



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1595

Date Filmed 2/8/86 Camera No. --- 2

Cameraman AS

866040165032

FEDERAL ELECTION COMMISSION

Internal Memo

Rating slips

Cancellation discussions

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 checked="" 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

*Robert [unclear]*

date

11/14/85

*[Signature]*

86040565033

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1595
Life Amendment Political	)	
Action Committee, Inc.	)	
Rick Woodrow, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 8, 1986, the Commission decided by a vote of 4-0 to take the followings actions in MUR 1595:

1. Close the file.
2. Approve the notification letter attached to the Memorandum to the Commission dated January 3, 1986.

Commissioners Aikens, Elliott, Josefiak and McGarry voted affirmatively for this decision; Commissioners Harris and McDonald did not cast a vote.

Attest:



1-8-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	Fri.,	1-3-86,	3:57
Circulated on 48 hour tally basis:	Mon.,	1-6-86,	11:00
Deadline for vote:	Wed.,	1-8-86,	11:00

86040565034



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

06 JAN 3 P 3: 57

January 3, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CNS*  
General Counsel

SUBJECT: Payment of Civil Penalty in MUR 1595

On November 13, 1985, the Commission voted to authorize the Office of the General Counsel to file a civil suit in the United States District Court against the Life Amendment Political Action Committee, Inc., ("LAPAC"), and its treasurer, Rick Woodrow. This action stemmed from LAPAC's failure to pay an agreed to civil penalty (\$400) imposed by a conciliation agreement dated August 23, 1985. Both parties were notified of the Commission's decision by letter dated November 15, 1985.

Along with a cover letter dated November 20, 1985, LAPAC submitted a money order drawn for \$400, made payable to the Commission.

RECOMMENDATION

The General Counsel's Office recommends that the Commission:

1. Close the file in MUR 1595; and
2. Approve the attached notification letter.

Attachments

1. Letter from Rick Woodrow, LAPAC's treasurer.
2. Photocopy of LAPAC's \$400 money order.
3. Proposed notification letter.

86040565035

**LIFE AMENDMENT POLITICAL ACTION COMMITTEE**

P.O. BOX 1884

GARNSVILLE, VA 22403

(703) 833-8128 or (703) 833-1888

Robert Sassone  
Chairman

Rick Woodrow  
Executive Director

ACC # 9053

①

November 20, 1985

Mr. Ivan Rivera  
Federal Elections Commission  
1325 K Street NW  
Washington, D.C. 20463

Dear Mr. Rivera:

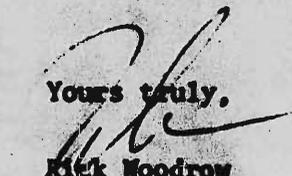
I have just received a phone call from our East Coast office informing me that they received a letter from you stating that the check that bounced to the Federal Elections Commission from LAPAC had not yet been taken care of.

It was my understanding that this had been taken care of several weeks ago but obviously it has not been. I apologize for this.

Enclosed please find a money order in the amount of \$400.00 to cover this check. I hope that this resolves this matter to your satisfaction.

Thankyou for your understanding in this matter.

Yours truly,

  
Rick Woodrow  
Treasurer

"Protecting the American Family and the Preborn Child...  
Through Political Action!"

Authorized and paid for by LAPAC, Inc., Rick Woodrow, Treasurer

Attachment 1

86040565036

11:50 AM '85



HEAD OFFICE, PORTLAND, OREGON  
 UNITED STATES NATIONAL BANK OF OREGON

23271661 <sup>24-22</sup>/<sub>1230</sub> 11

November 20 1985

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION

UNITED STATES NATIONAL BANK 400dnl's 00cts

Not Payable for more than ONE THOUSAND DOLLARS

LIFE AMENDMENT POLITICAL ACTION CMT. ②

PO BOX 1804 PURCHASER'S SIGNATURE

MEDFORD, OR 97501 ADDRESS

CITY & STATE

PERSONAL MONEY ORDER

⑈ 23271661⑈ ⑆ 123000220⑆ 011 0999 935⑈

CCC# 9055

MEMORANDUM

TO: RETHA DIXON TO: JOAN HARRIS  
 FROM: JOAN HARRIS FROM: RETHA DIXON

CHECK NO. 23271661 (a copy of which is attached) RELATING  
 TO MUR 1595 AND NAME Life Amendment PAC  
 WAS RECEIVED ON 11-27-85. PLEASE INDICATE THE ACCOUNT INTO  
 WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT (#95F3875.16)
- / \* / CIVIL PENALTIES ACCOUNT (#95-1099.160)
- / / OTHER \_\_\_\_\_

SIGNATURE Robyn M. Bishop DATE 11-27-85  
 Attachment 2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

January 10, 1986

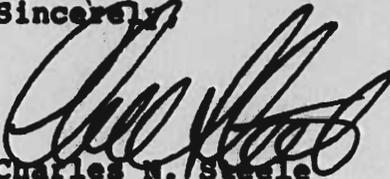
Rick Woodrow  
Life Amendment Political  
Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, VA 22463

Re: MUR 1595  
Life Amendment Political  
Action Committee, Inc.  
and Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On January 8, 1986, the Commission accepted your money order drawn for \$400 as payment of the civil penalty imposed by the August 23, 1985, conciliation agreement. Accordingly, the file in this matter has been closed, and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Sincerely,



Charles N. Steele  
General Counsel

8 6 0 4 0 5 6 5 0 3 8



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

**Rick Woodrow**  
**Life Amendment Political**  
**Action Committee, Inc.**  
**P.O. Box 1984**  
**Garrisonville, VA 22463**

**Re: MUR 1595**  
**Life Amendment Political**  
**Action Committee, Inc.**  
**and Rick Woodrow, as treasurer**

**Dear Mr. Woodrow:**

On January 8, 1986, the Commission accepted your money order drawn for \$400 as payment of the civil penalty imposed by the August 23, 1985, conciliation agreement. Accordingly, the file in this matter has been closed, and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

**Sincerely,**

**Charles N. Steele**  
**General Counsel**

OK

86040565039



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

3

Rick Woodrow  
Life Amendment Political  
Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, VA 22463

Re: MUR 1595  
Life Amendment Political  
Action Committee, Inc.  
and Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On January , 1986, the Commission accepted your money order drawn for \$400 as payment of the civil penalty imposed by the August 23, 1985, conciliation agreement. Accordingly, the file in this matter has been closed, and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Sincerely,

Charles M. Steele  
General Counsel

Attachment 3

86040565040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political )  
Action Committee, Inc. ) MUR 1595  
and Rick Woodrow, as )  
treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 13, 1985, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1595:

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer.
2. Approve and send the letter attached to the General Counsel's report dated November 1, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak, and McGarry voted affirmatively for the decision; Commissioner McDonald was not present at the meeting.

Attest:

11-13-85  
Date

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

86040565041

**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. )  
and Rick Woodrow, )  
as treasurer )

RECEIVED  
GENERAL COUNSEL  
COMMISSION SECRETARY  
NOV 3 12:41  
EXECUTIVE SECRETARY

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

The Commission found reason to believe that the Life Amendment Political Action Committee, Inc. and its treasurer ("LAPAC") violated 2 U.S.C. § 434(b)(8) by failing continuously to report certain debts. Rick Woodrow is currently LAPAC's treasurer.

LAPAC and the Commission entered into a conciliation agreement which became effective when executed by the Commission on August 23, 1985. See Attachment 1. The agreement provided that within 30 days after its effective date, LAPAC would pay a \$400 civil penalty. LAPAC tendered a \$400 check to the U.S. Treasurer, but that check was returned for insufficient funds. See Attachment 2. Via telephone, LAPAC indicated it would shortly transfer sufficient funds into its checking account and contact the Commission. See Attachment 3. LAPAC never contacted the Commission. Attempts by this office to contact LAPAC by telephone were unsuccessful until October 3, 1985, when Mr. Woodrow stated he would send a new check to the Commission by Federal Express. No such check ever arrived.

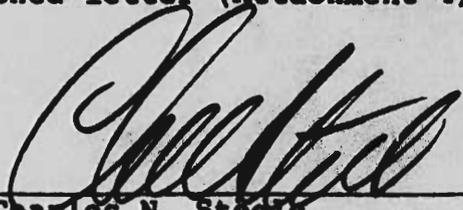
86040565042

If a conciliation agreement is violated, the Commission may institute a civil action for relief in a United States District Court. 2 U.S.C. § 437g(a)(5)(D). LAPAC violated the Agreement by failing to pay \$400 before September 23, 1985.

**II. RECOMMENDATIONS**

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer.
2. Approve and send the attached letter (Attachment 4).

1 November 1985  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

**Attachments**

1. Conciliation Agreement
2. Returned \$400 check
3. Letter from Kenneth Gross to LAPAC, dated September 11, 1985
4. Letter to respondents

86040565043

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Life Amendment Political	)	MUR 1595
Action Committee, Inc. and	)	
Rick Woodrow, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(b)(8) by failing to continuously report certain debts. Rick Woodrow is currently the Committee's treasurer.

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

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

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. The Life Amendment Political Action Committee, Inc., is the registered political action committee

- Att. 1, p. 1 -

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15 AUG 1975  
AUG 22 1975

for a Life Amendment organization.

2. Respondents failed to adequately report debts with the following six creditors: Phoenix Communications, Webcraft Packaging, Creative Mailing Consultants, Insta-Print, Word Processing Exchange and Barnett, Alagia and Carey

3. The debt settlement with Barnett, Alagia, and Carey has not yet been satisfactorily explained to the Commission.

V. Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report debts with the above mentioned creditors.

VI.(A) Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Dollars (\$400.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VI.(B) Respondents will file with the Commission amendments to previously filed reports, and any other necessary reports, in order to comply with all of the reporting requirements regarding the Respondents' debts with the above mentioned creditors.

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

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

- Att. 1, p. 2 -

86040565045

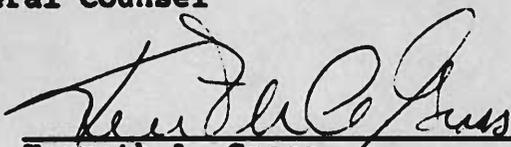
IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

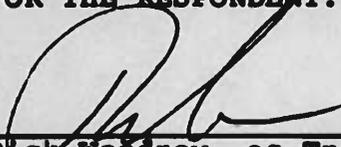
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

July 23, 1985  
Date

FOR THE RESPONDENT:

  
Rich Woodrow, as Treasurer of the  
Life Amendment Political Action  
Committee Inc.

8/8/85  
Date

86040565046

- ATT. 1, p. 3 -

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

PAYROLL ACCOUNT 12-84

P. O. BOX 1984

GARRISONVILLE, VA. 22403

1176

PAY TO THE ORDER OF

U.S. Treasury

82-19-23 882 82-22-21

882 82-22-21

882 82-22-21

882 82-22-21

7-27

92-11157

10 25

\$ 400.00

Tom Hundman

PAID INSUFFICIENT FUNDS CANCELLED

DOLLARS



FIRST VIRGINIA BANK

SERVE NORTH VIRGINIA  
FALLS CHURCH, VIRGINIA 22048

00001176

002483 65 02 0691

FOR MUR 1595

00001176

002483 65 28 3899

00001176

05600111

0861 5942

0000040000

Att. 2

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 11, 1985

Susan Limmer  
Life Amendment Political Action Committee, Inc.  
P.O. Box 1884  
Garrisonville, Virginia 22463

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc.  
and Rick Woodrow, as  
treasurer

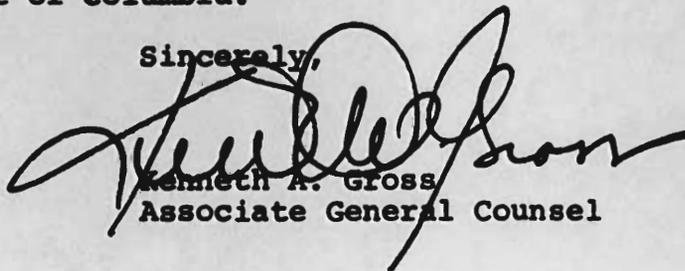
Dear Ms. Limmer:

This will confirm the substance of your conversation yesterday with Mr. Robert Raich of this Office.

LAPAC's \$400.00 check tendered to the Commission pursuant to our Conciliation Agreement was returned for insufficient funds. Rick Woodrow is currently in Oregon, but will call you within the next few days. When he calls, you will receive instructions concerning how to transfer sufficient funds into the checking account. You will call Robert Raich, at 202/523-4000, as soon as you hear from Mr. Woodrow.

Failure to abide by provisions of the Conciliation Agreement, including timely payment of the civil penalty, will result in the Commission bringing action for relief in the United States District Court for the District of Columbia.

Sincerely,



Kenneth A. Gross  
Associate General Counsel

Att. 3

86040565048

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Rick Woodrow  
Life Amendment Political  
Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, Virginia 22463

Re: MUR 1595  
Life Amendment Political  
Action Committee, Inc. and  
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

During August, 1985, you entered into a conciliation agreement with the Federal Election Commission. The agreement required you to pay a civil penalty of \$400 by September 22, 1985. The check you tendered was returned for insufficient funds. On October 3, 1985, you stated that you would send the Commission a new check by Federal Express. Because you failed to do so, the Commission has authorized the Office of the General Counsel to file a civil action against you in United States District Court.

Should you wish to avoid suit in this matter, contact Ivan Rivera, Assistant General Counsel for Litigation, at (202) 523-4000 by , 1985.

Sincerely,

Charles N. Steele  
General Counsel

86040565049  
- Att. 4 -

DEBIT

REPLACEMENT OF THE 1984 CHECK  
244-372-110

NO. OF P  
NUMBER

YEAR OF DEBIT IS 1, 2  
TREASURY'S ACCOUNT

3 DIGIT OR 4-DIGIT  
AGENCY LOCATION CODE (ALC)

AMOUNT

*Entered 9/9/85  
of*

(1) 94167

(2) 8-29-85  
M M D D Y Y

(3) 95-35-0001

(4) 400.00

*Judy G. Smith*  
*Received*

(5)  UNCOLLECTIBLE  
ITEM  
 OTHER  
(Explain in  
Block 6)

(6) DEPOSITARY USE

*Received 9/6/85 of*

AUG 29 1985

**Judy G. Smith  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463**

**MGR. FISCAL AGENCY  
BALTIMORE BRANCH  
FEDERAL RESERVE BANK**

IN DEPOSITORS' PAY TO THE ORDER OF

MEMORANDUM

# DEBIT VOUCHER

VOUCHER NUMBER (1) <b>74167</b>	DATE OF DEBIT TO U.S. DEPOSITARY'S ACCOUNT (2) <b>8-29-65</b> M M D D Y Y	8-DIGIT OR 4-DIGIT AGENCY LOCATION CODE (ALC) (3) <b>95-35-0001</b>	AMOUNT (4) <b>400.00</b>
------------------------------------	---	--	-----------------------------

PLEASE SPACE ALL ENTRIES ON THIS LINE  
USE NORMAL PUNCTUATION—OMIT \$ SIGN

*[Handwritten Signature]*

(5) <input type="checkbox"/> UNCOLLECTIBLE ITEM <input type="checkbox"/> OTHER (Specify in Block 6)	(6) DEPOSITARY USE
--	--------------------

**AUG 29 1965**

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

(7) NAME AND ADDRESS OF DEPOSITARY  
**INGR. FISCAL AGENCY**  
**BALTIMORE BRANCH**  
**FEDERAL RESERVE BANK**

(8) I CERTIFY THAT THE ABOVE AMOUNT HAS BEEN DEBITED TO THE ACCOUNT OF THE TREASURY ON THE DATE SHOWN. UNCOLLECTIBLE ITEMS HAVE BEEN RETURNED TO THE DEPOSITOR OR APPROPRIATE NOTICE GIVEN.

\_\_\_\_\_  
AUTHORIZED SIGNATURE

(9) DEPOSITOR'S TITLE, DEPARTMENT OR AGENCY AND ADDRESS  
DEPOSITARY FORWARD TO DEPOSITOR.

