



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1523

Date Filmed 1/2/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

- 1) routing slips
- 2) comment sheets from Commissioners
- 3) 12 Day Reports and attachments
- 4) Pre-Brief Reports

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

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

Signed Jonathan M. Levin  
 date 12/21/84

84040402578

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of            )  
                                  )  
Contributions, Inc.        )            MUR 1523

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 27, 1984, do hereby certify that the Commission took the following actions in MUR 1523:

1. Failed in a vote of 2-4 to pass a motion to
  - a) find probable cause to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15;
  - b) direct the Office of the General Counsel to send the appropriate notices and wait thirty days for a response; and
  - c) if no response is received by the end of the thirty days, close the file in this matter.

Commissioners Harris and Reiche voted affirmatively for the motion; Commissioners Aikens, Elliott, McDonald, and McGarry dissented.

(continued)

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2. Decided by a vote of 6-0 to
- a) take no further action;
  - b) close the file in this matter; and
  - c) approve the letter attached to the General Counsel's report dated November 6, 1984.

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

Attest:

11-30-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

84040492530



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 3, 1984

William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

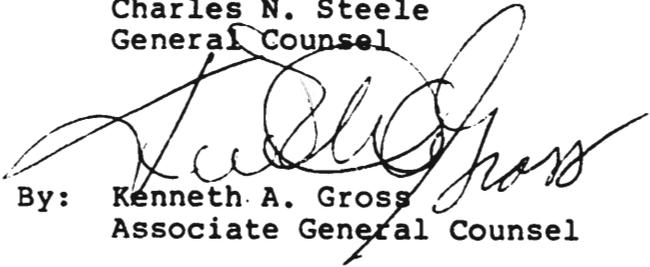
Re: MUR 1523  
Contributions, Inc.

Dear Mr. Smith:

Enclosed is a letter sent to Santo Singh by the Office of the General Counsel with reference to the above-captioned matter. If you have any questions, please contact Jonathan Levin at 202-523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

84040492581



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 3, 1984

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

Dear Mr. Singh:

On May 3, 1983, the Federal Election Commission determined that there was reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Upon making this finding, the Commission instituted an investigation of this matter.

On August 17, 1984, the General Counsel sent you a brief stating his position on the legal and factual issues of the case. After considering the circumstances of this matter, however, the Office of the General Counsel has determined to take no further action and close its file in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that use of contributor information filed with the Federal Election Commission for commercial purposes is in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. You and others associated with Contributions, Inc. should refrain from using such contributor information commercially in the future.

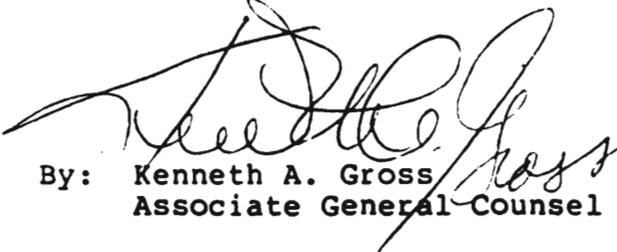
84740492582

Letter to Santo Singh  
Page 2

If you have any questions, please contact Jonathan Levin at  
202-523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

cc: William A. Smith

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

Dear Mr. Singh:

On May 3, 1983, the Federal Election Commission determined that there was reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Upon making this finding, the Commission instituted an investigation of this matter.

On August 17, 1984, the General Counsel sent you a brief stating his position on the legal and factual issues of the case. After considering the circumstances of this matter, however, the Office of the General Counsel has determined to take no further action and close its file in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that use of contributor information filed with the Federal Election Commission for commercial purposes is in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. You and others associated with Contributions, Inc. should refrain from using such contributor information commercially in the future.

JT 11/30/84

84740492584

Letter to Santo Singh  
Page 2

If you have any questions, please contact Jonathan Levin at  
202-523-4000.

*JS 11/30/84*

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

cc: William A. Smith

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Re: MUR 1523  
Contributions, Inc.

Dear Mr. Smith:

Enclosed is a letter sent to Santo Singh by the Office of the General Counsel with reference to the above-captioned matter. If you have any questions, please contact Jonathan Levin at 202-523-4000.

*JJ 11/30/84*

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

84040492586



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE  
GENERAL COUNSEL

FROM:

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

DATE:

NOVEMBER 13, 1984

SUBJECT:

OBJECTION - MUR 1523 - General Counsel's  
Report signed November 6, 1984

The above-named document was circulated to the  
Commission on Wednesday, November 7, 1984 at 4:00.

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

- Commissioner Aikens \_\_\_\_\_
- Commissioner Elliott \_\_\_\_\_
- Commissioner Harris \_\_\_\_\_
- Commissioner McDonald \_\_\_\_\_
- Commissioner McGarry \_\_\_\_\_
- Commissioner Reiche           X           (comments attached)

This matter will be placed on the Executive Session  
agenda for Tuesday, November 27, 1984.

84040492587



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
 FROM: Office of General Counsel *CA*  
 DATE: November 7, 1984  
 SUBJECT: MUR 1523 - General Counsel's Report

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[ ]		
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RECEIVED  
THE FEC  
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

84 NOV 7 9:10

In the Matter of )  
 )  
Contributions, Inc. ) MUR 1523

GENERAL COUNSEL'S REPORT

**SENSITIVE**

I. BACKGROUND

This matter involved an external complaint against Contributions, Inc. The complaint stated that Contributions, Inc. had used and was continuing to use reports filed at the Commission to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Commission's Disclosure Division, to the Office of the General Counsel (OGC) in late December 1982. Cooper stated that two employees of Contributions, Inc. were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

Respondent published the information it compiled in a four volume register named Campaign Contributions which it offered for sale at a price of \$1,150 or, with 1983 updates, a price of \$1,350. The register contained a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors

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but did contain the names of the employers of the contributors. After receipt of the complaint, respondent elected not to send a response to the allegations.

On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, and notifications of this finding were sent to respondents on May 6. The Commission received no response from the respondent, and, on July 22, 1983, OGC sent an order for answers to written interrogatories to Mr. Smith, the president of Contributions, Inc., at the company's address in Washington, D.C. This Office re-sent the interrogatories when it was discovered that Mr. Smith had moved to Berkeley, California, and received answers on September 23. In answering the questions, Mr. Smith informed the Commission that he had resigned his post as president on April 31, that he no longer had access to documents containing pertinent information, and that "to the best of [his] knowledge" the corporation had since ceased its activities.

Mr. Smith referred to three other persons associated with the company. These were Kenneth Mandler, who was the primary investor and source for the idea for the company, Santo Singh, who is the treasurer of the company, and Sohail Arzoo who "was employed by the corporation to acquire data" from the FEC and to "oversee the Data (sic) entry" onto the data base of the corporation.

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Mr. Arzoo was asked questions pertaining to his work with Contributions, Inc. and his reply was received on December 13, 1983. Mr. Arzoo described the work he performed as a data-gathering employee of the company and stated that he was laid off after a three or four month period when his work was completed.

The questions addressed to Mr. Mandler pertained to his relationship with the company, the principals and the owners of the company, to any present activity of the company, and to the receipt of information from Commission staff as to the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

The certified letter with the order and questions sent to Mr. Mandler was returned unclaimed. This Office proceeded to attempt to reach Mr. Mandler by other means and, on January 24, 1984, we contracted with Accurate Legal Services of Washington, D.C. to ensure that Mr. Mandler was served. Meanwhile, because Mr. Smith stated, in his first response, that the corporation has ceased all business activities and that he is no longer its president, this Office made further efforts to ascertain who may presently be responsible for respondent's affairs. On January 25, 1984, therefore, this Office sent a request for information to the California Secretary of State including a request for a copy of the Articles of Incorporation. The only new information obtained that was pertinent was that Santo Singh of San Pablo, California, mentioned by Mr. Smith as the corporation's treasurer, is also the agent for service of process. Accurate Legal Services was finally able to serve Mr.

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Mandler on March 9, 1984, just as he was moving out of his apartment in Sacramento. We received no response from Mr. Mandler.

A brief was mailed to Mr. Singh at the San Pablo address on August 17, 1984. In early September, 1984, the envelope containing the brief was returned with the denotation, "Return to Sender; Not Deliverable as Addressed; Unable to Forward." After this office sent a request to the U.S. Postmaster in San Pablo for Mr. Singh's new address, the Postmaster replied that Mr. Singh had moved and had left no forwarding address. Furthermore, in a conversation with the California Secretary of State's office, an Office of General Counsel staff member was informed that the Articles of Incorporation had not been amended to provide a new address and that the company's corporate status had been suspended for failure to pay state corporate taxes.

## II. ANALYSIS

The primary difficulty in pursuing this investigation has been communication with persons able to assume responsibility for the corporation's actions. After preliminary communications with Mr. Smith and the company, the company moved out of its Washington offices, apparently after failure to pay rent. After the Office of the General Counsel was able to locate Mr. Smith in Berkely, California, Mr. Smith, in his response to questions, stated that he was no longer president and the company was no longer in operation. In order to seek out other officers or directors, this Office used a private investigator to serve

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Mr. Mandler with questions. Although Mr. Mandler was served, he too moved and did not respond. Finally, Mr. Singh cannot be located and the company's corporate status has been suspended for failure to pay taxes.

It appears that, if this Office pursues this matter further, we will be attempting to conciliate with a virtually non-existent company which may not be able to pay any civil penalty. This is an unusual situation in which none of those able to assume responsibility for the company can be reached. The Office of the General Counsel, therefore, recommends that the Commission take no further action and close the file in this matter.

**III. RECOMMENDATIONS**

1. Take no further action.
2. Close the file in this matter.
3. Approve the attached letter.

Charles N. Steele  
General Counsel

84040492593

*Nov. 6, 1984*

By:   
 Kenneth A. Gross  
 Associate General Counsel

Attachment

Proposed letter to Santo Singh (with cc: to William A. Smith)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

Dear Mr. Singh:

On May 3, 1983, the Federal Election Commission determined that there was reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Upon making this finding, the Commission instituted an investigation of this matter.

On August 17, 1984, the General Counsel sent you a brief stating his position on the legal and factual issues of the case. After considering the circumstances of this matter, however, the Office of the General Counsel has determined to take no further action and close its file in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

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Attachment 1 - p. 1 of 2

Letter to Santo Singh  
Page 2

If you have any questions, please contact Jonathan Levin at  
202-523-4000.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

cc: William A. Smith

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1- p. 2 of 2

RECEIVED AT THE FEC  
GCC#S096  
84 OCT 9 P2: 15



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 24, 1984

*mwe*  
*1523*

4 OCT 10 A10: 52

POSTMASTER  
U.S. Post Office  
San Pablo, California 94806

Dear Sir:

Pursuant to 39 C.F.R. § 265.6(d)(1), we request that you provide us with the present address of Santo Singh. According to the Articles of Incorporation of Contributions, Inc., a California corporation, his address was 29 Las Moradas Circle, San Pablo, California 94806.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jonathan Levin, the attorney assigned to this matter, at 202-523-4000.

Your prompt attention to this matter is appreciated.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure

*Moved, left no forward*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Special Business  
Postage and Fees Paid for Private Use \$300



Postage and Fees Paid  
Federal Election Commission

Federal Election Commission  
Office of the General Counsel  
1325 "K" Street, N.W. Suite 700  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
84 OCT 9 P 2:45

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 24, 1984

POSTMASTER  
U.S. Post Office  
San Pablo, California 94806

*mur 1523*

Dear Sir:

Pursuant to 39 C.F.R. § 265.6(d)(1), we request that you provide us with the present address of Santo Singh. According to the Articles of Incorporation of Contributions, Inc., a California corporation, his address was 29 Las Moradas Circle, San Pablo, California 94806.

Under 39 C.F.R. § 265.8e(8) (iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jonathan Levin, the attorney assigned to this matter, at 202-523-4000.

Your prompt attention to this matter is appreciated.

Sincerely,

Charles N. Steele  
General Counsel

BY: *[Signature]*  
Kenneth A. Gross  
Associate General Counsel

Enclosure

84040492593



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM TO:** THE COMMISSION  
**FROM:** MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
**DATE:** AUGUST 20, 1984  
**SUBJECT:** MUR 1523 - General Counsel's Brief  
Memorandum to the Commission  
dated August 17, 1984

The attached documents are circulated for your  
information.

**ATTACHMENTS:**  
1) Memo; 2) Brief; 3) Letter

84040492599



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *act*  
DATE: August 17, 1984  
SUBJECT: MUR 1523 - Memorandum and General Counsel's Brief

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[X]	Other (see distribution below)	[ ]
Sensitive	[X]		
Non-Sensitive	[ ]		
Other	[ ]		

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

84 AUG 17 P 5: 34

August 17, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: MUR 1523

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on August 17, 1984. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On February 7, 1983, this office received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Commission's Disclosure Division, to the Office of the General Counsel (OGC) in late December 1982. Cooper stated that two members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

Respondent published the information it compiled in a four volume register named Campaign Contributions which it offered for sale at a price of \$1,150 or, with 1983 updates, a price of \$1,350. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors

Attachment 1 - p. 1 of 7

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but did contain the names of the employers of the contributors. After receipt of the complaint, respondent elected not to send a response to the allegations.

In his memorandum to OGC, Mr. Cooper stated that the employees of Contributions, Inc. who were copying FEC reports (and who included the President, William A. Smith) were notified of § 438(a)(4) by Public Records staff. According to Mr. Cooper, even after being notified specifically of § 438(a)(4), the respondent continued to engage in activity designed principally to benefit commercially from names on the public record at the FEC.

On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, and notifications of this finding were sent to respondents on May 6. The Commission received no response from the respondent, and, on July 22, 1983, OGC sent an order for answers to written interrogatories to Mr. Smith, the president of Contributions, Inc., at the company's address in Washington, D.C. This Office re-sent the interrogatories when it was discovered that Mr. Smith had moved to Berkeley, California, and received answers on September 23. In answering the questions, Mr. Smith informed the Commission that he had resigned his post as president on April 31, that he no longer had access to documents containing pertinent information, and that "to the best of [his] knowledge" the corporation had since ceased its activities.

1 - p. 2 of 7

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Mr. Smith referred to three other persons associated with the company. These were Kenneth Mandler, who was the primary investor and source for the idea for the company, Santo Singh, who is the treasurer of the company, and Sohail Arzoo who "was employed by the corporation to acquire data" from the FEC and to "oversee the Data (sic) entry" onto the data base of the corporation.

Mr. Smith stated that he and his staff obtained information concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 "in writing" from a "booklet" and "orally by employees of the FEC." He claims that he "investigated the restrictions through discussions with FEC employees and was comfortable that no laws were being violated." He went on to say that "several employees of the FEC also have varying interpretations."

Based on these responses, the Commission, on November 28, 1983, approved an order for answers to follow-up questions to be sent to Mr. Smith along with questions to be sent to Mr. Arzoo and Mr. Mandler.

Mr. Smith's response of September 23 prompted questions as to the supposed "various interpretations" given by Commission employees. Mr. Smith was asked the substance of these interpretations when he heard them, and from whom. He replied on December 28, 1983, that he could not recall the answers to any of these questions.

1- p. 3 of 7

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Mr. Arzoo was asked questions pertaining to his work with Contributions, Inc., and his reply was received on December 13, 1983. Mr. Arzoo acknowledged that he was an employee of the company from September 1983, until the end of the year. He stated that Mr. Smith took him to the Commission and familiarized him with the operations of the Public Records room. Mr. Arzoo acknowledges that he later saw written warnings on the walls of the Public Records room referring to the restrictions of 2 U.S.C. § 438(a)(4) but that, when he mentioned their existence to Mr. Smith, Mr. Smith told him that the company was not doing anything illegal. Mr. Arzoo was eventually made supervisor of the company's data-gatherers. He claims that he was "mainly involved with the collection of data and entirely unaware" whether the data was to be used for legal or illegal purposes.

Mr. Arzoo stated that he worked for the company for three to four months, spending most of his time at the Commission. He stated that he and other company employees dealt with a number of Public Records staff persons, listing five by first name. He stated that none of them mentioned 2 U.S.C. § 438(a)(4) or 11 C.F.R. § 104.15.

The questions addressed to Mr. Mandler pertained to his relationship with the company, the principals and the owners of the company, to any present activity of the company, and to the receipt of information from Commission staff as to the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

The certified letter with the order and questions sent to Mr. Mandler was returned unclaimed. This Office proceeded to

1-p. 4 of 7

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attempt to reach Mr. Mandler by other means and, on January 24, 1984, we contracted with Accurate Legal Services of Washington, D.C. to ensure that Mr. Mandler was served. Meanwhile, because Mr. Smith stated, in his first response, that the corporation has ceased all business activities and that he is no longer its president, this Office made further efforts to ascertain who may presently be responsible for respondent's affairs. On January 25, 1984, therefore, this Office sent a request for information to the California Secretary of State including a copy of the Articles of Incorporation. The only new information obtained that was pertinent was that Santo Singh, mentioned by Mr. Smith as the corporation's treasurer, is also the agent for service of process. Accurate Legal Services was finally able to serve Mr. Mandler on March 9, 1984, just as he was moving out of his apartment in Sacramento. We have received no response from Mr. Mandler.

II. LEGAL ANALYSIS

Section 438(a)(4) of Title 2 provides that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15 of the regulations allows for the use of information copied or otherwise obtained from reports filed with the Commission in newspapers, books, or other similar

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1- p.5 of 7

communications if "the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes." 11 C.F.R. § 104.15(c). This regulation focuses on the intent behind § 438(a)(4). It appears from the legislative history of the 1979 Amendments to the Act that, while other information such as the names and address of political committees may be obtained from FEC reports, the "prohibition on the copying and use of the names and address of individual contributors is maintained." H.R. Rep. No. 422, 96th Cong., 1st Sess. 23 (1979). See also Advisory Opinions 1980-101 and 1981-38. This matter presented a situation in which the respondent appears to have copied reports filed with the FEC in order to present individual contributors' names and employers in a book published for sale, i.e., for a commercial purpose. While none of the sample pages in our possession indicates that addresses were listed, the names of employers are provided. It appears from the evidence presented that Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

The Commission had made a reason to believe finding that the alleged violation was knowing and willful after the General Counsel reported that Mr. Cooper and Public Records staff had notified respondent specifically of the proscriptions in 2 U.S.C. § 438(a)(4). In addition, the signs stating the restrictions are posted in various places on the walls of the Public Records room.

1 - p. 6 of 7

84740492607

Responses from Mr. Smith and Mr. Arzoo, however, asserted that they believed their activities were lawful. Mr. Smith referred to the "varying interpretations" of "several" Commission employees, but could not recall specific employees or specific instances when interpretations were given. Mr. Arzoo asserts that, while he did see the signs, he also claims that Mr. Smith told him that the company's activities did not violate 2 U.S.C. § 438(a)(4) and he claims that none of the Commission employees mentioned the applicable statute or regulation. In considering the evidence, it appears that it is difficult to prove with any certainty that a knowing and willful violation occurred. While it is true that Mr. Smith was not able to recall specific instances of hearing various interpretations from Commission staffers, there is no evidence available which is conclusive enough to warrant a recommendation for a finding that the violation was committed in a knowing and willful manner.

III. RECOMMENDATION

Based on the foregoing analysis, the General Counsel recommends that the Commission find probable cause to believe that Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

17 August 1984  
Date

  
Charles N. Steele  
General Counsel

1 - p. 7 of 7

84040492603



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 17, 1984

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

Dear Mr. Singh:

Based on a complaint filed with the Commission on February 7, 1983, and information supplied by William A. Smith, president of Contributions, Inc., the Commission determined, on May 3, 1983, that there was reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 104.15, a provision of the Commission Regulations. Upon making this finding, the Commission instituted an investigation of this matter.

In prior correspondence pertaining to this matter, the Office of the General Counsel has communicated with William A. Smith, president of Contributions, Inc. at the time of the alleged violations. He has stated that he is no longer president of the company. On the company's Articles of Incorporation filed with the California Secretary of State, you are listed as the agent for service of process, and no principal of the company, other than Mr. Smith, is listed on this document. The Commission, therefore, is conducting all further discussions in this matter with you.

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should

ATTACHMENT 2 - p. 1 of 2

84740492607

Letter to Santo Singh  
Page 2

also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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

Should you have any questions, please contact Jonathan Levin, the attorney assigned to handle this matter, at (202)523-4000.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

84040492610

2 - p. 2 of 2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
DATE: SEPTEMBER 25, 1984  
SUBJECT: MUR 1523 - Comprehensive Investigative  
Report #4 signed September 21, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, September 24, 1984.

There were no objections to the Comprehensive Investigative Report at the time of the deadline.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *JCH*  
DATE: September 21, 1984  
SUBJECT: MUR 1523 - Comp. Inv. Rpt. #4

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

CIRCULATIONS

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

Other [ ]

DISTRIBUTION

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

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RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1523  
Contributions, Inc. )

COMPREHENSIVE INVESTIGATIVE REPORT #4

On August 17, 1984, this Office circulated a brief stating that the General Counsel is prepared to recommend that the Commission find probable cause to believe that Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The brief and the letter accompanying it were sent to Santo Singh, the respondent's treasurer and agent for service of process at the address listed on the respondent's Articles of Incorporation. In early September, the envelope containing the letter and the brief was returned, marked "Return to Sender; Not Deliverable as Addressed; Unable to Forward." This Office has sent a letter to the postmaster in order to ascertain Mr. Singh's new address.

84040492613

*September 21, 1984*  
Date

Charles N. Steele  
General Counsel

BY: *[Signature]*  
Kenneth A. Gross  
Associate General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *CX*  
DATE: August 22, 1984  
SUBJECT: MUR 1523 - Memorandum to The Commission

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

CIRCULATIONS

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

DISTRIBUTION

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

84040492614



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 22, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel *KAG*  
SUBJECT: Amendment to Brief in MUR 1523

Attached is a substitute first page for the brief circulated to the Commission on August 20, 1984. The original page omitted certain words from the last sentence of the first paragraph. This error is corrected on the substitute page.

The substitute page, along with a cover letter, is being mailed on this date to Santo Singh, the treasurer of Contributions, Inc.

Attachment

Substitute page

84040492615



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 22, 1984

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

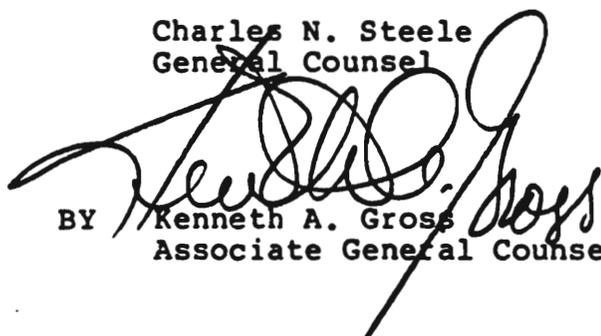
Dear Mr. Singh:

On August 17, 1984, this office sent you the General Counsel's Brief in the above-captioned matter. Certain words were omitted from the last sentence of the first paragraph of this brief. Enclosed is a substitute first page of the brief containing the amended sentence.

