 7 1 4

Attachment 2, page 2 of 2

Freeze PAC

RECEIVED AT THE FEC
Cat 9005
82 NOV 24 11:08

November 19, 1982

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received acknowledgement of receipt of the statement and we were assigned I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

Enclosed is a copy of the cover letter sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C Lavis

Robert C. Lavis, Treasurer

Sharon B. Delugach

Sharon B. Delugach, Regional Director
(415)652-2487; (415)549-2297

Encls.

cc: Mr. Charles M. Steele
Mr. Stephen Mims

8304040271E

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. 2. Date
Nuclear Weapons Freeze Voting Power Political Action Committee **7-9-82**

(b) Address (Number and Street) 3. FEC Identification Number
5825 Telegraph Ave. #53

(c) City, State and ZIP Code 4. Is this an amended Statement? YES NO
Oakland, California 94609

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

(c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

(d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
SUSAN M. HIGGINBOTHAM	5825 TELEGRAPH AVE #53, OAKLAND CA 94609 / 415-848-7251	FINANCIAL MANAGER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
ROBERT C. LAUIS	5825 TELEGRAPH AVE. #53, OAKLAND CA 94609	TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
SECURITY PACIFIC NATIONAL BANK	1401 WILSHIRE BLVD. SANTA MONICA CA 90401
SECURITY PACIFIC NATIONAL BANK	2301 SHATTUCK AVE., BERKELEY CA 94704
FIRST ENTERPRISE BANK	1632 FRANKLIN ST., OAKLAND CA 94612

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

ROBERT C. LAUIS	<i>Robert C. LaUIS</i>	9/20/82
Type or Print Name of Treasurer	SIGNATURE OF TREASURER	Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

8 3 0 4 0 4 0 2 7 1 7



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

**ACKNOWLEDGEMENT OF RECEIPT
OF**

Statement Of Organization

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting Power Political Action Committee
5825 Telegraph Ave. #53
Oakland, CA 94609

DATE: 9/27/82

**NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED**

Your assigned FEC IDENTIFICATION NUMBER is C00162412

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 15)
GPO 899-689

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

83040402718

Freeze PAC

5825 TRELLAM #53

107 W. Main Street
Vicksburg, GA 30297

OAKLAND CA 94609

(800) 702-4707

1
3
0
4
0
4
0
2
3
RER

CERTIFIED
P 329 709 124
MAIL



MR. KENNETH A. GROSS
ASSOCIATE GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

02 NOV 24 P 1:05

203427

RECEIVED AT THE FE
Ccc # 8991
82 NOV 22 P 2: 47

Freeze PAC

November 19, 1982

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

Re: MUR 1505

2 NOV 22 P 3: 56

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received acknowledgement of receipt of the statement and we were assigned I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

Enclosed is a copy of the cover letter sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C. Lavis
Robert C. Lavis, Treasurer

Sharon B. Delugach
Sharon B. Delugach, Regional Director
(415)652-2487; (415)549-2297

Encls.

cc: Mr. Charles M. Steele
Mr. Stephen Mims

8304010272

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) Check if name or address is changed. 2. Date
Nuclear Weapons Freeze Voting Power Political Action Committee **7-9-82**

(b) Address (Number and Street) 3. FEC Identification Number
5825 Telegraph Ave. #53

(c) City, State and ZIP Code 4. Is this an amended Statement? YES NO
Oakland, California 94609

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
-------------------	-----------------------------	---------------	----------------

(c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

(d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
SUSAN M. HIGGINBOTHAM	5825 TELEGRAPH AVE #53, OAKLAND CA 94609	415-848-7251 / FINANCIAL MANAGER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
ROBERT C. LAUIS	5825 TELEGRAPH AVE. #53, OAKLAND CA 94609	TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
SECURITY PACIFIC NATIONAL BANK	1401 WILSHIRE BLVD. SANTA MONICA CA 90401
SECURITY PACIFIC NATIONAL BANK	2301 SHATTUCK AVE., BERKELEY CA 94704
FIRST ENTERPRISE BANK	1632 FRANKLIN ST., OAKLAND CA 94612

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

ROBERT C. LAUIS	<i>Robert C. LaUIS</i>	9/20/82
Type or Print Name of Treasurer	SIGNATURE OF TREASURER	Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530. Local 202-523-4068

8 3 0 4 0 4 0 2 7 2 2



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

ACKNOWLEDGEMENT OF RECEIPT
OF
Statement Of Organization

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting Power Political Action Committee
5825 Telegraph Ave. #53
Oakland, CA 94609

DATE: 9/27/82

NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00162412

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 15)
GPO 500-500

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

33040402722

203726

RECEIVED AT THE FEC

CC# 8990

82 NOV 22 P2: 47

Freeze PAC

November 19, 1982

12 NOV 22 P 3: 55

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

Re: MUR 1505

Dear Mr. Gross:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed its Statement of Organization with the Federal Election Commission on September 20, 1982. On September 27, 1982 we received acknowledgement of receipt of the statement and we were assigned I.D. #C00162412. Our filing was completed one month prior to the time the above referenced complaint was filed against us.

Enclosed is a copy of the cover letter sent with our quarterly report. We were unaware of the F.E.C. filing requirement until ten weeks after we announced our intention to target for defeat three Congressional Representatives. We filed our Statement of Organization immediately upon learning of the requirement and we have subsequently filed two disclosure reports: the third quarterly report and the pre-General Election report. Hence, although our Statement of Organization was filed late, we submitted all required reports on time.