**CONFIRMED COPY**

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

PAYROLL ACCOUNT 12-84

P. O. BOX 1984

GARRISONVILLE, VA. 22463

1176

7-27

PAY TO THE ORDER OF

U.S. Treasury

PAID IN FULL  
INSUFFICIENT FUNDS  
OFFICE 111  
PAID  
CANCELLED

19 85

88-11157  
580

\$ 400.00

Tom Hundman

PAYROLL ACCOUNT

40 DOLLARS



FIRST VIRGINIA BANK

Serving Northern Virginia  
FALLS CHURCH, VIRGINIA 22048

0000 1176

002685 65 02 0691

FOR: MUR 1595

0000 1176

002685 65 28 3899

00001176

05600111

0861 5942

0000040000

# DEPOSIT TICKET

(1) DEPOSIT NUMBER <b>296962</b>	(2) DATE PRESENTED OR MAILED TO BANK M M D - D D Y Y <b>08 13 85</b>	(3) 8-DIGIT OR 4-DIGIT AGENCY LOCATION CODE (ALC) <b>95 35 0001</b>	(4) AMOUNT <b>43,776.80</b>
-------------------------------------	--	--	--------------------------------

(5) AGENCY USE

**95-3220 - 4251.80**  
**951071-163 - 4550.00**

**953875-26 - 0775.00**  
**95387523-26 - 0200.00**

*Accomp 8/28/85*  
**AUG 19 1985**  
**MANAGER PAYMENT SERVICES DEPT.**

(6) DEPOSITOR'S TITLE, DEPARTMENT OR AGENCY AND ADDRESS  
**JUDY G SMITH  
FEDERAL ELECTION COMMISSION  
1325 K ST NW  
WASHINGTON, DC 20463**

(7) NAME AND ADDRESS OF DEPOSITARY  
**BALTIMORE BR RICHMOND FED RESERVE  
BALTIMORE, MD 21203**

(8) I CERTIFY THAT THE ABOVE AMOUNT HAS BEEN RECEIVED FOR CREDIT IN THE ACCOUNT OF THE U.S. TREASURY ON THE DATE SHOWN SUBJECT TO ADJUSTMENT OF UNCOLLECTIBLE ITEMS INCLUDED THEREIN.

M M D D Y Y

\_\_\_\_\_  
AUTHORIZED SIGNATURE

\_\_\_\_\_  
CONFIRMED DATE

DEPOSITARY DATE, SIGN, AND RETURN THIS COPY TO DEPOSITOR.

**CONFIRMED COPY**

DATE OF DELIVERY

6. ADDRESSES ADDRESSES (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYER'S RETURN

**POSTMARK  
AUG 19 1985  
BALTIMORE, MD**

**ESSELTE**

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

1176

PAYROLL ACCOUNT 12-84

P. O. BOX 1984

GARRISONVILLE, VA. 22403

Aug 8

19 85

⑆11157  
500 57

PAY  
TO THE  
ORDER OF

U.S. Treasurer

\$ 400 <sup>00</sup>/<sub>100</sub>

Four Hundred

PAYROLL

DOLLARS



FIRST VIRGINIA BANK

Service Corporation  
Falls Church, Virginia 22046

FOR

MUR 1595

⑆00001176⑆ ⑆056001118⑆ 0861 5942⑆

**LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.**

**1176**

PAYROLL ACCOUNT 12-24

P. O. BOX 1984

GARRISONVILLE, VA. 22463

Aug 8 19 85

68-111157  
560

PAY TO THE ORDER OF U.S. Treasurer

From Hundem

**PAYROLL**

\$ 400.00

400 DOLLARS

FOR MUR 1595



**FIRST VIRGINIA BANK**  
Serving Customers in Virginia  
FALLS CHURCH, VIRGINIA 22046

⑆00001176⑆ ⑆056001128⑆ 0861 5942⑆

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Life Amendment Political	)	MUR 1595
Action Committee, Inc. and	)	
Rick Woodrow, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(b) (8) by failing to continuously report certain debts. Rick Woodrow is currently the Committee's treasurer.

85 AUG 29 11 28 AM '68  
 RECEIVED  
 FEDERAL ELECTION COMMISSION  
 GENERAL COUNSEL

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

- I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a) (4) (A) (i).
- II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondents enter voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  - 1. The Life Amendment Political Action Committee, Inc., is the registered political action committee

95059504098

for a Life Amendment organization.

2. Respondents failed to adequately report debts with the following six creditors: Phoenix Communications, Webcraft Packaging, Creative Mailing Consultants, Insta-Print, Word Processing Exchange and Barnett, Alagia and Carey

3. The debt settlement with Barnett, Alagia, and Carey has not yet been satisfactorily explained to the Commission.

V. Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report debts with the above mentioned creditors.

VI.(A) Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Dollars (\$400.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VI.(B) Respondents will file with the Commission amendments to previously filed reports, and any other necessary reports, in order to comply with all of the reporting requirements regarding the Respondents' debts with the above mentioned creditors.

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

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

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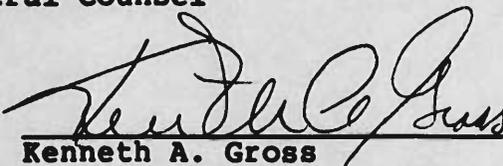
IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

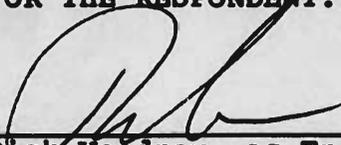
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

July 23, 1985  
Date

FOR THE RESPONDENT:

  
Rick Woodrow, as Treasurer of the  
Life Amendment Political Action  
Committee Inc.

8/8/85  
Date

86040565058

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

Rick Woodrow  
Life Amendment Political Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, Virginia 22463

RE: MUR 1595  
Life Amendment Political Action  
Committee, Inc. and Rick  
Woodrow, as treasurer

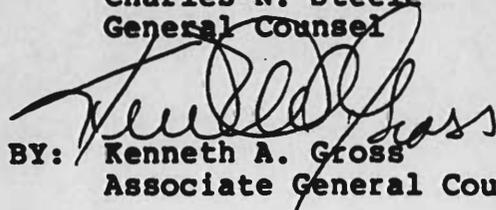
Dear Mr. Woodrow:

On August 21, 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
conciliation agreement

86040565059

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1595
Life Amendment Political Action	)	
Committee, Inc.	)	
Rick Woodrow, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 21, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1595:

1. Approve the conciliation agreement submitted with the General Counsel's Report signed August 15, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed August 15, 1985.

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

Attest:

8-21-85  
Date

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

86040565060

Received in Office of Commission Secretary:	Fri., 8-16-85, 5:03
Circulated on 48 hour tally basis:	Mon., 8-19-85, 11:00
Deadline for votes:	Wed., 8-21-85, 11:00

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
Life Amendment Political Action )  
Committee, Inc. and Rick Woodrow, )  
as treasurer )

35 AUG 18 P 5: 03  
MUR 1595

GENERAL COUNSEL'S REPORT

**SENSITIVE**

**BACKGROUND**

The Commission has found reason to believe that the Life Amendment Political Action Committee, Inc., and its treasurer ("LAPAC"), violated 2 U.S.C. § 434(b)(8) by failing to continuously report certain debts. Rick Woodrow is currently the Committee's treasurer.

On July 15, 1985, the Commission sent LAPAC a conciliation agreement. On August 8, 1985, Mr. Woodrow met with staff members and proposed certain revisions to the agreement.

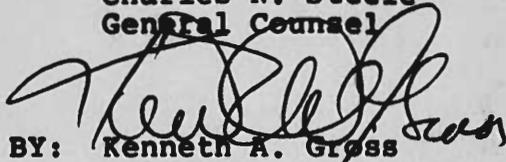
Accordingly, attached is a signed conciliation agreement incorporating a \$400 civil penalty as well as a photocopy of a \$400 check in complete payment of the civil penalty. Please note that Paragraph VI (B) of the agreement continues to state that LAPAC will amend its reports. The General Counsel's Office recommends that the Commission accept this in settlement of the matter and close the file.

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**RECOMMENDATION**

1. Approve the conciliation agreement attached to this report.
2. Close the file.
3. Send the attached letter.

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

August 15, 1985  
Date

**Attachments**

Conciliation Agreement signed by Rick Woodrow  
Photocopy of check for the civil penalty  
Letter to Respondent

86040565062

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Life Amendment Political ) MUR 1595  
 Action Committee, Inc. and )  
 Rick Woodrow, as treasurer )

Gerson

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Life Amendment Political Action Committee, Inc., and Patricia A. Brown, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(b) (8) by failing to continuously report certain debts. Rick Woodrow is currently the Committee's treasurer.

35 AUG 2 1972  
 FEDERAL ELECTION COMMISSION  
 GENERAL COUNSEL  
 RECEIVED

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

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

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. The Life Amendment Political Action Committee, Inc., is the registered political action committee

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for a Life Amendment organization.

2. Respondents failed to adequately report debts with the following six creditors: Phoenix Communications, Webcraft Packaging, Creative Mailing Consultants, Insta-Print, Word Processing Exchange and Barnett, Alagia and Carey

3. The debt settlement with Barnett, Alagia, and Carey has not yet been satisfactorily explained to the Commission.

V. Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report debts with the above mentioned creditors.

VI.(A) Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Dollars (\$400.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VI.(B) Respondents will file with the Commission amendments to previously filed reports, and any other necessary reports, in order to comply with all of the reporting requirements regarding the Respondents' debts with the above mentioned creditors.

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

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

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

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

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

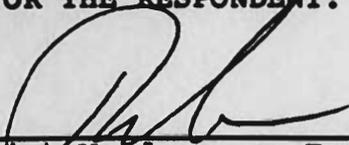
Charles N. Steele  
General Counsel

BY:

\_\_\_\_\_  
Kenneth A. Gross  
Associate General Counsel

\_\_\_\_\_  
Date

FOR THE RESPONDENT:

  
\_\_\_\_\_  
Rick Woodrow, as Treasurer of the  
Life Amendment Political Action  
Committee Inc.

8/8/85  
Date

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

1176

PAYROLL ACCOUNT 12-24

P. O. BOX 1984

GARRISONVILLE, VA. 22463

AUG 8 19 85

02-11157  
660 57

PAY TO THE ORDER OF U.S. Treasurer

From Hundman

PAYROLL

22 DOLLARS

\$ 400.00



FIRST VIRGINIA BANK  
Serving Northeastern Virginia  
FALLS CHURCH, VIRGINIA 22046

FOR MUR 1595

⑆00001176⑆ ⑆056001181⑆ 0861 5942⑆

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

**Rick Woodrow**  
Life Amendment Political Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, Virginia 22463

RE: MUR 1595  
Life Amendment Political Action  
Committee, Inc. and Rick  
Woodrow, as treasurer

Dear Mr. Woodrow:

On , 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
conciliation agreement

86040565067

CCC# 8203

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Life Amendment Political	)	MUR 1595
Action Committee, Inc. and	)	
Rick Woodrow, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(b)(8) by failing to continuously report certain debts. Rick Woodrow is currently the Committee's treasurer.

5 AUG 19 11:03

RECEIVED  
GENERAL COUNSEL

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

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

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. The Life Amendment Political Action Committee, Inc., is the registered political action committee

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for a Life Amendment organization.

2. Respondents failed to adequately report debts with the following six creditors: Phoenix Communications, Webcraft Packaging, Creative Mailing Consultants, Insta-Print, Word Processing Exchange and Barnett, Alagia and Carey

3. The debt settlement with Barnett, Alagia, and Carey has not yet been satisfactorily explained to the Commission.

V. Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report debts with the above mentioned creditors.

VI.(A) Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four Hundred Dollars (\$400.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VI.(B) Respondents will file with the Commission amendments to previously filed reports, and any other necessary reports, in order to comply with all of the reporting requirements regarding the Respondents' debts with the above mentioned creditors.

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

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

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

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

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

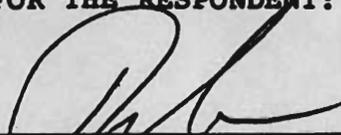
Charles N. Steele  
General Counsel

BY:

\_\_\_\_\_  
Kenneth A. Gross  
Associate General Counsel

\_\_\_\_\_  
Date

FOR THE RESPONDENT:

  
\_\_\_\_\_  
Rick Woodrow, as Treasurer of the  
Life Amendment Political Action  
Committee Inc.

8/8/85  
Date

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 15, 1985

Rick Woodrow  
Life Amendment Political Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, Virginia 22463

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc. and  
Rick Woodrow, as treasurer

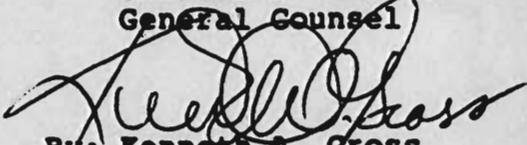
Dear Mr. Woodrow:

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Commission and your predecessor, Paul A. Brown, as treasurer, violated 2 U.S.C. § 434(b)(8). At your request, the Commission determined on June 27, 1985, to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Matt Gerson, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures

86040565071

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Life Amendment Political Action ) MUR 1595  
Committee, Inc. and Rick Woodrow, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 27, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1595:

1. Enter into conciliation with the Life Amendment Political Action League, Inc. and Rick Woodrow, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the conciliation agreement attached to the General Counsel's Report signed June 24, 1985.
3. Approve and send the letter attached to the General Counsel's Report signed June 24, 1985.

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

Attest:

6/28/85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

6-25-85, 12:46  
6-25-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
Life Amendment Political Action )  
Committee, Inc. and Rick Woodrow, as )  
treasurer )

MAY 25 1985 P12:46

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc., ("LAPAC") and Paul A. Brown, as treasurer, ("Respondents") violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until those debts were properly extinguished.<sup>\*/</sup> After an investigation requiring Interrogatories and a Subpoena and Order, this Office submitted a General Counsel's Brief to the Commission and the Respondents' counsel. When the Reports Analysis Division brought additional information to the General Counsel's attention, this Office decided to supplement and amend the original Brief. Because the Respondents' counsel informed this Office that he was withdrawing as counsel, the General Counsel sent Rick Woodrow, LAPAC's current treasurer, the Supplemental and Amended Brief submitted to the Commission on May 3, 1985. This Office sent Mr. Woodrow a photocopy of the original Brief, as well. Mr. Woodrow responded to the Briefs on May 28, 1985 with a letter requesting pre-probable case to believe conciliation. See Attachment I.

<sup>\*/</sup> The case originally recognized Paul A. Brown as treasurer. However, Rick Woodrow is currently the Committee's treasurer.

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**II. LEGAL ANALYSIS**

(See OGC's May 3, 1985 Supplemental and Amended Brief)

Audit discovered that debts and obligations to six (6) creditors were adjusted or otherwise credited. Because the Committee's reports did not state that the debts and obligations were settled for less than their reported amount, the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(b) (8).

2 U.S.C. 434(b) (8) requires that a Committee's report of receipts and disbursements disclose:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefore.

The creditors involved in this case were: A. Phoenix Communications; B. Webcraft Packaging; C. Creative Mailing Consultants; D. Insta-Print; E. Word Processing Exchange; and F. Barnett, Alagia & Carey.

A & B- The credits received from Phoenix Communications and Webcraft Packaging were reviewed by the Commission as debt settlements and found not to be in apparent violation of the Act or the Commission regulations. See DSR 84-23.

C- The credit received from Creative Mailing Consultants appears to have been generated by LAPAC's selling Creative a mailing list. See Attachment Two, Answer to Interrogatory #10.

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D.- The credit received from Insta-Print appears to result from an overpayment made by LAPAC to Insta-Print. See Attachment II, Answer to Interrogatory #6.

E.- The credit received from Word Processing Exchange appears to have come from purchases arising from a lease with an option to buy. The Answers to Interrogatories proffered by LAPAC's former treasurer state at #9.

Word Processing Exchange granted to LAPAC, with an option to buy, two IMB MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference. See Attachment II.

F.- The credit received from Barnett, Alagia and Carey has not been satisfactorily explained. The Answers to Interrogatories proffered by LAPAC's former treasurer state at #5.

The obligation had been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly. See Attachment II.

On November 16, 1984, the Commission received a settlement statement that was reviewed pursuant to 11 C.F.R. § 114.10. When the Reports Analysis Division determined that it did not have enough information about that settlement, it mailed a request for additional information to the Respondents. Because that request was not answered, a second letter was mailed on January 24, 1985.

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The Respondents did not provide that information and RAD discontinued its review of the debt settlement.

During a May 22, 1985 telephone conversation, this Office reminded the Committee's treasurer, Rick Woodrow, that the Commission needed more information before reviewing the debt settlement. He subsequently asked for, and was sent, photocopies of the above mentioned requests for additional information. In the letter requesting pre-probable cause conciliation, Mr. Woodrow notes:

The remaining issue, namely, Barnett, Alagia, & Carey, will be resolved immediately upon receipt of questions being sent...

Despite the fact that the Commission has repeatedly instructed LAPAC to continuously report the debt settlements not yet reviewed by the Commission, LAPAC has not done so. In fact, while reviewing the reports to determine whether LAPAC has been complying with that requirement, this Office discovered that the law firm has extended LAPAC additional credit. The treasurer subsequently explained that the creditor and debtor maintained a business relationship wherein LAPAC requested fewer services and stayed current on its debt. He also explained that the two entities recently severed their relationship and will no longer be working together.

### III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

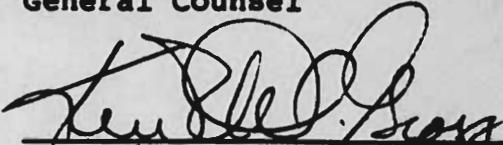
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**IV. RECOMMENDATIONS**

1. Enter into conciliation with the Life Amendment Political Action League, Inc. and Rick Woodrow, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the attached conciliation agreement.
3. Approve and send the attached letter.