Should you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
BY Kenneth A. Gross  
Associate General Counsel

Enclosure  
Substitute page

84740492616

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of                    )  
  )  
Contributions, Inc.                 )     MUR 1523

GENERAL COUNSEL'S BRIEF

I.     STATEMENT OF THE CASE

On February 7, 1983, this office received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Commission's Disclosure Division, to the Office of the General Counsel (OGC) in late December 1982. Cooper stated that two employees of Contributions, Inc. were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

Respondent published the information it compiled in a four volume register named Campaign Contributions which it offered for sale at a price of \$1,150 or, with 1983 updates, a price of \$1,350. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 22, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel *KAG*  
SUBJECT: Amendment to Brief in MUR 1523

Attached is a substitute first page for the brief circulated to the Commission on August 20, 1984. The original page omitted certain words from the last sentence of the first paragraph. This error is corrected on the substitute page.

The substitute page, along with a cover letter, is being mailed on this date to Santo Singh, the treasurer of Contributions, Inc.

Attachment

Substitute page

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 22, 1984

Santo Singh, Treasurer  
Contributions, Inc.  
29 Las Moradas Circle  
San Pablo, California 94806

Re: MUR 1523  
Contributions, Inc.

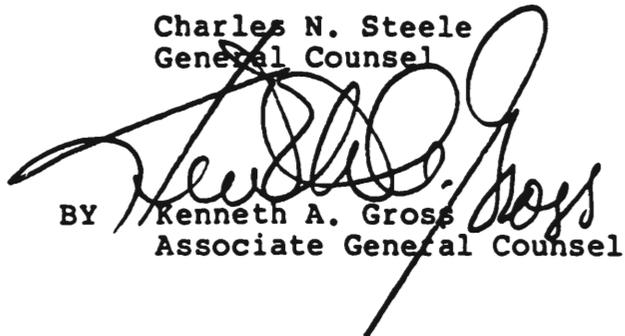
Dear Mr. Singh:

On August 17, 1984, this office sent you the General Counsel's Brief in the above-captioned matter. Certain words were omitted from the last sentence of the first paragraph of this brief. Enclosed is a substitute first page of the brief containing the amended sentence.

Should you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
BY Kenneth A. Gross  
Associate General Counsel

Enclosure  
Substitute page

34040492619

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On February 7, 1983, this office received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Commission's Disclosure Division, to the Office of the General Counsel (OGC) in late December 1982. Cooper stated that two employees of Contributions, Inc. were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

Respondent published the information it compiled in a four volume register named Campaign Contributions which it offered for sale at a price of \$1,150 or, with 1983 updates, a price of \$1,350. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

84 AUG 22 A 9: 33

August 22, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel  
SUBJECT: Amendment to Brief in MUR 1523

**SENSITIVE**

Attached is a substitute first page for the brief circulated to the Commission on August 20, 1984. The original page omitted certain words from the last sentence of the first paragraph. This error is corrected on the substitute page.

The substitute page, along with a cover letter, is being mailed on this date to Santo Singh, the treasurer of Contributions, Inc.

Attachment

Substitute page

34040492621

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

**SENSITIVE**

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On February 7, 1983, this office received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Commission's Disclosure Division, to the Office of the General Counsel (OGC) in late December 1982. Cooper stated that two employees of Contributions, Inc. were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

Respondent published the information it compiled in a four volume register named Campaign Contributions which it offered for sale at a price of \$1,150 or, with 1983 updates, a price of \$1,350. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN M. TEIR<sup>SMT</sup>

DATE: MAY 9, 1984

SUBJECT: MUR 1523 - COMPREHENSIVE INVESTIGATIVE  
REPORT #3 signed May 7, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00 on May 8, 1984.

There were no objections to the Comprehensive Investigative Report at the time of the deadline.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *ct*  
DATE: May 7, 1984  
SUBJECT: MUR 1523 - Comprehensive Investigative Report #3

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[X]	Closed MUR Letters	[ ]
Sensitive	[X]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )  
 )  
Contributions, Inc. ) MUR 1523

84 MAY 7 P 5: 02

**COMPREHENSIVE INVESTIGATIVE REPORT #3**

This matter involves the allegation that Respondent Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by copying reports filed at the Commission, compiling information on individual contributors, and offering this information for sale to the public. On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. On July 22, 1983, this Office sent an order for answers to written interrogatories to the president of Contributions, Inc., William A. Smith. This Office re-sent the interrogatories when it was discovered that Mr. Smith had moved to Berkeley, California, and received answers to the interrogatories on September 23.

Mr. Smith referred to other persons associated with the Respondent, including Sohail Arzoo, who was an employee, and Kenneth Mandler, "a primary investor and source of the idea of the company." On October 19, 1983, the General Counsel's Office recommended that the Commission approve follow-up questions to Mr. Smith. The Commission directed the Office of the General Counsel to supplement the questions to Mr. Smith. In addition, the Commission directed this office to draft questions to Sohail Arzoo, the employee who had compiled the names at the Commission.

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Because of its concern that the corporation might no longer be in operation, the Commission further directed the General Counsel's Office to draft questions to Mr. Mandler concerning the identity of the principals in the corporation. On November 28, 1983, the Commission approved an order for answers to follow-up questions to be sent to Mr. Smith along with questions to be sent to Mr. Arzoo and Mr. Mandler.

This Office received responses from Mr. Arzoo and Mr. Smith on December 13 and December 28 respectively. The certified letter sent to Mr. Mandler was returned unclaimed. This Office proceeded to attempt to reach Mr. Mandler by other means and, on January 24, 1984, we contracted with Accurate Legal Services of Washington, D.C. to ensure that Mr. Mandler was served. Meanwhile, because Mr. Smith stated, in his first response, that the corporation has ceased all business activities and that he is no longer its president, this Office made further efforts to ascertain who may presently be responsible for respondent's affairs. On January 25, 1984, therefore, this Office sent a request for information to the California Secretary of State including a copy of the Articles of Incorporation. The only new information obtained that was pertinent was that Santo Singh, mentioned by Mr. Smith as the corporation's treasurer, is also the agent for service of process. Accurate Legal Services was finally able to serve Mr. Mandler on March 9, 1984, just as he was moving out of his apartment in Sacramento. We have

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received no response from Mr. Mandler. This Office has considered the question of whether or not to petition to have the order enforced. Because he has moved to a new unknown location, it may be difficult to serve Mr. Mandler. Furthermore, the information he may be able to provide is not essential, in light of the fact that the information obtained from the California Secretary of State's Office indicates the corporation is presently ongoing and that Mr. Singh is its agent for service of process. Respondent corporation may be served through its agent for service of process.

This Office, therefore, will not draft a report recommending authorization of a petition to seek enforcement of the order to Mandler, but will instead proceed to the briefing stage.

Charles N. Steele  
General Counsel

May 7, 1984  
Date

By:   
Kenneth A. Gross  
Associate General Counsel

84040492627

In the Matter of )  
Contributions, Inc. )

MUR 1523

84 MAR 21 8:58

MUR 1523  
LEVIN

MAR 21 11:03

ORDER TO SUBMIT WRITTEN ANSWERS

RETURN OF PRIVATE PROCESS SERVER

I, DARRELL BROWN, hereby certify that I executed  
Service of Process upon Mr. Kenneth Mandler  
at 3:00 o'clock P.M., on March 9, 1984  
at 1431 3rd Street, Sacramento, CA  
by delivering and leaving with him a copy of the Subpoena  
and Order.

I further certify that I am over 18 years of age and am not a  
party to or otherwise interested in this matter of suit.

I do solemnly declare and affirm under the penalty of perjury that  
the matters and facts set forth herein are true to the best of my  
knowledge, information, and belief.

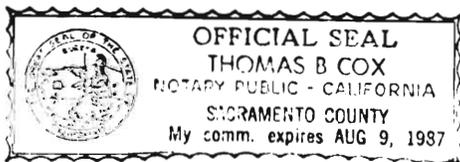
DESCRIPTION:

[Signature]  
PRIVATE PROCESS SERVER

Subscribed and sworn to before  
me this 13th day of March  
1984.

[Signature]

NOTARY PUBLIC



34040492623

**ACCURATE LEGAL SERVICES COMPANY, INC.**

P.O. Box 1833  
 Washington, D.C. 20013  
 308 H Street, N.E.  
 Washington, D.C. 20002 (202) 547-5710

INVOICE NO. 798

Firm: Federal Election Commission  
 1325 K. Street, NW  
 Wash., DC 20463

Attention: Lois G. Lerner  
 Assistant General Counsel  
 Date: March 17, 1984

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CASE NO.		FILE NO.	CHARGES
MUR 1523	Subpoena and Order for: Mr. Kenneth Mandler		
	Served: March 9, 1984 (Personal Service)		\$75.00
	Federal Express...		\$12.50
	Telephone Expense		\$16.75
	Original affidavit enclosed.		
	Total Due ...		\$104.25

*JL 3/21/84*

**ACCURATE LEGAL SERVICES COMPANY, INC.**

308 H. STREET N.E. • WASHINGTON, D.C. 20002



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

ATTN: Lois G. Lerner

34040



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
DATE: FEBRUARY 17, 1984  
SUBJECT: MUR 1523 - Comprehensive Investigative  
Report #2 signed February 14, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, February 16, 1984.

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

84040492631



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: February 15, 1984  
SUBJECT: MUR 1523 - Comprehensive Investigative Report #2

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

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[X]	Closed MUR Letters	[ ]
Sensitive	[X]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[ ]		

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )  
 )  
Contributions, Inc. ) MUR 1523

84 FEB 15 P12: 50

**COMPREHENSIVE INVESTIGATIVE REPORT #2**

This matter involves the allegation that respondent Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by copying reports filed at the Commission, compiling information on individual contributors, and offering this information for sale to the public. On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

Despite numerous attempts to communicate with respondent's president, William A. Smith, this Office received no reply from the respondent. On July 22, 1983, this Office sent an order for answers to written interrogatories addressing the issues of the identity of the principals and personnel of Contributions, Inc., the role of certain employees, and information received from Commission staff as to the restrictions on commercial use of reports on file at the Commission. The order was sent by certified mail to his business address. The envelope containing the order and interrogatories was returned unclaimed. On August 19, 1983, the interrogatories were re-sent by certified mail to Mr. Smith's home address. On September 23, after the interrogatories were forwarded to Mr. Smith's new address in

840492633

Berkely, California, this Office received answers to the interrogatories.

For the most part, Mr. Smith's answers were responsive to the interrogatories. One of the responses, however, raised the necessity for more interrogatories. In describing the activities engaged in by employees of the company, Mr. Smith stated that he "investigated the restrictions, through discussions with FEC employees," that his interpretation is not in accord with this Office's interpretation, and that "[s]everal employees of the FEC also have varying interpretations." Because of our inquiry as to a knowing and willful violation, this statement necessitated an inquiry as to the information Mr. Smith may have received from the Commission staff.

On November 28, 1983, the Commission approved follow-up questions to be sent to Mr. Smith along with questions to be sent to Sohail Arzoo, an employee of Contributions, Inc. and Kenneth Mandler, whom Mr. Smith characterized as a "primary investor and source of the idea of the company."

On December 13, this Office received a reply from Mr. Arzoo, and, on December 28, this Office received a reply from Mr. Smith. The certified letter sent to Mr. Mandler was returned unclaimed. This Office proceeded to attempt to reach Mr. Mandler by other means and, on January 24, 1984, we contracted with Accurate Legal Services of Washington, D.C. to ensure that Mr. Mandler was served.

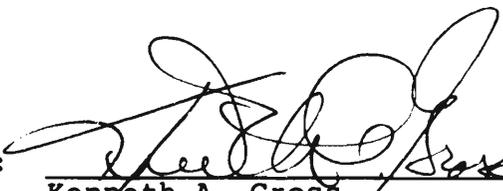
84040492634

Because Mr. Smith stated, in his first response, that the corporation has ceased all business activities and that he is no longer its president, this Office made further efforts to ascertain who may be responsible presently for respondent's affairs. On January 25, 1984, therefore, this Office sent a request for information to the California Secretary of State including a copy of the Articles of Incorporation. The only new information obtained that was pertinent was that Santo Singh, mentioned by Mr. Smith as the corporation's treasurer, is also the agent for service of process.

Upon receipt of Mr. Mandler's response, this Office will report to the Commission with appropriate recommendations.

Charles N. Steele  
General Counsel

February 14, 1984  
Date

By:   
Kenneth A. Gross  
Associate General Counsel

34040492635

G 00471689



Martha Fong Eu  
Secretary of State

1230 J Street  
Sacramento, California 95814

FEB 6 P 4: 11

CORPORATE DIVISION

- Legal Review (916) 445-0630
- Certification (916) 445-1431
- Statutes (916) 445-3900
- Microfilm Records (916) 445-1788
- Name Availability (916) 323-3887
- Trademarks (916) 445-0872
- Statement of Officers (916) 445-2020
- Service of Process (916) 445-0990
- Los Angeles Office (916) 620-3104

FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

*Met 1523  
LEWIN*

ATTENTION: LOIS G. LERNER

February 2, 1984

This is in answer to your inquiry of January 25, 1984

The records of this office indicate that CONTRIBUTIONS, INC.

84040492636

- Is not of record in this office as either a California domestic corporation or a foreign corporation.
  - Is a California corporation incorporated \_\_\_\_\_
  - Is in good legal standing \_\_\_\_\_
  - A statement as to the names and addresses of agent, officers and directors and address of principal office is on file in this office.  A COPY OF THE FILED STATEMENT MAY BE OBTAINED FOR A FEE OF \$1.00. Nonprofit corporations are not required to list directors.
  - A statement as to names and addresses of officers and address of principal office has not been filed in this office.
  - An agent for service of process has not been designated.
  - Was suspended by order of the Franchise Tax Board \_\_\_\_\_ for not complying with statutory requirements.
  - Was suspended by the Secretary of State \_\_\_\_\_ for failure to file a statement of officers.
  - Was dissolved \_\_\_\_\_  Its term of existence expired \_\_\_\_\_
  - Was merged into: \_\_\_\_\_
  - Is a \_\_\_\_\_ corporation which has been qualified in California since \_\_\_\_\_
  - Is in good legal standing \_\_\_\_\_
  - Agent for service of process: \_\_\_\_\_
- 
- Surrendered its right to transact intrastate business in California \_\_\_\_\_
  - Forfeited its right to transact business in California \_\_\_\_\_ for not complying with statutory requirements.
  - Copies of bylaws and names of shareholders or owners are not required to be filed with this office.
  - Information regarding related businesses of individual corporate entities is not required to be filed with this office.
  - Foreign corporations are not required to file names and addresses of officers with this office.

jjg/Certification

*Martha Fong Eu*

84040492637

598

1/25 1984

~~154~~ 20

MICHAEL R. MILES  
LOIS G. LERNER  
6344 31ST PL., N.W.  
WASHINGTON, D.C. 20015

PAY TO THE ORDER OF Secretary of State for California \$ 3.00

Three & 10/100

DOLLARS

**1st AMERICAN**

FIRST AMERICAN BANK, N.A. WASHINGTON, DC  
CONNECTICUT AND KENTUCKY

FOR REPAIRING - MOTOR 1444

Lois G. Lerner

⑆054000043⑆ 5 310 548⑈ 0598

FILED  
GENERAL COUNSEL  
AUG 6 4:11

1118608

FILED  
in the office of the Secretary of State  
of the State of California

AUG 2 1982

MARCH FONG EU, Secretary of State

By Bill Holden  
Deputy

ARTICLES OF INCORPORATION OF CONTRIBUTIONS, INC.

I.

The name of this corporation is Contributions, Inc.

II.

The purpose of this corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.

III.

The name and address in the State of California of this corporation's initial agent for service of process is:

Santo Singh  
29 Las Moradas Circle  
San Pablo, CA 94806

IV.

This corporation is authorized to issue only one class of shares of stock; and the total number of shares which this corporation is authorized to issue is 10,000,000.

Dated: August 2, 1982

William Allen Smith  
(signature)

WILLIAM ALLEN SMITH  
(printed name)

I hereby declare that I am the person who executed the foregoing Articles of Incorporation which executive is my act and deed.

William Allen Smith



March Fong Eu  
Secretary of State  
1230 J Street  
Sacramento, California  
95814 

84040492



PRIORITIZED  
FIRST CLASS



RECEIVED AT THE FL  
U.S. POSTAGE  
699527





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

File

Secretary of State  
1230 J Street  
Sacramento, California 95814  
Attention: Certification

MUR 1523

Re: Contributions, Inc.  
File # 1118608

Dear Sir/Madam:

As Assistant General Counsel for Enforcement of the Federal Election Commission, Washington, D.C., I request the following information concerning Contributions, Inc., File # 1118608, a corporation in "good standing" as of August 2, 1982.

This office requests a copy of the Articles of Incorporation, the names and addresses of past and present officers and directors and the name of the agent for service of process. It is our understanding that the corporation is ongoing and has never taken steps to dissolve. We would appreciate verification on the issue.

Enclosed is a check for \$3.00 to cover the costs of xeroxing. We would appreciate your immediate attention to this matter.

If you have any questions or need further information, please feel free to call me at (202) 523-4166.

Sincerely,

Lois G. Lerner  
Assistant General Counsel

Enclosure  
Check

84740492640

MUR ~~10044~~ 1523



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Secretary of State  
1230 J Street  
Sacramento, California 95814  
Attention: Certification

Re: Contributions, Inc.  
File # 1118608

Dear Sir/Madam:

As Assistant General Counsel for Enforcement of the Federal Election Commission, Washington, D.C., I request the following information concerning Contributions, Inc., File # 1118608, a corporation in "good standing" as of August 2, 1982.

This office requests a copy of the Articles of Incorporation, the names and addresses of past and present officers and directors and the name of the agent for service of process. It is our understanding that the corporation is ongoing and has never taken steps to dissolve. We would appreciate verification on the issue.

Enclosed is a check for \$3.00 to cover the costs of xeroxing. We would appreciate your immediate attention to this matter.

If you have any questions or need further information, please feel free to call me at (202) 523-4166.

Sincerely,

Lois G. Lerner  
Assistant General Counsel

Enclosure  
Check

84740492641



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MJR 1523

RECEIPT OF HAND DELIVERY

This is to certify that I received a letter and subpoena  
for service from the Federal Election Commission on January 24,  
1984.

Name: *James P. [Signature]*

Title: *Dr. 1*

Accurate Legal Services  
306 H Street, N.E.  
Washington, D.C.

84340492642



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**HAND DELIVERED**

Jim Smith  
Accurate Legal Services  
306 H Street, N.E.  
Washington, D.C. 20002

Re: MUR 1523

Dear Mr. Smith:

This letter is to confirm your January 18, 1984, conversation with Martha Romney of this Office concerning personal service of a subpoena. You indicated that the standard fee for personal service to Sacramento, California would be \$35 - \$45. Additional charges would be made for Express Mail or Federal Express of the subpoena materials to California, for any necessary telephone calls, for attempt charges, waiting charges and "rush jobs." The subpoena we want served is issued to Mr. Kenneth Mandler, 1431 Third Street, Sacramento, California 92507. We understand that attempts will be made to locate Mr. Mandler at the given address and that we will be contacted for further instructions and authorization if Mr. Mandler does not reside at that address.

Enclosed is a copy of the subpoena to be served. Please send the mail to Sacramento via Federal Express or Express Mail. If you have any questions or need further information please contact Ms. Romney at 523-4060 or me at 523-4166.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Lois G. Lerner".

Lois G. Lerner  
Assistant General Counsel

840404926413

RECEIVED AT THE FEC  
Cocet 1315  
83 DEC 28 P 2: 43  
MUR 1523  
Levin

4:27

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Kenneth A. Gross  
Associate General Counsel  
Federal Elections Commission  
Washington, DC. 20463

RE: MUR 1523  
December 16, 1983

Dear Mr. Gross,

In response to your letter dated December 1, 1983 and Order to answer interrogatories:

- #1 I cannot recall.
- #2 I cannot recall.
- #3 I cannot recall.

I swear under penalty of perjury that the foregoing is true to the best of my knowledge.

  
William A. Smith

840404926444

A. Smith  
id Ave.  
LA. 94708

RECEIVED 1.35 + postage

88 DEC 28 P 2:42

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Kenneth A. Gross  
Associate General Counsel  
Federal Elections Commission (FECES)  
Washington, DC 20463  
RE: MUR 1523

**CERTIFIED**

**P 264 496 908**

**MAIL**



Coca 1254  
Levin  
1523

December 9, 1983

DEC 13 P 5:36

Mr. Jonathan Levin  
Office of General Counsel  
Federal Election Commission  
1325 - K Street, N.W.  
Washington, D.C 20463

Dear Mr. Levin:

This is in reference to your letter dated December 1, 1983 regarding my answers in the matter of Contributions, Inc.

I joined Contributions, Inc., somewhere in September 1982. I was the first employee to be hired. And I was told it is a California based company and they are here to research and compile data on the Contributors to Political Committees.

I never been involved in any kind of research before and the reason I considered this job because at that time I was unemployed and financially I wasn't in a condition to wait for some other opportunity.

Anyway, Mr. William Smith, President of Contributions, Inc., took me to FEC and made me familiarize with how everything works there, and showed me with the help of other Commission employees how to use micro films and go to files to extract data.

Later, I did see written on the walls all kinds of rules, regulations and warnings about the use of information. Which later I mentioned to Mr. Smith, inquiring if we are not doing anything against those rules and regulations. But he satisfied me by saying that you do not have to worry about anything, we are not doing anything illegal.

The time passed, and being more involved with FEC, they made me Supervisor of the rest of the people which they hired from time to time to work at FEC. This is only because I was more aware of the arrangements of documents at the FEC and also to see that all others are copying correct information for the right person. In other words, I was mainly involved with the collection of data and entirely unaware whether its going to be used as a legal or illegal purposes.

During my length of employment with Contributions, Inc., which was approximately between 3 to 4 months, I spent most of my time at FEC. And, during this time me and my co-workers spoke with different FEC employees from time to time about the availability of reports. Among all the Commission employees, Ken, Lucinda, Rory, Patricia and Kathy were the employees with whom me and my co-workers mostly dealt with about the status of the reports. I do

84040492646

not remember their full names and their positions, but I believe they were there to assist people in locating the reports.

As far as I recall none of the above mentioned employees spoke with me or with my co-workers with respect to 2 U.S.C Section 438(a) (4) and 11C.F.R Section 104.15.

Neither did I care asking anything about these Sections, as I was just trying to finish up my work i.e. collection of data, as I was told by Mr. Smith that we need all material before the end of year.

We almost completed all the research before the Christmas. After the Christmas holidays when I went to work, I was told that everybody, including me, laid-off, because our services were no longer needed.

In the end, I hope this letter will provide sufficient information to show that I am free from any kind of involvement and/or legal/illegal acts done by Contributions, Inc..

Sincerely,

*M. Sohail Arzoo*

M. Sohail Arzoo

Subscribed and sworn to before me this  
10<sup>th</sup> day of DECEMBER, 19 83  
*[Signature]*  
My Commission exp. 10/1/85 Notary Date.