We regret that our lack of experience in and knowledge about federal elections prevented us from filing our Statement of Organization on time. Ours is a grassroots based organization and we had not, until this summer, worked for or against federal candidates. We have made and will continue to make every possible effort to comply with F.E.C. requirements and we apologize for the inconvenience our inexperience has caused you.

Please contact us at once should you have any questions about this letter.

Sincerely,

Robert C. Lavis
Robert C. Lavis, Treasurer

Sharon B. Delugach
Sharon B. Delugach, Regional Director
(415)652-2487; (415)549-2297

Encls.

cc: Mr. Charles M. Steele
Mr. Stephen Mims

8304010272

8 3 0 4 0 4 0 2 7 2 7



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

ACKNOWLEDGEMENT OF RECEIPT
OF

Statement Of Organization

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

Robert C. Lavis, Treasurer
Nuclear Weapons Freeze Voting Power Political Action Committee
5825 Telegraph Ave. #53
Oakland, CA 94609

DATE: 9/27/82

NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00162412

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/78)
(Supersedes FEC Forms 13, 14, and 18)
SPO 000-000

Freeze PAC

October 15, 1982

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

Dear Sir/Madam:

The Nuclear Weapons Freeze Voting Power Political Action Committee (dba Freeze-PAC) filed a Statement of Organization as a Campaign Committee with the California Secretary of State on March 22, 1982 (State I.D. #821203). The committee formed as an uncontrolled committee to register and educate voters and in support of the Bilateral Nuclear Weapons Freeze Initiative (Proposition 12) on the California ballot.

On July 9, 1982, Freeze-PAC announced its intention to target three Federal Congressional representatives who do not support the Nuclear Weapons Freeze. No separate committee was organized and Freeze-PAC's primary purpose has continued to be to support Proposition 12.

Freeze-PAC has accepted no corporate or labor contributions. Ours is a mass based organization and most of our contributions are for \$5 or less.

This quarterly report is the first FEC report we have been required to file. We received our FEC I.D. number in the mail but did not receive reporting forms or instructions. An FEC information specialist informed me that we should report our cash-on-hand on the day we became eligible as a Federal Committee and report all contributions received and distributions made after, but not prior to, that date. The independent expenditures we have itemized are the only costs we incurred solely on the behalf of the three targeted candidates. We did, however, report all the expenditures we have made since becoming a Federal Campaign Committee.

Please notify me at once if the format of this report does not comply with your requirements.

Thank you for your consideration.

Sincerely,

Susan Higginbotham

Susan Higginbotham
Financial Manager

Encls.

83040402728

0304040273

FRODO PAC

505 TRUMAN ST

WASHINGTON DC 20007

RECEIVED
NOV 22 1992

RECEIVED



MR. STEVEN NIMS
FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

MUR # 1505
DATE 11/2/62

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

83040 2730

① Freeze PAC
5825 Telegraph Avenue
Room 53
Oakland, CA 94609

② Nuclear Weapons Freeze
Voting Power Political Action Committee
5273 College Avenue
Oakland, CA 94618

~~Attn: Sharon~~

③ Nuclear Weapons Freeze
Voting Power Political Action Committee
Sharon DeLoach, Regional Director
5273 College Avenue
Oakland, CA 94618



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 3, 1982

Mr. Paul P. Kamenar
Washington Legal Foundation
1612 K Street, NW
Suite 502
Washington, D.C. 20006

Dear Mr. Kamenar:

This letter is to acknowledge receipt of your complaint of October 26, 1982, against the Freeze PAC and Nuclear Weapons Freeze Voting Power PAC which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. 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 complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

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

By Kenneth A. Gross
Associate General Counsel

Enclosure

8304042731



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 3, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nuclear Weapons Freeze
Voting Power Political Action Committee
5273 College Avenue
Oakland, CA 94619

Re: MUR 1505

Dear Sir/Madam:

This letter is to notify you that on November 1, 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 1505. 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.

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.

83040402732



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 3, 1982

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Sharon Delugach, Regional Director
Nuclear Weapons Freeze

Voting Power Political Action Committee
5273 College Avenue
Oakland, CA 94619

Re: MUR 1505

Dear Ms. Delugach:

This letter is to notify you that on November 1, 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 1505. 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.

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.

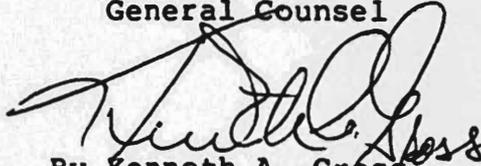
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040402754

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4039. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