Charles N. Steele  
General Counsel

June 24, 1985  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Letter from Rick Woodrow to Charles N. Steele dated May 28, 1985
2. Answer to Interrogatories executed by Paul A. Brown on March 12, 1984
3. Proposed Conciliation Agreement
4. Letter to Respondents

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RECEIVED THE FEC

**LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.**

P.O. BOX 1084

GARRISONVILLE, VA 22463

(703) 659-6129 or (703) 659-6128

Robert Sassone  
Chairman

Rick Woodrow  
Executive Director

May 28, 1985

Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1595  
JUN 11 1985  
ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

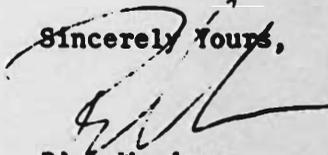
Dear Sirs:

As per my discussion with Mr. Matt Gerson, of your department on Friday, May 24, 1985, the Life Amendment Political Action Committee, Inc. would hereby request that we enter into the pre probable cause regarding MUR 1595.

I respectfully request that the following factors be taken into consideration by your department in regards to this situation.

Thank you for your kind assistance in this matter and I do hope we can satisfactorily resolve this matter in the very near future.

Sincerely Yours,

  
Rick Woodrow  
Executive Director/  
Treasurer

"Protecting the American Family and the Preborn Child . . .  
Through Political Action!"

Authorized and paid for by LAPAC, Inc., Rick Woodrow, Treasurer

86040565078

FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.

]

MUR 1595

ANSWERS TO INTERROGATORIES  
OF MR. PAUL A. BROWN

1. What are your duties as Treasurer of the Committee?

I keep the books, administer LAPAC and implement the wishes of the Board of Directors.

2. How long have you served in this capacity?

Since LAPAC was founded. I was elected at the First Meeting of the Board of Directors on December 5, 1977.

3. Did you have a written contract with any of the following?

A. Barnett, Alagia & Carey

No.

Attachment I

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B. Creative Mailing Consultants

Yes. photocopy attached.

C. Insta-Print

No.

D. Phoenix Communications

No.

E. Word Processing Exchange

No.

F. Webcraft Packaging

No. However, there is a written bid. photocopy attached.

4. If the answer is yes to any of the above, please provide copies of each written contract.

No documentation.

5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.

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The obligation had been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAFAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.

6. Please explain the \$208.37 credit received from Insta-Print.

Inadvertent overpayment to Insta-Print from LAFAC.

7. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$510.56 Webcraft Packaging settlement.

To be provided. None was prepared heretofore.

8. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$1,381.95 Phoenix Communications settlement.

To be provided. None was prepared heretofore.

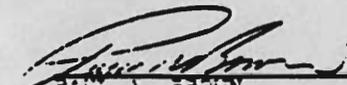
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9. Please provide a detailed explanation and documentation of the \$784.00 credit received from Word Processing Exchange.

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MIST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.

10. Please provide a detailed explanation and documentation of the \$9,252.26 credit received from Creative Mailing Consultants.

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.

  
PAUL A. BROWN

DISTRICT OF COLUMBIA     |  
                                  | ss.  
CITY OF WASHINGTON        |

Subscribed and sworn to before me, a Notary Public, this 12th day of March, 1984.

  
MARLENE LESNOCK

My commission expires April 14, 1988.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Rick Woodrow  
Life Amendment Political Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, Virginia 22463

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc. and  
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Commission and your predecessor, Paul A. Brown, as treasurer, violated 2 U.S.C. § 434(b)(8). At your request, the Commission determined on , 1985, to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Matt Gerson, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures

86040565083

RECEIVED BY THE FED  
6/11/85  
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P.O. BOX 1984

GARRISONVILLE, VA 22463

(703) 659-8129 or (703) 659-8128

Robert Sessions  
Chairman

Rick Woodrow  
Executive Director

May 28, 1985

Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1595  
JUN 11 1985  
ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED  
DATE 11/11/85 BY SP-10/BJW

Dear Sirs:

As per my discussion with Mr. Matt Gerson, of your department on Friday, May 24, 1985, the Life Amendment Political Action Committee, Inc. would hereby request that we enter into the pre probable cause regarding MUR 1595.

I respectfully request that the following factors be taken into consideration by your department in regards to this situation.

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Thank you for your kind assistance in this matter and I do hope we can satisfactorily resolve this matter in the very near future.

Sincerely Yours,

Rick Woodrow  
Executive Director/  
Treasurer

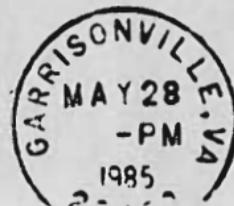
"Protecting the American Family and the Preborn Child...  
Through Political Action!"

Authorized and paid for by LAPAC, Inc., Rick Woodrow, Treasurer

AMENDMENT POLITICAL  
COMMISSION COMMITTEE, INC.

P.O. BOX 1983  
GARRISONVILLE, VA 22463

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Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463



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**CONFIDENTIAL**

RECEIVED  
OFFICE OF THE FED.  
COMMISSION SECRETARY

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

05 MAY 9 8:25

May 9, 1985

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele  
General Counsel

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

SUBJECT: Erratum in MUR 1595 - Life Amendment Political  
Action Committee, Inc.  
Paul A. Brown, as treasurer

Please be advised that Attachment 6 to the General Counsel's Supplemental and Amended Brief for MUR 1595 was inadvertently omitted from the photocopy circulated to the Commission on May 6, 1985. Therefore, the letters are attached herewith.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

05 MAY 3 P 5: 16

May 3, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steel  
General Counsel

SUBJECT: MUR 1595

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Attached for the Commission's review is a Supplemental and Amended Brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. On April 1, 1985, this Office submitted a General Counsel's Brief to the Commission and the Respondent's counsel. Because RAD thereafter brought additional information to our attention, this Office decided to supplement and amend the original brief. Because the attorney of record withdrew as Counsel for the Respondents, a copy of this brief and a letter notifying the Respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed to the Respondents as well as the attorney of record on May 3, 1985. We also mailed the Respondents a photocopy of the original brief. Following receipt of the Respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondents



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

May 3, 1985

Marion Edwyn Harrison, Esquire  
Scott, Harrison & McLeod  
2501 M Street, N.W.  
Washington, D.C. 20037

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc.

Dear Mr. Harrison:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 7, 1984, found reason to believe that your client had violated 2 U.S.C. § 434(b)(8), and instituted an investigation in this matter.

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

On April 1, 1985, this Office submitted for your review a brief stating the General Counsel's position on the legal and factual issues of the case. Enclosed you will find a Supplemental and Amended version of that Brief. 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 General Counsel's Briefs. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's Briefs 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 not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

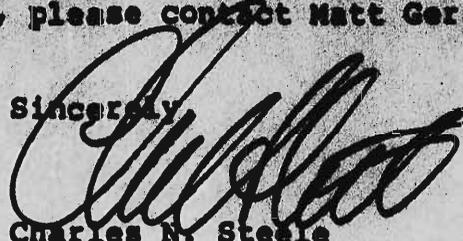
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Marion Edwyn Harrison, Esquire  
Page 2

While this Office is in receipt of the letter dated April 17, 1985 in which you withdraw as counsel, this Office will continue to correspond with you and the Respondents until the Respondents withdraw their counsel designation.

Should you have any questions, please contact Matt Gerson, at (202) 523-4143.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. and )  
Paul A. Brown, as treasurer )

GENERAL COUNSEL'S SUPPLEMENTAL AND AMENDED BRIEF

I. BACKGROUND

On April 1, 1985, this Office submitted a General Counsel's Brief to the Commission and the Respondent's counsel. Because the Reports Analysis Division thereafter brought additional information to this Office's attention, this Office decided to supplement and amend the original Brief. On April 3, 1985, while discussing that decision with the attorney designated as Respondent's counsel, that attorney indicated that he was withdrawing as counsel. An April 17, 1985 letter to the Commission confirmed counsel's withdrawal. This Office will correspond with the attorney of record and the Respondents until the Respondents withdraw their counsel designation. Therefore, this Supplemental and Amended Brief is being furnished to the Respondents as well as the attorney of record. This Office will also provide the Respondents with the original Brief.

II. STATEMENT OF CASE

This matter was internally generated as a result of a referral by the Audit Division (hereinafter "Audit"). The referral is based on findings made during the audit of the Life Amendment Political Action Committee, Inc. (hereinafter "the Committee".)

The audit covered the period January 1, 1981, through October 21, 1982. The Committee reported a cash balance on January 1, 1981, of \$4,412.00; total receipts for the period of \$351,606.35; total disbursements for the period of \$356,545.43;

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and a cash balance on October 21, 1982, of \$2,337.00. The audit revealed possible violations of 2 U.S.C. §§ 434(b)(8), 441a, and 441b during the period audited.

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc., (hereinafter "the Respondent") and Paul A. Brown, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. The violation surrounds six debts and obligations that the Committee credited or adjusted causing the Committee's debts and obligations to be reduced by \$23,196.70. The notification letter as well as Interrogatories were mailed on February 8, 1984. The Interrogatories were prepared to determine whether the committee and its treasurer may have also violated 2 U.S.C. §§ 441a and 441b by accepting contributions from any of its creditors.

On March 14, 1984, this Office received from the Committee's counsel the answers to the Interrogatories. See Attachment 1. However, certain documents were not included as indicated in the answers to the Interrogatories.

On April 30, 1984, in response to our request, we received two duly executed settlement agreements that were negotiated by the Committee and two creditors: Phoenix Communications and Webcraft Packaging. See Attachment 2. 1/

1/ Those debt settlement requests were reviewed by the Commission on July 31, 1984, and found not to be in violation of the Act or the Commission regulations. See DSR 84-23 for additional details.

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On May 11, 1984, Counsel stated that other documents would be provided as soon as possible. When these documents were not provided, the Commission authorized a Subpoena and Order for the production of the documents; the Subpoena and Order were mailed on August 6, 1984.

On September 10, 1984,<sup>2/</sup> this Office received a courtesy copy of a letter from the Respondents to counsel asking his assistance in responding to the Subpoena and Order. See Attachment 3. The letter also states that the Respondent was away most of August. Presumably, that is the explanation for the delay in responding to the Subpoena and Order.

On September 26, 1984, this Office received the documents requested in the Commission's Subpoena and Order. See Attachment 4. Finally, on November 16, 1984, this Office received the last debt settlement request involved in this matter. See Attachment 5. Because the Respondents did not answer two requests for additional information from the Reports Analysis Division, the Commission staff discontinued its review of that request.

<sup>2/</sup> Item #5 of the Respondents' letter speaks of a July 19, 1984, meeting with Commission staff. It should be noted that this meeting was with the Reports Analysis Division and had no bearing on the issues discussed in this matter. Additionally, it should be noted that there is no record of receipt of the "review letter" that he states he sent to a staff person in the Reports Analysis Division.

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III. LEGAL ANALYSIS  
1. § 434(b)(8)

Audit discovered that debts and obligations to six (6) creditors were adjusted or otherwise credited. Because the Committee's reports did not state that the debts and obligations were settled for less than their reported amount, the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(b)(8).

2 U.S.C. § 434(b)(8) requires that a Committee's report of receipts and disbursements disclose:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefore.

The Commission's investigation revealed that the debts and obligations were adjusted in the following manner.

A. & B. Phoenix Communications and Webcraft Packaging

<u>CREDITORS</u>	<u>Balance Reported Beginning of Period 3/</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Phoenix Com- munications	3,128.75	-0-	1,746.80	1,381.95	-0-
Webcraft Packaging	1,460.56	-0-	950.00	510.56	-0-

3/ The period at issue throughout this Brief commenced on January 1, 1981, and continued through October 21, 1982.

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On April 30, 1984, the Respondents submitted two (2) duly executed "Settlement Agreements" stating that the Respondents have settled the outstanding debts with Phoenix Communications and Webcraft Packaging.

C. Creative Mailing Consultants

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Creative Mailing Consultants	41,139.43	3,103.51	7,500.00	1,854.74	34,888.26
		272.18		6,888.34	27,990.92
				272.18	27,990.00
				<u>237.00</u>	<u>27,543.00<sup>4/</sup></u>
			Total=	<u>9,252.26</u>	

The Respondents provide the following explanation for the credit received from Creative Mailing Consultants:

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.<sup>5/</sup>

D. Insta-Print

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Insta-Print	855.53	-0-	647.16	208.37	-0-

<sup>4/</sup> Figures come from the Committee's reports. The debt was paid in full by December 1982.

<sup>5/</sup> Answer to Interrogatory #10. See Attachment 1.

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The Respondents state that the credit received from Insta-Print was credit due them from an overpayment.<sup>6/</sup>

E. Word Processing Exchange

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Word Processing Exchange	784.00	-0-	-0-	784.00	-0-

Finally, the Respondents proffer the following explanation concerning the credit received from Word Processing Exchange:

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.<sup>7/</sup>

F. Barnett, Alagia & Carey ("B A & G") <sup>8/</sup>

The one remaining credit or adjustment at issue has not been satisfactorily explained to the Commission. That obligation involves the B A & G law firm.

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Barnett, Alagia & Carey	\$10,578.19	\$ 881.37	\$ 400.00	\$11,059.56	-0-

<sup>6/</sup> Answer to Interrogatory #6. See Attachment 1.

<sup>7/</sup> Answer to Interrogatory #7. See Attachment 1.

<sup>8/</sup> This section of the Supplemental and Amended Brief is substantially different from the first General Counsel's Brief. The changes reflect the fact that the Commission has not yet accepted the Committee's debt settlement request involving B A & G.

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In the March 4, 1984 Answers to Interrogatories, the Respondent's treasurer explained:

The obligation has been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.<sup>9/</sup>

On November 16, 1984, the Commission received a settlement statement that was reviewed pursuant to 11 C.F.R. § 114.10. When the Reports Analysis Division determined that it did not have enough information about that settlement, it mailed a request for additional information to the Respondents. Because that request was not answered, a second letter was mailed on January 24, 1985. The Respondents have not yet provided that information. Thus, the Commission has discontinued its review of the B A & G debt settlement. Until the Commission is able to complete its review, the debts involved in the debt settlement request must be continuously reported.

Despite the explanations for the obligations involving the creditors referred to in A through E above, the Respondent's violated 2 U.S.C. § 434(5)(8) because they failed to fully disclose six (6) debts until properly extinguished.

2. §§ 441a and 441b

Most of the creditors were corporations but at least one was a partnership. Therefore, if those entities extended credit

9/ Answer to Interrogatory #5. See Attachment 1.

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intending, in fact, to make a contribution or expenditure, there may have been 2 U.S.C. § 441a and § 441b violations.

Section 441a sets dollar limits on how much a partnership can contribute to any candidate or political committee. Section 441b prohibits any corporation from making any contribution or expenditure in connection with a federal election. Section 441b(a) further prohibits any political committee from knowingly accepting a contribution from a corporation.

The term "contribution" includes the extension of credit by a corporation for a length of time beyond normal business or trade practice, unless the creditor has made a commercially reasonable attempt to collect the debt. 11 C.F.R. § 100.7(a)(4) Additionally, a debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless the debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10(c).

Pursuant to 11 C.F.R. § 114.10(a), a corporation may extend credit to a candidate, political committee or other person in connection with a federal election, provided that the credit is extended in the ordinary course of the corporations's business and the terms are substantially similar to extensions of credit for similar nonpolitical debts. 11 C.F.R. § 114.10(b) prohibits a corporation from forgiving prior debts or settling debts which have been incurred by a candidate, political committee, or other

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person in connection with a federal election for less than the amount owed on the debt.

11 C.F.R. § 114.10(c), however, permits a corporation to settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered to be commercially reasonable if the initial extension of credit was made in accordance with 11 C.F.R. § 114.10(a), the candidate or political committee has undertaken all commercially reasonable efforts to satisfy the outstanding debt, and the corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor. A corporation and/or the debtor must file a Statement of Settlement with the Commission that includes the initial terms of credit, the steps the debtor has taken to satisfy the debt, and the remedies pursued by the creditor. This statement must be filed prior to the termination of the debtor's reporting status, and the settlement is subject to Commission review.

It is noteworthy that the Committee has already attempted to explain the credit arrangements and filed the Statements of Settlement. In addition, it appears that the creditors established and carried out business relationships with the Committee as they would with any other entity and fully expected to profit financially. Therefore, it does not appear that the Respondents accepted prohibited contributions from any of the six(6) creditors and, thus, did not violate 2 U.S.C. § 441a or 441b.

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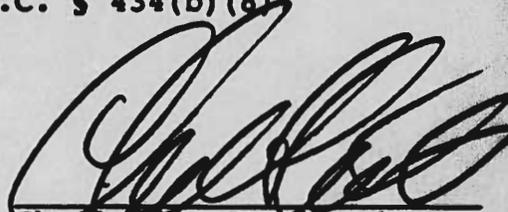
### III. CONCLUSION

Based on the above and the information provided by the Respondents, the Office General Counsel is prepared to recommend a finding of probable cause to believe that the Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report six (6) debts until properly extinguished.

### IV. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Paul A. Brown, as treasurer violated 2 U.S.C. § 434(b)(8)
2. Approve attached letter.