84040492647

## FEDERAL ELECTION COMMISSION

83 DEC 13 P 2:16

TO: Sohail Arzoo

The Commission has information that you were notified of and shown sections of the Federal Election Campaign Act of 1971, as amended, and Commission Regulations providing that contributor information copied from reports filed with the Commission may not be used for a commercial purpose. The appropriate sections are enclosed. The following interrogatories are asked with reference to your name gathering activities on behalf of Contributions, Inc.:

1. State your position with Contributions, Inc. during the second half of 1982. State what your duties entailed during this time period.
2. State the names, positions, and divisions of employment of each Commission employee who spoke to you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. State the date(s) on which you and/or your co-workers spoke to each of the individuals referred to in your response to Interrogatory # 2.
4. State what each individual listed in response to Interrogatory # 2 told you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

84040492643



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 1, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Sohail Arzoo  
5000 Columbia Pike  
Arlington, Virginia 22204

Re: MUR 1523

Dear Mr. Arzoo:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that, during the fall of 1982, you and other employees of Contributions, Inc. compiled names of contributors from reports on file with the Commission. The enclosed interrogatories are asked with reference to your activities on behalf of Contributions, Inc. Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

84040492649

Letter to Sohail Arzoo  
Page 2

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

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

Enclosure

84040492650

PS Form 3811, July 1982

• **REMI**: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).  
 Show to whom and date delivered .....  
 Show to whom, date, and address of delivery ..  
2.  RESTRICTED DELIVERY .....  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ .....

3. ARTICLE ADDRESSED TO:  
Sohail Arzoo  
5000 Capital Drive  
Alexandria, VA 22204

4. TYPE OF SERVICE: ARTICLE NUMBER  
 REGISTERED  INSURED  
 CERTIFIED  COD 943866  
 EXPRESS MAIL

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (only if restricted delivery)  
VA 50110  
3 1985  
SIA

7. UNABLE TO DELIVER BECAUSE: 7-10000-0000  
INITIALS

RETURN RECEIPT

MUR 1523 JL 7/24/85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. Sohail Arzoo  
5000 Columbia Pike  
Arlington, Virginia 22204

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *30th* day of *November*, 1983.

*Danny L. McDonald*  
\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492651

FEDERAL ELECTION COMMISSION

TO: Sohail Arzoo

The Commission has information that you were notified of and shown sections of the Federal Election Campaign Act of 1971, as amended, and Commission Regulations providing that contributor information copied from reports filed with the Commission may not be used for a commercial purpose. The appropriate sections are enclosed. The following interrogatories are asked with reference to your name gathering activities on behalf of Contributions, Inc.:

1. State your position with Contributions, Inc. during the second half of 1982. State what your duties entailed during this time period.
2. State the names, positions, and divisions of employment of each Commission employee who spoke to you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. State the date(s) on which you and/or your co-workers spoke to each of the individuals referred to in your response to Interrogatory # 2.
4. State what each individual listed in response to Interrogatory # 2 told you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

8404049265?

438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

§ 104.15 Sale or use restriction (2 U.S.C. 435(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

84040492653



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 1, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kenneth Mandler  
1431 Third Street  
Sacramento, California 92507

Re: MUR 1523

Dear Mr. Mandler:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that you are the primary investor in Contributions, Inc. It appears that this company compiled names of contributors on file with the Commission and published a book listing these names.

Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

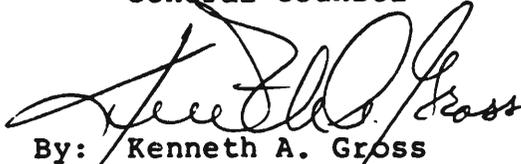
84040492654

Letter to Kenneth Mandler  
Page 2

If you have any questions please direct them to Jonathan  
Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel



By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Order  
Interrogatories

84040492655

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. Kenneth Mandler  
1431 Third Street  
Sacramento, California 92507

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *30th* day of *November*, 1983.

*Danny L. McDonald*  
\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492656

FEDERAL ELECTION COMMISSION

To: Kenneth Mandler

1. Describe your relationship with Contributions, Inc., including, but not limited to, all positions held in the corporation, all ownership interests in the corporation, and your role in the day-to-day operations of the corporation.

2. List the names, present addresses and positions of all directors and officers of Contributions, Inc.

3. For each of the names listed above, state the decision-making duties and role in the day-to-day operations of Contributions, Inc.

4. State the name, address, and percentage of ownership interest of each of the owners of Contributions, Inc.

5. Describe all business activities in which Contributions, Inc. is presently engaged.

6. Describe in detail all occasions upon which you, Contributions, Inc. and/or its officers, employees, and agents received information from Federal Election Commission staff concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 (copies enclosed). State when this information was given, to whom it was given, the names, positions, and divisions of employment of each Commission staff member giving the information, and the substance of what the Commission staff members said concerning the application of the above sections to your company's activities.

84040492657

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

§104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

84740492658



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 1, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Re: MUR 1523

Dear Mr. Smith:

On May 6, 1983, notification was sent that the Commission had found reason to believe that Contributions, Inc. had violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On September 23, 1983, the Office of General Counsel received your response to interrogatories. Based on one of your responses, the Commission has decided to ask you additional questions. The Commission has, therefore, issued the attached order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

84040492657

84040492650

PS Form 3811, July 1982

RETURN RECEIPT

● **GENERAL:** Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**(CONSULT POSTMASTER FOR FEES)**

1. The following service is requested (check one):

Show to whom and date delivered .....

Show to whom, date, and address of delivery .....

2.  RESTRICTED DELIVERY.....  
(The maximum delivery fee is charged in addition to the return receipt fee.)

TOTAL \$.....

3. ARTICLE ADDRESSED TO:  
Wm. Smith  
972 Euclid AVE  
Woburn, MA 01898

4. TYPE OF SERVICE:      ARTICLE NUMBER

REGISTERED       INSURED      943864

CERTIFIED       COD

EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE       Addressee       Authorized agent

Nancy Harris

5. DATE OF DELIVERY      POSTMARK

12-5-83      DEC 5 1983

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1523 JL (12/1/83)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *30th* day of *November* 1983.

*Danny L. McDonald*  
\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492661

FEDERAL ELECTION COMMISSION

To: Wilbiam A. Smith

The following interrogatories are asked with reference to your statement, made in response to the Commission's first set of interrogatories, that "[s]everal employees of the FEC also have varying interpretations" of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15:

1. State the names, positions, and divisions of employment of each Commission employee who spoke to you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.

2. State the date(s) on which you and/or your employees spoke to each of the individuals referred to in your response to Interrogatory # 1.

3. State what each individual listed in response to Interrogatory # 1 told you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

8404049266?

§438. Administrative provisions

(a) *Duties of Commission.* The Commission shall—

(4) within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. A political committee may submit 10 pseudonyms on each report filed in order to protect against the illegal use of names and addresses of contributors, provided such committee attaches a list of such pseudonyms to the appropriate report. The Clerk, Secretary, or the Commission shall exclude these lists from the public record;

§ 104.15 Sale or use restriction (2 U.S.C. 438(a)(4)).

(a) Any information copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed with the Commission, Clerk of the House, Secretary of the Senate, or any Secretary of State or other equivalent State officer, shall not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, except that the name and address of any political committee may be used to solicit contributions from such committee.

(b) For purposes of 11 CFR 104.15, "soliciting contributions" includes soliciting any type of contribution or donation, such as political or charitable contributions.

(c) The use of information, which is copied or otherwise obtained from reports filed under 11 CFR Part 104, in newspapers, magazines, books or other similar communications is permissible as long as the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes.

84040492663



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JAN SAVAGE JS

DATE: NOVEMBER 30, 1983

SUBJECT: ORDERS RE: MUR 1523

The attached orders regarding MUR 1523 have been signed and sealed this date.

840404926654

Attachments:  
Orders (3)  
Arzoo, Mandler and Smith



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: November 22, 1983  
SUBJECT: MUR 1523 - Memorandum to The 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) [ ]

84040492665



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Sohail Arzoo  
5000 Columbia Pike  
Arlington, Virginia 22204

Re: MUR 1523

*JZ*  
*11/29/83*

Dear Mr. Arzoo:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that, during the fall of 1982, you and other employees of Contributions, Inc. compiled names of contributors from reports on file with the Commission. The enclosed interrogatories are asked with reference to your activities on behalf of Contributions, Inc. Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

84040492666

Letter to Sohail Arzoo  
Page 2

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure

84040492667



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kenneth Mandler  
1431 Third Street  
Sacramento, California 92507

Re: MUR 1523

*JZ 11/29/83*

Dear Mr. Mandler:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that you are the primary investor in Contributions, Inc. It appears that this company compiled names of contributors on file with the Commission and published a book listing these names.

Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

84040492663

Letter to Kenneth Mandler  
Page 2

If you have any questions please direct them to Jonathan  
Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Order  
Interrogatories

84040492667



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Re: MUR 1523

*JL* 11/29/83

Dear Mr. Smith:

On May 6, 1983, notification was sent that the Commission had found reason to believe that Contributions, Inc. had violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On September 23, 1983, the Office of General Counsel received your response to interrogatories. Based on one of your responses, the Commission has decided to ask you additional questions. The Commission has, therefore, issued the attached order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

34040492670

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 28, 1983, the Commission authorized by a vote of 5-0 the orders and cover letters to William A. Smith, Sohail Arzoo and Kenneth Mandler as submitted with the General Counsel's November 22, 1983, Memorandum to the Commission.

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

Attest:

Nov. 28, 1983

Date

Jeddy C. Ransom  
for Marjorie W. Emmons  
Secretary of the Commission

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

11-22-83, 4:29  
11-23-83, 11:00

84040492671



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 NOV 22 P 4: 29

November 22, 1983

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel

**SENSITIVE**

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: Orders for Answer to Written Interrogatories  
in MUR 1523 - Contributions, Inc.

On November 1, 1983, the Commission considered a proposed letter and questions to be sent to William A. Smith, president of Respondent Contributions, Inc. The Commission, at that time, directed the Office of General Counsel to redraft the letter to Mr. Smith and to expand upon the questions being asked. Pursuant to that direction, this Office has drafted additional questions to be sent to Sohail Arzoo, who gathered data for Contributions, Inc., and Kenneth Mandler, the primary investor in Contributions, Inc.

Attached to this memorandum are letters and orders to answer written interrogatories to be sent to Messrs. Smith, Arzoo, and Mandler. The General Counsel recommends authorization of the attached orders.

Recommendation

Authorize the attached orders and cover letters.

Attachments

1. Letter, order, and interrogatories to be sent to William A. Smith.
2. Letter, order, and interrogatories to be sent to Sohail Arzoo.
3. Letter, order, and interrogatories to be sent to Kenneth Mandler.

34040492672



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Re: MUR 1523

Dear Mr. Smith:

On May 6, 1983, notification was sent that the Commission had found reason to believe that Contributions, Inc. had violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On September 23, 1983, the Office of General Counsel received your response to interrogatories. Based on one of your responses, the Commission has decided to ask you additional questions. The Commission has, therefore, issued the attached order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

*Attachment 1 - p. 1 of 3*

84040492673

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1523  
Contributions, Inc. )

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of , 1983.

\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492674

1- p. 2 of 3

FEDERAL ELECTION COMMISSION

To: William A. Smith

The following interrogatories are asked with reference to your statement, made in response to the Commission's first set of interrogatories, that "[s]everal employees of the FEC also have varying interpretations" of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15:

1. State the names, positions, and divisions of employment of each Commission employee who spoke to you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. State the date(s) on which you and/or your employees spoke to each of the individuals referred to in your response to Interrogatory # 1.
3. State what each individual listed in response to Interrogatory # 1 told you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

84740492675



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Sohail Arzoo  
5000 Columbia Pike  
Arlington, Virginia 22204

Re: MUR 1523

Dear Mr. Arzoo:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that, during the fall of 1982, you and other employees of Contributions, Inc. compiled names of contributors from reports on file with the Commission. The enclosed interrogatories are asked with reference to your activities on behalf of Contributions, Inc. Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

Attachment 2 - p. 1 of 4

84040492676

Letter to Sohail Arzoo  
Page 2

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure

84040492677

2 - p. 2 of 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. Sohail Arzoo  
5000 Columbia Pike  
Arlington, Virginia 22204

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of , 1983.

\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

2 - p. 3 of 4

84040492673

FEDERAL ELECTION COMMISSION

TO: Sohail Arzoo

The Commission has information that you were notified of and shown sections of the Federal Election Campaign Act of 1971, as amended, and Commission Regulations providing that contributor information copied from reports filed with the Commission may not be used for a commercial purpose. The appropriate sections are enclosed. The following interrogatories are asked with reference to your name gathering activities on behalf of Contributions, Inc.:

1. State your position with Contributions, Inc. during the second half of 1982. State what your duties entailed during this time period.
2. State the names, positions, and divisions of employment of each Commission employee who spoke to you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
3. State the date(s) on which you and/or your co-workers spoke to each of the individuals referred to in your response to Interrogatory # 2.
4. State what each individual listed in response to Interrogatory # 2 told you and/or your co-workers with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

84040492677

2-p.4 of 4



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kenneth Mandler  
1431 Third Street  
Sacramento, California 92507

Re: MUR 1523

Dear Mr. Mandler:

The Federal Election Commission, established in April 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order, requiring you to provide certain information, has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

The Commission has information that you are the primary investor in Contributions, Inc. It appears that this company compiled names of contributors on file with the Commission and published a book listing these names.

Since your responses are being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

Attachment 3 - p. 1 of 4

84040492637

Letter to Kenneth Mandler  
Page 2

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Order  
Interrogatories

84040492631

3 - p. 2 of 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. Kenneth Mandler  
1431 Third Street  
Sacramento, California 92507

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this \_\_\_\_\_ day of \_\_\_\_\_, 1983.

\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492682

FEDERAL ELECTION COMMISSION

To: Kenneth Mandler

1. Describe your relationship with Contributions, Inc., including, but not limited to, all positions held in the corporation, all ownership interests in the corporation, and your role in the day-to-day operations of the corporation.

2. List the names, present addresses and positions of all directors and officers of Contributions, Inc.

3. For each of the names listed above, state the decision-making duties and role in the day-to-day operations of Contributions, Inc.

4. State the name, address, and percentage of ownership interest of each of the owners of Contributions, Inc.

5. Describe all business activities in which Contributions, Inc. is presently engaged.

6. Describe in detail all occasions upon which you, Contributions, Inc. and/or its officers, employees, and agents received information from Federal Election Commission staff concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 (copies enclosed). State when this information was given, to whom it was given, the names, positions, and divisions of employment of each Commission staff member giving the information, and the substance of what the Commission staff members said concerning the application of the above sections to your company's activities.

840404922633

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
                          )  
Contributions, Inc. )

MUR 1523

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on November 1, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1523:

1. Direct the Office of General Counsel to redraft the letter to Mr. William A. Smith making it responsive to intervening correspondence.
2. Direct the Office of General Counsel to redraft the questions being submitted to Mr. William A. Smith, asking for additional information that might be needed by the Commission, in accord with the discussion held on this matter in the meeting of November 1, 1983.

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

Attest:

11-2-83

Date



Marjorie W. Emmons  
Secretary of the Commission

84040492634



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 OCT 19 11:22

October 19, 1983

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel

**SENSITIVE**

SUBJECT: Order for Answer to Written Interrogatories  
in MUR 1523 - Contributions, Inc.

This matter involves an allegation that Respondent, Contributions, Inc., violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by copying reports filed at the Commission, compiling information on individual contributors, and offering the information for sale to the public. On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4). On July 22, 1983, the Office of General Counsel sent an order to answer written interrogatories to William A. Smith, president of Contributions, Inc. This order was sent by certified mail to his business address. The envelope containing the order and interrogatories was returned unclaimed. On August 19, 1983, the interrogatories were re-sent by certified mail to Mr. Smith's home address. On September 23, after the interrogatories were forwarded to Mr. Smith's new address in Berkely, California, this Office received answers to the interrogatories. (See Attachment 1).

For the most part, Mr. Smith's answers were responsive to the interrogatories. One of the responses, however, raised the necessity for more interrogatories. In describing the activities engaged in by employees of the company, Mr. Smith stated that he "investigated the restrictions, through discussions with FEC employees," that his interpretation is not in accord with this Office's interpretation, and that "[s]everal employees of the FEC also have varying interpretations." Because of our inquiry as to a knowing and willful violation, this statement necessitates an inquiry as to the information Mr. Smith may have received from the Commission staff.

84040492635

Attached to this memorandum is an order for answers to written interrogatories to be sent to Mr. Smith. The General Counsel recommends authorization of the order.

Recommendation

Authorize the attached order and cover letter.

Attachments

1. Response from William A. Smith, received on September 23, 1983.
2. Letter, order, and interrogatories to be sent to William A. Smith.

84040492636

6007-054  
FEC

03 SEP 23 P12:32

84040492687

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

September 20, 1983

RE: MUR 1523

Dear Mr. Gross,

I am writing in response to your letter dated August 19, 1983 which included an order to answer interrogatories.

Although I resigned my post as President of Contributions, Inc. on April 31 of this year, I will make an attempt to answer your questions. Please keep in mind that I no longer have access to documents containing certain pertinent information which you have requested. To the best of my knowledge the corporation has since ceased all business activities.

- #1: My role as president was mostly administrative with corporate directions originating from the primary investor. I also acted as the sole salesperson in dealing with clients. ie; phone calls, informational brochures, etc.
- #2: Since I do not have access to the documents listing this information, I cannot fully satisfy this question. I do know that Mr. Kenneth Mandler of Sacramento, CA. is the primary investor and source for the idea for the company. Also, Mr. Santo Singh of San Pablo, CA. is (was) the Treasurer. I was CEO and board member.
- #3: Sohail Arzoo was employed by the corporation to acquire data from the Federal Elections Commission and oversee the Data entry onto the corporations data base. I do not know address.
- #4: Data was acquired from the FEC by 1. photocopying disclosure reports, 2. from the FEC's computer, and 3. from members themselves. Data was compiled on a daily basis from September 1982 to December 1982.
- #5: Information concerning the restrictions of 2 U.S.C. 438(a) (4) and 11 C.F.R. 104.15 was obtained through several sources. 1. orally by employees of the FEC and 2. in writing. (I don't remember the name of the booklet). Certainly I investigated the restrictions through discussions with FEC employees and was comfortable that no laws were being violated. I can see now that my interpretation of the restrictions does not match yours. Note: Several employees of the FEC also have varying interpretations.

Attachment 1 - p. 1 of 2

84040492687

Page 2.  
FEC  
Mr. Kenneth A. Gross  
September 20, 1983

I would like to add, Mr. Gross, that the true essence of the law restricting use of campaign finance disclosure reports was followed to the tee. In no way was there any violation of privacy and quite frankly I am amazed that you and members of the Commission would waste taxpayers money (my money) pursuing such a minor issue. Contributions, Inc. simply published a book based on information that is public record and in doing so provided a service that the FEC is incapable of doing. I do believe that if you will do your homework you will find that the information Contributions, Inc. obtained may be used legally in "magazines, periodicals, and similar publications." (If I was an attorney I could cite the code).

If you are not convinced of the usefulness of the product that Contributions sold ~~you~~, you should consult a few of their clients. ie; Senator Hollings, Walter Mondale, Brooks Jackson of the Wall Street Journal, Congressman Dymally etc. Would they be involved in any ILLEGAL activity? I doubt it!

My apologies if I seem bitter; but I am. I don't have the time or financial resources to do battle with the Commission over such a simple matter, and unless I am notified by you in the near future, I will consider the subject closed.

Sincerely,  
  
William A. Smith

I HEREBY CERTIFY UNDER OATH THAT THE FOREGOING IS TRUE TO THE BEST OF MY KNOWLEDGE UNDER PENALTY OF PURGERY.  9/20/83

8 4 1 0 4 0 4 9 2 6 3 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Re: MUR 1523

Dear Mr. Smith:

On May 6, 1983, notification was sent that the Commission had found reason to believe that Contributions, Inc. had violated 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary. Consequently, the Federal Election Commission has issued the attached order which requires you to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Act.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

*Attachment 2 - p. 1 of 3*

84040492637

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1523  
Contributions, Inc. )

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. William A. Smith  
972 Euclid Avenue  
Berkeley, California 94708

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this            day of            , 1983.

\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492690

2 - p. 2 of 3

FEDERAL ELECTION COMMISSION

To: William A. Smith

The following interrogatories are asked with reference to your statement that "[s]everal employees of the FEC also have varying interpretations" of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15:

1. State the names, positions, and divisions of the Commission employees who spoke to you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15.
2. State the date(s) on which you and/or your employees spoke to each of the individuals referred to in your response to Interrogatory # 1.
3. State what each individual named in response to Interrogatory # 1 told you and/or your employees with respect to 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 and how those sections applied to your copying of information from FEC files.

84040492691



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
DATE: OCTOBER 21, 1983  
SUBJECT: MUR 1523 - Memorandum to the Commission  
dated October 19, 1983

The above-named document was circulated to the Commission on Wednesday, October 19, 1983 at 4:00.

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

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session agenda for Tuesday, November 1, 1983.

84040492692



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *gah*  
DATE: October 19, 1983  
SUBJECT: MUR 1523 - Memo to COMM

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

CIRCULATIONS

48 Hour Tally Vote         
    Sensitive                 
    Non-Sensitive            
  
24 Hour No Objection       
    Sensitive                 
    Non-Sensitive            
  
Information                 
    Sensitive                 
    Non-Sensitive        

DISTRIBUTION

Compliance                 
Audit Matters               
  
Litigation                   
Closed MUR Letters         
  
Status Sheets               
Advisory Opinions     

Other                    

Other (see distribution  
below)                   

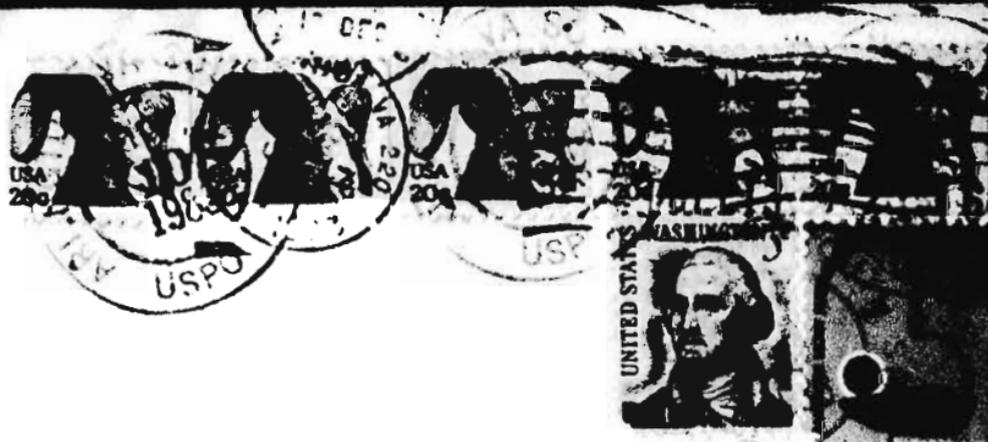
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

84040492693

M. Sohail Arzoo  
5000 Columbia Pike 2  
Arlington, VA 22204

**RETURN RECEIPT  
REQUESTED**



Mr. Jonathan Levin  
Office of General Counsel  
Federal Election Commission  
1325-K Street, N.W.  
Washington, D.C. 20463

**CERTIFIED**

**P 511 392 075**

**MAIL**

RECEIVED AT THE FEC  
Doc# 873  
83 SEP 27 All: 88



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 23, 1983

RECEIVED  
GENERAL COUNSEL  
SEP 27 11:24

Manager  
South Station  
3532 Columbia Pike  
Arlington, Virginia 22204

Re: MUR 1523

Dear Madam:

Pursuant to 39 C.F.R. § 265.6(d)(1), we request that you provide us with the present address of William A. Smith. According to our records, his home address as of November 1982, was 1830 Columbia Pike, No. 106, Arlington, Virginia 22204.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Thank you very much for your assistance.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Return Envelope

Address: 1420 GREENWOOD RD  
HARRISBURG, PA 17112

84040492675

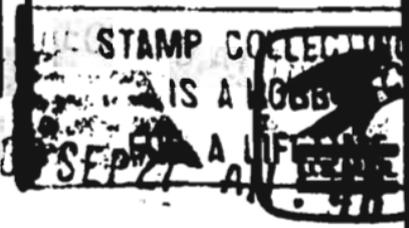
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Special Business  
Penalty for Private Use \$300

8404049269

Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Attention: Jonathan Levin



Postage and Fees Paid  
Federal Election Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 23, 1983

Manager  
South Station  
3532 Columbia Pike  
Arlington, Virginia 22204

Re: MUR 1523

Dear Madam:

Pursuant to 39 C.F.R. § 265.6(d)(1), we request that you provide us with the present address of William A. Smith. According to our records, his home address as of November 1982, was 1830 Columbia Pike, No. 106, Arlington, Virginia 22204.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection, I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jonathan Levin, the attorney assigned to this matter, at 202-523-4060.