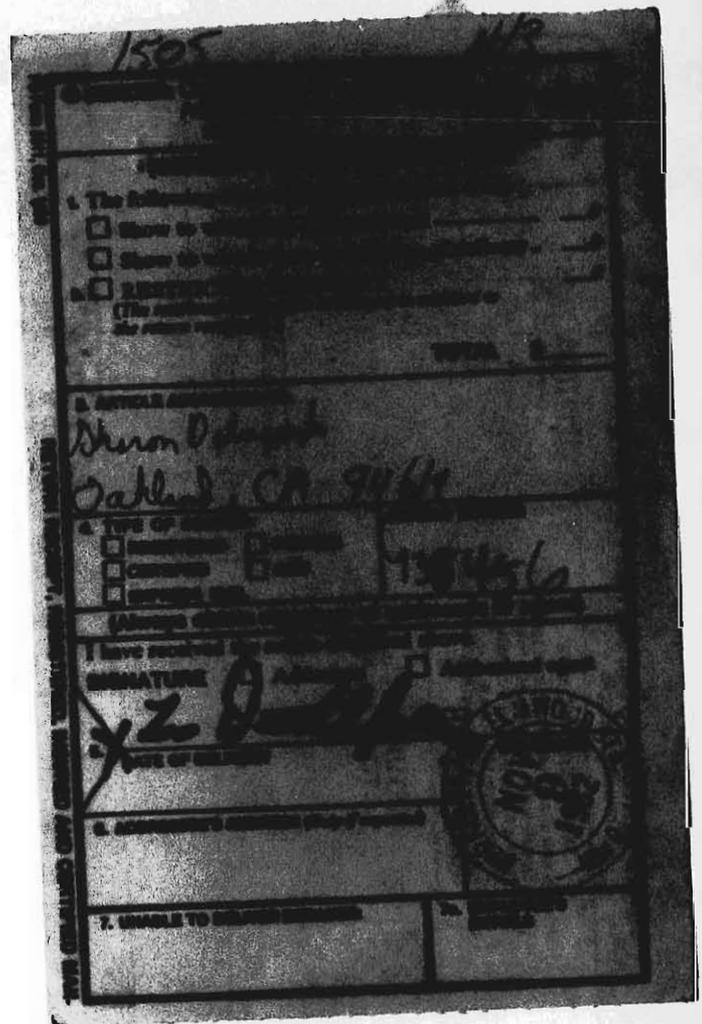


By Kenneth A. Gross
Associate General Counsel

83040402733E

Enclosures

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





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 3, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Freeze PAC
5825 Telegraph Avenue
Room 53
Oakland, CA 94609

Re: MUR 1505

Dear Sir/Madam:

This letter is to notify you that on November 1, 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 1505. 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.

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.

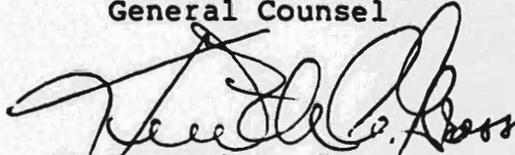
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040402766

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4039. 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

8 3 0 4 0 4 0 2 7 3 7

Enclosures

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

1505

COMMISSION ON

1. The following information is required:

- Show to whom the complaint is directed.
- Show to whom the complaint is referred.
- RESTRICTED (The number of copies of the complaint to be made for the entire record.)

2. OFFICE ADDRESS (If any)

Frage MC
Oakland, CA 94612

3. TYPE OF BUSINESS

- BUSINESS
- CONTRACT
- SERVICE

(Always obtain approval of the Commission before releasing any information.)

I have received the entire complaint file.

SIGNATURE Address Individual only

[Signature]

4. DATE OF RECEIPT

5. NAME OF BUSINESS

6. NAME OF BUSINESS

7. UNABLE TO OBTAIN BUSINESS



RECEIVED AT THE FEC
6cc# 8816
82 OCT 29 P2:46

NUCLEAR WEAPONS FREEZE)
VOTING POWER POLITICAL ACTION COMMITTEE)
(a/k/a FREEZE PAC))

HAND DELIVERED
Matter Under Review
(MUR)

SHARON DELUGACH)
REGIONAL DIRECTOR)

12 NOV 1 P3:42

COMPLAINT

Pursuant to 2 U.S.C. §437g, the Washington Legal Foundation hereby files this Complaint against the above-named respondents for violating numerous provisions of the Federal Election Campaign Act and the regulations promulgated thereunder.

Attached as Exhibit A is a copy of a fundraising letter printed and distributed by respondents which advocate the defeat of Congressmen Don Clausen, Charles Pashayan and Robert Lagomarsino. According to news accounts, this group has raised \$155,000. Exhibit B. A check of Federal Election Commission records does not show that the respondent Nuclear Weapons Voting Power Political Action Committee has registered with the FEC. Consequently, the respondent has violated numerous provisions of the law, including but not limited to 2 U.S.C. §§432 (accounting), 433 (registration), 434 (reporting), 441d (disclaimers on solicitation and other materials).

Complainant believes that "Freeze PAC" is another name for Nuclear Weapons Freeze Voting Power Political Action Committee, although the "Freeze PAC" literature has the address 5825 Telegraph Avenue, Room 53, Oakland, California, 94609 and the Nuclear Weapons Freeze Voting Power PAC has the address

83040402738

WASHINGTON LEGAL FOUNDATION
1612 K STREET, N. W.
SUITE 502
WASHINGTON, D. C. 20006
202-857-0240

5273 College Avenue, Oakland, California, 94618. If the FEC's investigation shows that indeed there are two separate groups, then complainant hereby files this complaint against both entities.

Complainant requests the Commission to act expeditiously on this Complaint because of the flagrant nature of the violations committed. This Complaint is separate from the one filed by the Foundation against Council for a Livable World and other respondents on October 15.

Respectfully submitted,

Daniel J. Popeo

Daniel J. Popeo
General Counsel

DATE: OCTOBER 25, 1982

Paul D. Kamenar

Paul D. Kamenar
Director of Litigation

Washington Legal Foundation
1612 K Street, N.W.
Suite 502
Washington, D.C. 20006
(202) 857-0240

Washington X
District of Columbia X SS

Subscribed and sworn to before me this 26th day of October, 1982.