2 May 1985  
Date

  
Charles N. Steele  
General Counsel

### Attachments

1. Answers to Interrogatories
2. Settlement Agreements involving Phoenix Communications and Webcraft Packaging.
3. September 10, 1984 letter from Respondents to Counsel.
4. September 26, 1984 letter from Counsel attached to subpoenaed documents.
5. November 16, 1984 debt settlement request involving Barnett, Alagia & Carey.
6. Letters to Respondents

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FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.

] ]

MUR 1595

ANSWERS TO INTERROGATORIES  
OF MR. PAUL A. BROWN

1. What are your duties as Treasurer of the Committee?

I keep the books, administer LAPAC and implement the wishes of the Board of Directors.

2. How long have you served in this capacity?

Since LAPAC was founded. I was elected at the First Meeting of the Board of Directors on December 5, 1977.

3. Did you have a written contract with any of the following?

A. Barnett, Alagia & Carey

No.

Attachment I

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**B. Creative Mailing Consultants**

Yes, photocopy attached.

**C. Insta-Print**

No.

**D. Phoenix Communications**

No.

**E. Word Processing Exchange**

No.

**F. Webcraft Packaging**

No. However, there is a written bid, photocopy attached.

4. If the answer is yes to any of the above, please provide copies of each written contract.

No documentation.

5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.

The obligation had been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.

6. Please explain the \$208.37 credit received from Insta-Print.

Inadvertent overpayment to Insta-Print from LAPAC.

7. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$510.56 Webcraft Packaging settlement.

To be provided. None was prepared heretofore.

8. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$1,381.95 Phoenix Communications settlement.

To be provided. None was prepared heretofore.

9. Please provide a detailed explanation and documentation of the \$784.00 credit received from Word Processing Exchange.

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.

10. Please provide a detailed explanation and documentation of the \$9,252.26 credit received from Creative Mailing Consultants.

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.

  
PAUL E. BROWN

DISTRICT OF COLUMBIA     ]  
  ] ss.  
CITY OF WASHINGTON        ]

Subscribed and sworn to before me, a Notary Public, this 12th day of March, 1984.

  
MARLENE LESHNOCK

My commission expires April 14, 1988.

# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P. O. BOX 1984 • GARRISONVILLE, VA 22403 • (703) 659-4171 or (703) 690-2049



## SETTLEMENT AGREEMENT

Between Webcraft Packaging (hereinafter the "Creditor") and the Life Amendment Political Action Committee which was organized to support and finance campaigns for elections of candidates for the U.S. House of Representatives and U.S. Senate. (hereinafter the "Committee").

WHEREAS, the Creditor has a claim against the Committee in the amount of \$1460.56 as the result of providing services and/or materials in connection with campaigns for the U.S. House and U.S. Senate said claim constitutes the only claim which the Creditor has in connection with said campaigns; and

WHEREAS, the Committee has made good faith, diligent efforts to raise funds to pay off all debts left over from said campaign, it now appears unlikely that the Committee will be able to raise more funds and the Committee has undertaken all reasonable efforts to satisfy this debt: and

WHEREAS, the Creditor has treated the debt of the Committee in a commercially reasonable manner, having pursued its remedies in a manner similar to that employed with respect of claims against other debtors: and

WHEREAS, after taking into account the limited funds available to the Committee, the costs of litigation and the prospects for collection, it appears prudent and reasonable to compromise and settle said claim on a negotiated basis regarded as fair by both parties under the circumstances.

NOW, THEREFORE, in consideration of the premises hereinabove stated and the undertakings of the parties herein stated, it is agreed:

1. That in full and final satisfaction of said claim, the Committee or its agent shall pay to the Creditor the sum of \$950.60.

2. That upon receipt by the Creditor of said sum, the Committee, its officers, members, consultants, agents and employees, and any and all parties in any manner associated with said Committee, as well as the candidates on whose behalf the Committee was organized shall stand, and each of them shall

*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

Printed and paid for by, LAPAC Inc. Paul A. Brown, Treasurer

ATTACHMENT II

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SETTLEMENT AGREEMENT

be, released, acquitted and discharged from such judgment debt and from any and all indebtedness and liability to the Creditor, his assigns successors, administrators, executor or any party claiming by or through said Creditor in connection with said claim or any claims which said Creditor may have in connection with the aforementioned campaign.

Signed this 28 day of Feb, 1984

Life Amendment Political Action Committee

  
Paul Brown, Treasurer

2-28-84  
Date

Name of Creditor

Libby +  
Charles Libby

April 18 1984  
Date

86040565105

# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P. O. BOX 1984 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 690-2049



## SETTLEMENT AGREEMENT

Between Phoenix Communications (hereinafter the "Creditor") and the Life Amendment Political Action Committee which was organized to support and finance campaigns for elections of candidates for the U.S. House of Representatives and U.S. Senate (hereinafter the "Committee").

WHEREAS, the Creditor has a claim against the Committee in the amount of \$5,128.75 as the result of providing services and/or materials in connection with campaigns for the U.S. House & Senate said claim constitutes the only claim which the Creditor has in connection with said campaigns; and

WHEREAS, the Committee has made good faith, diligent efforts to raise funds to pay off all debts left over from said campaign, it now appears unlikely that the Committee will be able to raise more funds and the Committee has undertaken all reasonable efforts to satisfy this debt: and

WHEREAS, the Creditor has treated the debt of the Committee in a commercially reasonable manner, having pursued its remedies in a manner similar to that employed with respect of claims against other debtors: and

WHEREAS, after taking into account the limited funds available to the Committee, the costs of litigation and the prospects for collection, it appears prudent and reasonable to compromise and settle said claim on a negotiated basis regarded as fair by both parties under the circumstances.

NOW, THEREFORE, in consideration of the premises hereinabove stated and the undertakings of the parties herein stated, it is agreed:

1. That in full and final satisfaction of said claim, the Committee or its agent shall pay to the Creditor the sum of \$1746.80

2. That upon receipt by the Creditor of said sum, the Committee, its officers, members, consultants, agents and employees, and any and all parties in any manner associated with said Committee, as well as the candidates on whose behalf the Committee was organized shall stand, and each of them shall

*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

Printed and paid for by LAPAC Inc. Paul A. Brown, Treasurer

ATTACHMENT II

86040565106

SETTLEMENT AGREEMENT

be, released, acquitted and discharged from such judgment debt and from any and all indebtedness and liability to the Creditor, his assigns successors, administrators, executor or any party claiming by or through said Creditor in connection with said claim or any claims which said Creditor may have in connection with the aforementioned campaign.

Signed this 28 day of Feb, 1984

Life Amendment Political Action Committee

  
\_\_\_\_\_  
Earl Brown, Treasurer

2-25-84  
Date

Name of Creditor

Phoenix Direct Response

Spuranga S. Conson  
Date

Prep. 4/12/84

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC. 49:44

P. O. BOX 1924 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 690-2049



September 5, 1984

Mr. Marion Edwyn Harrison  
Scott, Harrison & McLeod  
2501 M Street, NW  
Washington, DC 20037

RECEIVED  
GENERAL COUNCIL  
14 SEP 10 4:00

Dear Mr. Harrison:

Enclosed is information concerning our matter before the FEC (MJR 15909).

I don't exactly understand what the problems are. As best I can reconstruct things here is where we stand.

1. On February 8, 1984, the FEC requested Interrogatories from Paul Brown, LAPAC's former treasurer. These concerned the following companies. (A) Barnett, Alagia & Carey, (B) Creative Mail Consultants, (C) Insta-Print, (D) Phoenix Communications, (E) Webcraft Packaging and (E) Word Processing Exchange. (EXHIBIT "A".)
2. Interrogatories were completed and sent to FEC. (EXHIBIT "B".)
3. Requested debt settlements for Webcraft Packaging and Phoenix Communications were completed and sent to FEC. (EXHIBIT "C".)
4. On August 6, 1984, FEC sent a letter to LAPAC accepting debt settlements. (EXHIBIT "D".)
5. On Thursday, July 19, 1984, I met for three hours with Mr. Anthony Raymond and one of the supervisors at the FEC at which time we reviewed each and every complaint they had in their file. My understanding was at the conclusion of that meeting LAPAC had a clean slate and we were starting fresh. A copy of the review letter I sent to Mr. Raymond is enclosed. (EXHIBIT "E".)
6. Finally, after all of this, I received the enclosed letter and subpoena dated August 6, which says that on August 7 we were in violation of certain disclosure laws. (EXHIBIT "F".)

Please review this and advise me as to what steps I am to take. I would appreciate it if you would contact either Conley Edwards, Jr. (523-4000) or Kenneth Gross and advise them that we have retained your services and are preparing our response.

"Protecting the American Family and the Preborn Child  
Through Political Action!"

8604056108

ATTACHMENT III

September 5, 1984

Prior to my arrival, LAPAC had some paperwork and record keeping problems in that Paul Brown largely ran LAPAC out of his suitcase. This was all explained at my July 19 meeting with the FEC. Since I came here in March, I have bent over backwards trying to satisfy them but it is virtually impossible to reconstruct everything that has ever happened here.

I will be leaving Wednesday afternoon for California but my office will have a number to reach me if you need me for anything.

Also, please point out to Mr. Edwards that I only received their latest letter and subpoena this past week due to the fact that I was away most of August.

Thanks for your assistance in this matter.

Sincerely yours,

Rick Woodrow  
Executive Director  
Treasurer

RW/pafy

cc: Conley Edwards, Jr.  
Kenneth Gross  
Charles N. Steele

86040565109

LAW OFFICES

SCOTT, HARRISON & McLEOD

2501 M STREET, N. W.

WASHINGTON, D. C. 20037

(202) 861-1234

TELECOPIER (202) 486-6538

CABLE SCOTTLAW

TELEX 350-340

MARION EDITH HARRISON  
PARTNER

September 26, 1984

By hand

Mr. Conley Edwards, Jr.  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1595

Dear Mr. Edwards:

With respect to the letter of August 6, 1984 to Mr. Paul A. Brown, Treasurer, Life Amendment Political Action Committee, Inc. ("LAPAC"), which in turn relates to the audit period January 1, 1981 - October 21, 1982, with a subpoena attached thereto, photocopy of each attached, LAPAC responds as follows.

1. Five cancelled checks dated February 8, 1981; September 28, 1981; March 15, 1982; April 21, 1982 and August 25, 1982, photocopies attached, all with respect to Barnett, Alagia & Carey or Barnett & Alagia.

2. One statement dated April 28 (no year) and three undated statements from Intra-Print, Inc., photocopies attached.

14 SEP 26 1984 P 3: 48

RECEIVED  
GENERAL COUNSEL

86040565110

Mr. Conley Edwards, Jr.  
September 26, 1984  
Page - 2 -

Three checks dated February 2, 1981; September 28, 1981; and November 20, 1981 to Intra-Print, Inc.; photocopies attached.

3. Ten checks dated January 28, 1981; February 8, 1981; March 3, 1981; April 14, 1981; May 13, 1981; June 23, 1981; July 28, 1981; September 28, 1981; November 21, 1981 and February 3, 1982 to Phoenix Communications, Inc.; photocopies attached.

Five statements from Phoenix Communications, Inc. dated July 31, 1980; October 5, 1980; two dated October 6, 1980; January 17, 1981; and one ledger card pertaining thereto; photocopies attached. (Please note Phoenix Communications formerly was called Phoenix Publications.)

4. Six invoices dated October 13, 1980; October 22, 1980; November 24, 1980; December 19, 1980; February 20, 1981 and March 18, 1981; and five Statements of Account dated October 31, 1980; November 30, 1980; December 31, 1980; January 31, 1981 and February 28, 1981 from Webcraft, Division of Beatrice Foods; photocopies attached.

Sixteen letters dated April 3, 1981; May 6, 1981; May 18, 1981; May 22, 1981; May 27, 1981; June 4, 1981; July 2, 1981; July 15, 1981; July 22, 1981; October 2, 1981; October 14, 1981; November 10, 1981; November 17, 1981; November 30, 1981; December 4, 1981 and January 6, 1982 from Brenner Credit Adjustment Bureau to LAPAC pertaining to Webcraft; photocopies attached.

Eight checks to Webcraft dated February 8, 1981; May 13, 1981; June 19, 1981; July 28, 1981; August 28, 1981; September 14, 1981; November 20, 1981 and February 2, 1982; photocopies attached.

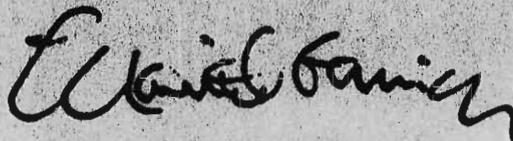
One check to Brenner Credit Corp. dated February 3, 1982, photocopy attached.

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SCOTT, HARRISON & McLEOD

Mr. Conley Edwards, Jr.  
September 26, 1984  
Page - 3 -

Sincerely,



MARION EDWYN HARRISON

MEH:jb  
Enc

cc LAPAC

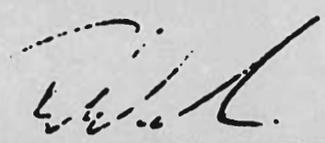
86040565112

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.  
STATEMENT OF SETTLEMENT (11 CFR §114.10(c))

Barnett, Alagia & Carey - \$11,059.56

1. Initial Terms of Credit. The firm of Barnett, Alagia & Carey, now called Barnett & Alagia, was performing legal services for Life Amendment Political Action Committee, Inc. (LAPAC). LAPAC, pursuant to an informal and oral understanding, was to pay the firm within a reasonable time after receipt of a bill (normally within 30 days but in any event within 90 days). LAPAC ran up \$11,059.56 in aged accounts.

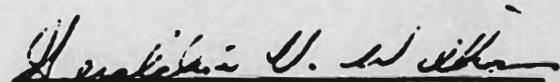
2. Steps Taken to Satisfy Debt. The parties negotiated a settlement. The firm agreed that it would be willing to write off the sum then accrued, upon a once-only basis, inasmuch as the cost of carrying it over 90 days was excessive and presented internal problems within the firm, provided that in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements promptly.



\_\_\_\_\_  
RICK WOODROW  
Treasurer, LAPAC

COMMONWEALTH OF VIRGINIA }  
County of \_\_\_\_\_ } ss.  
CITY OF Stafford }

Subscribed and sworn to before me, a Notary Public, this  
10th day of November, 1984.



My commission expires Feb. 13, 1988.

Attachment V

86040565113

R I S S I . . . 97

LAW OFFICE  
**SCOTT, HARRISON & McLEOD**

2501 M STREET, N.W.  
WASHINGTON, D.C. 20037  
(202) 331-2884  
TELECOM: (202) 462-6538  
CABLE: SCOTLAW  
TELEX: 250-340

85 APR 22 AM 10:38

HUGH SCOTT  
MARION EDWYN HARRISON  
JOHN M. FRIEDBERG  
MARSHALL L. MATZ  
MICHAEL S. McLEOD  
ALEXANDER J. PILES, JR.  
WAYNE S. WATKINSON

APR 22 1985  
MARION EDWYN HARRISON

April 17, 1985

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
APR 22 1985 AM 10:00

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

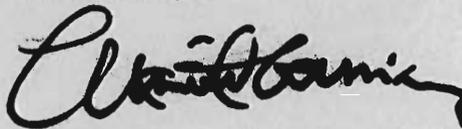
Re: MUR 1595

Dear Mr. Steele:

At Mr. Matt Gerson's request, we return herewith the Federal Election Commission letter of April 1, 1985, with attachments. Mr. Gerson advises us that the letter was sent erroneously.

Inasmuch as we no longer are counsel for Life Amendment Political Action Committee, Inc., a disengagement we sought for some time, we ask that further correspondence be addressed directly to the responsible person at Life Amendment Political Action Committee, Inc.

Sincerely,



MARION EDWYN HARRISON

MEH:jb

cc LAPAC, Inc.

Matt Gerson, Esquire  
Office of the General Counsel  
Federal Election Commission

86040565114

LAW OFFICES

SCOTT, HARRISON & McLEOD

2501 M STREET, N. W.

WASHINGTON, D. C. 20037



Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

85 APR 22

86040565115



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463



April 1, 1985

Marion Edwyn Harrison, Esquire  
Scott, Harrison & McLeod  
2501 M Street, N.W.  
Washington, D.C. 20037

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc.

Dear Mr. Harrison:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 7, 1984, found reason to believe that your clients had violated 2 U.S.C. § 434(b)(8), and instituted an investigation in this matter.

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, 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 not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

86040565116

Marion Edwin Harrison, Esquire  
Page 2

Should you have any questions, please contact Matt Gerson,  
at (202) 523-4143.

Sincerely,

*Charles N. Steele*  
Charles N. Steele  
General Counsel

Enclosure  
Brief

86040565117

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. and )  
Paul A. Brown, as treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF CASE

This matter was internally generated as a result of a referral by the Audit Division (hereinafter "Audit"). The referral is based on findings made during the audit of the Life Amendment Political Action Committee, Inc. (hereinafter "the Committee".)