Thank you very much for your assistance.

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  
Return Envelope

84040492697

William A. Smith  
Euclid Ave.  
Berkeley, CA. 94708

MAILED  
MOUNT EDEN  
SEP 20 1983  
CALIF.  
U.S. POSTAGE  
83 SEP 28 5P12:32

Federal Elections Commission  
Washington, DC 20463  
ATTN: Mr. KENNETH GROSS  
RE: MUR 1523

CERTIFIED MAIL

**CERTIFIED**

P 485 105 357

**MAIL**

**RETURN RECEIPT  
REQUESTED**

6cc # 854  
RECEIVED AT THE FEC

83 SEP 23 P12: 32

30 SEP 23 P4:100

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

September 20, 1983

RE: MUR 1523

Dear Mr. Gross,

I am writing in response to your letter dated August 19, 1983 which included an order to answer interrogatories.

Although I resigned my post as President of Contributions, Inc. on April 31 of this year, I will make an attempt to answer your questions. Please keep in mind that I no longer have access to documents containing certain pertinent information which you have requested. To the best of my knowledge the corporation has since ceased all business activities.

- #1: My role as president was mostly administrative with corporate directions originating from the primary investor. I also acted as the sole salesperson in dealing with clients. ie; phone calls, informational brochures, etc.
- #2: Since I do not have access to the documents listing this information, I cannot fully satisfy this question. I do know that Mr. Kenneth Mandler of Sacramento, CA. is the primary investor and source for the idea for the company. Also, Mr. Santo Singh of San Pablo, CA. is (was) the Treasurer. I was CEO and board member.
- #3: Sohail Arzoo was employed by the corporation to acquire data from the Federal Elections Commission and oversee the Data entry onto the corporations data base. I do not know address.
- #4: Data was acquired from the FEC by L. photocopying disclosure reports, 2. from the FEC's computer, and 3. from members themselves. Data was compiled on a daily basis from September 1982 to December 1982.
- #5: Information concerning the restrictions of 2 U.S.C. 438(a) (4) and 11 C.F.R. 104.15 was obtained through several sources. 1. orally by employees of the FEC and 2. in writing. (I don't remember the name of the booklet). Certainly I investigated the restrictions through discussions with FEC employees and was comfortable that no laws were being violated. I can see now that my interpretation of the restrictions does not match yours. Note: Several employees of the FEC also have varying interpretations.

84040492699

Page 2.

FEC

Mr. Kenneth A. Gross

September 20, 1983

I would like to add, Mr. Gross, that the true essence of the law restricting use of campaign finance disclosure reports was followed to the tee. In no way was there any violation of privacy and quite frankly I am amazed that you and members of the Commission would waste taxpayers money (my money) pursuing such a minor issue. Contributions, Inc. simply published a book based on information that is public record and in doing so provided a service that the FEC is incapable of doing. I do believe that if you will do your homework you will find that the information Contributions, Inc. obtained may be used legally in "magazines, periodicals, and similar publications." (If I was an attorney I could cite the code).

If you are not convinced of the usefulness of the product that Contributions sold ~~you~~, you should consult a few of their clients. ie; Senator Hollings, Walter Mondale, Brooks Jackson of the Wall Street Journal, Congressman Dymally etc. Would they be involved in any ILLEGAL activity? I doubt it!

My apologies if I seem bitter; but I am. I don't have the time or financial resources to do battle with the Commission over such a simple matter, and unless I am notified by you in the near future, I will consider the subject closed.

Sincerely,



William A. Smith

I HEREBY CERTIFY UNDER OATH THAT THE FOREGOING IS TRUE TO THE BEST OF MY KNOWLEDGE UNDER PENALTY OF PURGERY.

*AS* 9/20/83

84040492700



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 19, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William A. Smith, President  
Contributions, Inc.  
1830 Columbia Road, No. 106  
Arlington, Virginia 22204

Re: MUR 1523

Dear Mr. Smith:

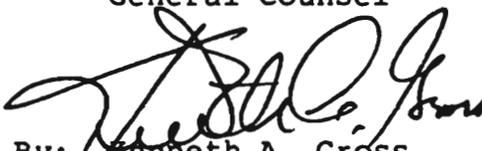
On July 22, 1983, the Commission sent an order to answer interrogatories in the above-captioned matter to the principal business address of the respondent, Contributions, Inc. The order and interrogatories with a cover letter were sent by certified mail. This office has received an unanswered return receipt from the Post Office. Therefore, the items mailed to you are being re-sent to you at your home address.

This order issued by the Commission is still in effect. Therefore, responses to the interrogatories must still be submitted under oath within ten days of your receipt of this letter.

If you have any questions, please direct them to Jonathan Levin, the attorney assigned to this matter, at 523-4060.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures

Letter to William A. Smith, Jr., dated July 22, 1983  
Order  
Interrogatories

84040492701

8404049270?

8/19 L. Harris - 15233

• **SHIPPER:** Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

**(CONSULT POSTMASTER FOR FEES)**

1. The following service is requested (check one).

Show to whom and date delivered .....  
 Show to whom, date, and address of delivery .....  
 RESTRICTED DELIVERY .....  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL - \$ .....

3. ARTICLE ADDRESSED TO  
 William D Smith, Cont. Inc.  
 Arlington, VA 22204

4. TYPE OF SERVICE: ARTICLE NUMBER

REGISTERED  INSURED 943480  
 CERTIFIED  COD  
 EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent  
 N Harris

5. DATE OF DELIVERY  
 8/31/83

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK  
 AUG 31 1983

EMPLOYEE'S INITIALS

• GPO 1982-070-000

RETURN RECEIPT



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 22, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

Re: MUR 1523

Dear Mr. Smith:

On May 3, 1983, you received notification that the Commission had found reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

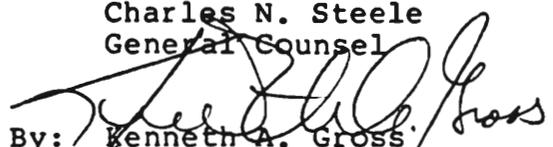
Consequently, the Federal Election Commission has issued the attached order which requires you to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

84040492703

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

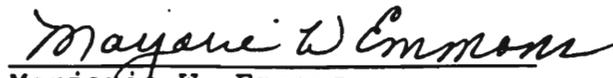
Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this 21st day of July, 1983.

  
\_\_\_\_\_  
Lee Ann Elliott  
Vice Chairman

ATTEST:

  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

84040492704

FEDERAL ELECTION COMMISSION

TO: William A. Smith, President  
Contributions, Inc.

1. Describe your role in the day-to-day operations of Contributions, Inc. In responding, please describe your supervisory responsibilities and your dealings with clients.
2. List the names and addresses of the officers and directors of Contributions, Inc. Beside each name, list the position held.
3. Describe the role that Sohail Arzoo has played in the organization and day-to-day operations of Contributions, Inc., and provide Mr. Arzoo's address.
4. Describe the activities engaged in by you, by Mr. Arzoo, and by other employees of Contributions, Inc. in compiling the data for Campaign Contributions. Include in your description, the time period during which the data was compiled, the frequency of such activities (e.g., every day, twice a week), how the data was obtained, and what types of reports and indexes were obtained.
5. Describe in detail all occasions upon which you or your staff received information from Commission staff concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, during the compilation of data for Campaign Contributions. State how often this information was given to you, to Mr. Arzoo, and to your employees, when this information was given, in what form it was given (i.e., written or oral), and any response that was made upon receiving the information.

84040492705

8/18/83

MEMORANDUM TO: The File of 1523

FROM: Jonathan M. Levin JML

SUBJECT: Return of letter containing  
order and interrogatories to  
Contributions, Inc.

On July 23, 1983, this office sent an order for answers to enclosed interrogatories to William Smith of Contributions, Inc. at the address of the company. On August 16, 1983, the envelope containing the <sup>cover letter,</sup> order, and interrogatories came back with the return receipt unsigned. The cover letter, order, and interrogatories are being re-sent to Mr. Smith's home address.

84040492706

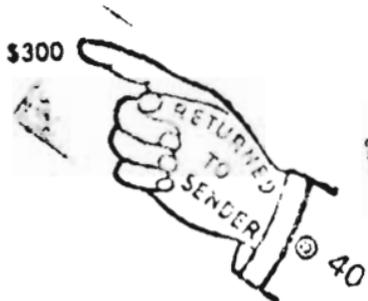
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

WASHINGTON, D.C. 200  
-PM.  
22 JUL  
1983

FBI 75  
ANNIVERSARY  
1908-1983

0  
CLASS CHECK  
289  
2  
HOLD  
DATE *MLL*  
*7/26/83*  
FIRST NOTICE  
SEND NOTICE  
RETURN  
from

Private Use \$300



UNCLAIMED

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

305

N/A

UNCLAIMED

*ML*

Postage  
Federal Electi

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Contributions, Inc.

)  
)  
)

MUR 1523

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 19, 1983, the Commission authorized by a vote of 5-0 the sending of the order and cover letter to William A. Smith as submitted with the General Counsel's July 14, 1983 Memorandum to the Commission.

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

Attest:

7-19-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

7-14-83, 1:34  
7-15-83, 2:00

84040492708



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 22, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

Re: MUR 1523

Dear Mr. Smith:

On May 3, 1983, you received notification that the Commission had found reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

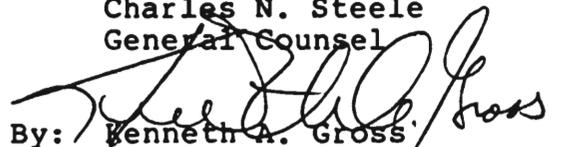
Consequently, the Federal Election Commission has issued the attached order which requires you to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

84040492709



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

Re: MUR 1523

*JL 7/20/83*

Dear Mr. Smith:

On May 3, 1983, you received notification that the Commission had found reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached order which requires you to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

34040492713



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL *MWE*

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

DATE: JULY 21, 1983

SUBJECT: ORDER TO SUBMIT WRITTEN ANSWERS  
Re: MUR 1523

The attached order, which was Commission approved on July 19, 1983 by a vote of 5-0, has been signed and sealed this date.

34040492711

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

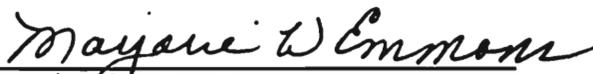
Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this 21st day of July, 1983.

  
\_\_\_\_\_  
Lee Ann Elliott  
Vice Chairman

ATTEST:

  
\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

840404927112

FEDERAL ELECTION COMMISSION

TO: William A. Smith, President  
Contributions, Inc.

1. Describe your role in the day-to-day operations of Contributions, Inc. In responding, please describe your supervisory responsibilities and your dealings with clients.
2. List the names and addresses of the officers and directors of Contributions, Inc. Beside each name, list the position held.
3. Describe the role that Sohail Arzoo has played in the organization and day-to-day operations of Contributions, Inc., and provide Mr. Arzoo's address.
4. Describe the activities engaged in by you, by Mr. Arzoo, and by other employees of Contributions, Inc. in compiling the data for Campaign Contributions. Include in your description, the time period during which the data was compiled, the frequency of such activities (e.g., every day, twice a week), how the data was obtained, and what types of reports and indexes were obtained.
5. Describe in detail all occasions upon which you or your staff received information from Commission staff concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, during the compilation of data for Campaign Contributions. State how often this information was given to you, to Mr. Arzoo, and to your employees, when this information was given, in what form it was given (i.e., written or oral), and any response that was made upon receiving the information.

84040492713

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Contributions, Inc.

)  
)  
)

MUR 1523

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 19, 1983, the Commission authorized by a vote of 5-0 the sending of the order and cover letter to William A. Smith as submitted with the General Counsel's July 14, 1983 Memorandum to the Commission.

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

Attest:

7-19-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

7-14-83, 1:34  
7-15-83, 2:00

84040492714



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *cut*  
DATE: July 14, 1983  
SUBJECT: MUR 1523 - Memorandum to Commission

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[ ]		

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

84040492715



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 JUL 14 P 1: 34

July 14, 1983

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel

**SENSITIVE**

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

SUBJECT: Authorization to Issue Order in Connection  
with MUR 1523

This matter involves the allegation that respondent Contributions, Inc. violated 2 U.S.C. § 438(a)(4) by copying reports filed at the Commission, compiling information on individual contributors, and offering this information for sale to the public. On May 3, 1983, the Commission found reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4).

Despite numerous attempts to communicate with Contributions, Inc., and its president, William A. Smith, this Office has received no reply from the respondent. The Office of General Counsel has drafted the attached questions in order to further investigate this matter with respect to the "knowing and willful" finding. Furthermore, this Office has drafted questions to ascertain Mr. Smith's role in respondent corporation and in the compiling of information for sale to the public. These questions are being asked under order in order to insure that we receive a response.

**Recommendation**

Authorize the attached order and cover letter to William A. Smith

**Attachments**

1. Order to Submit Written Answers
2. Letter to Mr. Smith
3. Interrogatories to Mr. Smith

84040492716

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Contributions, Inc. ) MUR 1523

ORDER TO SUBMIT WRITTEN ANSWERS

To: William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of , 1983.

\_\_\_\_\_  
Danny L. McDonald  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Interrogatories (1 page)

*Attachment 1*

84040492717



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Washington, D.C. 20036

Re: MUR 1523

Dear Mr. Smith:

On May 3, 1983, you received notification that the Commission had found reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached order which requires you to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Jonathan Levin, the attorney handling this matter, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Order  
Interrogatories

Attachment 2

84040492713

FEDERAL ELECTION COMMISSION

TO: William A. Smith, President  
Contributions, Inc.

1. Describe your role in the day-to-day operations of Contributions, Inc. In responding, please describe your supervisory responsibilities and your dealings with clients.
2. List the names and addresses of the officers and directors of Contributions, Inc. Beside each name, list the position held.
3. Describe the role that Sohail Arzoo has played in the organization and day-to-day operations of Contributions, Inc., and provide Mr. Arzoo's address.
4. Describe the activities engaged in by you, by Mr. Arzoo, and by other employees of Contributions, Inc. in compiling the data for Campaign Contributions. Include in your description, the time period during which the data was compiled, the frequency of such activities (e.g., every day, twice a week), how the data was obtained, and what types of reports and indexes were obtained.
5. Describe in detail all occasions upon which you or your staff received information from Commission staff concerning the restrictions of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15, during the compilation of data for Campaign Contributions. State how often this information was given to you, to Mr. Arzoo, and to your employees, when this information was given, in what form it was given (i.e., written or oral), and any response that was made upon receiving the information.

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Attachment 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*  
DATE: JUNE 23, 1983  
SUBJECT: OBJECTION - MUR 1523 Comprehensive  
Investigative Report #1 signed  
June 21, 1983

The above-named document was circulated to the  
Commission on Wednesday, June 22, 1983 at 4:00.

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

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____ . _____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session  
agenda for Wednesday, July 6, 1983.

94040492720



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *ct*  
DATE: June 22, 1983  
SUBJECT: MUR 1523 - Comp. Invest. Report #1

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

CIRCULATIONS

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

DISTRIBUTION

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

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )  
 ) MUR 1523  
Contributions, Inc. )

83 JUN 22 AIO: 44

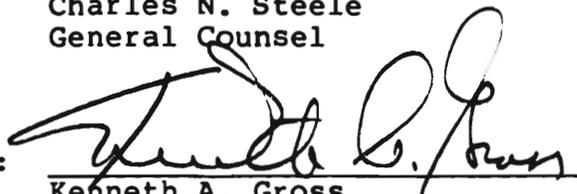
**COMPREHENSIVE INVESTIGATIVE REPORT # 1**

This matter involves an allegation that respondent Contributions, Inc. violated 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 by copying reports filed at the Commission, compiling information on individual contributors, and offering this information for sale to the public. On May 3, 1983, the Commission found reason to believe that Contributions, Inc. violated section 438(a)(4). Despite numerous attempts to communicate with the president of Contributions, Inc., this Office has received no reply from the respondent.

Presently, we are preparing a draft affidavit reflecting Kent Cooper's account of how employees of the respondent obtained the information and how respondent was informed of the relevant statutory provision. Upon completion of the affidavit, we will report to the Commission with appropriate recommendations.

June 21, 1983  
Date

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

84040492722



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Suite 305  
Washington, D.C. 20036

Re: MUR 1523

*JZ 5/5/83*

Dear Mr. Smith:

The Federal Election Commission notified you on February 9, 1983, of a complaint which alleges that your company, Contributions Inc., 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 May 3, 1983, determined that there is reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Act. Specifically, it appears that your company copied the names of individual contributors from FEC reports and compiled these names in a book published for sale. This violated the prohibition against copying and using such reports for commercial purposes. It also appears that your company continued to engage in this activity after a Commission staff member notified you of the provisions of § 438(a)(4).

As of this date, we have received no written response from your company in connection with this matter. 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. Statements should be submitted under oath.

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Letter to William A. Smith  
Page 2

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 company, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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 Jonathan Levin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

Enclosures  
Procedures  
General Counsel's Factual and Legal Analysis

84040492724





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *DK*  
DATE: April 25, 1983  
SUBJECT: PreMUR 103 & MUR 1523 - 1st GC Rpt

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

CIRCULATIONS

48 Hour Tally Vote   
Sensitive   
Non-Sensitive   
  
24 Hour No Objection   
Sensitive   
Non-Sensitive   
  
Information   
Sensitive   
Non-Sensitive   
  
Other

DISTRIBUTION

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

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 6, 1983

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Suite 305  
Washington, D.C. 20036

Re: MUR 1523

Dear Mr. Smith:

The Federal Election Commission notified you on February 9, 1983, of a complaint which alleges that your company, Contributions Inc., 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 May 3, 1983, determined that there is reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Act. Specifically, it appears that your company copied the names of individual contributors from FEC reports and compiled these names in a book published for sale. This violated the prohibition against copying and using such reports for commercial purposes. It also appears that your company continued to engage in this activity after a Commission staff member notified you of the provisions of § 438(a)(4).

As of this date, we have received no written response from your company in connection with this matter. 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. Statements should be submitted under oath.

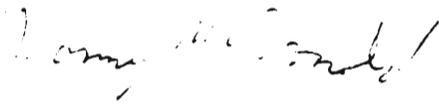
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The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your company, the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

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 Jonathan Levin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,



DANNY L. McDONALD  
Chairman

Enclosures  
Procedures  
General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Contributions, Inc.

MUR NO. 1523  
Pre-MUR 103  
STAFF MEMBER & TEL. NO.  
Jonathan Levin  
523-4529

SUMMARY OF ALLEGATIONS

On February 7, 1983, the Office of General Counsel received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of information provided by Kent Cooper, Assistant Staff Director of the Disclosure Division. Cooper stated that two employees of Contributions, Inc., were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

FACTUAL AND LEGAL ANALYSIS

Respondent publishes the information it compiles in a four volume register named Campaign Contributions which it sells for \$1,150. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or

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more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors but did contain the names of the employers of the contributors. Respondent elected not to send a response to the allegations.

Section 438(a)(4) of title 2 provides that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15 of the regulations allows for the use of information copied or otherwise obtained from reports filed with the Commission in newspapers, books, or other similar communications if "the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes." 11 C.F.R. § 104.15(c). This regulation focuses on the intent behind § 438(a)(4). It appears from the legislative history of the 1979 Amendments to the Act that, while other information such as the names and address of political committees may be obtained from FEC reports, the "prohibition on the copying and use of the names and address of individual contributors is maintained." H.R. Rep. No. 422, 96th Cong., 1st

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Sess. 23 (1979). See also Advisory Opinions 1980-101 and 1981-38. This matter presents a situation in which the respondent appears to have copied reports filed with the FEC in order to present individual contributors' names and employers in a book published for sale, i.e., for a commercial purpose. While none of the sample pages in our possession indicates that addresses were listed, the names of employers are provided. \*/ Therefore, it appears that Contributions, Inc. violated 2 U.S.C. § 438(a)(4).

Mr. Cooper stated that the employees of Contributions, Inc. who were copying FEC reports (and who included the President, Bill Smith) were notified of § 438(a)(4) by Public Records staff. It appears that, even after being notified specifically of § 438(a)(4), the respondent continued to engage in activity designed principally to benefit commercially from names on the public record at the FEC. Therefore, the General Counsel recommends the Commission find reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4).

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\*/ Locating many of the contributors is also abetted by the fact that the register lists contributors by the candidates to whom they contributed.

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**SENSITIVE**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

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

83 APR 25 P 4: 30

**FIRST GENERAL COUNSEL'S REPORT**

<b>DATE AND TIME OF TRANSMITTAL</b>	<b>Pre-MUR 103</b>
<b>BY OGC TO THE COMMISSION</b> <u>4-25-83</u>	<b>MUR # 1523</b>
	<b>DATE COMPLAINT RECEIVED</b>
	<b>BY OGC</b> <u>February 7, 1983</u>
	<b>DATE OF NOTIFICATION TO</b>
	<b>RESPONDENT</b> <u>February 9, 1983</u>
	<b>STAFF MEMBER</b> <u>Levin</u>

**COMPLAINANT'S NAME:** David U. Greevy, President  
PAC Researchers, Ltd.

**RESPONDENT'S NAME:** Contributions, Inc.

**RELEVANT STATUTE and REGULATION:** 2 U.S.C. § 438(a)(4)  
11 C.F.R. § 104.15

**INTERNAL REPORTS CHECKED:** None

**FEDERAL AGENCIES CHECKED:** None

**SUMMARY OF ALLEGATIONS**

On February 7, 1983, this office received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of a memorandum sent by Kent Cooper, Assistant Staff Director of the Disclosure Division, to the Office of General Counsel (OGC) in late December. (See Attachment 1). Cooper stated that two employees for Contributions, Inc., were copying current House

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members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates. This memorandum became the basis for Pre-MUR 103.