Francine D. Pirek

Paul D. Kamenar
MY COMMISSION EXPIRES
JULY 14, 1986

33040402739
WASHINGTON LEGAL FOUNDATION
1612 K STREET, N. W.
SUITE 502
WASHINGTON, D. C. 20006
202-857-0240

consistently vote for Nuclear Weapons and against programs for the American People.



Rep. Don Clausen
California



Rep. Robert Lagomarsino
California



Rep. Charles Pashayan, Jr.
California

You know the terrifying numbers already:

15 000 warheads able to destroy all life on our planet in an exchange lasting only two hours — already in place. You've heard the increasingly war-like talk from the Reagan Administration. We all know the cost to our economy of the last round of the weapons race — recession and high interest rates, lost jobs and cuts in Social Security and programs serving human needs. And we know that the Reagan Administration wants an even larger share of our Nation's wealth to go for weapons spending over the next several years.

You may not know that you can make a difference.

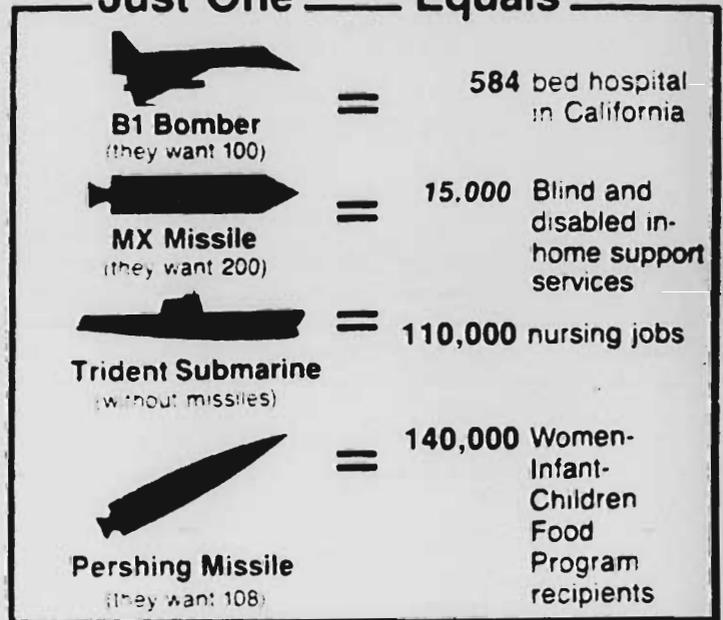
Changing just 2 votes in Congress would have passed the Nuclear Freeze Resolution. Changing just 2 votes in Congress would have sent the MX Missile to defeat. We Californians can change 3 votes to "No" to more by defeating Congressman Don Clausen, Robert Lagomarsino and Charles Pashayan, Jr. at the polls in November.

We can elect a Nuclear Freeze Majority to Congress.

Four out of five Americans support a Freeze on Nuclear Weapons building right now. 750 000 Californians have signed the Nuclear Weapons Freeze Initiative and thousands have donated their time and money to the effort. The Nuclear DUMP campaign is the way to prove to the political leaders of our country and our State that if they won't take action to stop the Nuclear Weapons madness we will take their job away and give it to someone who will.

But we need your help. Take the time to fill out the coupon below and send it in. And DUMP Clausen, Lagomarsino and Pashayan in November.

Just One — Equals



In California this year:

Each \$1 Billion spent by the Federal Government can create



Military spending sacrifices jobs in the economy.

We can tip the balance in Congress this November.

EXH. A

Yes I want to help Freeze PAC's campaign to change California's vote in Congress. Enclosed is my membership contribution of

- \$_____ a month Pledging Member
- \$500. a year Sponsor Membership
- \$100. a year Sustaining Member
- \$100. a year Organizational Membership
- \$50. a year Supporting Member
- \$25. a year Regular Member
- \$15. a year Contributing Member
- \$_____ Nuclear DUMP contribution

Yes I want to help with the Nuclear **DUMP!** I will: register voters _____ canvass a precinct _____ sell bumperstickers _____ get out the vote _____ caravan to a Nuclear DUMP district _____

Name _____ Phone (_____) _____

Address _____ City _____ Zip _____

Occupation _____ Employer _____

Send checks to: **Freeze PAC**, 5825 Telegraph Ave., Room 53, Oakland, CA 94609

The Nuclear DUMP is a campaign of The Freeze Political Action Committee to tip the balance in Congress to a Nuclear Freeze Majority. On several crucial votes the powerful Weapons Lobby has won by the barest of margins: the MX Missile passed its July 22nd test 212 For to 209 Against. Representatives Clausen, Lagomarsino and Pashayan have repeatedly ignored the opinion of the majority of Americans by consistently voting money for the production of the MX Missile and the B-1 Bomber, for the manufacture of nerve gas and the Neutron Bomb—which kills people while leaving machinery and buildings intact. **They have voted FOR virtually every major weapons build-up bill presented to Congress.** To finance this build-up they have voted to cut funds from programs such as Medicare, Unemployment Insurance, housing and children's nutrition.