The audit covered the period January 1, 1981, through October 21, 1982. The Committee reported a cash balance on January 1, 1981, of \$4,412.00; total receipts for the period of \$351,606.35; total disbursements for the period of \$356,545.43; and a cash balance on October 21, 1982, of \$2,337.00. The audit revealed possible violations of 2 U.S.C. §§ 434(b)(8), 441a, and 441b during the period audited.

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc., (hereinafter "the Respondent") and Paul A. Brown as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. The violation surrounds six debts and obligations that the Committee credited or adjusted causing the Committee's debts and obligations to be reduced by \$23,196.70. The notification letter as well as Interrogatories were mailed on February 8, 1984. The

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Interrogatories were prepared to determine whether the committee and its treasurer may have also violated 2 U.S.C. §§ 441a and 441b by accepting contributions from any of its creditors.

On March 14, 1984, this Office received from the Committee's counsel the answers to the Interrogatories. However, certain documents were not included as indicated in the answers to the Interrogatories.

On April 30, 1984, in response to our request, we received two duly executed settlement agreements that were negotiated by the Committee and two creditors: Phoenix Communications and Webcraft Packaging.<sup>1/</sup>

On May 11, 1984, Counsel stated that other documents would be provided as soon as possible. When these documents were not provided, the Commission authorized a Subpoena and Order for the production of the documents; the Subpoena and Order were mailed on August 6, 1984.

On September 10, 1984,<sup>2/</sup> this Office received a courtesy copy of a letter from the Respondents to counsel asking his

<sup>1/</sup> Those debt settlement requests were reviewed by the Commission on July 31, 1984, and found not to be in violation of the Act or the Commission regulations. See DSR 84-23 for additional details.

<sup>2/</sup> Item #5 of the Respondents' letter speaks of a July 19, 1984, meeting with Commission staff. It should be noted that this meeting was with the Reports Analysis Division and had no bearing on the issues discussed in this matter. Additionally, it should be noted that there is no record of receipt of the "review letter" that he states he sent to a staff person in the Reports Analysis Division.

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assistance in responding to the Subpoena and Order. The letter also states that the Respondent was away most of August. Presumably, that is the explanation for why the response to the Subpoena and Order was delayed.

On September 26, 1984, this Office received the documents requested in the Commission's Subpoena and Order. Finally, on November 16, 1984, this Office received the last document requested in this matter.

## II. LEGAL ANALYSIS

### 1. § 434(b)(8)

Audit discovered that debts and obligations to six (6) creditors were adjusted or otherwise credited. As a result, the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(b)(8) because its reports did not reflect that the debts and obligations were settled for less than their reported amount.

2 U.S.C. § 434(b)(8) requires that a Committee's report of receipts and disbursements disclose:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefore.

The Commission's investigation revealed that the debts and obligations were adjusted in the following manner.

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A. Barnett, Alagia & Carey

	<u>Balance Reported Beginning of Period<sup>3/</sup></u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
--	--	---	--	--	--

CREDITOR

Barnett, Alagia & Carey	\$10,578.19	\$ 881.37	\$ 400.00	\$11,059.56	-0-
-------------------------------	-------------	-----------	-----------	-------------	-----

According to the Respondents:

The obligation has been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.<sup>4/</sup>

Additionally, the Respondents submitted a statement of Settlement pursuant to 11 C.F.R. § 114.10 indicating that the parties settled the debt.

B. & C. Phoenix Communications and Webcraft Packaging

	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
<u>CREDITORS</u>					
Phoenix Com- munications	3,128.75	-0-	1,746.80	1,381.95	-0-
Webcraft Packaging	1,460.56	-0-	950.00	510.56	-0-

<sup>3/</sup> The period discussed in this matter concerning all the creditors, commenced on January 1, 1981, and continued through October 21, 1982.

<sup>4/</sup> Answer to Interrogatory #5

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On April 30, 1984, the Respondents submitted two (2) duly executed "Settlement Agreements" stating that the Respondents have settled the outstanding debts with Phoenix Communications and Webcraft Packaging.

D. Creative Mailing Consultants

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Creative Mailing Consultants	41,139.43	3,103.51	7,500.00	1,854.74	34,888.26
		272.18		6,888.34	27,990.92
				272.18	27,990.00
				237.00	27,543.00 <sup>5/</sup>
			Total=	9,252.26	

The Respondents provide the following explanation for the credit received from Creative Mailing Consultants:

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.<sup>6/</sup>

E. Insta-Print

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Insta-Print	855.53	-0-	647.16	208.37	-0-

The Respondents state that the credit received from Insta-Print was credit due them from an overpayment.<sup>7/</sup>

<sup>5/</sup> Figures come from the Committee's reports. The debt was paid in full by December 1982.

<sup>6/</sup> Answer to Interrogatory #10.

<sup>7/</sup> Answer to Interrogatory #6.

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F. Word Processing Exchange

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Word Processing Exchange	784.00	-0-	-0-	784.00	-0-

Finally, the Respondents state the following concerning the credit received from Word Processing Exchange:

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.<sup>8/</sup>

Despite these explanations, the Respondent's continued failure to fully disclose six (6) debts until properly extinguished violates 2 U.S.C. §434(b)(8).

2. §§ 441a and 441b

Most of the creditors were corporations but at least one was a partnership. Therefore, if those entities extended credit intending, in fact, to make a contribution or expenditure, there may have been 2 U.S.C. § 441a and § 441b violations.

Section 441a sets dollar limits on how much a partnership can contribute to any candidate or political committee. Section 441b prohibits any corporation from making any contribution or expenditure in connection with a federal election. Section

<sup>8/</sup> Answer to Interrogatory #7.

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441b(a) further prohibits any political committee from knowingly accepting a contribution from a corporation.

The term "contribution" includes the extension of credit by a corporation for a length of time beyond normal business or trade practice, unless the creditor has made a commercially reasonable attempt to collect the debt. 11 C.F.R. § 100.7(a)(4) Additionally, a debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless the debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10(c).

Pursuant to 11 C.F.R. § 114.10(a), a corporation may extend credit to a candidate, political committee or other person in connection with a federal election, provided that the credit is extended in the ordinary course of the corporations's business and the terms are substantially similar to extensions of credit for similar nonpolitical debts. 11 C.F.R. § 114.10(b) prohibits a corporation from forgiving prior debts or settling debts which have been incurred by a candidate, political committee, or other person in connection with a federal election for less than the amount owed on the debt.

11 C.F.R. § 114.10(c), however, permits a corporation to settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered to be commercially reasonable if the initial extension of credit was made in accordance with

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11 C.F.R. § 114.10(a), the candidate or political committee has undertaken all commercially reasonable efforts to satisfy the outstanding debt, and the corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor. A corporation and/or the debtor must file a Statement of Settlement with the Commission that includes the initial terms of credit, the steps the debtor has taken to satisfy the debt, and the remedies pursued by the creditor. This statement must be filed prior to the termination of the debtor's reporting status, and the settlement is subject to Commission review.

It is noteworthy that the Committee has already filed the necessary Statements of Settlement. In addition, it appears that the creditors established and carried out business relationships with the Committee as they would with any other entity and fully expected to profit financially. Therefore, it does not appear that the Respondents accepted prohibited contributions from any of the six (6) creditors and, thus, did not violate 2 U.S.C. § 441a or 441b.

### III. CONCLUSION

Based on the above and the information provided by the Respondents, the Office of General Counsel is prepared to recommend a finding of probable cause to believe that the Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report six (6) debts until properly extinguished.

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**IV. GENERAL COUNSEL'S RECOMMENDATIONS**

1. Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Paul A. Brown, as treasurer, violated 2 U.S.C. § 434(b) (8).
2. Approve attached letter.

3/29/85  
Date

  
Charles N. Steele  
General Counsel

Attachments  
Letter to Respondents

86040565126

LAW OFFICE

SCOTT, HARRISON & McLEOD COUNSEL

2501 M STREET, N.W.

WASHINGTON, D.C. 20037

(202) 981-1234

TELECOPIER (202) 466-6536

CABLE SCOTTLAW

TELEX 350-340

RECEIVED

OFFICE OF THE

APR 18 1985

05 APR 18 08:51

ADVN J. CEEKE  
MARC ERIC MILLER  
OF COUNSEL  
SANDY J. BURKE  
GOVERNMENT RELATIONS

HUGH SCOTT  
MARION EDWYN HARRISON  
JOHN M. HIGGELBERG  
MARSHALL L. MATZ  
MICHAEL R. McLEOD  
ALEXANDER J. PIRLS, JR.  
WAYNE R. WATKINSON

April 17, 1985

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1595

Dear Mr. Steele:

At Mr. Matt Gerson's request, we return herewith the Federal Election Commission letter of April 1, 1985, with attachments. Mr. Gerson advises us that the letter was sent erroneously.

Inasmuch as we no longer are counsel for Life Amendment Political Action Committee, Inc., a disengagement we sought for some time, we ask that further correspondence be addressed directly to the responsible person at Life Amendment Political Action Committee, Inc.

Sincerely,

MARION EDWYN HARRISON

MEH:jb

cc LAPAC, Inc.

Matt Gerson, Esquire  
Office of the General Counsel  
Federal Election Commission

86040565127

LAW OFFICES

**SCOTT, HARRISON & McLEOD**

2501 M STREET, N. W.

WASHINGTON, D. C. 20037



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

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03 APR 19 1981 48:51



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

05 APR 1 09:32

April 1, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CNS/AM*  
General Counsel

SUBJECT: MUR 1595

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 Respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on April 1, 1985. Following receipt of the Respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondents

96040565129

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. and )  
Paul A. Brown, as treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF CASE

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86040565130

Interrogatories were prepared to determine whether the committee and its treasurer may have also violated 2 U.S.C. §§ 441a and 441b by accepting contributions from any of its creditors.

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<sup>1/</sup> Those debt settlement requests were reviewed by the Commission on July 31, 1984, and found not to be in violation of the Act or the Commission regulations. See DSR 84-23 for additional details.

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On September 26, 1984, this Office received the documents requested in the Commission's Subpoena and Order. Finally, on November 16, 1984, this Office received the last document requested in this matter.

## II. LEGAL ANALYSIS

### 1. § 434(b)(8)

Audit discovered that debts and obligations to six (6) creditors were adjusted or otherwise credited. As a result, the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(b)(8) because its reports did not reflect that the debts and obligations were settled for less than their reported amount.

2 U.S.C. § 434(b)(8) requires that a Committee's report of receipts and disbursements disclose:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefore.

The Commission's investigation revealed that the debts and obligations were adjusted in the following manner.

86040565132

A. Barnett, Alagia & Carey

	<u>Balance Reported Beginning of Period<sup>3/</sup></u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
--	--	---	--	--	--

CREDITOR

Barnett, Alagia & Carey	\$10,578.19	\$ 881.37	\$ 400.00	\$11,059.56	-0-
-------------------------------	-------------	-----------	-----------	-------------	-----

According to the Respondents:

The obligation has been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.<sup>4/</sup>

Additionally, the Respondents submitted a statement of Settlement pursuant to 11 C.F.R. § 114.10 indicating that the parties settled the debt.

B. & C. Phoenix Communications and Webcraft Packaging

<u>CREDITORS</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Phoenix Com- munications	3,128.75	-0-	1,746.80	1,381.95	-0-
Webcraft Packaging	1,460.56	-0-	950.00	510.56	-0-

<sup>3/</sup> The period discussed in this matter concerning all the creditors, commenced on January 1, 1981, and continued through October 21, 1982.

<sup>4/</sup> Answer to Interrogatory #5

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On April 30, 1984, the Respondents submitted two (2) duly executed "Settlement Agreements" stating that the Respondents have settled the outstanding debts with Phoenix Communications and Webcraft Packaging.

D. Creative Mailing Consultants

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Creative Mailing Consultants	41,139.43	3,103.51	7,500.00	1,854.74	34,888.26
		272.18		6,888.34	27,990.92
				272.18	27,990.00
				<u>237.00</u>	<u>27,543.00<sup>5/</sup></u>
			Total=	<u>9,252.26</u>	

The Respondents provide the following explanation for the credit received from Creative Mailing Consultants:

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.<sup>6/</sup>

E. Insta-Print

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Insta-Print	855.53	-0-	647.16	208.37	-0-

The Respondents state that the credit received from Insta-Print was credit due them from an overpayment.<sup>7/</sup>

<sup>5/</sup> Figures come from the Committee's reports. The debt was paid in full by December 1982.

<sup>6/</sup> Answer to Interrogatory #10.

<sup>7/</sup> Answer to Interrogatory #6.

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F. Word Processing Exchange

<u>CREDITOR</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Word Processing Exchange	784.00	-0-	-0-	784.00	-0-

Finally, the Respondents state the following concerning the credit received from Word Processing Exchange:

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.<sup>8/</sup>

Despite these explanations, the Respondent's continued failure to fully disclose six (6) debts until properly extinguished violates 2 U.S.C. §434(b)(8).

2. §§ 441a and 441b

Most of the creditors were corporations but at least one was a partnership. Therefore, if those entities extended credit intending, in fact, to make a contribution or expenditure, there may have been 2 U.S.C. § 441a and § 441b violations.

Section 441a sets dollar limits on how much a partnership can contribute to any candidate or political committee. Section 441b prohibits any corporation from making any contribution or expenditure in connection with a federal election. Section

<sup>8/</sup> Answer to Interrogatory #7.

86040565135

441b(a) further prohibits any political committee from knowingly accepting a contribution from a corporation.

The term "contribution" includes the extension of credit by a corporation for a length of time beyond normal business or trade practice, unless the creditor has made a commercially reasonable attempt to collect the debt. 11 C.F.R. § 100.7(a)(4) Additionally, a debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless the debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10(c).

Pursuant to 11 C.F.R. § 114.10(a), a corporation may extend credit to a candidate, political committee or other person in connection with a federal election, provided that the credit is extended in the ordinary course of the corporations's business and the terms are substantially similar to extensions of credit for similar nonpolitical debts. 11 C.F.R. § 114.10(b) prohibits a corporation from forgiving prior debts or settling debts which have been incurred by a candidate, political committee, or other person in connection with a federal election for less than the amount owed on the debt.

11 C.F.R. § 114.10(c), however, permits a corporation to settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered to be commercially reasonable if the initial extension of credit was made in accordance with

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11 C.F.R. § 114.10(a), the candidate or political committee has undertaken all commercially reasonable efforts to satisfy the outstanding debt, and the corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor. A corporation and/or the debtor must file a Statement of Settlement with the Commission that includes the initial terms of credit, the steps the debtor has taken to satisfy the debt, and the remedies pursued by the creditor. This statement must be filed prior to the termination of the debtor's reporting status, and the settlement is subject to Commission review.

It is noteworthy that the Committee has already filed the necessary Statements of Settlement. In addition, it appears that the creditors established and carried out business relationships with the Committee as they would with any other entity and fully expected to profit financially. Therefore, it does not appear that the Respondents accepted prohibited contributions from any of the six (6) creditors and, thus, did not violate 2 U.S.C. § 441a or 441b.

### III. CONCLUSION

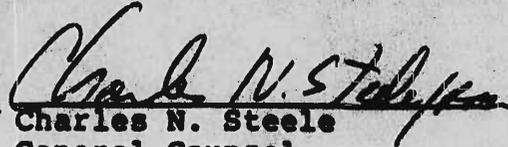
Based on the above and the information provided by the Respondents, the Office of General Counsel is prepared to recommend a finding of probable cause to believe that the Respondents violated 2 U.S.C. § 434(b)(8) by failing to continuously report six (6) debts until properly extinguished.

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**IV. GENERAL COUNSEL'S RECOMMENDATIONS**

1. Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Paul A. Brown, as treasurer, violated 2 U.S.C. § 434(b)(8).
2. Approve attached letter.

3/29/85  
Date

  
Charles N. Steele  
General Counsel

Attachments  
Letter to Respondents

86040565138



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1985

Marion Edwyn Harrison, Esquire  
Scott, Harrison & McLeod  
2501 M Street, N.W.  
Washington, D.C. 20037

RE: MUR 1595  
Life Amendment Political  
Action Committee, Inc.

Dear Mr. Harrison:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 7, 1984, found reason to believe that your clients had violated 2 U.S.C. § 434(b)(8), and instituted an investigation in this matter.

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

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, 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 not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

86040565139

Marion Edwyn Harrison, Esquire  
Page 2

Should you have any questions, please contact Matt Gerson,  
at (202) 523-4143.

Sincerely,

*Charles N. Steele*  
Charles N. Steele  
General Counsel

Enclosure  
Brief

86040565140



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 27, 1985

MEMORANDUM

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

**ATTENTION:** CONLEY EDWARDS

**FROM:** SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1595: LIFE AMENDMENT PAC (LAPAC)

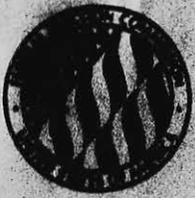
Please review the attached Request for Additional Information which is to be sent to the LAPAC for the 1984 Year End Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, March 1, 1985. Thank you.

COMMENTS:

Attachment

86040565141



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
14618 Stone Crossing Street  
Centreville, VA 22020

Identification Number: C00082297

Reference: Year End Report (11/27/84-12/31/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

-Please amend your Detailed Summary Page to include a year-to-date figure for Line 13.