**FACTUAL AND LEGAL ANALYSIS**

Respondent publishes the information it compiles in a four volume register named Campaign Contributions which it sells for \$1,150. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors but did contain the names of the employers of the contributors. (See Attachments 2 and 3). Respondent elected not to send a response to the allegations.

Section 438(a)(4) of title 2 provides that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15 of the regulations allows for the use of information copied or otherwise obtained from reports filed with the Commission in newspapers, books, or other similar

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communications if "the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes." 11 C.F.R. § 104.15(c). This regulation focuses on the intent behind § 438(a)(4). It appears from the legislative history of the 1979 Amendments to the Act that, while other information such as the names and address of political committees may be obtained from FEC reports, the "prohibition on the copying and use of the names and address of individual contributors is maintained." H.R. Rep. No. 422, 96th Cong., 1st Sess. 23 (1979). See also Advisory Opinions 1980-101 and 1981-38. This matter presents a situation in which the respondent appears to have copied reports filed with the FEC in order to present individual contributors' names and employers in a book published for sale, i.e., for a commercial purpose. While none of the sample pages in our possession indicates that addresses were listed, the names of employers are provided. Therefore, it appears that Contributions, Inc. violated 2 U.S.C. § 438(a)(4).

In his memo to OGC, Mr. Cooper stated that the employees of Contributions, Inc. who were copying FEC reports (and who included the President, Bill Smith) were notified of § 438(a)(4)

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\*/ Locating many of the contributors is also abetted by the fact that the register lists contributors by the candidates to whom they contributed. (See Attachment 2, pp. 4-5).

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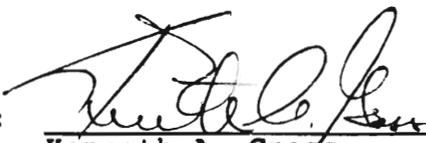
by Public Records staff. It appears that, even after being notified specifically of § 438(a)(4), the respondent continued to engage in activity designed principally to benefit commercially from names on the public record at the FEC. Therefore, the General Counsel recommends the Commission find reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4).

Recommendations

1. Merge Pre-MUR 103 into MUR 1523.
2. Find reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4).
3. Approve the attached letter.

April 25, 1983  
Date

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

Attachments

1. Memorandum from Kent Cooper, dated December 27, 1982.
2. Solicitation for and sample pages from Campaign Contributions.
3. Solicitation for Campaign Contributions.
4. Letter to respondent.
5. Factual and Legal Analysis

84040492735



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 27, 1982

Memorandum

TO: General Counsel

THRU: Staff Director *John P. ...*

FROM: Kent Cooper *KC*

SUBJECT: Possible Violation of Section 438(a)(4)

This memorandum is to make you aware of a possible violation of Section 438(a)(4) by an organization by the name of Contributions, Inc.. I am forwarding several comments which lead me to believe that the Commission would be wise to look into the matter, possibly as a pre-MUR.

On September 8, 1982, and September 22, 1982, the Public Records office received requests for G index contributor printouts on certain 1978 Senate winners. This order was placed by Bill Smith and Sohail Arzoo, an employee of Bill Smith. At that time they stated they were researching present Senators who had been elected in 1978. Since that time Sohail Arzoo has spent the last several months in the office copying current House members' campaign reports. We are receiving payment each day in amounts of several hundred dollars. During this time the restriction clause was stated to Bill Smith and Sohail Arzoo by two members of the Public Records staff, Rory Conley and Ken Almy. In addition, I restated the restriction clause to Mr. Arzoo in November 1982. They have continued to copy reports.

The phone number and address for these two persons is Contributions Inc., 1101 17th Street, N.W., Washington, D.C., 296-5180

Attachment 1

84040492736



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*Levin*

0-82-72a  
*Update*

*pm 103*

February 8, 1983

MEMORANDUM

TO: Charles N. Steele  
General Counsel

THRU: B. Allen Clutter *BAC*  
Staff Director

FROM: Kent C. Cooper *KCC*  
Asst. Staff Dir. for Disclosure

SUBJECT: Contributions, Inc.

This memorandum is in regard to my previous memo of December 27, 1982, which dealt with the use of files in the Public Records Office by persons from Contributions, Inc.

On February 8, 1983, I received the enclosed brochure and sample pages from a reporter who stated it had been sent to his office. The brochure and sample pages may be of some interest.

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*Attachment 2 - p. 1 of 7*

Contributions, Inc.  
1101 17th St., NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

# CAMPAIGN CONTRIBUTION

The complete register  
of reported contributions  
to the Members of Congress

Compiled by Contributions, Inc.



**"The fact is,  
money is  
everything  
on the Hill  
these days."**

From Elizabeth Drew's  
*"Politics and Money"*  
*The New Yorker*  
December 6, 1982

2-p. 2 of 7

And, the fact is, that keeping track of where that money's coming from and going to has always been a burdensome chore. If you've sifted through the endless files at the Federal Election Commission, you know it's a time-consuming process. Those days are over. For the first time since the FEC's creation, everything you need to know about the money that moves Congress is available in a single set of books called *Campaign Contributions—the complete register of reported contributions to the Members of Congress.*

### **Campaign Contributions tells you who's giving what to whom.**

In four volumes, *Campaign Contributions* lists every reported contribution to each member of the U.S. Senate and the U.S. House of Representatives (contributions of over \$200 must be reported to the Federal Election Commission). The contributions are listed by name of each individual contributor, his or her employer and occupation and the amount of the contribution. And the list includes every reported PAC contribution!

Contributions are alphabetized by recipient in separate volumes for House and Senate members and also by contributor in separate, individual and PAC volumes. This vital and valuable information is at your fingertips whenever you need it!

### **Campaign Contributions' only competitor for timeliness is the FEC, but do you have the time?**

All contributions reported to the FEC for each member's most recent election through the December 2, 1982 filing date are included in *Campaign Contributions*. This means the information covers the November 1982 elections and to stay current, you can order two 1983 updates—covering the July 31 and December 31 filing periods.

### **Campaign Contributions has done all the legwork for you.**

If you've researched contributions yourself at the Federal Election Commission, or if you've waited for staff to report their findings, you already know how useful this tool can be. The information is accurate, current, easy to reference and easy to use. All contributions listed were compiled from reports made to the Federal Election Commission by recipients.

### **Campaign Contributions feeds Washington's insatiable appetite for information.**

*Campaign Contributions* fulfills the need to know for everyone conducting political business in the nation's capital. Whether you're influencing power or influencing power brokers; whether you're providing statistical data or tracking legislation and votes; whether

you're reporting back to clients, corporate headquarters or association members; whether you're informing the public through news media, newsletters or public interest organizations; or whether you're involved in political campaigns yourself as an adviser, staff person or candidate, *Campaign Contributions* will become your most valuable office reference book.

*Campaign Contributions* is published by Contributions, Inc., a private, congressional research systems company based in Washington.

Contributions, Inc.  
1101 17th St., NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

### **SPECIAL BONUS**

If you order *Campaign Contributions* before February 28, you'll receive the 1983 updates for free—a savings of \$200.



Find out everything you need to know about the money that moves Washington by ordering today.

Fill out the coupon below and mail to

Contributions, Inc.  
1101 17th Street, NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

The four-volume set, *Campaign Contributions—the complete register of reported contributions to the Members of Congress* costs \$1150, or \$1350 with updates.

\_\_\_\_ Please send *Campaign Contributions* to me before February 28, 1983.

\_\_\_\_ Please bill me.

\_\_\_\_ Payment of \$ \_\_\_\_\_ is enclosed.

Name \_\_\_\_\_

Organization \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_

Signature \_\_\_\_\_

### **Save \$200**

We'll send updates covering the July 31st and December 31st filing periods if you order before February 28, 1983.

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
81-82	Abboud, Robert	1,000	Executive	Occidental Petroleum
81-82	Acton, Edward J.	200	Literary Agent	Self Employed
81-82	Adams, Angel	300	Photographer	Self Employed
81-82	Adams, Ansel	500	Photographer	Self Employed
81-82	Adams, Brock	1,000	Attorney	Carvey Schubert Adams & Barer
81-82	Adolfson, Louis	1,000	Attorney	Self Employed
81-82	Ahlquist, Harold E., Jr.	200	Agent	State Mutual Life
81-82	Albert, Carl A.	2,000	Attorney	Self Employed
81-82	Andreas, D. O.	500		
81-82	Antonelli, Larry	200	Steel Fabricator	Self Employed
81-82	Arnautoff, Vasily	300	Importer	V B I Inc
81-82	Arnos, Robert H.	1,000	Real Estate	
81-82	Athy, Andrew, Jr.	500	Attorney	O Neill & Haase
81-82	Atkisson, John H.	500	Attorney	
81-82	Balianzi, Armen	500	Restaurateur	Self Employed
81-82	Ball, Leonard	500	Attorney	H T B Inc
81-82	Bala, David A.	250		
81-82	Beal, Robert L.	200	Executive President	Beal & Company
81-82	Beckett, Forest	500	Owner	Beckett Aviation
81-82	Bell, W. D.	500	Chairman Of The Board C E O	State Mutual Life Assurance
81-82	Belli, Lia	1,000	President	Demo Council
81-82	Belli, Liz	500	Houseperson	
81-82	Belton, John P.	250	I. T. R.	Self Employed
81-82	Bennett, Clarence H.	500	Chairman Of Board	National Standards Association
81-82	Berman, Henry E.	600	Consultant	Self Employed
81-82	Berman, Jack X.	300	Attorney	Self Employed
81-82	Berman, Jason	500	Vice President	Warner Communication Inc
81-82	Berman, M. H.	1,000		
81-82	Berman, Philip I.	1,000	Department Store Owner	
81-82	Bernstein, David W.	250	Executive	American Biltrade Inc
81-82	Bernstein, Morris	1,500	Investor	Self Employed
81-82	Blackett, D. A.	250		
81-82	Blumenthal, Robert	300	Investor	Self Employed
81-82	Blumenthal, Robert	500	Owner	Perm Eblem
81-82	Boggs, Thomas H., Jr.	500	Attorney	Self Employed
81-82	Boggsian, John L.	1,200	President	B & M Associates
81-82	Bolles, Peter F.	900	Architect	Self Employed
81-82	Bosque, Jack	650	Real Estate	Self Employed
81-82	Boyle, Edward J.	200	Attorney	Self Employed
81-82	Bracy, Terrence L.	250		Bracy Williams & Company
81-82	Brady, M. H.	600	Dentist	Self Employment
81-82	Brady, Herbert H.	1,300	Dentist	Self Employed
81-82	Brinkman, W.	250	President	Board Of Trade Clearing Corpor
81-82	Bronsvag, Vivien L.	250	Houseperson	Self Employed
81-82	Brook, William F.	250	Retired	National Grain Trade Council
81-82	Brooks, Jack	1,000	Retired	
81-82	Brovica, W. A.	300	Attorney	La Raza Central Legal
81-82	Brown, M. L.	250	Physician	
81-82	Buckley, John C.	1,000	Business Executive	Northeast Petroleum
81-82	Burger, Kenneth	450	Restaurant Owner	
81-82	Cable, Austin I.	250		
81-82	Cable, William H.	500	Attorney	Williams & Jensen
81-82	Cafaro, John J.	200	President	The Cafaro Company
81-82	Cahners, M. L.	200	Owner	Cahners Publisher Company
81-82	Califano, Joseph A., Jr.	500	Attorney	Califano Ross & Heinesan
81-82	Callaghan, Richard L.	250	Attorney	Western Union

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
79-80	Keenan, James F.	1,000	Manufacturer	
79-80	Keenan, Maryn	1,000	Interior Designer	
81-82	Kentor, William E.	1,000		Self Employed
79-80	Kinkade, Robert R.	1,000	Commodity Trader	
79-80	Klein, Elvin B.	1,000		
79-80	Kleppe, Tom	500		
79-80	Knigley, John H.	1,000	Oil Producer	
79-80	Kriebley, Nancy B.	500		
79-80	Kroh, Elizabeth P.	1,000	Housewife	
79-80	Kroh, George P.	500		
79-80	Kroh, John A.	1,000	Retired	
79-80	Kroh, John A., Jr.	500		
79-80	Krueger, Nelson L.	500		
79-80	Landau, Howard	900		
79-80	Lasker, Bernard J.	980		Lasker Stone and Stern
79-80	Lauder, Ronald	1,000		
79-80	Law, Theo N.	1,000		
79-80	Leach, Walker	200		
79-80	Leben, Theodore I.	900	Oil Producer	
79-80	Lee, Hsiang Lin	1,000		Snowden And Decuyper
79-80	Lefrak, Sam	600		Maple Leasing Company
79-80	Lehner, Anita C.	1,000	Retired	
79-80	Lehman, D. Gilbert	1,000		
79-80	Lehman, D. Gilbert, Mrs.	1,000		
79-80	Lehman, Louise	1,000		
79-80	Leiber, Edward J.	1,000		Fresno Endemity
79-80	Levens, Esther H.	2,000		
79-80	Levens, Vera D.	1,000	Retired	
79-80	Lincoln, George	1,000		Lincoln Industries
79-80	Lindquist, Edwin R.	1,000		California Inn Management Inc
79-80	Lipsky, Eugene C.	500		
79-80	Litvyn, Hendrick	250		
79-80	Litwin, Harry	1,000	Oil Producer	
79-80	Livingston, Andrew D.	1,000		
79-80	Livingston, Andrew D., Mrs.	1,000		
79-80	Loomis, A. J., Jr.	500		
79-80	Lund, Russell T.	1,000	Grocer	
79-80	Lynn, Charles J., Mrs.	500	Housewife	
79-80	Maffitt, P. C.	500		
79-80	Marcus, S. H.	750	Heat Processor	
79-80	Marsh, John D.	1,000		
79-80	Marsh, Robert J.	500	Attorney	
79-80	Razer, Robert K.	400		
79-80	McCoy, John Roger	500	Oil Producer	
79-80	McIntosh, William A.	1,000		Salomon Brothers
79-80	McIntyre, Lee E.	1,000		Fresno Endemity
79-80	McIntyre, Maurine H.	1,000	Homeaker	
79-80	McLaughlin, Jack	1,000		
79-80	McMorris, Donald L.	750		Self Employed
79-80	McKie, Paul S.	500		
79-80	Meredith, Kenneth	1,000		Fox and Company
79-80	Merrigan, Edward L.	500	Attorney	
79-80	Meyer, Russell, Jr.	1,000		
79-80	Mills, Bradford	1,000		Bradford Ventures Limited
79-80	Mills, Donald	500		
79-80	Mills, William W., Jr.	250	Attorney	

PAIGN CONTRIBUTIONS

REPORTED BY CONTRIBUTIONS, INC 1983

1-80 Haamer, Armand.....500	HART	CO	81-82 Haason, Jake L.....1,000	ROSTENKOWSKI	IL8
1-80 Haamer, Armand.....1,000	LONG	LA	81-82 Haason, Jake L.....300	LONG	LA2
1-82 Haamer, Armand.....500	MOYNIHAN	NY	81-82 Haason, Jake L.....800	STENNIS	MS
1-82 Haamer, Armand.....500	MURDICK	ND	81-82 Haason, Jake L.....1,000	BENTSEN	TX
1-82 Haamer, Frances B.....1,000	KEITZENBAUM	OH	81-82 Haason, Jake L.....250	BARTLETT	TX3
1-78 Haamer, Frances Barrett.....1,000	TSINGAS	MA	81-82 Haason, Jake L.....2,000	WILSON	TX2
1-80 Haamer, Frances Barrett.....2,000	CRANSTON	CA	77-78 Haason, Jake L.....2,000	TOWER	TX
1-80 Haamer, Frances Barrett.....1,000	HART	CO	77-78 Haason, Jake L.....1,000	HEFLIN	AL
1-78 Haamer, Francis B.....1,000	RANDOLPH	WV	77-78 Haason, Jake L.....1,000	JOHNSTON	LA
1-78 Haamer, Francis Barrett.....1,000	BRADLEY	NJ	79-80 Haason, Jake L.....1,000	LONG	LA
1-78 Haamer, Francis Barrett.....2,000	PELL	RI	79-80 Haason, Jake L.....500	ABINER	SD
1-80 Haamer, Francis Barrett.....1,000	LONG	LA	79-80 Haason, Jake L.....500	LONG	LA
1-78 Haamer, Francis Barrett, Mrs.....1,000	RANDOLPH	WV	81-82 Haason, Jake L. III.....1,000	FROST	TX24
1-82 Haamer, Frederick S.....250	ROUKEMA	NJ5	77-78 Haason, Jake L. III.....250	TOWER	TX
1-80 Haamer, Julian.....1,000	HART	CO	79-80 Haason, Jake L. III.....1,000	MURKOWSKI	AK
1-78 Haamer, Leo M.....200	HELUS	NC	79-80 Haason, Jake L. III.....500	QUAYLE	IN
1-78 Haamer, Milton.....352	JOHNSTON	LA	81-82 Haason, Jake L. III.....800	MURDICK	ND
1-82 Haamer, Morris.....500	LAUTENBERG	NJ	81-82 Haason, Jake L., III.....500	HAMEE	TX19
1-82 Haamer, Robert.....250	DECONCINI	AZ	81-82 Haason, Jake L., III.....800	WELCHER	MT
1-78 Haamer, Armand.....1,000	PELL	RI	81-82 Haason, Jake L., III.....500	GRAFF	TX6
1-82 Haamerling, Robert.....500	HEWEN	OH6	81-82 Haason, Jake L., III.....1,000	BARTLETT	TX3
1-82 Haamersmann, I. H., II.....250	MEJUSKI	MD3	81-82 Haason, Jake L., III.....1,500	FROST	TX24
1-82 Haamerschaedt, Frederick R.....250	HEINZ	PA	81-82 Haason, Jake L., III.....1,000	BENTSEN	TX
1-82 Haamerschaedt, John P.....1,750	HATERSCHMIDT	AR3	77-78 Haason, Jake L., Mrs.....1,000	TOWER	TX
1-82 Haamerslag, J. G.....500	KENEDY	MA	77-78 Haason, Jake L., Mrs.....1,000	JOHNSTON	LA
1-82 Haamerslag, Julius G.....200	KEITZENBAUM	OH	77-78 Haason, Jake L., Mrs.....500	TOWER	TX
1-82 Haamersmith, John H.....200	DIXON	IL	81-82 Haason, Jake S. III.....1,000	BYRD	WV
1-82 Haamett, D. S.....250	CRANE	IL12	81-82 Haason, Jake, II.....300	SMITH	OK5
1-82 Haamett, H. H., Jr.....200	ROLAND	GA8	81-82 Haason, Jake, III.....500	WRIGHT	TX12
1-82 Haamett, Harold B.....400	WRIGHT	TX12	81-82 Haason, Rany D.....1,000	BARTLETT	TX3
1-82 Haamett, Harold, Jr.....500	FRANKLIN	MS2	81-82 Haason, Mrs. Jake L.....1,000	BENTSEN	TX
1-82 Haamett, James B.....500	JONES	OK1	81-82 Haason, Mrs. Jake L., III.....500	BENTSEN	TX
1-82 Haallette, Robert L.....250	IRELAND	FL10	81-82 Haason, Nancy.....1,000	WILSON	TX2
1-82 Haall, Claud R.....300	ARCHER	TX7	79-80 Haason, Nancy.....1,000	LONG	LA
1-78 Haalock, Hyrtle S.....300	MUMH	GA	81-82 Haason, Nancy R.....1,000	WILSON	TX2
1-82 Haalock, James H.....300	ROLAND	GA8	81-82 Haasoth, Harvey J.....500	WEBER	MS2
1-82 Haalock, Leon R.....332	MCCOLLUM	FL5	81-82 Haasovit, Phil S.....2,000	SISISKY	VA4
1-82 Haalson, George.....200	HANSEN	UT1	77-78 Haasperi, D. L.....500	HUMPHREY	NH
1-78 Haalson, Henry R.....500	TOWER	TX	77-78 Haaspers, C. L.....200	HUMPHREY	NH
1-82 Haalmond Elliot, Jean.....1,000	BOSCO	CA1	81-82 Haaspers, C. L.....500	O'NEIL	MS8
1-78 Haalmond, Charles B.....1,000	TOWER	TX	79-80 Haaspers, C. L.....500	DOLE	KS
1-80 Haalmond, Charles D.....300	DIXON	IL	77-78 Haapton, Alton D.....1,000	PRIOR	AR
1-82 Haalmond, Clayton.....500	ROGERS	KY5	81-82 Haapton, Charles.....200	HALL	TX1
1-78 Haalmond, Edmund R., Jr.....200	HEFLIN	AL	81-82 Haapton, Colin C.....500	FITCHELL	ME
1-82 Haalmond, J. B.....250	MAZZOLI	KY3	81-82 Haapton, Delon.....1,000	BAKES	MD8
1-78 Haalmond, Jack.....500	TOWER	TX	81-82 Haapton, Duane.....1,000	MOYNIHAN	NY
1-78 Haalmond, Jack L.....500	TOWER	TX	81-82 Haapton, E. S.....500	ROBERTS	KS1
1-82 Haalmond, Jack L.....250	TOWER	TX	81-82 Haapton, Gordon F.....1,000	WILSON	GA
1-78 Haalmond, Marsyl Stokes.....500	PELL	RI	81-82 Haapton, Howard.....1,000	DYMALLY	CA31
1-82 Haalmond, Richard B.....1,000	ZSCHAU	CA12	79-80 Haapton, J. C.....250	NICKLES	OK
1-82 Haalmond, Saul B.....250	WELCHER	CT	77-78 Haapton, Jeral L.....250	PRIOR	AR
1-78 Haalmond, William A.....250	HATFIELD	OR	81-82 Haapton, John.....1,000	MADDIN	OR1
1-82 Haalmondtree, Kon.....1,000	JONES	TN8	77-78 Haapton, John C.....1,000	HATFIELD	OR
1-82 Haam, Edward H.....240	BOSCHWITZ	MN	81-82 Haapton, Kent.....250	DOLEY	OH4
1-82 Haaner, George F.....250	IRELAND	FL10	77-78 Haapton, Louis R.....500	PELL	RI
1-82 Haaner, W. W.....250	TRIBLE	VA	79-80 Haapton, Marilyn S.....1,000	MURKOWSKI	AK
1-82 Haao, Louis C.....1,000	HEINZ	PA	81-82 Haapton, Mark.....1,000	MOYNIHAN	NY
1-82 Haao, David.....1,000	HATCH	UT	81-82 Haapton, Philip M.....250	KROOKS	TX9
1-82 Haach, Jack L., III.....250	BENTSEN	TX	79-80 Haapton, Robert N.....250	MURKOWSKI	AK

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p.6  
of 7

National Education Association

(CONTINUED)

81-82	BRITT	NC6	1,500
81-82	BROOKS	TX9	5,000
81-82	BROWN	CA36	7,000
81-82	BRYANT	TX5	7,000
81-82	BURDICK	ND	10,000
81-82	BURTON	CAS	10,000
81-82	BYRD	WV	10,000
81-82	CAPPER	DE1	5,000
81-82	CARR	MI6	11,450
81-82	CHAFFEE	RI	500
81-82	CHANDLER	WAS	8,000
81-82	CLARKE	NC11	10,000
81-82	CLAY	ND1	2,500
81-82	COELHO	CA15	2,700
81-82	COLEMAN	TX16	5,000
81-82	COOPER	TH4	6,000
81-82	CORCORAN	IL14	200
81-82	COYNE	PA14	500
79-80	CRAWSTON	CA	1,000
81-82	CROCKETT	MI13	800
81-82	D'AMOURS	NH1	5,500
81-82	DASCHE	SD1	8,500
81-82	DAUB	NE2	250
81-82	DECONCINI	AZ	1,000
81-82	DERRICK	SC3	1,500
81-82	DICIS	W6	2,100
81-82	DINGELL	MI16	705
81-82	DIXON	CA25	200
81-82	DIXON	IL	500
79-80	DOOD	CT	2,200
81-82	DOOD	CT	500
77-78	DOFENICI	NH	300
81-82	DONNELLY	MA11	200
81-82	DORCAN	ND1	8,500
81-82	DOWDY	MS4	8,500
81-82	DOWNEY	NY2	2,250
81-82	DUNCAN	TN2	500
81-82	DURBIN	OR20	5,000
81-82	DUTER	NJ6	250
81-82	DYMALLY	CA31	1,400
81-82	DYSON	ND1	750
79-80	EAGLETON	ND	2,000
81-82	EDGAR	PA7	4,400
81-82	EDWARDS	CA10	2,500
81-82	ERDREICH	AL6	7,000
81-82	EVANS	IL17	7,000
81-82	FASCELL	FL19	5,000
81-82	FAZIO	CA4	1,500
81-82	FEIGHAN	OH19	10,000
81-82	FLORIO	NJ1	500
81-82	FUCLIETTA	PA1	1,200
81-82	FULEY	WAS	8,000
81-82	FORD	MI15	2,500
81-82	FORD	TH9	1,500
79-80	FORD	KY	800

84040492743

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 23, 1983

MEMORANDUM TO: Kenneth A. Gross,  
Associate General Counsel for Enforcement

FROM: Commissioner Joan D. Aikens *JDA*

SUBJECT: MUR 1523

Attached hereto is a copy of a solicitation from Contributions, Inc.,  
(respondent in the abovecited MUR) which may assist the Commission in  
its review of the matter.