Freeze PAC, is working along with Californians for a Bilateral Nuclear Weapons Freeze to pass Proposition 13, the Nuclear Freeze Initiative. And we're taking the next step. We're working to defeat politicians who blindly ignore the dangers of unrestrained nuclear weapons build-up. Our main efforts have gone into registering the 50% of California voters who have given up voting. We have registered 50,000 people in less than four months. 95,000 Californians have signed our Letter of Concern which was presented to the California Delegation to Congress on August 23rd. And our canvassing efforts have reached more than 20,000 people whose generous contributions and support have moved us closer to a Nuclear FREE Congress.

We can tip the balance in Congress this November.

Freeze PAC
 5825 Telegraph Avenue, Room 53
 Oakland, CA 94609
 (415) 542-0487

Buy Rate
 10% Postage
 #20
 Permit No. 306
 Oakland, CA

**Join in the
 Nuclear DUMP**

... fill out the coupon and send it in.

NUCLEAR WEAPONS FREEZE

VOTING POWER POLITICAL ACTION COMMITTEE

STATEMENT OF PURPOSE

The nuclear arms race between the United States and the Soviet Union must be stopped. The current policies of the two nations have led to accelerated production of nuclear weapons. Each new nuclear weapon increases the likelihood of nuclear war and drains billions of dollars away from jobs, health care, housing and other vital human needs.

The nuclear arms race can only be stopped through a negotiated agreement between the political leaders of the two nations that are involved. For this to come about, a freeze on the production of nuclear weapons must become a top priority and focus of the governments of the Soviet Union and the United States. The success or failure of this endeavor within the coming years may determine the fate of each person on earth.

Across the United States, an unprecedented wave of opposition to the nuclear weapons race is building. Recent polls have shown that more than 70% of the people of the United States support a nuclear weapons freeze. Millions of Americans are scared, frustrated, and angry about the nuclear weapons which jeopardize their own lives, their jobs, the future of their children, and the survival of their planet.

In the United States, decisions on nuclear strategy and arms negotiations are the responsibility of elected national leaders. The only way the citizens of the United States can affect this policy is by creating a political context in which politicians feel compelled to take action to stop the nuclear weapons race and understand that failure to do so will cost them their jobs.

Creating this political context requires a strong national weapons freeze movement capable of securing and using political power. In the United States, political power is based on economic power and voting power. Although most business people are firmly opposed to nuclear war, corporate power has traditionally supported the massive build up of nuclear weapons. The vast majority of Americans have no significant economic power. Their only power is voting power.

Most Americans feel powerless to stop the nuclear arms race, and do not recognize the potential power of voting. In the 1980 Presidential election, half the adults who were eligible to vote failed to cast a ballot. The 26% of Americans who voted for Ronald Reagan were disproportionately white, wealthy and conservative.

5273 COLLEGE AVENUE, OAKLAND CA 94618

NUCLEAR WEAPONS FREEZE

VOTING POWER POLITICAL ACTION COMMITTEE

BACKGROUND

THE FREEZE P.A.C.

The Freeze P.A.C. was formed in April 1982 to pressure Congress for an immediate bilateral nuclear weapons Freeze by building voting power in key Congressional districts. Its founders have been active with the United Farm Workers of America, the J. P. Stevens boycott, reproductive rights organizing and several progressive initiatives. Executive Director Robert Lavis had previously directed the statewide petitioning drive that put Proposition 12, the Freeze initiative, on the ballot.

The Freeze P.A.C.'s emphasis is on mass people-to-people action. In the last four months it has registered over 50,000 voters, collected 95,000 signatures on petitions to California Congressional Representatives, raised \$155,000 in small contributions, trained 25 fulltime organizers and hundreds of volunteers, and researched the voting records of California's Congressional Representatives.

THE NUCLEAR DUMP CAMPAIGN

The Freeze P.A.C. has selected three California hawks to defeat in 1982: Don Clausen, R-Santa Rosa; Chip Pashayan, R-Fresno; and Robert Lagomarsino, R-Santa Barbara. In the combined thirty years that the three have been in Congress, each has voted for virtually every major weapons build-up bill presented to the House of Representatives. Last month, their votes authorized production of the MX missile system and blocked the House vote for an immediate bilateral nuclear weapons Freeze. At the same time, each voted to tighten food stamp eligibility, slash school lunch subsidies, eliminate minimum Social Security benefits, cut job programs, stop federal Medicaid payments to the states and increase interest rates in lending programs for small businesses and farms.

To make the Nuclear Dump Campaign a success, Freeze P.A.C. activists are moving to the three targeted districts. By the end of August, Nuclear Dump campaign teams will be operating in each area. Using the grassroots tactics of intensive voter registration, door-to-door voter education exposing the incumbents' records, mass bumperstickering and an extensive Get Out the Vote effort in each area, as well as the help provided by biweekly caravans of volunteer registrars from the Bay Area and other Bay Area support activities, the Freeze P.A.C. hopes to dump Clausen, Pashayan and Lagomarsino this November.

The goal of the Nuclear Weapons Freeze Movement is to slow, stop, and reverse the nuclear arms race. To do this we must create a movement broad enough to force our elected officials to make ending the nuclear arms race their first priority. The mission of the Nuclear Weapons Freeze Voting Power Political Action Committee is to create an active base of support for the nuclear weapons Freeze among the 50% of the population who do not currently vote. Using the grassroots tactics of intensive voter registration and one-to-one voter education we will build the voting power required to force politicians to stop and reverse the arms race and meet human needs.