-Please provide a Schedule A to support the entry of \$575 reported on Line 14 of the Detailed Summary Page. All loans and loan repayments received by your committee must be itemized on Schedule A, regardless of the amount loaned or repaid. 2 U.S.C. §§434(b)(3)(E) and (5)(D).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565142



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 13, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: CONLEY EDWARDS

FROM: SHAWN WOODHEAD *AW*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1595: LIFE AMENDMENT PAC (LAPAC)

Please review the attached Miscellaneous Notice which is to be sent to the LAPAC. Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, February 15, 1985. Thank you.

COMMENTS:

Attachment

86040565143



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MSF

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
14618 Stone Crossing Court  
Centreville, VA 22020

Identification Number: C00082297

Reference: Change To Semi-Annual Filer

Dear Mr. Woodrow:

The Commission has received your notification to change to a Semi-Annual filer of receipts and disbursements. You are advised that Section 104.5(c) of the Commission regulations prohibits a committee from changing its filing frequency more than once per calendar year. A reporting schedule is provided below.

Report Type	Coverage Dates	Reports Due For Filing
Mid-Year Report	1/1/85-6/30/85	July 31, 1985
Year End Report	7/1/85-12/31/85	January 31, 1986

If the Commission can be of further assistance to you in this matter, please do not hesitate to write or call (202) 523-4048. Our toll free number is (800) 424-9530.

Sincerely,

Michael B. Filler  
Chief, Party/Non-Party Branch  
Reports Analysis Division

86040565144

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1984

MEMORANDUM

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

**ATTENTION:** CONLEY EDWARDS

**FROM:** SHAWN WOODHEAD *W*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1595 - LIFE AMENDMENT PAC

Please review the attached Informational Notice which is to be sent to the Life Amendment PAC for the 1984 September Monthly Report. Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Monday, November 26, 1984. Thank you.

COMMENTS:

Attachment

86040565145



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
14618 Stonecrossing Court  
Centreville, VA 22020

Identification Number: C00082297

Reference: September Monthly Report (8/1/84-8/31/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule D of your previous report, you disclose an outstanding balance of \$900 owed to Political Data Systems. On Schedule D of this report, the outstanding balance owed to Political Data Systems is \$1,400. Please clarify this apparent discrepancy. [Note: the \$500 payment disclosed on Schedule D does not appear on Schedule B.]

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

860405146

LAW OFFICES

SCOTT, HARRISON & McLEOD

2501 M STREET, N. W.

WASHINGTON, D. C. 20037

(202) 861-1234

TELECOPIER (202) 466-6538

CABLE SCOTTLAW

TELEX 350-340

NOV 15 4 37

MARION EDWYN HARRISON  
PARTNER

NOV 16 10:37

November 15, 1984

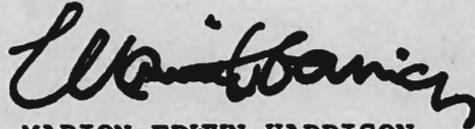
George Demougeot, Esquire  
Federal Election Commission  
Seventh Floor  
1325 K Street, N. W.  
Washington, D. C. 20463

Re: Life Amendment Political Action  
Committee, Inc.

Dear Mr. Demougeot:

We attach Statement of Settlement (11 CFR §114.10(c))  
in this matter.

Sincerely,



MARION EDWYN HARRISON

MEH:gjf  
Encl.

86040565147

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.  
STATEMENT OF SETTLEMENT (11 CFR §114.10(c))

Barnett, Alagia & Carey - \$11,059.56

1. Initial Terms of Credit. The firm of Barnett, Alagia & Carey, now called Barnett & Alagia, was performing services for Life Amendment Political Action Committee, Inc. ("LAPAC"). LAPAC, pursuant to an informal and oral understanding, was to pay the firm within a reasonable time after receipt of a bill (normally within 30 days but in any event within 90 days). LAPAC ran up \$11,059.56 in aged accounts.

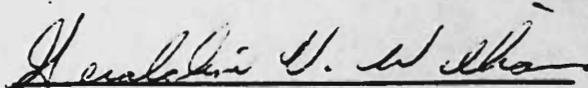
2. Steps Taken to Satisfy Debt. The parties negotiated a settlement. The firm agreed that it would be willing to write off the sum then accrued, upon a once-only basis, inasmuch as the cost of carrying it over 90 days was excessive and presented internal problems within the firm, provided that in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements promptly.



\_\_\_\_\_  
RICK WOODROW  
Treasurer, LAPAC

COMMONWEALTH OF VIRGINIA ]  
County ] ss.  
CITY OF Stafford ]

Subscribed and sworn to before me, a Notary Public, this  
10th day of November, 1984.



My commission expires Feb. 13, 1988.

86040565148

4595 RECEIVED AT THE

# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

A 9: 00

P. O. BOX 1984 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 690-2049



September 5, 1984

Mr. Marion Edwyn Harrison  
Scott, Harrison & McLeod  
2501 M Street, NW  
Washington, DC 20037

Dear Mr. Harrison:

Enclosed is information concerning our matter before the FEC (MUR 159)

I don't exactly understand what the problems are. As best I can reconstruct things here is where we stand.

1. On February 8, 1984, the FEC requested Interrogatories from Paul Brown, LAPAC's former treasurer. These concerned the following companies. (A) Barnett, Alagia & Carey, (B) Creative Mail Consultants, (C) Insta-Print, (D) Phoenix Communications, (E) Webcraft Packaging and (E) Word Processing Exchange. (EXHIBIT "A".)
2. Interrogatories were completed and sent to FEC. (EXHIBIT "B".)
3. Requested debt settlements for Webcraft Packaging and Phoenix Communications were completed and sent to FEC. (EXHIBIT "C".)
4. On August 6, 1984, FEC sent a letter to LAPAC accepting debt settlements. (EXHIBIT "D".)
5. On Thursday, July 19, 1984, I met for three hours with Mr. Anthony Raymond and one of the supervisors at the FEC at which time we reviewed each and every complaint they had in their file. My understanding was at the conclusion of that meeting LAPAC had a clean slate and we were starting fresh. A copy of the review letter I sent to Mr. Raymond is enclosed. (EXHIBIT "E".)
6. Finally, after all of this, I received the enclosed letter and subpoena dated August 6, which says that on August 7 we were in violation of certain disclosure laws. (EXHIBIT "F".)

Please review this and advise me as to what steps I am to take. I would appreciate it if you would contact either Conley Edwards, Jr. (523-4000) or Kenneth Gross and advise them that we have retained your services and are preparing our response.

*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

Authorized and paid for by LAPAC, Inc. Paul A. Brown, Treasurer

860405149

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

Mr. Marion Edwyn Harrison

Page 2

September 5, 1984

Prior to my arrival, LAPAC had some paperwork and record keeping problems in that Paul Brown largely ran LAPAC out of his suitcase. This was all explained at my July 19 meeting with the FEC. Since I came here in March, I have bent over backwards trying to satisfy them but it is virtually impossible to reconstruct everything that has ever happened here.

I will be leaving Wednesday afternoon for California but my office will have a number to reach me if you need me for anything.

Also, please point out to Mr. Edwards that I only received their latest letter and subpoena this past week due to the fact that I was away most of August.

Thanks for your assistance in this matter.

Sincerely yours,

Rick Woodrow  
Executive Director  
Treasurer

RN/pafy

cc: Conley Edwards, Jr.  
Kenneth Gross  
Charles N. Steele

86040565150

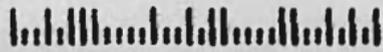
FEDERAL AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.

P.O. BOX 1983  
GARRISONVILLE, VA 22463



040565151

Mr. Conley Edwards, Jr.  
Federal Elections Commission  
Washington, DC 20463



**LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.**

RECEIVED AT THE FEC  
G-C # 4595  
84 SEP 7 AM: 01

P. O. BOX 1984 • GARRISONVILLE, VA 22463 • (703) 660-4171 or (703) 660-2049



September 5, 1984

Mr. Marion Edwyn Harrison  
Scott, Harrison & McLeod  
2501 M Street, NW  
Washington, DC 20037

Dear Mr. Harrison:

Enclosed is information concerning our matter before the FEC (MUR 1595):

I don't exactly understand what the problems are. As best I can reconstruct things here is where we stand.

1. On February 8, 1984, the FEC requested Interrogatories from Paul Brown, LAPAC's former treasurer. These concerned the following companies. (A) Barnett, Alagia & Carey, (B) Creative Mail Consultants, (C) Insta-Print, (D) Phoenix Communications, (E) Webcraft Packaging and (E) Word Processing Exchange. (EXHIBIT "A".)
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*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

Authorized and paid for by LAPAC, Inc. Paul A. Brown, Treasurer

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

84 SEP 7 10:19

86040565152

Mr. Marion Edwyn Harrison

Page 2

September 5, 1984

Prior to my arrival, LAPAC had some paperwork and record keeping problems in that Paul Brown largely ran LAPAC out of his suitcase. This was all explained at my July 19 meeting with the FEC. Since I came here in March, I have bent over backwards trying to satisfy them but it is virtually impossible to reconstruct everything that has ever happened here.

I will be leaving Wednesday afternoon for California but my office will have a number to reach me if you need me for anything.

Also, please point out to Mr. Edwards that I only received their latest letter and subpoena this past week due to the fact that I was away most of August.

Thanks for your assistance in this matter.

Sincerely yours,

Rick Woodrow  
Executive Director  
Treasurer

RW/pafy

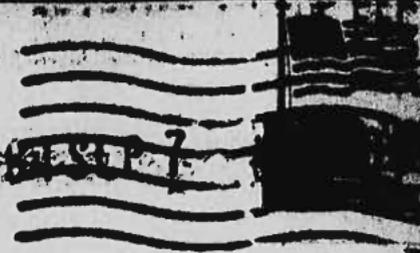
cc: Conley Edwards, Jr.  
Kenneth Gross  
Charles N. Steele

86040565153

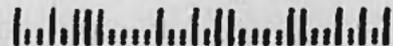
FE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.

P.O. BOX 1983  
GARRISONVILLE, VA 22463

6040565154



Mr. Kenneth Gross  
Federal Elections Commission  
Washington, DC 20463



CC # 4862

LAW OFFICES

**SCOTT, HARRISON & McLEOD**

2501 M STREET, N. W.  
WASHINGTON, D. C. 20037  
(202) 861-1234  
TELECOMER (202) 486-6538  
CABLE SCOTTLAW  
TELEX 350-340

MARION EDWYN HARRISON  
PARTNER

September 26, 1984

By hand

Mr. Conley Edwards, Jr.  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1595

Dear Mr. Edwards:

With respect to the letter of August 6, 1984 to Mr. Paul A. Brown, Treasurer, Life Amendment Political Action Committee, Inc. ("LAPAC"), which in turn relates to the audit period January 1, 1981 - October 21, 1982, with a subpoena attached thereto, photocopy of each attached, LAPAC responds as follows.

1. Five cancelled checks dated February 8, 1981; September 28, 1981; March 15, 1982; April 21, 1982 and August 25, 1982, photocopies attached, all with respect to Barnett, Alagia & Carey or Barnett & Alagia.

2. One statement dated April 28 (no year) and three undated statements from Intra-Print, Inc., photocopies attached.

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
34 SEP 26 1984  
P 3:48

86040565155

**SCOTT, HARRISON & McLEOD**

Mr. Conley Edwards, Jr.  
September 26, 1984  
Page - 2 -

Three checks dated February 2, 1981; September 26, 1981; and November 20, 1981 to Intra-Print, Inc.; photocopies attached.

3. Ten checks dated January 28, 1981; February 8, 1981; March 3, 1981; April 14, 1981; May 13, 1981; June 23, 1981; July 28, 1981; September 28, 1981; November 21, 1981 and February 3, 1982 to Phoenix Communications, Inc.; photocopies attached.

Five statements from Phoenix Communications, Inc. dated July 31, 1980; October 5, 1980; two dated October 6, 1980; January 17, 1981; and one ledger card pertaining thereto; photocopies attached. (Please note Phoenix Communications formerly was called Phoenix Publications.)

4. Six invoices dated October 13, 1980; October 22, 1980; November 24, 1980; December 19, 1980; February 20, 1981 and March 18, 1981; and five Statements of Account dated October 31, 1980; November 30, 1980; December 31, 1980; January 31, 1981 and February 28, 1981 from Webcraft, Division of Beatrice Foods; photocopies attached.

Sixteen letters dated April 3, 1981; May 6, 1981; May 18, 1981; May 22, 1981; May 27, 1981; June 4, 1981; July 2, 1981; July 15, 1981; July 22, 1981; October 2, 1981; October 14, 1981; November 10, 1981; November 17, 1981; November 30, 1981; December 4, 1981 and January 6, 1982 from Brenner Credit Adjustment Bureau to LAPAC pertaining to Webcraft; photocopies attached.

Eight checks to Webcraft dated February 8, 1981; May 13, 1981; June 19, 1981; July 28, 1981; August 28, 1981; September 14, 1981; November 20, 1981 and February 2, 1982; photocopies attached.

One check to Brenner Credit Corp. dated February 3, 1982, photocopy attached.

86040565156

SCOTT HARRISON & McLEOD

Mr. Conley Edwards, Jr.  
September 26, 1984  
Page - 3 -

Sincerely,



MARION EDWYN HARRISON

MEH:jb  
Enc

cc LAPAC

86040565157

BALTIMORE  
CRANE & CO BOSTON



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 6, 1984



Paul A. Brown, Treasurer  
Life Amendment Political  
Action Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

RE: MUR 1595

Dear Mr. Brown:

On February 7, 1984, the Commission determined that your committee and you, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. An investigation of this matter is being conducted and it has been determined that certain information is needed from you. This information was requested from your committee, but it was not supplied.

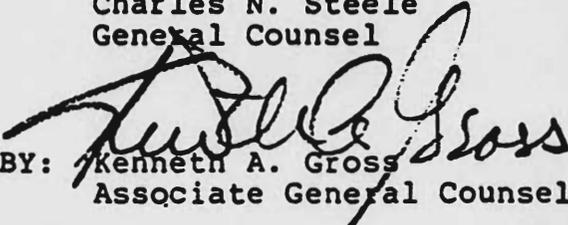
Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and 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 Conley Edwards, Jr. at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Subpoena and Order

cc: Marion Edwyn Harrison, Esquire

86040565158

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. )  
Paul A. Brown, Treasurer )

SUBPOENA AND ORDER FOR THE  
PRODUCTION OF DOCUMENTS

To: Paul A. Brown, Treasurer  
Life Amendment Political Action  
Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

8 6 0 4 0 5 6 5 1 5 9  
PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all books, records, memoranda and other written materials in your possession which pertain to the business transactions between the Life Amendment Political Action Committee and the following creditors:

Barnett, Alagia and Carey  
Insta-Print  
Phoenix Communications  
Webcraft Packaging

Definitions

As used in this subpoena and order, the terms listed below are defined as follows:

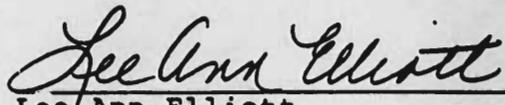
1. The term "documents and materials" shall mean all tangible things by which human communication is transmitted or stored including the original, all copies, and drafts of writings of any kind, printed, visual, or electronic materials to be produced with respect to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary

entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

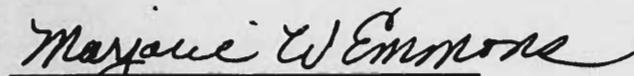
2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from January 1, 1981, up to and including July 20, 1984, unless otherwise specified.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this 3rd day of August, 1984.

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

ATTEST:

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

86040565160

ITEM IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1515

2/17 1981 150005

PAY TO THE ORDER OF Barnett Blagie & Cary \$ 200.00  
Two Hundred 00/100 DOLLARS

**SNB** SECURITY NATIONAL BANK  
WASHINGTON, D. C.

*[Signature]*

⑆0001515⑆ ⑆054000807⑆ ⑆05114024⑆ ⑆0000020000⑆

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LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1848

PAY Four Hundred 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1848	Barnett Blagie & Cary	9/28/81	Legal	400.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆ ⑆0000040000⑆

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LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT
3-72	055146	365.63

15-80  
540

2082

PAY Three hundred sixty-eight and 63/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
2082	Barnett & Blagie	3-15-82	Legal Fees	365.63

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆ ⑆0000036563⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

2172

PAY Two hundred-seventy-two & 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
2172	Barnett & Alagia 1627 K. St. N.W. D.C. 20006	4-21-82	legal fees	272 18

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆ ⑆05114024⑆01⑆ ⑆0000027268⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

2433

PAY four hundred-seventy & 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
2433	Barnett & Alagia	8-25-82	legal fees	470 64

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆002433⑆ ⑆054000807⑆ ⑆05114024⑆01⑆ ⑆0000047064⑆

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ITEM IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1556

11/21 1981 1556 05

PAY TO THE ORDER OF Insta Print \$ 300<sup>00</sup>  
Three Hundred & 00/100 DOLLARS



SECURITY NATIONAL BANK  
WASHINGTON, D. C.