JDA:jet

1 Attachment a/s

84040492744

Attachment 3 - p. 1 of 3

NAME	AMOUNT	DATE	OFFICE
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
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Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior
Adm. Serv. Co.	100.00	11/15/82	Sen. D. B. Bonior

### Campaign Contributions tells you who's giving what to whom.

Campaign Contributions is a four-volume register of every reported contribution to each member of the U.S. Senate and the U.S. House of Representatives (contributions of over \$200 must be reported to the FEC). These four volumes contain 160,000 individual contributions, listed by name of each contributor, his or her employer and occupation and the amount of the contribution. And the list includes over 100,000 PAC entries—every PAC contribution reported to the FEC.

Contributions are alphabetized by recipient in separate volumes for House and Senate members and also by contributor in separate individual and PAC volumes.

Now you know how Larry Franklin stays way ahead of Washington's game. He has Campaign Contributions.

### Campaign Contributions has you on its list.

Knowing about the money that moves Congress is your professional responsibility and your personal challenge. Yet, as you know, keeping track of where that money is coming from and going to has always been burdensome, time consuming and costly.

That's why we're introducing you to Campaign Contributions—the resource that puts the information at your fingertips the moment you need it.

Whether you're influencing power or influencing power brokers; whether you're providing statistical data or tracking legislation and votes; whether you're reporting back to clients, corporate headquarters or association members; whether you're informing the public through news media, newsletters or public interest organizations; or whether you're involved in political campaigns yourself as an advisor, staff person or candidate, Campaign Contributions is your most valuable resource tool.

### Test yourself. Can you answer these questions?

- Which member of the U.S. Senate received the highest amount of contribution money from individuals?
- Whose Congressional campaign received the most money from NCPAC?
- How much money did General Electric donate to 98th Congress election campaigns?

Before Campaign Contributions there were three ways to get the answers to these questions. (1) Go to the FEC yourself, and sift through endless files of tapes, microfilm and files. (2) Send one or two of your staff people to the FEC for you. (3) Call the FEC, request your information and wait.

But Campaign Contributions has done all the leg-work for you. If you've researched contributions yourself at the FEC or if you've waited for staff to report their findings, you know how valuable this tool is. And you know how quickly it will streamline your operation and save you money.

Here are the answers to the quiz, by the way, all found in Campaign Contributions before Larry Franklin finished his second cup of coffee.

- Senator Lloyd Bentsen, (D), Texas, received \$2,362,016 from individual contributors.
- Senator Jesse Helms, (R), North Carolina, received \$6,216 from NCPAC.
- \$185,680.

### Campaign Contributions' information is current, accurate and easy to use.

Campaign Contributions is current—all contributions reported to the FEC for each member of Congress' most recent election through the December 2, 1982 filing date are included. This means the information covers the November 1982 elections.

Campaign Contributions is accurate—the listings were compiled from actual candidate reports, not just the FEC compilations.

3 - p. 2 of 3

NAME	ADDRESS	CITY	STATE	ZIP
Alford, Robert	1000	Washington	DC	20540
Alford, Robert	1000	Washington	DC	20540
Alford, Robert	1000	Washington	DC	20540
Alford, Robert	1000	Washington	DC	20540
Alford, Robert	1000	Washington	DC	20540
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3- p. 2 of 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

William A. Smith, President  
Contributions, Inc.  
1101 Seventeenth Street, N.W.  
Suite 305  
Washington, D.C. 20036

Re: MUR 1523

Dear Mr. Smith:

The Federal Election Commission notified you on February 9, 1983, of a complaint which alleges that your company, Contributions Inc., 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 April , 1983, determined that there is reason to believe that your company committed a knowing and willful violation of 2 U.S.C. § 438(a)(4), a provision of the Act. Specifically, it appears that your company copied the names of individual contributors from FEC reports and compiled these names in a book published for sale. This violated the prohibition against copying and using such reports for commercial purposes. It also appears that your company continued to engage in this activity after a Commission staff member notified you of the provisions of § 438(a)(4).

As of this date, we have received no written response from your company in connection with this matter. 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. Statements should be submitted under oath.

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Attachment 4 - p. 1 of 2

Letter to William A. Smith  
Page 2

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 company, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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 Jonathan Levin, the attorney, assigned to this matter, at 202-523-4529.

Sincerely,

Enclosures  
Procedures  
Factual and Legal Analysis

84040492748

4 - p. 2 of 2

**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

**RESPONDENT** Contributions, Inc.

**MUR NO.** 1523  
**Pre-MUR** 103  
**STAFF MEMBER & TEL. NO.**  
Jonathan Levin  
523-4529

**SUMMARY OF ALLEGATIONS**

On February 7, 1983, the Office of General Counsel received a complaint filed by David U. Greevy, President of PAC Researchers, Ltd., against Contributions, Inc. The complaint stated that Contributions, Inc. has used and continues to use FEC reports to compile information on individual contributors and sell this information to the public in violation of 2 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15. The activities of the respondent were also the subject of information provided by Kent Cooper, Assistant Staff Director of the Disclosure Division. Cooper stated that two employees of Contributions, Inc., were copying current House members' campaign reports over a period of several months and receiving contributor printouts on 1978 Senate candidates.

**FACTUAL AND LEGAL ANALYSIS**

Respondent publishes the information it compiles in a four volume register named Campaign Contributions which it sells for \$1,150. The register contains a vast amount of contributor information, including lists of individuals contributing \$200 or

*Attachment 5 - p. 1 of 3*

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more to specific candidates, lists of recipients of contributions from specific PACs, and alphabetized lists of contributors to Congressional candidates in general. The list of contributors to specific candidates did not contain addresses of the contributors but did contain the names of the employers of the contributors. Respondent elected not to send a response to the allegations.

Section 438(a)(4) of title 2 provides that any information copied from filed reports may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of a political committee to solicit contributions from such committee. Section 104.15 of the regulations allows for the use of information copied or otherwise obtained from reports filed with the Commission in newspapers, books, or other similar communications if "the principal purpose of such communications is not to communicate any contributor information listed on such reports for the purpose of soliciting contributions or for other commercial purposes." 11 C.F.R. § 104.15(c). This regulation focuses on the intent behind § 438(a)(4). It appears from the legislative history of the 1979 Amendments to the Act that, while other information such as the names and address of political committees may be obtained from FEC reports, the "prohibition on the copying and use of the names and address of individual contributors is maintained." H.R. Rep. No. 422, 96th Cong., 1st

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Sess. 23 (1979). See also Advisory Opinions 1980-101 and 1981-38. This matter presents a situation in which the respondent appears to have copied reports filed with the FEC in order to present individual contributors' names and employers in a book published for sale, i.e., for a commercial purpose. While none of the sample pages in our possession indicates that addresses were listed, the names of employers are provided. \*/ Therefore, it appears that Contributions, Inc. violated 2 U.S.C. § 438(a)(4).

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Mr. Cooper stated that the employees of Contributions, Inc. who were copying FEC reports (and who included the President, Bill Smith) were notified of § 438(a)(4) by Public Records staff. It appears that, even after being notified specifically of § 438(a)(4), the respondent continued to engage in activity designed principally to benefit commercially from names on the public record at the FEC. Therefore, the General Counsel recommends the Commission find reason to believe that Contributions, Inc. committed a knowing and willful violation of 2 U.S.C. § 438(a)(4).

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\*/ Locating many of the contributors is also abetted by the fact that the register lists contributors by the candidates to whom they contributed.

5-PB93

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83 FEB 17 P12: 37

# CONTRIBUTIONS

CONGRESSIONAL RESEARCH SYSTEMS

February 16, 1983

83 FEB 17 P 2: 27

Federal Elections Commission  
ATTN: Mr. Jonathan Levin  
1325 K. Street N. W.  
Washington, D. C. 20463

Dear Mr. Levin:

In accordance with 2 U.S.C. 437g(a) (4) (B) and 437g (a) (12) (A),  
we would like case number MUR 1523 to be made public.

Sincerely,



WILLIAM A. SMITH  
President,  
Contributions, Inc.

84040492752

# CONTRIBUTIONS

CONGRESSIONAL RESEARCH SYSTEMS

101 SEVENTEENTH STREET NORTHWEST  
SUITE 305, WASHINGTON, D.C. 20036

84610192

Federal Elections Commission  
ATTN: Mr. Jonathan Levin  
1325 K. Street N. W.  
Washington, D. C. 20463





**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 23, 1983

MEMORANDUM TO: Kenneth A. Gross,  
Associate General Counsel for Enforcement

FROM: Commissioner Joan D. Aikens *JDA*

SUBJECT: MUR 1523

Attached hereto is a copy of a solicitation from Contributions, Inc.,  
(respondent in the abovesited MUR) which may assist the Commission in  
its review of the matter.

JDA:jet

1 Attachment a/s

84040492754



**RESEARCHERS LTD.**  
 5403 Midship Court  
 Burke, Virginia 22015  
 703/323-9336

204049

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83 FEB 17 8 41 AM '83  
 Belmont, Massachusetts 02178  
 617/484-2361

February 15, 1983

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

Dear Mr. Steele:

This letter will serve as an addendum to my complaint filed against Contributions, Inc. on February 3, 1983.

Please find enclosed copies of pages taken from the company's book, Campaign Contributions. You will note that the price of the book is \$1,150. This certainly constitutes use of contributor information taken from candidate and committee reports for a commercial purpose.

You will also note that the company plans to update this information. Their intent is clearly to continue to violate the provisions set forth in 2 U.S.C. 438(a)(4) and 11 CFP 104.15.

In order to protect the privacy of the individuals who are included in this book and will be included in future updates, Contributions, Inc. should be required to cease their marketing of this product.

Sincerely,

*David U. Greevy*  
 David U. Greevy  
 President

David U. Greevy swore to the contents of and signed this complaint in my presence.

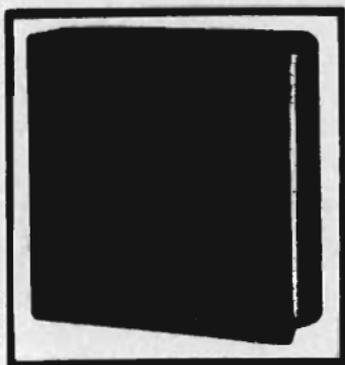
*David Fowler*  
 Notary Public

15 February 1983  
 Date

May 7, 1986  
 My term expires on:

84040492755

83 FEB 17 P 2: 28  
 FEDERAL ELECTION COMMISSION



**Find out every-  
thing you need to  
know about the  
money that moves  
Washington by  
ordering today.**

---

Fill out the coupon below and mail to

**Contributions, Inc.**  
1101 17th Street, NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

**The four-volume set, *Campaign Contributions—the complete register of reported contributions to the Members of Congress* costs \$1150, or \$1350 with updates.**

\_\_\_\_\_ Please send *Campaign Contributions* to me  
before February 28, 1983.

\_\_\_\_\_ Please bill me.

\_\_\_\_\_ Payment of \$\_\_\_\_\_ is enclosed.

---

Name \_\_\_\_\_

Organization \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_

Signature \_\_\_\_\_

---

**Save \$200**

**We'll send updates covering the July 31st  
and December 31st filing periods if you  
order before February 28, 1983.**

Sample page: Contribution to Member of the U. S. House of Representatives

CAMPAIGN CONTRIBUTIONS

COPYRIGHTED BY CONTRIBUTIONS, INC. 1983

O'NEIL

MA8

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
81-82	Abboud, Robert.....	1,000	Executive	Occidental Petroleum
81-82	Acton, Edward J.....	200	Literary Agent	Self Employed
81-82	Adams, Angel.....	300	Photographer	Self Employed
81-82	Adams, Ansel.....	500	Photographer	Self Employed
81-82	Adams, Brock.....	1,000	Attorney	Garvey Schubert Adams & Barer
81-82	Adolfson, Louis.....	1,000	Attorney	Self Employed
81-82	Ahlquist, Harold E., Jr.....	200	Agent	State Mutual Life
81-82	Albert, Carl A.....	2,000	Attorney	Self Employed
81-82	Andreas, D. O.....	500		
81-82	Antonelli, Larry.....	200	Steel Fabricator	Self Employed
81-82	Arnautoff, Vasily.....	300	Importer	V B I Inc
81-82	Arnou, Robert H.....	1,000	Real Estate	
81-82	Athy, Andrew, Jr.....	500	Attorney	O Neill & Haase
81-82	Atkisson, John M.....	500	Attorney	
81-82	Baliantz, Armen.....	500	Restaurateur	Self Employed
81-82	Bail, Leonard.....	500	Attorney	H T B Inc
81-82	Baum, David A.....	250		
81-82	Beal, Robert L.....	200	Executive President	Beal & Company
81-82	Beckett, Forest.....	500	Owner	Beckett Aviation
81-82	Bell, W. D.....	500	Chairman Of The Board C E O	State Mutual Life Assurance
81-82	Belli, Lia.....	1,000	President	Demo Council
81-82	Belli, Liz.....	500	Houseperson	
81-82	Belton, John P.....	250	I. T. R.	Self Employed
81-82	Bennett, Clarence H.....	500	Chairman Of Board	National Standards Association
81-82	Berman, Henry E.....	600	Consultant	Self Employed
81-82	Berman, Jack K.....	300	Attorney	Self Employed
81-82	Berman, Jason.....	500	Vice President	Warner Communication Inc
81-82	Berman, M. M.....	1,000		
81-82	Berman, Philip I.....	1,000	Department Store Owner	
81-82	Bernstein, David W.....	250	Executive	American Biltrade Inc
81-82	Bernstein, Morris.....	1,500	Investor	Self Employed
81-82	Blackett, D. A.....	350		
81-82	Blumentahl, Robert.....	300	Investor	Self Employed
81-82	Blumenthal, Robert.....	500	Owner	Penn Emblem
81-82	Boggs, Thomas H., Jr.....	500	Attorney	Self Employed
81-82	Bogosian, John L.....	1,200	President	B & M Associates
81-82	Boiles, Peter P.....	900	Architect	Self Employed
81-82	Bosque, Jack.....	650	Real Estate	Self Employed
81-82	Royle, Edward J.....	200	Attorney	Self Employed
81-82	Bracy, Terrence L.....	250		
81-82	Brady, H. H.....	600	Dentist	Bracy Williams & Company
81-82	Brady, Herbert H.....	1,300	Dentist	Self Employment
81-82	Brinkman, W.....	250	President	Board Of Trade Clearing Corpor
81-82	Bronshvag, Vivien L.....	250	Houseperson	Self Employed
81-82	Brook, William F.....	250	Retired	National Grain Trade Council
81-82	Brooks, Jack.....	1,000	Retired	
81-82	Brovic, W. A.....	300	Attorney	La Raza Central Legal
81-82	Brown, W. L.....	250	Physician	
81-82	Buckley, John G.....	1,000	Business Executive	Northeast Petroleum
81-82	Burger, Kenneth.....	450	Restaurant Owner	
81-82	Cable, Austin I.....	250		
81-82	Cable, William H.....	500	Attorney	Williams & Jensen
81-82	Cafaro, John J.....	200	President	The Cafaro Company
81-82	Cahners, N. L.....	200	Owner	Cahners Publisher Company
81-82	Califano, Joseph A., Jr.....	500	Attorney	Califano Ross & Heinegan
81-82	Callaghan, Richard L.....	250	Attorney	Western Union

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Sample page: Contribution to Member of U. S. Senate

CAMPAIGN CONTRIBUTIONS

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DOLE

KS

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
79-80	Keenan, James P.	1,000	Manufacturer	
79-80	Keenan, Xaryn	1,000	Interior Designer	
81-82	Kentor, William E.	1,000		Self Employed
79-80	Kinkade, Robert R.	1,000	Commodity Trader	
79-80	Klein, Elvin B.	1,000		
79-80	Kleppe, Tom	500		
79-80	Knigtley, John H.	1,000	Oil Producer	
79-80	Kriebley, Nancy B.	500		
79-80	Kroh, Elizabeth P.	1,000	Housewife	
79-80	Kroh, George P.	500		
79-80	Kroh, John A.	1,000	Retired	
79-80	Kroh, John A., Jr.	500		
79-80	Krueger, Nelson L.	500		
79-80	Landau, Howard	900		
79-80	Lasker, Bernard J.	980		Lasker Stone and Stern
79-80	Lauder, Ronald	1,000		
79-80	Law, Theo N.	1,000		
79-80	Leach, Walker	200		
79-80	Leben, Theodore I.	900	Oil Producer	
79-80	Lee, Hsiand Lin	1,000		Snowden And Decuyper Maple Leasing Company
79-80	Lefrak, Sam	600		
79-80	Lehner, Anita C.	1,000	Retired	
79-80	Lehman, D. Gilbert	1,000		
79-80	Lehman, D. Gilbert, Mrs	1,000		
79-80	Lehman, Louise	1,000		
79-80	Leiber, Edward J.	1,000		Freemont Endemity
79-80	Levens, Esther H.	2,000		
79-80	Levens, Vren D.	1,000	Retired	
79-80	Lincoln, George	1,000		Lincoln Industries
79-80	Linguist, Edwin R.	1,000		California Inn Management Inc
79-80	Lipsky, Eugene C.	500		
79-80	Literwyk, Hendrick	250		
79-80	Litwin, Harry	1,000	Oil Producer	
79-80	Livingston, Andrew D.	1,000		
79-80	Livingston, Andrew D., Mrs	1,000		
79-80	Loomis, A. J., Jr.	500		
79-80	Lund, Russell T.	1,000	Grocer	
79-80	Lynn, Charles J., Mrs	500	Housewife	
79-80	Maffitt, P. C.	500		
79-80	Marcus, S. H.	750	Meat Processor	
79-80	Marsh, John D.	1,000		
79-80	Marsh, Robert J.	500	Attorney	
79-80	Mazer, Robert R.	400		
79-80	McCoy, John Roger	500	Oil Producer	
79-80	McIntosh, William A.	1,000		Salomon Brothers
79-80	McIntyre, Lee E.	1,000		Freemont Endemity
79-80	McIntyre, Maurine H.	1,000	Homemaker	
79-80	McLaughlin, Jack	1,000		
79-80	McMorris, Donald L.	750		Self Employed
79-80	McKie, Paul S.	500		
79-80	Meredith, Kenneth	1,000		Fox and Company
79-80	Merrigan, Edward L.	500	Attorney	
79-80	Meyer, Russell, Jr.	1,000		
79-80	Mills, Bradford	1,000		Bradford Ventures Limited
79-80	Mills, Donald	500		
79-80	Mills, William W., Jr.	250	Attorney	

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 Belmont, Massachusetts 02178  
 617/484-2361

February 15, 1983

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

Dear Mr. Steele:

This letter will serve as an addendum to my complaint filed against Contributions, Inc. on February 3, 1983.

Please find enclosed copies of pages taken from the company's book, Campaign Contributions. You will note that the price of the book is \$1,150. This certainly constitutes use of contributor information taken from candidate and committee reports for a commercial purpose.

You will also note that the company plans to update this information. Their intent is clearly to continue to violate the provisions set forth in 2 U.S.C. 438(a)(4) and 11 CFP 104.15.

In order to protect the privacy of the individuals who are included in this book and will be included in future updates, Contributions, Inc. should be required to cease their marketing of this product.

Sincerely,

*David U. Greevy*  
 David U. Greevy  
 President

David U. Greevy swore to the contents of and signed this complaint in my presence.

*J. David Fowler*  
 Notary Public

15 February 1983      May 7, 1986  
 Date                              My term expires on:

84040492759



**Find out every-  
thing you need to  
know about the  
money that moves  
Washington by  
ordering today.**

---

Fill out the coupon below and mail to

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1101 17th Street, NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

**The four-volume set, *Campaign Contributions—the complete register of reported contributions to the Members of Congress* costs \$1150, or \$1350 with updates.**

\_\_\_\_\_ Please send *Campaign Contributions* to me  
before February 28, 1983.

\_\_\_\_\_ Please bill me.

\_\_\_\_\_ Payment of \$\_\_\_\_\_ is enclosed.