For 1982, the Nuclear Weapons Freeze Voting Power P.A.C. will focus on a voting power drive in the state of California, registering a massive number of voters in support of the advisory California Bilateral Nuclear Weapons Freeze Initiative and targeting for defeat congressional representatives who support the nuclear arms build-up.

We must convince our political leaders that if they can't stop the arms race, we will take their jobs away. We must prove our ability to build voting power and affirm our commitment to keep at it for as long as it takes to win.

Nuclear Weapons Freeze
Voting Power P.A.C., 1982

83040402744

NUCLEAR WEAPONS FREEZE

VOTING POWER POLITICAL ACTION COMMITTEE

FACT SHEET: HUMAN NEEDS VS. NUCLEAR WEAPONS

EMPLOYMENT: Dollar for dollar, military spending creates far fewer jobs than almost any other form of government or private spending. A U.S. Bureau of Labor Statistics study found that for each one billion dollars invested in five industries:

military	-	75,000 jobs are created
construction	-	100,000 jobs are created
mass transit	-	92,000 jobs are created
health care	-	139,000 jobs are created
education	-	187,000 jobs are created

During the first year of the Reagan administration, jobs in the Department of Defense increased by 30,000 - but jobs in non-defense government agencies decreased by almost 70,000 according to the Office of Personnel Management.

JOB PROGRAMS: Nuclear weapons production does provide job programs - for nuclear engineers. In 1982, the U.S. spent \$1.9 billion in the research and development of the MX.

In the last year, 32,000 Californians lost their CETA (Comprehensive Employment Training Act) public service jobs as part of Reagan's plan to dismantle the program.

HEALTH: The cost of one B-1 bomber could build a 500 bed hospital in Oakland. Reagan's 1983 budget calls for the construction of 100 B-1 bombers. Further, the Reagan administration and its Congressional allies plan to cut \$17 billion from Medicaid and Medicare over the next three years.

FOOD: One Trident submarine (only part of a total fleet of 32) costs \$1.2 billion to build. In 1982, children's nutritional assistance programs were slashed \$1.2 billion.

In late March, an administration spokesperson confirmed the President's plan to build approximately 17,000 nuclear weapons over the next fifteen years. Also in 1982, almost 17,000 California households had their food stamp benefits eliminated, and another 360,000 had their benefits reduced.

TAXES: The accumulated federal deficit is currently over \$1 trillion. For fiscal year 1983, Congress has approved a record \$178 billion for military spending while instituting a \$98.3 billion tax increase.

HOUSING: Next year, President Reagan hopes to spend \$250 million on Civil Defense plans which include evacuating entire cities on a few hours notice. Last year, 8000 rent-subsidized housing units were eliminated in California.

5273 COLLEGE AVENUE, OAKLAND CA 94618

NUCLEAR WEAPONS FREEZE

VOTING POWER POLITICAL ACTION COMMITTEE

Why DUMP Pashayan?

Key Votes: Arms Race 1980-82

MX MISSILE

- Voted to authorize and appropriate \$1.9 billion in Fiscal Year (FY) 1982 to fund the MX missile system (HR 3519, 7/9/81; HR 4995, 11/18/81).
- Voted, as part of the \$177.1 billion Dept. of Defense (DOD) authorization bill for FY '83, to provide \$1.14 billion to begin production of the first nine MX missiles -- with no decision yet made on where the missiles will be based (7/22/82).

B-1 BOMBER

- Voted to appropriate \$1.8 billion for the procurement of the B-1 bomber (HR 4995, 11/18/81).

NERVE GAS

- Voted to provide \$54. million for the production of binary nerve gas (HR 6030, '82).

NEUTRON BOMB

- Voted for the Department of Energy Nuclear Weapons Authorization, FY '82, which provided funding for research, design and production of enhanced radiation weapons (HR 3413, 6/11/81).

DRAFT REGISTRATION

- Voted to provide \$8.6 million to fund registration of young men (4/22/80).

PENTAGON WASTE

- Voted against the Schroeder amendment to HR 3519 (see above), calling for \$8. billion worth of cuts in "waste, fraud and abuse" in the Pentagon (7/9/81).

NUCLEAR WEAPONS FREEZE

- Voted against the Bingham-Zablocki Resolution, calling on the United States to negotiate an immediate verifiable bilateral nuclear weapons freeze with the Soviet Union (HJRes 521, 8/5/82).

Key Votes: Human Needs and Civil Rights 1980-82

BUDGET PRIORITIES

- Voted for the Reagan Reconciliation Budget bill, FY '82, which slashed funding for: Aid to Families with Dependent Children (AFDC), Food Stamps,

5273 COLLEGE AVENUE, OAKLAND CA 94618

FINANCIAL PRIORITIES, continued

the Woman, Infants and Children nutrition program (WIC), Medicaid, and the Legal Services Corporation (HR 3982). The FY '82 budget brought food stamp benefits down to 44¢ per meal per person; cut the number of new low-income housing units by 41%; and left 400,000 households with no AFDC benefits at all and 659,354 households with reduced benefits.

- Voted for Reagan's \$93. billion tax increase (8/19/82).

JOBS

- Voted for the FY82 Budget, which eliminated 500,000 Comprehensive Employment Training Act (CETA) jobs and prohibited extension of unemployment benefits by 13 weeks, despite a national unemployment rate of 9.5% and rising.
- The AFL-CIO gives Pashayan a rating of 25%.