*[Signature]*

⑆0001556⑆ ⑆054000807⑆ ⑆05114024001⑆ ⑆0000030000⑆

⑆00000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1883

PAY Two Hundred & 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1883	Insta Print	9/28/81	Prints	200

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024001⑆ ⑆0000020000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1922

PAY Four Hundred Forty Seven & 16/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1922	Insta Print	11/20/81	Print	447 <sup>16</sup>

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

*in full of payment*

⑆054000807⑆ ⑆05114024001⑆ ⑆0000044716⑆

86040565167

(12)

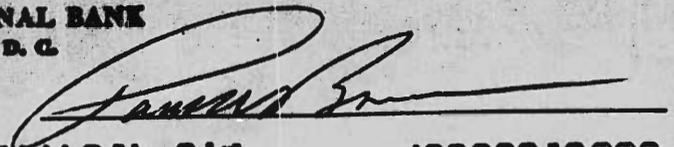
ITEM IS IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1500  
1-28-1981 18-90 05  
546

PAY TO THE ORDER OF Phoenix Communications \$ 300<sup>00</sup>  
Three hundred + 00/100 DOLLARS

 SECURITY NATIONAL BANK  
WASHINGTON, D. C.



⑈0001500⑈ • ⑆054000807⑆ ⑈05114024⑈01⑈ ⑆0000030000⑆

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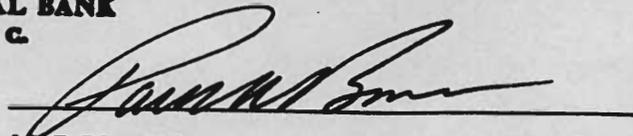
ITEM IS IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1542  
2/8 19 81 18-90 05  
546

PAY TO THE ORDER OF Phoenix Communications \$ 100<sup>00</sup>  
One hundred + 00/100 DOLLARS

 SECURITY NATIONAL BANK  
WASHINGTON, D. C.



⑈0001542⑈ • ⑆054000807⑆ ⑈05114024⑈01⑈ ⑆0000010000⑆

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ITEM IS IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1602  
3-3-1981 18-90 05  
546

PAY TO THE ORDER OF Phoenix Communications \$ 500<sup>00</sup>  
Five hundred + 00/100 DOLLARS

 SECURITY NATIONAL BANK  
WASHINGTON, D. C.



⑈0001602⑈ • ⑆054000807⑆ ⑈05114024⑈01⑈ ⑆0000050000⑆

E 1000 V

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1618

PAY Two hundred and 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1618	Epic Carcass Phoenix Publications	4-14-81	in account	200 00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆

⑆05114024001⑆

⑆0000020000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1658

PAY five hundred and 00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1658	Phoenix Communications	5-13-81	brochure	500 00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆

⑆05114024001⑆

⑆0000050000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

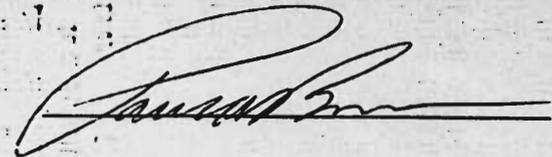
15-80  
540

1764

PAY FIVE HUNDRED EXACTLY DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1764	PHOENIX PUBLICATIONS	6-23-81	consulting d-d	500 00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆

⑆05114024001⑆

⑆0000050000⑆

86040565169

8 6 0 4 0 5  
 LAPAC, INC.  
 6 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-90  
 540

1797

PAY FIVE HUNDRED EXACTLY DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1797	PHOENIX PUBLICATIONS	7-2-81	VOTER EDUCATION GUIDE	500.00

1681 WALLEYE DR  
 CROFTON, MD 21114

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆01⑆ ⑆0000050000⑆

LAPAC, INC.  
 6 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-90  
 540

1891

PAY Three Hundred +00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1891	Phoenix Communications	9/27/81	Advert	300.00

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆01⑆ ⑆0000030000⑆

LAPAC, INC.  
 6 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-90  
 540

1925

PAY One Hundred Fifty +00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1925	Phoenix Comm.	11/21/81	Advert	150.00

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆01⑆ ⑆0000015000⑆

LAPAC, INC.  
 6 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-90  
 540

2001

PAY One Thousand-seven-hundred +00/100 DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
2001	Phoenix Communications	2-3-82	1980 Target List	1746.00

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

PHOENIX COMMUNICATIONS, INC.  
P. O. Box 3082  
CROFTON, MARYLAND 21114

DATE JAN 17, 1981

(301) 261-0487 Washington  
(301) 721-1297 Annapolis

LIFE AMENDMENT POLITICAL ACTION Comm.  
8 Library Court  
Washington, D.C.  
Attn; Judi Brown

TERMS:

PLEASE DETACH AND RETURN WITH YOUR PAYMENT

AMOUNT ENCLOSED

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
				BALANCE FORWARD → 6348.75
11/14	CHECK		1000 00	5348 75
		2/8 CK#1542		300 00
				5048 75
		2/3 CK#1602		500 00
				4548 75
		2/3 CK#1797		500 00
				4048 75
		6/23 CK#1704		500 00
				3548 75
		CK#1891 9/12		300 00
				3248 75
		CK#1925 11/20		150 00
				2948 75
				2798 75

*2000 of Bank  
paid in full  
settlement  
9-2-82  
\$1746.80  
2001 2/3/82*

PHOENIX COMMUNICATIONS, INC.

*Partial paid  
Thank You*

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
				BALANCE FORWARD →
7/31/80	1005 Job No. 1009	625 00		625 00
8/18/80	CHECK		1500 00	(875 00)
9/5/80	CHECK		500 00	(1375 00)
3/80	CHECK		1000 00	(2375 00)
10/5/80	1022 Job No. 1010	4608 00		2233 00
10/6/80	1023 Job No. 1010	1815 75		4048 75
10/6/80	1024 Job No. 1010	2350 00		6398 75
10/10/80	CHECK		50 00	6348 75

*1 1/8 c/o on unpaid  
Balance over 30  
days*

PHOENIX COMMUNICATIONS, INC.

Thank You

PAY LAST AMOUNT IN THIS COLUMN

PHOENIX PUBLICATIONS, INC.  
 Post Office Box 3082  
 CROFTON, MARYLAND 21114

INVOICE

No 1005

(301) 721-1297

TO

LIFE AMENDMENT POLITICAL ACTION COMM.  
 529 14th Street N.W. Suite 357  
 Washington, D.C.

DATE	July 31, 1980
CUSTOMER ORDER NO.	
SALESMAN	
VIA	

TERMS:

8 6 0 4 0 5 6 5 1 7 2

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Job No. 1009 February 1980		
	Design and Comprehensive layout for Pro-Life Responder		625 00
		CL# 131 9-14	50 00
			<u>575 00</u>

ORIGINAL

Thank You!

PHOENIX PUBLICATIONS, INC.  
 Post Office Box 3082  
 CROFTON, MARYLAND 21114

INVOICE

No 1022

TO (301) 721-1297  
 LIFE AMENDMENT POLITICAL  
 ACTION COMMITTEE  
 National Press Bldg. #357  
 529 14th Street N.W.  
 Washington D.C.

DATE	October 5, 1980
CUSTOMER ORDER NO.	
SALESMAN	Espie Corson
VIA	

TERMS:

86040565173

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Job No. 1010 = 10 sets of color separations with special composite stripping in 5 sets of separations		3600 00
	Stripping from mechanicals with positives, tints and type for one piece film proofs front and back		820 00
	AA's on Envelope side - two new black printers		150 00
	Shipping to Webcraft		38 00
			<hr/> 4608 00

ORIGINAL

*Thank You!*

**PHOENIX PUBLICATIONS, INC.**  
 Post Office Box 3082  
 CROFTON, MARYLAND 21114

INVOICE

No 1023

(301) 721-1297

TO

**LAPAC**  
 National Press Bldg. #357  
 529 14th Street N.W.  
 Washington, D.C.

DATE	October 6, 1980
CUSTOMER ORDER NO.	
SALESMAN	Espie Corson
VIA	

TERMS:

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Job No. 1010		
	4 Photo Sessions plus expenses		1200 00
	1 Special photo session (Rush)		250 00
	Special Air Brushing for photo backgrounds		350 00
	Child's dress (given to child in place of modelling fee)		15 75
			<u>1815 75</u>
			4608 00
			<u>2320 00</u>
			8773 75
			<u>575 00</u>

*8348 75*  
*1000.00 C.F.P. 1385*  
~~*7348.75*~~

86040565174

ORIGINAL

Thank You!

*C.F.P. 1342 - 9348.75*  
~~*3348.75*~~

**PHOENIX PUBLICATIONS, INC.**  
 Post Office Box 3082  
 CROFTON, MARYLAND 21114

INVOICE

No 1024

TO (301) 721-1297  
**LAPAC**  
 National Press Bldg. #357  
 529 14th Street N.W.  
 Washington, D.C.

DATE	October 6, 1980
CUSTOMER ORDER NO.	
SALESMAN	Espie Corson
VIA	

TERMS:

86040565175

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Job No. 1010 Comprehensive four color design and Layout for political 6 page responder		850 00
	Display and text phototypesetting and mechanical preparation for process color mechanicals including position half-tones, Consultation with photographer, Lithographer and others including press inspection		1500 00
			<hr/> 2350 00

ORIGINAL

*Thank You!*

*Hoerig*

LIFE AMENDMENT POLITICAL ACTION COMM.

ACCOUNT NO. 106

#6 Library Court

CARD NO. \_\_\_\_\_

Washington, D.C. 20003

CREDIT LIMIT \_\_\_\_\_

BALANCE FORWARD →

	DATE	DESCRIPTION	CHARGES	CREDITS	✓	BALANCE	PREVIOUS BALANCE
1	7/3/80	1005 Job # 1009	625 00			625 00	
2	8/19/80	Check		1500 00		(875 00)	
3	9/15/80	Check		500 00		(1375 00)	
4	10/3/80	Check		1000 00		(2375 00)	
5	10/6/80	1022 Job # 1010	4608 00			2233 00	
6	10/6/80	1023 Job # 1010	1815 00			4048 75	
7	10/6/80	1024 Job # 1010	2350 00			6398 75	
8	10/10/80	Check		50 00		6348 75	
9	11/6/80	INTEREST	119 03			6467 78	
10	11/14/80	Check		1000 00	✓	5467 78	
11	12/6/80	INTEREST	102 52			5570 30	
12	1/6/81	INTEREST	104 44			5674 74	
13	1/29/81	Check		300 00	✓	5374 74	
14	2/6/81	INTEREST	100 78			5475 52	
15	2/27/81	Check		100 00	✓	5375 52	
16	3/4/81	Check		500 00	✓	4875 52	
17	3/6/81	INTEREST	91 42			4966 94	
18	4/6/81	INTEREST	33 13			5000 07	
19	4/21/81	Check		200 00		4800 07	
20	5/6/81	INTEREST	90 00			4890 07	
21	5/18/81	Check		500 00		4390 07	
22	6/6/81	INTEREST	82 31			4472 38	
23	6/30/81	Check		500 00		3972 38	
24	7/6/81	INTEREST	74 48			4046 86	
25	9/28			300 -		3746 86	

□ BALANCE FORWARDED

*500 798 11*  
*2948.75*

86040565176



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 17592

Date 10/13/80

Your Order No.

Sold To Life Amend Polit. Action Committee  
 529 14th St. NW  
 ■ Washington, DC  
 ■ Attn: Accounts Payable

Shipped to Various

Our Order No.	Salesman	Terms* SEE BELOW	O.B.	Date Shipped	Shipped Via.		
16398	B. Rudderow	Net 20 Days	Our Plant	10/7-13/80	Various		
Quantity Ordered	Quantity Shipped	Stock Number/Description		Unit Price	Unit	Amount	
86040565177		Authorized by Paul Brown					
		737,700	(Single Count) 8.250 x 25.000 Printed 5 C / 4 C on 50# Juniper Matte "Responder"	40.16	M	\$29,626.03	
			9 Basic Plates	165.00		1,485.00	
			5 Version Plates	165.00		825.00	
			Additional Prep:				
			Stripping			165.00	
			Proofing			675.00	
			Freight:				
		395,000	To Huntington, IN Via Exclusive Trk	KSS			955.70
		19,500	To Washington, DC Customer Pickup				-
		12,500	To Jasper, AL Via Yellow Frt				48.01
		1,900	To Washington, DC Via S&S				40.95
		14,000	To Emmett, ID Via P.I.E.				98.45
		41,500	To Indianapolis, IN Via M&D				99.46
		13,500	To Tell City, IN Via M&D				56.08
	12,000	To Sturgis, SD Via P.I.E.				83.74	
	1,400	To Bayou, AL Via Yellow Frt				91.71	
	25,000	To La Crusse, WI Via Halls				89.18	
	20,000	To Shawano, WI Via Halls				70.17	
	25,000	To Dubuque, IA Via Yellow Frt				96.97	
	29,000	To West Des Moines, IA Via Yellow Frt				116.28	
	24,500	To Wilton, IA Via Yellow Frt				85.35	
	46,000	To Tucson, AZ Via Yellow Frt				236.10	
		ICC Fuel Cost Surcharge				152.86	
		* Received in Advance \$10,000.00 on 9/19/80					
		Received in Advance 20,000.00 on 10/7/80					
		Balance Net 20 Days				\$35,097.04	
		Freight Charges To Follow					
		<b>CREDIT TERMS: NET 20 DAYS</b>					
		A service charge of 1 7/8% per month will be assessed on charges not paid within 20 days of the billing date and will continue until the past due amount is paid in full.					

ORIGINAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.

# Invoice



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 17751

Date 10/22/80

Your  
 Order No.

Sold To **LIFE AMENDMENT POLITICAL ACTION  
 COMMITTEE**  
 ■ 529 14th St. NW  
 ■ Washington, DC

Shipped to **LEMARS DAILY SENTINEL  
 Lemars, IA**  
 ■  
 ■

att'n: Accounts Payable

Our Order No.	Salesman	Terms	F.O.B.	Date Shipped	Shipped Via	
16398	B. Rudderow	Net 20 days	Our Plant	10/22/80	KSS	
Quantity Ordered	Quantity Shipped	Stock Number/Description		Unit Price	Unit	Amount
	27,500	Authorized by Paul Brown Freight: to Lemars, IA I.C.C. Fuel Cost Surcharge  Additional freight charges to follow when shipped.				\$110.04 14.31 <hr/> \$124.35 5,097.04 <hr/> 5,221.39 <del>5,000.00</del> <del>5,221.39</del> 300.00 <hr/> 4,921.39 100.00 <hr/> 4,821.39 100.00 <hr/> 4,721.39
<p><b>CREDIT TERMS: NET 20 DAYS</b>                      A service charge of _____ per month will be assessed on charges not paid within 20 days of the billing date and will continue until the past due amount is paid in full.</p>						

8604055178

*Handwritten notes and corrections:*  
 C# 1983  
 C# 208  
 C# 218  
 10/22/80  
 2/8

ORIGINAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.

# Invoice



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 2175  
 Date 11/24/80  
 Your Order No.

Sold To LIFE AMEND POLIT ACTION COMMOTTEE  
 529 14th St. N.W.  
 ■ Washington, D.C.  
 ■ Att'n Accounting Dep't

Shipped to

Our Order No.	Salesman B. Rudderow	Terms Net Cash	F.O.B.	Date Shipped	Shipped Via	
Quantity Ordered	Quantity Shipped	Stock Number/Description		Unit Price	Unit	Amount
86040565179		Interest Charge 1 7/8% on Balances Past 20 Days AS of 11/15/80				
		<u>Invoice # 17592, 10/13/80, \$5,097.04 Bal.</u>				
		Interest on \$ 5,097.04 Int. Days - 14 To 11/15/80				43.98
						43.98
<b>CREDIT TERMS: NET 20 DAYS</b> A service charge of _____ per month will be assessed on charges not paid within 20 days of the billing date and will continue until the past-due amount is paid in full.						

ORIGINAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.

# Invoice



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 2203

Date 12/19/80

Your Order No.

Sold To **LIFE AMEND POLIT ACTUON COMMOTTEE**  
 529 14th St. N.W.  
 Washington,, DC.  
 Att'n Accounting Dep't

Shipped to

Our Order No.	Salesman	Terms	F.O.B.	Date Shipped	Shipped Via
	R. Rudderow	Net CASH			
Quantity Ordered	Quantity Shipped	Stock Number/Description	Unit Price	Unit	Amount
86040565130		Interest Charge 1 7/8% on BALANCES Past 20 DAYS As of 12/15/80  <u>Invoice # 17592, 10/13/80, \$5,097.04</u>  Interest on \$ 5,097.04 Int. Days - 30 To 12/15/80			94.26  94.26
<p><b>CREDIT TERMS: NET 20 DAYS</b>                      A service charge of _____ per month will be assessed on charges not paid within 20 days of the billing date and will continue until the past due amount is paid in full.</p>					

ORIGINAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.