---

Name \_\_\_\_\_

Organization \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_

Signature \_\_\_\_\_

---

**Save \$200**

**We'll send updates covering the July 31st  
and December 31st filing periods if you  
order before February 28, 1983.**

Sample page: Contribution to Member of the U. S. House of Representatives

CAMPAIGN CONTRIBUTIONS

COPYRIGHTED BY CONTRIBUTIONS, INC. 1983

O'NEIL

MA8

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
81-82	Abboud, Robert	1,000	Executive	Occidental Petroleum
81-82	Acton, Edward J.	200	Literary Agent	Self Employed
81-82	Adams, Angel	300	Photographer	Self Employed
81-82	Adams, Ansel	500	Photographer	Self Employed
81-82	Adams, Brock	1,000	Attorney	Garvey Schubert Adams & Barer
81-82	Adolfsen, Louis	1,000	Attorney	Self Employed
81-82	Ahlquist, Harold E., Jr.	200	Agent	State Mutual Life
81-82	Albert, Carl A.	2,000	Attorney	Self Employed
81-82	Andreas, D. O.	500		
81-82	Antonelli, Larry	200	Steel Fabricator	Self Employed
81-82	Arnautoff, Vasily	300	Importer	V B I Inc
81-82	Arnou, Robert H.	1,000	Real Estate	
81-82	Athy, Andrew, Jr.	500	Attorney	O Neill & Haase
81-82	Atkisson, John M.	500	Attorney	
81-82	Baliantz, Arsen	500	Restaurateur	Self Employed
81-82	Ball, Leonard	500	Attorney	H T B Inc
81-82	Baum, David A.	250		
81-82	Beal, Robert L.	200	Executive President	Beal & Company
81-82	Beckett, Forest	500	Owner	Beckett Aviation
81-82	Bell, W. D.	500	Chairman Of The Board C E O	State Mutual Life Assurance
81-82	Belli, Lia	1,000	President	Dem Council
81-82	Belli, Liz	500	Houseperson	
81-82	Belton, John P.	250	I. T. R.	Self Employed
81-82	Bennett, Clarence H.	500	Chairman Of Board	National Standards Association
81-82	Berman, Henry E.	600	Consultant	Self Employed
81-82	Berman, Jack K.	300	Attorney	Self Employed
81-82	Berman, Jason	500	Vice President	Warner Communication Inc
81-82	Berman, M. M.	1,000		
81-82	Berman, Philip I.	1,000	Department Store Owner	
81-82	Bernstein, David W.	250	Executive	American Biltrade Inc
81-82	Bernstein, Morris	1,500	Investor	Self Employed
81-82	Blackett, D. A.	350		
81-82	Blumentahl, Robert	300	Investor	Self Employed
81-82	Blumenthal, Robert	500	Owner	Penn Emblem
81-82	Boggs, Thomas H., Jr.	500	Attorney	Self Employed
81-82	Bogosian, John L.	1,200	President	B & M Associates
81-82	Bolles, Peter P.	900	Architect	Self Employed
81-82	Bosque, Jack	650	Real Estate	Self Employed
81-82	Boyle, Edward J.	200	Attorney	Self Employed
81-82	Bracy, Terrence L.	250		Bracy Williams & Company
81-82	Brady, M. H.	600	Dentist	Self Employment
81-82	Brady, Herbert H.	1,300	Dentist	Self Employed
81-82	Brinkman, W.	250	President	Board Of Trade Clearing Corpor
81-82	Bronshvag, Vivien L.	250	Houseperson	Self Employed
81-82	Brook, William F.	250	Retired	National Grain Trade Council
81-82	Brooks, Jack	1,000	Retired	
81-82	Brovic, W. A.	300	Attorney	La Raza Central Legal
81-82	Brown, W. L.	250	Physician	
81-82	Buckley, John G.	1,000	Business Executive	Northeast Petroleum
81-82	Burger, Kenneth	450	Restaurant Owner	
81-82	Cable, Austin I.	250		
81-82	Cable, William H.	500	Attorney	Williams & Jensen
81-82	Cafaro, John J.	200	President	The Cafaro Company
81-82	Cahners, M. L.	200	Owner	Cahners Publisher Company
81-82	Califano, Joseph A., Jr.	500	Attorney	Califano Ross & Heinehan
81-82	Callaghan, Richard L.	250	Attorney	Western Union

84040492761

84040492762

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
79-80	Keenan, James F.....	1,000	Manufacturer	
79-80	Keenan, Karyn.....	1,000	Interior Designer	
81-82	Kentor, William E.....	1,000		Self Employed
79-80	Kinkade, Robert R.....	1,000	Commodity Trader	
79-80	Klein, Elvin B.....	1,000		
79-80	Kleppe, Tom.....	500		
79-80	Knigtley, John H.....	1,000	Oil Producer	
79-80	Kriebley, Nancy B.....	500		
79-80	Kroh, Elizabeth P.....	1,000	Housewife	
79-80	Kroh, George P.....	500		
79-80	Kroh, John A.....	1,000	Retired	
79-80	Kroh, John A., Jr.....	500		
79-80	Krueger, Nelson L.....	500		
79-80	Landau, Howard.....	900		
79-80	Lasker, Bernard J.....	980		Lasker Stone and Stern
79-80	Lauder, Ronald.....	1,000		
79-80	Law, Theo N.....	1,000		
79-80	Leach, Walker.....	200		
79-80	Leben, Theodore I.....	900	Oil Producer	
79-80	Lee, Hsiand Lin.....	1,000		Snowden And Decuyper
79-80	Lefrak, Sam.....	600		Maple Leasing Company
79-80	Lehner, Anita C.....	1,000	Retired	
79-80	Lehrman, D. Gilbert.....	1,000		
79-80	Lehrman, D. Gilbert, Mrs.....	1,000		
79-80	Lehrman, Louise.....	1,000		
79-80	Leiber, Edward J.....	1,000		Freemont Endemity
79-80	Levens, Esther H.....	2,000		
79-80	Levens, Vrem D.....	1,000	Retired	
79-80	Lincoln, George.....	1,000		Lincoln Industries
79-80	Linguist, Edwin R.....	1,000		California Inn Management Inc
79-80	Lipsky, Eugene C.....	500		
79-80	Literwyk, Hendrick.....	250		
79-80	Litwin, Harry.....	1,000	Oil Producer	
79-80	Livingston, Andrew D.....	1,000		
79-80	Livingston, Andrew D., Mrs.....	1,000		
79-80	Locais, A. J., Jr.....	500		
79-80	Lund, Russell T.....	1,000	Grocer	
79-80	Lynn, Charles J., Mrs.....	500	Housewife	
79-80	Maffett, P. C.....	500		
79-80	Marcus, S. H.....	750	Meat Processor	
79-80	Marsh, John D.....	1,000		
79-80	Marsh, Robert J.....	500	Attorney	
79-80	Mazer, Robert R.....	400		
79-80	McCoy, John Roger.....	500	Oil Producer	
79-80	McIntosh, William A.....	1,000		Salomon Brothers
79-80	McIntyre, Lee E.....	1,000		Freemont Endemity
79-80	McIntyre, Maurine H.....	1,000	Honemaker	
79-80	McLaughlin, Jack.....	1,000		
79-80	McMorris, Donald L.....	750		Self Employed
79-80	Mckie, Paul S.....	500		
79-80	Meredith, Kenneth.....	1,000		Fox and Company
79-80	Merrigan, Edward L.....	500	Attorney	
79-80	Meyer, Russell, Jr.....	1,000		
79-80	Mills, Bradford.....	1,000		Bradford Ventures Limited
79-80	Mills, Donald.....	500		
79-80	Mills, William W., Jr.....	250	Attorney	



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83 FEB 17 9 00 AM '83  
 Belmont, Massachusetts 02178  
 617/484-2361

February 15, 1983

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

Dear Mr. Steele:

This letter will serve as an addendum to my complaint filed against Contributions, Inc. on February 3, 1983.

Please find enclosed copies of pages taken from the company's book, Campaign Contributions. You will note that the price of the book is \$1,150. This certainly constitutes use of contributor information taken from candidate and committee reports for a commercial purpose.

You will also note that the company plans to update this information. Their intent is clearly to continue to violate the provisions set forth in 2 U.S.C. 438(a)(4) and 11 CFP 104.15.

In order to protect the privacy of the individuals who are included in this book and will be included in future updates, Contributions, Inc. should be required to cease their marketing of this product.

Sincerely,

*David U. Greevy*  
 David U. Greevy  
 President

David U. Greevy swore to the contents of and signed this complaint in my presence.

*Josephine Fowler*  
 Notary Public

15 February 1983      May 7, 1986  
 Date                      My term expires on:

84040492763



**Find out every-  
thing you need to  
know about the  
money that moves  
Washington by  
ordering today.**

---

Fill out the coupon below and mail to

**Contributions, Inc.**  
1101 17th Street, NW  
Suite 305  
Washington, DC 20036  
(202) 296-5180

**The four-volume set, *Campaign Contributions—the complete register of reported contributions to the Members of Congress* costs \$1150, or \$1350 with updates.**

\_\_\_\_\_ Please send *Campaign Contributions* to me  
before February 28, 1983.

\_\_\_\_\_ Please bill me.

\_\_\_\_\_ Payment of \$\_\_\_\_\_ is enclosed.

---

Name \_\_\_\_\_

Organization \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_

Signature \_\_\_\_\_

---

**Save \$200**

**We'll send updates covering the July 31st  
and December 31st filing periods if you  
order before February 28, 1983.**

Sample page: Contribution to Member of the U. S. House of Representatives

CAMPAIGN CONTRIBUTIONS

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O'NEIL

MA8

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
81-82	Abboud, Robert.....	1,000	Executive	Occidental Petroleum
81-82	Acton, Edward J.....	200	Literary Agent	Self Employed
81-82	Adams, Angel.....	300	Photographer	Self Employed
81-82	Adams, Ansel.....	500	Photographer	Self Employed
81-82	Adams, Brock.....	1,000	Attorney	Garvey Schubert Adams & Barer
81-82	Adolfsen, Louis.....	1,000	Attorney	Self Employed
81-82	Ahlquist, Harold E., Jr.....	200	Agent	State Mutual Life
81-82	Albert, Carl A.....	2,000	Attorney	Self Employed
81-82	Andreas, D. O.....	500		
81-82	Antonelli, Larry.....	200	Steel Fabricator	Self Employed
81-82	Arnautoff, Vasily.....	300	Importer	V B I Inc
81-82	Arnov, Robert H.....	1,000	Real Estate	
81-82	Athy, Andrew, Jr.....	500	Attorney	O Neill & Haase
81-82	Atkisson, John M.....	500	Attorney	
81-82	Baliantz, Armen.....	500	Restaurateur	Self Employed
81-82	Ball, Leonard.....	500	Attorney	H T B Inc
81-82	Baum, David A.....	250		
81-82	Beal, Robert L.....	200	Executive President	Beal & Company
81-82	Beckett, Forest.....	500	Owner	Beckett Aviation
81-82	Bell, W. D.....	500	Chairman Of The Board C E O	State Mutual Life Assurance
81-82	Belli, Lia.....	1,000	President	Demco Council
81-82	Belli, Liz.....	500	Houseperson	
81-82	Belton, John P.....	250	I. T. R.	Self Employed
81-82	Bennett, Clarence H.....	500	Chairman Of Board	National Standards Association
81-82	Berman, Henry E.....	600	Consultant	Self Employed
81-82	Berman, Jack K.....	300	Attorney	Self Employed
81-82	Berman, Jason.....	500	Vice President	Warner Communication Inc
81-82	Berman, M. M.....	1,000		
81-82	Berman, Philip I.....	1,000	Department Store Owner	
81-82	Bernstein, David W.....	250	Executive	American Biltrade Inc
81-82	Bernstein, Morris.....	1,500	Investor	Self Employed
81-82	Blackett, D. A.....	350		
81-82	Blumentahl, Robert.....	300	Investor	Self Employed
81-82	Blumenthal, Robert.....	500	Owner	Penn Emblem
81-82	Boggs, Thomas H., Jr.....	500	Attorney	Self Employed
81-82	Bogosian, John L.....	1,200	President	B & M Associates
81-82	Bolles, Peter P.....	900	Architect	Self Employed
81-82	Bosque, Jack.....	650	Real Estate	Self Employed
81-82	Boyle, Edward J.....	200	Attorney	Self Employed
81-82	Bracy, Terrence L.....	250		Bracy Williams & Company
81-82	Brady, M. H.....	600	Dentist	Self Employment
81-82	Brady, Herbert H.....	1,300	Dentist	Self Employed
81-82	Brinkman, W.....	250	President	Board Of Trade Clearing Corpor
81-82	Bronshvag, Vivien L.....	250	Houseperson	Self Employed
81-82	Brook, William F.....	250	Retired	National Grain Trade Council
81-82	Brooks, Jack.....	1,000	Retired	
81-82	Brovic, W. A.....	300	Attorney	La Raza Central Legal
81-82	Brown, W. L.....	250	Physician	
81-82	Buckley, John G.....	1,000	Business Executive	Northeast Petroleum
81-82	Burger, Kenneth.....	450	Restaurant Owner	
81-82	Cable, Austin I.....	250		
81-82	Cable, William H.....	500	Attorney	Williams & Jensen
81-82	Cafaro, John J.....	200	President	The Cafaro Company
81-82	Cahners, M. L.....	200	Owner	Cahners Publisher Company
81-82	Califano, Joseph A., Jr.....	500	Attorney	Califano Ross & Heineman
81-82	Callaghan, Richard L.....	250	Attorney	Western Union

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PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
79-80	Keenan, James P.	1,000	Manufacturer	
79-80	Keenan, Maryn	1,000	Interior Designer	
81-82	Kentor, William E.	1,000		Self Employed
79-80	Kinkade, Robert R.	1,000	Commodity Trader	
79-80	Klein, Elvin B.	1,000		
79-80	Kleppe, Tom	500		
79-80	Knigtley, John H.	1,000	Oil Producer	
79-80	Kriebley, Nancy B.	500		
79-80	Kroh, Elizabeth P.	1,000	Housewife	
79-80	Kroh, George P.	500		
79-80	Kroh, John A.	1,000	Retired	
79-80	Kroh, John A., Jr.	500		
79-80	Krueger, Nelson I.	500		
79-80	Landau, Howard	900		
79-80	Lasker, Bernard J.	980		Lasker Stone and Stern
79-80	Lauder, Ronald	1,000		
79-80	Law, Theo N.	1,000		
79-80	Leach, Walker	200		
79-80	Leben, Theodore I.	900	Oil Producer	
79-80	Lee, Hsiand Lin	1,000		Snowden And Decuyper Maple Leasing Company
79-80	Lefrak, Sam	600		
79-80	Lehner, Anita C.	1,000	Retired	
79-80	Lehrman, D. Gilbert	1,000		
79-80	Lehrman, D. Gilbert, Mrs	1,000		
79-80	Lehrman, Louise	1,000		
79-80	Leiber, Edward J.	1,000		Freemont Endemity
79-80	Levens, Esther H.	2,000		
79-80	Levens, Vrem D.	1,000	Retired	
79-80	Lincoln, George	1,000		Lincoln Industries
79-80	Linguist, Edwin R.	1,000		California Inn Management Inc
79-80	Lipsky, Eugene C.	500		
79-80	Literwyk, Hendrick	250		
79-80	Litwin, Harry	1,000	Oil Producer	
79-80	Livingston, Andrew D.	1,000		
79-80	Livingston, Andrew D., Mrs	1,000		
79-80	Loomis, A. J., Jr.	500		
79-80	Lund, Russell T.	1,000	Grocer	
79-80	Lynn, Charles J., Mrs	500	Housewife	
79-80	Maffitt, P. C.	500		
79-80	Marcus, S. H.	750	Meat Processor	
79-80	Marsh, John D.	1,000		
79-80	Marsh, Robert J.	500	Attorney	
79-80	Mazer, Robert R.	400		
79-80	McCoy, John Roger	500	Oil Producer	
79-80	McIntosh, William A.	1,000		Salomon Brothers
79-80	McIntyre, Lee E.	1,000		Freemont Endemity
79-80	McIntyre, Maurine H.	1,000	Homemaker	
79-80	McLaughlin, Jack	1,000		
79-80	McMorris, Donald L.	750		Self Employed
79-80	Mckie, Paul S.	500		
79-80	Meredith, Kenneth	1,000		Fox and Company
79-80	Merrigan, Edward L.	500	Attorney	
79-80	Meyer, Russell, Jr.	1,000		
79-80	Mills, Bradford	1,000		Bradford Ventures Limited
79-80	Mills, Donald	500		
79-80	Mills, William W., Jr.	250	Attorney	

84040492755



**RESEARCHERS LTD.**  
5403 Midship Court  
Burke, Virginia 22015  
703/323-9336

84040492767

83 FEB 17 PIZ: 37

Mr. Charles Steele  
General Counsel  
Federal Election Commission  
1325 K. Street NW  
Washington, D.C. 20463

84040492768

Complainant: David U. Greevy  
President  
PAC Researchers, Ltd.  
5403 Midship Court  
Burke, Virginia 22015

Respondent: Contributions, Inc.  
1011 17<sup>th</sup> Street, N.W.  
Suite 305  
Washington, D.C. 20036



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 9, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Contributions, Inc.  
1011 17th Street, NW  
Suite 305  
Washington, D.C. 20036

Re: MUR 1523

Dear Sir/Madam:

This letter is to notify you that on February 7, 1983, the Federal Election Commission received a complaint which alleges that your company 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 1523. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your company 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.

84040492769





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 9, 1983

Mr. David U. Greevy  
PAC Researchers, Ltd.  
5403 Midship Court  
Burke, VA 22015

Dear Mr. Greevy:

This letter is to acknowledge receipt of your complaint which we received on February 7, 1983, against Contributions, Inc. 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

84040492771



**RESEARCHERS LTD.**  
 5403 Midship Court  
 Burke, Virginia 22015  
 703/323-9336

203976

REC'D  
 8004 9475

03 FEB 7 9 2:23  
 Belmont, Massachusetts 02178  
 617/484-2361

February 3, 1983

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

03 FEB 7 9 4:09

Dear Mr. Steele:

Pursuant to the provisions set forth in 2 U.S.C. 437g and 11 CFR 111.4, I hereby file the following complaint.

My identification is: David U. Greevy  
 President  
 PAC Researchers, Ltd.  
 5403 Midship Court  
 Burke, Virginia 22015

The subject of the complaint is that Contributions, Inc., located at 1011 17th Street, N.W., Suite 305, Washington, D.C. 20036, has in the past and will continue to in the future compile information on individual contributors itemized in the FEC reports filed with the FEC, Secretary of the Senate, and Clerk of the House. The compilation of this information is being sold to the public at large. As this constitutes use of this information for a commercial purpose, Contributions, Inc. is in violation of 2 U.S.C. 438(a)(4) and 11 CFR 104.15.

I refer to language included in the Commission's Advisory Opinion 1980-101 which states:

2 U.S.C. 438(a)(4) generally allows for inspection and copying of reports and statements filed with the Commission but prohibits the sale or use of such copied information to solicit contributions or for any other commercial purpose with the exception of using the names and addresses of any political committee to solicit contributions from such committee...

Included herein is an advertisement for the product which appeared in the Federal Republic, dated February 7, 1983.

Sincerely,

*David U. Greevy*

David U. Greevy

David U. Greevy swore to the contents of and signed this complaint in my presence.

*David J. ...*  
 Notary Public

3 Feb 83  
 Date

May 6, 1986  
 My term expires on:

34040492772

8 4 0 4 0 4 0 2 7 7 7

Before Larry Franklin finishes his morning coffee, he'll be able to tell you every Congressman who's getting money from the AMA...

... or the trucking industry, the Sierra Club, Jane Fonda, Armand Hammer, NCPAC, General Mills or General Dynamics. He can put his hands on so much information so quickly because he subscribes to Washington's newest information resource. *Campaign Contributions*—the complete register of reported contributions to the members of Congress.

**WHAT CAMPAIGN CONTRIBUTIONS PUTS AT YOUR FINGERTIPS**

*Campaign Contributions* is a four volume register of every individual and PAC campaign contribution, \$200 or larger, made to every current member of Congress since that member's last election. A compilation of 160,000 individual listings and 100,000 PAC entries from the FEC's own files.

Alphabetically arranged first by the member of Congress receiving the contribution and again by contributor, *Campaign Contributions* supplies in seconds what used to take hundreds of hours to collect.

Each entry lists the amount of the contribution, the contributor's name and, in the case of an individual, the contributor's occupation and employer—information available until now only by sifting through the endless files at the FEC.

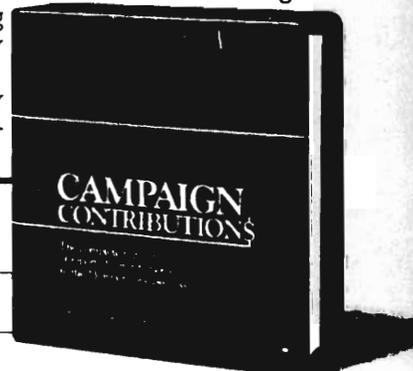
The current edition of *Campaign Contributions* is complete through the December 2, 1982 election filing period and covers the November elections. To keep the data timely, subscribers will receive 90-day revisions in election years and 180-day revisions in non-election years.

**SEND FOR AN INFORMATION PACKAGE WITH A SAMPLE LISTING**

If you have any doubts that this is the most powerful political research tool to come along in years, fill out and return the form below. We will send you a *Campaign Contributions* Information Package (one per office, please) including sample pages on any current member of Congress you request.

The game in Washington will never be the same, now that *Campaign Contributions* is here.

*Contributions, Inc.* / 1011 17th Street, NW  
Suite 305 / Washington, D.C. 20036  
(202) 296-5180



**The complete list of who's giving what to whom.**

Name \_\_\_\_\_

Organization \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_ Zip \_\_\_\_\_

Send me sample pages for (Member of Congress—State) \_\_\_\_\_



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 703/323-9336

9 Carleton Road  
 Belmont, Massachusetts 02178  
 617/484-2361

February 3, 1983

General Counsel  
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*David U. Greevy*

David U. Greevy

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*J. Bruce Fowler*  
 Notary Public

*3 Feb 1983*  
 Date

*May 6, 1986*  
 My term expires on:

84040492774

Before Larry Franklin finishes his morning coffee, he'll be able to tell you every Congressman who's getting money from the AMA...

... or the trucking industry, the Sierra Club, Jane Fonda, Armand Hammer, NCPAC, General Mills or General Dynamics. He can put his hands on so much information so quickly because he subscribes to Washington's newest information resource. *Campaign Contributions*—the complete register of reported contributions to the members of Congress.