INFANT FORMULA

- 7 4 7
- The House voted overwhelmingly (301 to 100) to condemn the U.S. vote against an international marketing code for infant formula (HJRes 287). Pashayan was one of the dissenting representatives who sided with the Reagan Administration, and voted against the resolution.

2
AID TO EL SALVADOR

- 4 0 4 0
- Voted against nullifying Reagan's certification of El Salvador's human-rights progress, thus clearing the way for U.S. military aid to the ruling junta there (HJRes 552, 8/3/82).

4 0
Congressional District 17

3 0
The incumbent: Chip Pashayan (R-Fresno) was elected to the House of Representatives in 1978. By outspending his opponent six to one, he was re-elected with a majority of 71%.

3
The voters: Only 64% of the eligible voters are registered in the counties of District 17 (Fresno, Kings, Kern, Tulare). Fifty-four percent of those registered are Democrats and 37% are Republicans.

The challenger: Democrat Gene Tackett has served two terms on the Kern County Board of Supervisors. He supports an immediate bilateral nuclear weapons Freeze.

NUCLEAR WEAPONS FREEZE

VOTING POWER POLITICAL ACTION COMMITTEE

PRESS STATEMENT
SHARON DELUGACH
REGIONAL DIRECTOR

For the last 37 years we, the American people have been pleading with our elected officials for an end to the arms race. We've held meetings, written letters, made phone calls, marched, and demonstrated for peace. Now at a time when we are building nuclear weapons that are designed to initiate and win a nuclear war, when our quality of life is further threatened by slashed human services, when public sentiment for a bilateral nuclear weapons freeze is at its highest, we demand an end to the arms race. We say NO to politicians who, either by initiation or lack of leadership, endanger our lives and the future of our planet. Now we are telling these politicians that their failure to stop the nuclear arms race will cost them their jobs.

8 3 0 4 0 4 0 2 7 1 8
We have an awesome task before us. Never before have we been so close to nuclear disaster and never before has the urgency of working for peace been so clear. What Martin Luther King said in 1968 rings so true today: "The time is now. For years people have been talking about war and peace. Now the situation demands that we do something about it. No longer do we have a choice between violence and non-violence. The choice today is between non-violent coexistence or violent coannihilation."

Most American feel unable to affect the course of American politics and powerless to stop the arms race. But, while decisions on nuclear strategy and arms negotiations are determined by our elected representatives, ultimate responsibility for these decisions rests on our shoulders, on the shoulders of all the American people. Using voting power, our power as citizens in a political democracy, we can stop and reverse the nuclear arms race.

We have the chance, here in California, to achieve national impact by defeating three conservative hawks: Rep. Don Clausen (R-Santa Rosa), Rep. Chip Pashayan (R-Fresno), and Rep. Robert Lagomarsino (R-Santa Barbara). We will prove to the country that freeze activists and allies can mount successful grassroots campaigns to oust hawks from Congress.

There are no district lines when it comes to nuclear war. We are going into those areas where the representatives have shown a blatant disregard for their constituents' lives and futures. We will recruit their votes, their time, and their dollars. We will be wherever people congregate: in shopping centers, on street corners, and in their homes. When we find unregistered voters we will register them. We will let them know of their dual opportunity to vote against nuclear weapons by voting for Proposition 12 and against their bomb-building representative. By November we will have personally talked to at least 100,000 constituents -- one of three people in each district. We will have actively involved over 200 people in each district.

PRESS STATEMENT
SHARON DELUGACH
REGIONAL DIRECTOR

Because Representative Dellums has taken courageous initiative in Congress for a nuclear weapons freeze, we are, today, entrusting him with 95,000 signatures urging our California Congressional representatives to take effective action now to freeze the nuclear arms race.

Tomorrow, 25 of us will be leaving our homes in the Bay Area and moving to Fresno, Santa Rosa and Santa Barbara to work on defeating three of the most consistent backers of nuclear proliferation. Others of us will remain here building local support for the campaign to oust Clausen, Pashayan, and Lagamarsino.

By involving hundreds of concerned Californians and by reaching hundreds of thousand of people one by one, we will have a new Congress on November 2nd.

NUCLEAR WEAPONS FREEZE
VOTING POWER PAC
AUGUST 23, 1982

83040402719

very successful. She indicated that NOW PAC, a different organization that supports candidates on the national level, expects to be just as successful in November.

Records at the FEC show that, as of July, the NOW PAC had contributed \$67,450 to 32 candidates for Congress and the Senate. But the only two Republicans who were supported — Maureen Reagan in California and Rep. Thomas Railback in Illinois — were both defeated in primaries held earlier this year.

The records also show that NOW PAC has contributed to Sen. Robert Byrd (D.-W.Va.), Rep. Toby Moffett (D.-Conn.), who is liberal Republican Sen. Lowell Weicker's opponent in November, and Harriett Woods, who is running against Sen. John Danforth (R.-Mo.).

On the disarmament front, a group called PEACE PAC, an affiliate of the anti-nuclear Council for a Livable World, announced last week the names of the "Doomsday Dozen" who it said deserved to be defeated at the polls in November. The list included two Democratic representatives—Sam Stratton (N.Y.) and Bill Chappell (Fla.)—and 10 Republican congressmen—William Carney (N.Y.), Don Clausen (Calif.), James Coyne (Pa.), Larry Craig (Idaho), John LeBoutillier (N.Y.), Dan Mariott (Utah), Robert Michel (Ill.), John Rousselot (Calif.), Denny Smith (Ore.) and Frank Wolf (Va.).

Catherine McGraw, a spokesman for the PEACE PAC, told HUMAN EVENTS that the twelve House members "have consistently promoted America's participation in the nuclear arms race." She added, "Moreover, they are challenged by opponents who have very good positions on these issues."

The Council for a Livable World itself gets involved in Senate races in two ways—directly, by providing money and services, and indirectly, by funneling its members' contributions to the candidates. This has resulted in the following amounts of money going to the following candidates, according to spokesman McGraw.

- Sen. John Chafee (R.-R.I.) — \$11,000.
- Sen. Paul Sarbanes (D.-Md.) — \$36,500.
- Sen. Howard Metzenbaum (D.-Ohio) — \$20,000.
- Sen. James Sasser (D.-Tenn.) — \$10,000.
- Rep. Toby Moffett (D.-Conn.) — \$28,500.
- Rodger McDaniels, who is opposing Sen. Malcolm Wallop (R.-Wyo.) — \$31,000.
- Ted Wilson, who is opposing Sen. Orrin Hatch (R.-Utah) — \$23,500.
- Jeff Bingamman, who is opposing Sen. Harrison Schmitt (R.-N.M.) — \$10,000.
- Rep. Millicent Fenwick (R.-N.J.), who is now running for the Senate — \$29,500.
- David Levinson, who is running against Sen. Bill Roth (R.-Del.) — \$13,000.
- Sen. George Mitchell (D.-Maine), who is running against Rep. David Emery — \$29,000.
- Sen. Don Riegle (D.-Mich.) — \$13,500.

A new group, Citizens for Common Sense in National Defense, was founded by millionaire leftist Philip Stern. According to executive director Rose-

(Continued on page 18)

mary Gribben, the group will target Hatch, Wallop, Schmitt and David Emery (Maine) for defeat. In House races, she said the organization will target for defeat eight to 10 Republican candidates, including Ed Weber (Ohio), Bob Michel (Ill.), Frank Wolf (Va.), Larry Craig (Idaho), Don Clausen (Calif.) and Arlen Stangeland (Minn.).

The Nuclear Weapons Freeze Voting Power Political Action Committee, which has not yet registered with the FEC, has targeted three "bomb building representatives" for defeat in California. They are Republican Representatives Don Clausen, Charles Pashayan and Robert Lagomarsino. According to a spokesman, the campaigns against these three congressmen will consist of voter registration drives and the distribution of materials about their opposition to a nuclear freeze. The PAC claims to have already registered 50,000 new voters and raised \$155,000.

A group with a similar name, the Nuclear Freeze PAC, based in New York, says that it will raise \$1 million to be used in various races in November. Although the organization has not yet announced its target list of candidates, treasurer Donald Spector indicated to HUMAN EVENTS that the group will support Jerry Brown for the Senate in California, Ted Wilson for the Senate in Utah, and will also work to defeat Sen. Schmitt in New Mexico.

The Freeze PAC's advisory board includes Sen. Claiborne Pell (D.-R.I.), and 22 members of Congress. Two of them, Reps. Harold Hollenbeck (N.J.) and Stewart McKinney (Conn.), are Republicans.

The Friends of the Earth PAC has contributed only \$6,065 to 11 candidates, two of them Republicans. Sen. Robert Stafford (Vt.) received \$693 and Rep. Claudine Schneider (R.I.) received \$175.

One of the major liberal PACs, the National Committee for an Effective Congress, has contributed \$182,436 to 93 candidates. Its executive director, Russell Hemenway, has been quoted as saying that no candidate who opposes the nuclear freeze can expect a contribution.

The Fund for a Democratic Majority, founded by Sen. Ted Kennedy (D.-Mass.), has contributed \$54,713 to 51 Democratic candidates. The biggest contribution in a Senate race (\$4,000) has gone to Sen. Metzenbaum and in a House race (\$3,000) to Rep. Barney Frank (Mass.).

Democrats for the '80s, a group founded by Pamela Harriman, wife of Democratic party elder statesman Averell Harriman, has contributed \$119,336 to 252 Democratic candidates and has mounted a \$20,104 campaign on behalf of Sen. Paul Sarbanes (D.-Md.). Despite its name, FEC records also show that it contributed \$100 each to three Republicans.

Independent Action, a PAC that is similar to Victor Kamber's PROPAC (see HUMAN EVENTS, Sept. 11, page 5), has spent \$64,876 in an effort to defeat Republican Senators Hatch, Wallop, Schmitt and Jesse Helms (N.C.), who is not up for re-election until 1984. Independent Action has also contributed to the campaigns of 43 congressional candidates, with only one of them, Rep. Claudine Schneider (R.I.), being a Republican.

Thus, the liberals, feminists, peaceniks and their allies are working hard to elect their candidates to Congress. In the view of most of them, it doesn't really matter if the Congress is Republican or Democrat, just so long as it is not conservative.

EX 115

8 3 0 4 0 4 0 2 7 5 1

RECEIVED BY THE FEC

82 OCT 29 P 2: 46

FEDERAL ELECTION COMMISSION

1325 K ST. N.W.

WASHINGTON, D.C.

5B1750R
Mail Room

HAND-DELIVER



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 1505

Date Filmed 6/17/83 Camera No. --- 2

Cameraman SPC