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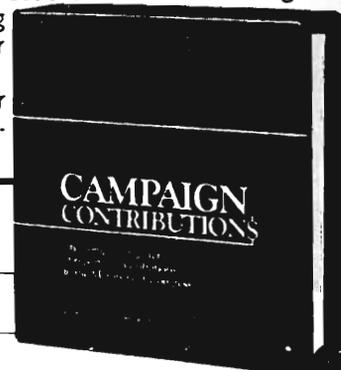
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*Contributions, Inc./1011 17th Street, NW Suite 305 / Washington, D.C. 20036 (202) 296-5180*



**The complete list of who's giving what to whom.**

Name \_\_\_\_\_

Organization \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_ Zip \_\_\_\_\_

Send me sample pages for (Member of Congress—State) \_\_\_\_\_



RESEARCHERS LTD.  
 5403 Midship Court  
 Burke, Virginia 22015  
 703/323-9336

9 Carleton Road  
 Belmont, Massachusetts 02178  
 617/484-2361

February 3, 1983

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*J. Bruce Fowler*  
 Notary Public

3 Feb 1983  
 Date

May 6, 1986  
 My term expires on:

84040492775



**Before Larry Franklin finishes  
his morning coffee, he'll be able  
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*Contributions, Inc., 1011 17th Street, NW  
Suite 305, Washington, D.C. 20036  
(202) 296-5180*

Name \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_  
 State \_\_\_\_\_ Zip \_\_\_\_\_

Send me sample pages for (Member of Congress—State) \_\_\_\_\_



**The complete list  
of who's giving  
what to whom.**

8 4 0

CS

**RESEARCHERS LTD.**  
5403 Midship Court  
Burke, Virginia 22015  
703/323-9336



8404049277

General Counsel  
Federal Election Commission  
1325 K. St. N.W.  
Washington, D.C. 20463



0-82-72a  
Update



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 8, 1983

MEMORANDUM

TO: Charles N. Steele  
General Counsel

THRU: B. Allen Clutter *BAC*  
Staff Director

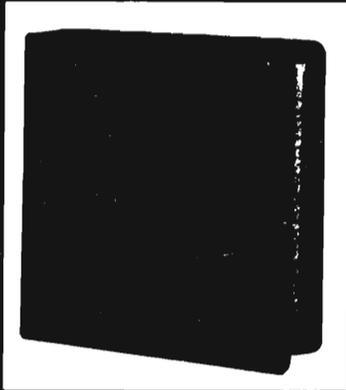
FROM: Kent C. Cooper *KCC*  
Asst. Staff Dir. for Disclosure

SUBJECT: Contributions, Inc.

This memorandum is in regard to my previous memo of December 27, 1982, which dealt with the use of files in the Public Records Office by persons from Contributions, Inc.

On February 8, 1983, I received the enclosed brochure and sample pages from a reporter who stated it had been sent to his office. The brochure and sample pages may be of some interest.

84040492779



Contributions by  
MEMBERS OF CONGRESS  
AND SENATORS  
AND  
MEMBERS OF THE HOUSE OF REPRESENTATIVES

# CAMPAIGN CONTRIBUTION

The complete register  
of reported contributions  
to the Members of Congress

**"The fact is,  
money is  
everything  
on the Hill  
these days."**

Compiled by the  
U.S. House of Representatives  
and the U.S. Senate  
U.S. GOVERNMENT PRINTING OFFICE

U.S. GOVERNMENT PRINTING OFFICE

And, the fact is, that keeping track of where that money's coming from and going to has always been a burdensome chore. If you've sifted through the endless files at the Federal Election Commission, you know it's a time-consuming process. Those days are over. For the first time since the FEC's creation, everything you need to know about the money that moves Congress is available in a single set of books called *Campaign Contributions—the complete register of reported contributions to the Members of Congress.*

**Campaign Contributions tells you who's giving what to whom.**

In four volumes, *Campaign Contributions* lists every reported contribution to each member of the U.S. Senate and the U.S. House of Representatives (contributions of over \$200 must be reported to the Federal Election Commission). The contributions are listed by name of each individual contributor, his or her employer and occupation and the amount of the contribution. And the list includes every reported PAC contribution!

Contributions are alphabetized by recipient in separate volumes for House and Senate members and also by contributor in separate, individual and PAC volumes. This vital and valuable information is at your fingertips whenever you need it!

**Campaign Contributions' only competitor for timeliness is the FEC, but do you have the time?**

All contributions reported to the FEC for each member's most recent election through the December 2, 1982 filing date are included in *Campaign Contributions*. This means the information covers the November 1982 elections. And to stay current, you can order two 1983 updates—covering the July 31 and December 31 filing periods.

**Campaign Contributions has done all the legwork for you.**

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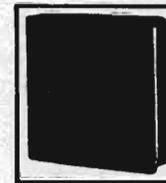
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Organization \_\_\_\_\_

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Phone \_\_\_\_\_

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Sample page: Contributions to Member of the U. S. House of Representatives

CAMPAIGN CONTRIBUTIONS

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O'NEIL

MA8

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
81-82	Abboud, Robert.....	1,000	Executive	Occidental Petroleum
81-82	Acton, Edward J.....	200	Literary Agent	Self Employed
81-82	Adams, Angel.....	300	Photographer	Self Employed
81-82	Adams, Ansel.....	500	Photographer	Self Employed
81-82	Adams, Brock.....	1,000	Attorney	Garvey Schubert Adams & Barer
81-82	Adolfson, Louis.....	1,000	Attorney	Self Employed
81-82	Ahlquist, Harold E., Jr.....	200	Agent	State Mutual Life
81-82	Albert, Carl A.....	2,000	Attorney	Self Employed
81-82	Andreas, D. O.....	500		
81-82	Antonelli, Larry.....	200	Steel Fabricator	Self Employed
81-82	Arnautoff, Vasily.....	300	Importer	V B I Inc
81-82	Arnov, Robert H.....	1,000	Real Estate	
81-82	Athy, Andrew, Jr.....	500	Attorney	O'Neill & Haase
81-82	Atkisson, John M.....	500	Attorney	
81-82	Baliantz, Armen.....	500	Restaurateur	Self Employed
81-82	Ball, Leonard.....	500	Attorney	H T B Inc
81-82	Baum, David A.....	250		
81-82	Beal, Robert L.....	200	Executive President	Beal & Company
81-82	Beckett, Forest.....	500	Owner	Beckett Aviation
81-82	Bell, W. D.....	500	Chairman Of The Board C E O	State Mutual Life Assurance
81-82	Belli, Lia.....	1,000	President	Demco Council
81-82	Belli, Liz.....	500	Houseperson	
81-82	Belton, John P.....	250	I. T. R.	Self Employed
81-82	Bennett, Clarence H.....	500	Chairman Of Board	National Standards Association
81-82	Berman, Henry E.....	600	Consultant	Self Employed
81-82	Berman, Jack K.....	300	Attorney	Self Employed
81-82	Berman, Jason.....	500	Vice President	Warner Communication Inc
81-82	Berman, N. M.....	1,000		
81-82	Berman, Philip I.....	1,000	Department Store Owner	
81-82	Bernstein, David W.....	250	Executive	American Biltrade Inc
81-82	Bernstein, Morris.....	1,500	Investor	Self Employed
81-82	Blackett, D. A.....	350		
81-82	Blumentahl, Robert.....	300	Investor	Self Employed
81-82	Blumenthal, Robert.....	500	Owner	Penn Emblem
81-82	Boggs, Thomas H., Jr.....	500	Attorney	Self Employed
81-82	Bogosian, John L.....	1,200	President	B & M Associates
81-82	Kolles, Peter P.....	900	Architect	Self Employed
81-82	Bosque, Jack.....	650	Real Estate	Self Employed
81-82	Boyle, Edward J.....	200	Attorney	Self Employed
81-82	Bracy, Terrence L.....	250		Bracy Williams & Company
81-82	Brady, H. H.....	600	Dentist	Self Employment
81-82	Brady, Herbert H.....	1,300	Dentist	Self Employed
81-82	Brinkman, W.....	250	President	Board Of Trade Clearing Corpor
81-82	Bronshvag, Vivien L.....	250	Houseperson	Self Employed
81-82	Brook, William F.....	250	Retired	National Grain Trade Council
81-82	Brooks, Jack.....	1,000	Retired	
81-82	Brovic, W. A.....	300	Attorney	La Raza Central Legal
81-82	Brown, W. L.....	250	Physician	
81-82	Buckley, John G.....	1,000	Business Executive	Northeast Petroleum
81-82	Burger, Kenneth.....	450	Restaurant Owner	
81-82	Cable, Austin I.....	250		
81-82	Cable, William H.....	500	Attorney	Williams & Jensen
81-82	Cafaro, John J.....	200	President	The Cafaro Company
81-82	Cahners, N. L.....	200	Owner	Cahners Publisher Company
81-82	Califano, Joseph A., Jr.....	500	Attorney	Califano Ross & Heineman
81-82	Callaghan, Richard L.....	250	Attorney	Western Union

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Sample page: Contributions to Member of U. S. Senate

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 CAMPAIGN CONTRIBUTIONS

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DOLE

KS

PERIOD	CONTRIBUTOR	AMOUNT	OCCUPATION	EMPLOYER
79-80	Keenan, James F.....	1,000	Manufacturer	
79-80	Keenan, Maryn.....	1,000	Interior Designer	
81-82	Kentor, William E.....	1,000		Self Employed
79-80	Kirkade, Robert R.....	1,000	Commodity Trader	
79-80	Klein, Elvin B.....	1,000		
79-80	Kleppa, Tom.....	500		
79-80	Knigtley, John H.....	1,000	Oil Producer	
79-80	Kriebley, Nancy B.....	500		
79-80	Kroh, Elizabeth P.....	1,000	Housewife	
79-80	Kroh, George P.....	500		
79-80	Kroh, John A.....	1,000	Retired	
79-80	Kroh, John A., Jr.....	500		
79-80	Krueger, Nelson L.....	500		
79-80	Landau, Howard.....	900		
79-80	Lasker, Bernard J.....	980		Lasker Stone and Stern
79-80	Lauder, Ronald.....	1,000		
79-80	Law, Theo H.....	1,000		
79-80	Leach, Walker.....	200		
79-80	Leben, Theodore I.....	900	Oil Producer	
79-80	Lee, Hsiand Lin.....	1,000		Snowden And Decuyper
79-80	Lefrak, Sam.....	600		Maple Leasing Company
79-80	Lehner, Anita C.....	1,000	Retired	
79-80	Lehraan, D. Gilbert.....	1,000		
79-80	Lehraan, D. Gilbert, Mrs.....	1,000		
79-80	Lehraan, Louise.....	1,000		
79-80	Leiber, Edward J.....	1,000		Freemont Endeanity
79-80	Levens, Esther H.....	2,000		
79-80	Levens, Vrem D.....	1,000	Retired	
79-80	Lincoln, George.....	1,000		Lincoln Industries
79-80	Linquist, Edwin R.....	1,000		California Inn Management Inc
79-80	Lipsky, Eugene C.....	500		
79-80	Literwyk, Hendrick.....	250		
79-80	Litwin, Harry.....	1,000	Oil Producer	
79-80	Livingston, Andrew D.....	1,000		
79-80	Livingston, Andrew D., Mrs.....	1,000		
79-80	Loomis, A. J., Jr.....	500		
79-80	Lund, Russell T.....	1,000	Grocer	
79-80	Lynn, Charles J., Mrs.....	500	Housewife	
79-80	Maffitt, P. C.....	500		
79-80	Marcus, S. H.....	750	Meat Processor	
79-80	Marsh, John D.....	1,000		
79-80	Marsh, Robert J.....	500	Attorney	
79-80	Mazer, Robert R.....	400		
79-80	McCoy, John Roger.....	500	Oil Producer	
79-80	McIntosh, William A.....	1,000		Salomon Brothers
79-80	McIntyre, Lee E.....	1,000		Freemont Endeanity
79-80	McIntyre, Maurine H.....	1,000	Homemaker	
79-80	McLaughlin, Jack.....	1,000		
79-80	McMorris, Donald L.....	750		Self Employed
79-80	Mckie, Paul S.....	500		
79-80	Meredith, Kenneth.....	1,000		Fox and Company
79-80	Herrigan, Edward L.....	500	Attorney	
79-80	Meyer, Russell, Jr.....	1,000		
79-80	Mills, Bradford.....	1,000		Bradford Ventures Limited
79-80	Mills, Donald.....	500		
79-80	Mills, William W., Jr.....	250	Attorney	

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National Education Association

(CONTINUED)

81-82	BRITT	NC6	1,500
81-82	BROOKS	TX9	5,000
81-82	BROWN	CA36	7,000
81-82	BRYANT	TX5	7,000
81-82	BURDICK	MD	10,000
81-82	BURTON	CA5	10,000
81-82	BYRD	WV	10,000
81-82	CARPER	DE1	5,000
81-82	CARR	MI6	11,450
81-82	CHAFEE	RI	500
81-82	CHANDLER	WA8	8,000
81-82	CLARKE	NC11	10,000
81-82	CLAY	MD1	2,500
81-82	COELHO	CA15	2,700
81-82	COLEMAN	TX16	5,000
81-82	COOPER	TN4	6,000
81-82	CORCORAN	IL14	200
81-82	COYNE	PA14	500
79-80	CRANSTON	CA	1,000
81-82	CROCKETT	MI13	800
81-82	D'AMOURS	NH1	5,500
81-82	DASCHLE	SD1	8,500
81-82	DAUB	ME2	250
81-82	DECONCINI	AZ	1,000
81-82	DERRICK	SC3	1,500
81-82	DICKS	WA6	2,100
81-82	DINGELL	MI16	705
81-82	DIXON	CA28	200
81-82	DIXON	IL	500
79-80	DODD	CT	2,200
81-82	DODD	CT	500
77-78	DOMENICI	NH	300
81-82	DONNELLY	MA11	200
81-82	DORGAN	ND1	8,500
81-82	DOWDY	MS4	8,500
81-82	DOWNY	NY2	2,250
81-82	DUNCAN	TN2	500
81-82	DURBIN	OR20	5,000
81-82	DWYER	NJ6	250
81-82	DYMALLY	CA31	1,400
81-82	DYSON	MD1	750
79-80	EAGLETON	MD	2,000
81-82	EDGAR	PA7	4,400
81-82	EDWARDS	CA10	2,500
81-82	ERDREICH	AL6	7,000
81-82	EVANS	IL17	7,000
81-82	FASCELL	FL19	5,000
81-82	FAZIO	CA4	1,500
81-82	FEIGHAN	OH19	10,000
81-82	FLORIO	NJ1	500
81-82	FOGLIETTA	PA1	1,200
81-82	FOLEY	WA5	8,000
81-82	FORD	MI15	2,500
81-82	FORD	TN9	1,500
79-80	FORD	KY	800

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Sample page: Contributions individuals

CAMPAIGN CONTRIBUTIONS

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79-80 Hammer, Armand.....500	HART	CO	81-82 Hamon, Jake L.....1,000	ROSTENKOWSKI	IL8
79-80 Hammer, Armand.....1,000	LONG	LA	81-82 Hamon, Jake L.....300	LONG	LA8
81-82 Hammer, Armand.....500	MOYNIHAN	NY	81-82 Hamon, Jake L.....800	STENNIS	MS
81-82 Hammer, Armand.....500	BURDICK	MD	81-82 Hamon, Jake L.....1,000	BENTSEN	TX
81-82 Hammer, Frances B.....1,000	NETZENBAUM	OH	81-82 Hamon, Jake L.....250	BARTLETT	TX3
77-78 Hammer, Frances Barrett.....1,000	TSONGAS	MA	81-82 Hamon, Jake L.....2,000	WILSON	TX2
79-80 Hammer, Frances Barrett.....2,000	CRANSTON	CA	77-78 Hamon, Jake L.....2,000	TOWER	TX
79-80 Hammer, Frances Barrett.....1,000	HART	CO	77-78 Hamon, Jake L.....1,000	HEFLIN	AL
77-78 Hammer, Francis B.....1,000	RANDOLPH	WV	77-78 Hamon, Jake L.....1,000	JOHNSTON	LA
77-78 Hammer, Francis Barrett.....1,000	BRADLEY	NJ	79-80 Hamon, Jake L.....1,000	LONG	LA
77-78 Hammer, Francis Barrett.....2,000	PELL	RI	79-80 Hamon, Jake L.....500	ABDNOR	SD
79-80 Hammer, Francis Barrett.....1,000	LONG	LA	79-80 Hamon, Jake L.....500	LONG	LA
77-78 Hammer, Francis Barrett, Mrs....1,000	RANDOLPH	WV	81-82 Hamon, Jake L. III.....1,000	FROST	TX24
81-82 Hammer, Frederick S.....250	ROUCKEPA	NJ5	77-78 Hamon, Jake L. III.....250	TOWER	TX
79-80 Hammer, Julian.....1,000	HART	CO	79-80 Hamon, Jake L. III.....1,000	MURKOWSKI	AK
77-78 Hammer, Leo M.....200	HELMS	NC	79-80 Hamon, Jake L. III.....500	QUAYLE	IN
77-78 Hammer, Milton.....352	JOHNSTON	LA	81-82 Hamon, Jake L. III.....800	BURDICK	MD
81-82 Hammer, Morris.....500	LAUTENBERG	NJ	81-82 Hamon, Jake L., III.....500	HANCE	TX19
81-82 Hammer, Robert.....250	DECONCINI	AZ	81-82 Hamon, Jake L., III.....800	MELCHER	MT
77-78 Hammer, Armand.....1,000	PELL	RI	81-82 Hamon, Jake L., III.....500	GRAMM	TX6
81-82 Hammerling, Robert.....500	MCEWEN	OH6	81-82 Hamon, Jake L., III.....1,000	BARTLETT	TX3
81-82 Hamersmann, I. H., II.....250	MIXULSKI	MD3	81-82 Hamon, Jake L., III.....1,500	FROST	TX24
81-82 Hammerschmidt, Frederick R.....250	HEINZ	PA	81-82 Hamon, Jake L., III.....1,000	BENTSEN	TX
81-82 Hammerschmidt, John P.....1,750	HAMMERSCHMIDT	AR3	77-78 Hamon, Jake L., Mrs.....1,000	TOWER	TX
81-82 Hammerslag, J. G.....500	KENNEDY	MA	77-78 Hamon, Jake L., Mrs.....1,000	JOHNSTON	LA
81-82 Hammerslag, Julius G.....200	NETZENBAUM	OH	77-78 Hamon, Jake L., Mrs.....500	TOWER	TX
79-80 Hammersmith, John H.....200	DIXON	IL	81-82 Hamon, Jake S. III.....1,000	BYRD	WV
81-82 Hammett, D. S.....250	CRANE	IL12	81-82 Hamon, Jake, II.....300	SMITH	OK5
81-82 Hammett, H. H., Jr.....200	ROWLAND	GA8	81-82 Hamon, Jake, III.....500	WRIGHT	TX12
81-82 Hammett, Harold D.....400	WRIGHT	TX12	81-82 Hamon, Mary D.....1,000	BARTLETT	TX3
81-82 Hammett, Harold, Jr.....500	FRANKLIN	MS2	81-82 Hamon, Mrs. Jake L.....1,000	BENTSEN	TX
81-82 Hammett, James B.....500	JONES	OK1	81-82 Hamon, Mrs. Jake L., III.....500	BENTSEN	TX
81-82 Hammette, Robert L.....250	IRELAND	FL10	81-82 Hamon, Nancy.....1,000	WILSON	TX2
81-82 Hammit, Claud B.....300	ARCHER	TX7	79-80 Hamon, Nancy.....1,000	LONG	LA
77-78 Hamock, Hrytle S.....300	NUNN	GA	81-82 Hamon, Nancy B.....1,000	WILSON	TX2
81-82 Hamock, James H.....300	ROWLAND	GA8	81-82 Hamoth, Harvey J.....500	WEBER	MN2
81-82 Hamock, Leon R.....332	MCCOLLUM	FL5	81-82 Hamovit, Phil S.....2,000	SISISKY	VA4
81-82 Hamon, George.....200	HANSEN	UT1	77-78 Hamperi, D. L.....500	HUMPHREY	NH
77-78 Hamon, Henry R.....500	TOWER	TX	77-78 Hampers, C. L.....200	HUMPHREY	NH
81-82 Hammond Elliot, Jean.....1,000	BOSCO	CA1	81-82 Hampers, C. L.....500	O'NEIL	MA8
77-78 Hammond, Charles B.....1,000	TOWER	TX	79-80 Hampers, C. L.....500	DOLE	KS
79-80 Hammond, Charles D.....300	DIXON	IL	77-78 Hampton, Alton D.....1,000	PRYOR	AR
81-82 Hammond, Clayton.....500	ROGERS	KY5	81-82 Hampton, Charles.....200	HALL	TX1
77-78 Hammond, Edmund B., Jr.....200	HEFLIN	AL	81-82 Hampton, Colin C.....500	MITCHELL	ME
81-82 Hammond, J. B.....250	MAZZOLI	KY3	81-82 Hampton, Delon.....1,000	BARNES	MD8
77-78 Hammond, Jack.....500	TOWER	TX	81-82 Hampton, Duane.....1,000	MOYNIHAN	NY
77-78 Hammond, Jack L.....500	TOWER	TX	81-82 Hampton, E. S.....500	ROBERTS	KS1
81-82 Hammond, Jack L.....250	TOWER	TX	81-82 Hampton, Gordon F.....1,000	WILSON	CA
77-78 Hammond, Marsyl Stokes.....500	PELL	RI	81-82 Hampton, Howard.....1,000	DYMALLY	CA31
81-82 Hammond, Richard B.....1,000	ZSCHAU	CA12	79-80 Hampton, J. C.....250	NICKLES	OK
81-82 Hammond, Saul B.....250	WEICKER	CT	77-78 Hampton, Jeral L.....250	PRYOR	AR
77-78 Hammond, William A.....250	HATFIELD	OR	81-82 Hampton, John.....1,000	AUCOIN	OR1
81-82 Hammondtree, Ron.....1,000	JONES	TN8	77-78 Hampton, John C.....1,000	HATFIELD	OR
81-82 Haan, Edward H.....240	BOSCHWITZ	MN	81-82 Hampton, Kent.....250	OXLEY	OH4
81-82 Hanner, George F.....250	IRELAND	FL10	77-78 Hampton, Louis R.....500	PELL	SI
81-82 Hanner, W. W.....250	TRIBLE	VA	79-80 Hampton, Marilyn S.....1,000	MURKOWSKI	AK
81-82 Hano, Louis C.....1,000	HEINZ	PA	81-82 Hampton, Mark.....1,000	MOYNIHAN	NY
81-82 Hamoley, David.....1,000	HATCH	UT	81-82 Hampton, Philip M.....250	KROOKS	TX9
81-82 Hamon, Jack L., III.....250	BENTSEN	TX	79-80 Hampton, Robert N.....250	MURKOWSKI	AK
77-78 Hamon, Jake.....1,000	RAUCUS	MT	81-82 Hampton, Ronald D.....200	HILEX	IN3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 27, 1982

Memorandum

TO: General Counsel  
 THRU: Staff Director *John P. ...*  
 FROM: Kent Cooper *KC*  
 SUBJECT: Possible Violation of Section 438(a)(4)

This memorandum is to make you aware of a possible violation of Section 438(a)(4) by an organization by the name of Contributions, Inc.. I am forwarding several comments which lead me to believe that the Commission would be wise to look into the matter, possibly as a pre-MUR.

On September 8, 1982, and September 22, 1982, the Public Records office received requests for G index contributor printouts on certain 1978 Senate winners. This order was placed by Bill Smith and Sohail Arzoo, an employee of Bill Smith. At that time they stated they were researching present Senators who had been elected in 1978. Since that time Sohail Arzoo has spent the last several months in the office copying current House members' campaign reports. We are receiving payment each day in amounts of several hundred dollars. During this time the restriction clause was stated to Bill Smith and Sohail Arzoo by two members of the Public Records staff, Rory Conley and Ken Almy. In addition, I restated the restriction clause to Mr. Arzoo in November 1982. They have continued to copy reports.

The phone number and address for these two persons is Contributions Inc., 1101 17th Street, N.W., Washington, D.C., 296-5180

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1523

Date Filmed 1/2/05 Camera No. --- 2

Cameraman AS

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