**Invoice**



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 2282  
 Date 2/20/81  
 Your Order No.

Sold To **LIFE AMEND POLIT ACTION COMMITTEE** Shipped to  
 529 14th St. N.W.  
 Washington, D.C.  
 Att'n Accounting Dep't

Our Order No.	Salesman	Terms	F.O.B.	Date Shipped	Shipped Via
	R. Rudderow	Net Cash			
Quantity Ordered	Quantity Shipped	Stock Number/Description	Unit Price	Unit	Amount
		Interest Charge 1 7/8% on Balances Past 20 Days AS of 2/15/81			
		<u>Invoice # 17592, 10/13/80, \$4,797.04</u>			
		Interest on \$ 4,797.04 Int. Days - 21 To 2/5/81			62.10
		Payment of \$100.00 2/5/81			
		Interest on \$4,697.04 Int. Days -8 To 2/13/81			23.16
		Payment of 100.00 2/13/81			
		Interest on \$ 4,597.04 Int. Days - 2 To 2/15/81			5.67
					<hr/> 90.93

96040565191

4687.97

ORIGINAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.

# Invoice



P.O. Box 185 • Rt. 1 & Adams Station  
 North Brunswick • New Jersey 08902  
 201-297-5100

No. 2292  
 Date 3/18/81  
 Your Order No.

Sold To **LIFE AMENT POLIT ACTION COMMITTEE** Shipped to  
 6529 14th St. N.W.  
 Washington, D.C.

Att'n Accounting Dep't

Our Order No.	Salesman	Terms	F.O.B.	Date Shipped	Shipped Via
	R. Rudderow	Net Cash			
Quantity Ordered	Quantity Shipped	Stock Number/Description	Unit Price	Unit	Amount
		Interest charge 1 7/8% on Balances Past 20 Days As of 3/15/81			
		<u>Invoice # 17592, 10/13/80, \$4,597.04</u>			
		Interest on \$ 4,597.04 Int. Days - 28 To 3/15/81			79.35
					<u>79.35</u>

86040565189

CONFIDENTIAL

This invoice is subject to the terms and conditions printed on the face and reverse side of our Confirmation and Production Order.



Webcraft

U.S. Highway 1 & Adams Station

North Brunswick, New Jersey 08902

(201) 297-5100

STATEMENT OF ACCOUNT

PAGE

PAGE

DATE  
10/31/80

COMP CUSTOMER  
1237600

DATE COMP CUSTOMER  
10/31/80 1237600

LIFE AMEND POLIT ACTION  
NATIONAL PRESS BLOC 529  
14TH ST  
NW WASHINGTON

DC

DIRECT  
RESPONSE  
PRINTERS

THANK YOU FOR YOUR BUSINESS

INVOICE NUMBER	DATE	TRAN	CURRENT	PAST 30	PAST 60	PAST 90	PAST 120	INVOICE NUMBER	TRAN	AMOUNT
999	9/19/80	PMT		10,000.00				999	PMT	10,000.00
999	9/19/80	INV		10,000.00				999	INV	10,000.00
998	10/07/80	PMT	20,000.00					998	PMT	20,000.00
998	10/07/80	INV	20,000.00					998	INV	20,000.00
17592	10/13/80	INV	35,097.04					17592	INV	35,097.04
998	10/07/80	CRN	20,000.00					998	CRN	20,000.00
999	9/19/80	CRN	10,000.00					999	CRN	10,000.00
17751	10/22/80	INV	124.35					17751	INV	124.35
<b>TOTAL DUE</b>			<b>TOTAL CURRENT</b>	<b>TOTAL PAST 30</b>	<b>TOTAL PAST 60</b>	<b>TOTAL PAST 90</b>	<b>TOTAL PAST 120</b>	<b>TOTAL DUE</b>		
			5,221.39	10,000.00				5,221.39		

2 6 1 5 4 0 7 0 0 8

CUSTOMER





**Webcraft**  
 U.S. Highway 1 & Adams Station  
 North Brunswick, New Jersey 08902  
 (201) 297-5100

STATEMENT OF ACCOUNT

PAGE
1

DATE
12/31/80

COMP	CUSTOMER
	1237606

LIFE AMEND POLIT ACTION  
 NATIONAL PRESS BLDG 529  
 14TH ST  
 NW WASHINGTON

DC

DIRECT  
 RESPONSE  
 PRINTERS

THANK YOU FOR YOUR BUSINESS

INVOICE NUMBER	DATE	TRAN	CURRENT	PAST 30	PAST 60	PAST 90	PAST 120
17592	10/13/80	INV			35,097.04		
998	10/07/80	CRM			20,000.00		
999	9/19/80	CRM			10,000.00		
17592	12/22/80	PMT			300.00		
17751	10/22/80	INV			124.35		
2175	11/24/80	INV		43.98			
2203	12/19/80	INV	94.26				
<b>TOTAL DUE</b>			<b>TOTAL CURRENT</b>	<b>TOTAL PAST 30</b>	<b>TOTAL PAST 60</b>	<b>TOTAL PAST 90</b>	<b>TOTAL PAST 120</b>
			5,059.63	93.98	49,221.39	.00	.00

*Paid 100.00  
 2-2-81*

CUSTOMER

STATEMENT OF ACCOUNT

**Webcraft**  
 U.S. Highway 1 & Adams Station  
 North Brunswick, New Jersey 08902  
 (201) 297-5100

PAGE
1

PAGE
1

DATE
1/31/81

COMP	CUSTOMER
	123760

DATE	COMP	CUSTOMER
1/31/81		123760

LIFE AMEND POLIT ACTION  
 NATIONAL PRESS BLDG 529  
 14TH ST  
 NW WASHINGTON DC

THANK YOU FOR YOUR BUSINESS

DIRECT  
 RESPONSE  
 PRINTERS

INVOICE NUMBER	DATE	TRAN	CURRENT	PAST 30	PAST 60	PAST 90	PAST 120	INVOICE NUMBER	TRAN	AMOUNT
7592	10/13/80	INV				35,097.04		17592	INV	35,097.04
999	10/07/80	CRM				20,000.00		998	CRM	20,000.00
999	9/19/80	CRM				10,000.00		999	CRM	10,000.00
7592	12/22/80	PMT				300.00		17592	PMT	300.00
7751	10/22/80	INV				124.35		17751	INV	124.35
2175	11/24/80	INV			43.98			2175	INV	43.98
2203	12/19/80	INV		94.26				2203	INV	94.26
			<b>TOTAL CURRENT</b>	<b>TOTAL PAST 30</b>	<b>TOTAL PAST 60</b>	<b>TOTAL PAST 90</b>	<b>TOTAL PAST 120</b>	<b>TOTAL DUE</b>		



**Webcraft**

U.S. Highway 1 & Adams Station  
North Brunswick, New Jersey 08902  
(201) 297-5100

STATEMENT OF ACCOUNT

PAGE

PAGE

LIFE A-END POLIT ACTION  
NATIONAL PRESS BLOC 529  
14TH ST  
NW WASHINGTON DC

DATE  
2/28/81

COMP CUSTOMER  
1237600

DATE COMP CUSTOMER  
2/28/81 1237600

THANK YOU FOR YOUR BUSINESS

DIRECT  
RESPONSE  
PRINTERS

INVOICE NUMBER	DATE	TRAN	CURRENT	PAST 30	PAST 60	PAST 90	PAST 120	INVOICE NUMBER	TRAN	AMOUNT
7592	10/13/80	INV					35,097.04	17592	INV	35,097.04
999	10/07/80	CRN					20,000.00-	999	CRN	20,000.00-
999	9/19/80	CRN					10,000.00-	999	CRN	10,000.00-
7592	12/22/80	PMT					300.00-	17592	PMT	300.00-
7592	2/05/81	PMT					100.00-	17592	PMT	100.00-
7592	2/13/81	PMT					100.00-	17592	PMT	100.00-
1751	10/22/80	INV					124.35	17751	INV	124.35
2175	11/24/80	INV				43.98		2175	INV	43.98
2203	12/19/80	INV			94.25			2203	INV	94.25
2282	2/20/81	INV	90.93					2282	INV	90.93
<b>TOTAL DUE</b>			<b>TOTAL CURRENT</b>	<b>TOTAL PAST 30</b>	<b>TOTAL PAST 60</b>	<b>TOTAL PAST 90</b>	<b>TOTAL PAST 120</b>			<b>TOTAL DUE</b>



**Brenner Credit Adjustment Bureau**

100 Merrick Road  
Rockville Centre, New York 11571

Phone: (516) 764-4400  
(212) 632-8734

04/03/81

Our File #124675

Life Amendment Political  
Action Committee  
6 Library Court, S.E.  
Washington, D.C. 20003

Att: Judy and Paul Brown

Gentlemen: RE: WEBCRAFT PACKAGING, N. BRUNSWICK, NJ

There has been placed with us for immediate collection your unpaid account in the sum of \$4,950.56 in favor of the above named creditor.

Our instructions are to demand payment so as to effect collection forthwith. It will be to the best interests of all concerned for you to settle directly with us now and avoid any further activity and expense in the bringing about the desired results.

Therefore, please submit your certified check for \$4,950.56 in full settlement at once, without fail. This matter is of such importance that we must request your answer immediately by return mail, with either an expression of your intentions or your remittance.

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

VY:rc

cc: LAPAC  
P.O. Box 488  
Stafford, VA 22554  
Att: Paul Brown

8  
6  
0  
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0  
5  
6  
5  
1  
8  
9



**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phones: (516) 764-4400  
 (212) 532-8734

05/06/81

#124675

Life Amendment Political  
 Action Committee  
 6 Library Court, S.E.  
 Washington, D.C. 20003

Att: Jim Kappus, Adm Asst.

Gentlemen: **WEBCRAFT PACKAGING** N. BRUNSWICK, NJ

Have you forwarded your promised remittance of \$500.00 to apply on the balance due on the above account of \$4,950.56.

You are to disregard this letter if your remittance has already been mailed; otherwise please cooperate by return mail forthwith.

THIS IS IMPORTANT!

Very truly yours,

*Steve Brenner*  
 BRENNER CREDIT ADJUSTMENT BUREAU

CPT:mf  
 124675  
 L.A.P.A.C.  
 P. O. Box 488  
 Stafford, VA 22254  
 Att: Paul Brown

86040565189





**Brenner Credit Adjustment Bureau**  
100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 784-4400  
(212) 632-8734

05/18/81

#124675  
Life Amendment Political  
Action Committee  
6 Library Court, S.E.  
Washington, D.C. 20003

Att: Judy & Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Further delay in settlement is decidedly unsatisfactory. It is in your own interest that we again urge you to let us have your check for \$4,950.56.

Remit promptly and eliminate further need for additional collection activity herein.

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:mf  
124675  
L.A.P.A.C.  
P. O. Box 488  
Stafford, VA 22554  
Att: Paul Brown

86040565190





**Brenner Credit Adjustment Bureau**  
100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 764-4400  
(212) 532-8734

5/22/81

124675  
Life Amendment Political  
Action Committee  
Library Court, S.E.  
Washington, D.C. 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N BRUNSWICK, NJ

Thank you for your remittance in the sum of \$500.00 which has been credited to the above account leaving a balance due of \$4450.56.

We do not know of any advices which may have accompanied your payment relative to this remaining balance, but are dating our files ahead until 5/29/81 to await your promised payment in the sum of \$500.00 to apply on the account.

Please use the enclosed self-addressed envelope when remitting and thank you for your cooperation.

*Very truly yours*  
*Steve Brenner*

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

86040565191





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phones: (516) 764-4400  
 (212) 532-8734

5/27/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court, S.E.  
 Washington, D.C. 20003

Att: Judy & Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Have you forwarded your remittance of \$500.00 to apply on the above account of \$4450.56.

You are to disregard this letter if your remittance has already been mailed; otherwise please cooperate by return mail forthwith.

THIS IS IMPORTANT!

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

86040565192





**Brenner Credit Adjustment Bureau**  
100 Merrick Road  
Rockville Centre, New York 11571

Phone: (516) 764-4400  
(212) 532-8734

6/04/81

124675  
Litfe Amendment Political  
Action Committe  
6 Library Court S.E.  
Washington, DC 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Further delay in settlement is decidedly unsatisfactory. It is in your own interest that we again urge you to let us have your check for \$4450.56

Remit promptly and eliminate further need for additional collection activity herein.

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

VY:rc

86040565193





**Brenner Credit Adjustment Bureau**  
100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 764-4400  
(212) 532-8734

07/02/81

124675  
Life Amendment Political  
Action Committee  
6 Library Court, S.E.  
Washington, DC 20003

Att: Judy & Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Have you forwarded your remittance of \$500.00 to apply on the above account of \$3950.56.

You are to disregard this letter if your remittance has already been mailed; otherwise please cooperate by return mail forthwith.

THIS IS IMPORTANT!

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:mf  
124675  
L.A.P.A.C.  
P. O. Box 488  
Stafford, VA 22554  
Att: Paul Brown

86040565194





**Brenner Credit Adjustment Bureau**

100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 764-4400  
(212) 532-9734

7/15/81

124675  
Life Amendment Political  
Action Committee  
6 Library Court, S.E.  
Washington, DC 20003

Att: Judy & Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Further delay in settlement is decidedly unsatisfactory. It is in your own interest that we again urge you to let us have your check for \$3950.56.

Remit promptly and eliminate further need for additional collection activity herein.

Very truly yours,

VY:rc

BRENNER CREDIT ADJUSTMENT BUREAU

86040565195





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phones: (516) 764-4400  
 (212) 632-8734

7/22/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court S.E  
 Washington, DC 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

It is certainly strange that you should have seen fit to ignore our courteous letters. Apparently you fail to understand that this sort of treatment and neglect by you can be avoided if desired.

We once more and finally urge upon you the absolute necessity of letting us hear from you by the first outgoing mail if you really want to pay this account or explain your continued refusal to do so.

The very least your knowledge of business courtesy and your sense of propriety should prompt you to do is favor us with an immediate answer in some form or your remittance to cover for \$3950.56.

Very truly yours

*Stuart Brenner*

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

8 6 0 4 0 5 6 5 1 9 6





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phone: (516) 764-4400  
 (212) 532-8734

10/02/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court S.E.  
 Washington, DC 20003

Att: Judy & Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Have you forwarded your remittance of \$500.00 to apply on the above account of \$24500.56.

You are to disregard this letter if your remittance has already been mailed; otherwise please cooperate by return mail forthwith.

THIS IS IMPORTANT!

Very truly yours,

*John West*  
 BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

124675  
 L.A.P.A.C.  
 PO Box 488  
 Stafford, VA 22554

Att: Paul Brown

*24,500.56* ~~ck# 1931~~ *Voiced*  
~~500~~  


---

*24,000.56* *ck# 1963*  
~~500~~  


---

*23,500.56*  
  
*\$ 1450.56*

86040565197





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phone: (516) 784-4400  
 (212) 832-8734

10/14/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court S.E.  
 Washington, DC 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

Further delay in settlement is decidedly unsatisfactory. It is in your own interest that we again urge you to let us have your check for \$2450.56.

Remit promptly and eliminate further need for additional collection activity herein.

Very truly yours,

BRENNER CREDIT ADJUSTMENT BUREAU

VY:rc

124675  
 L P P A C  
 PO Box 488  
 Stafford, VA 22554

Att: Paul Brown

8 6 0 4 0 5 6 5 1 9 8





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phone: (516) 764-4400  
 (212) 532-8734

11/17/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court S.E.  
 Washington DC 20003

Att: judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, NJ

It is certainly strange that you should have seen fit to ignore our courteous letters. Apparently you fail to understand that this sort of treatment and neglect by you can be avoided if desired.

We once more and finally urge upon you the absolute necessity of letting us hear from you by the first outgoing mail if you really want to pay this account or explain your continued refusal to do so.

The very least your knowledge of business courtesy and your sense of propriety should prompt you to do is favor us with an immediate answer in some form or your remittance to cover for \$2450.56.

Very truly yours  
*Robert Thomas Jr.*

CPT:rc

BRENNER CREDIT ADJUSTMENT BUREAU

124675  
 L.A.P.A.C.  
 PO Bxo 488  
 stafford VA 22554

86040565199





**Brenner Credit Adjustment Bureau**  
 100 Merrick Road  
 Rockville Centre, New York 11571

Phone: (516) 754-4400  
 (212) 532-6734

11/10/81

124675  
 Life Amendment Political  
 Action Committee  
 6 Library Court S.E.  
 Washington, DC 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING N. BRUNSWICK, N J

Your failure to comply with our many letters requesting payment of this account is indeed surprising. No further delay can be sanctioned.

Certainly you ought to understand the necessity of paying this obligation directly. By not remitting voluntarily you are simply further aggravating a serious situation which is already sufficiently strained.

We have been permitted to wait only until 11/17/81 for the receipt of your remittance of \$2450.56.

*Robert Thomas Jr.*  
 Sincerely yours,

CPT:rc

BRENNER CREDIT ADJUSTMENT BUREAU

124675  
 L.A.P.A.C.  
 PO Box 488  
 Stafford, VA 22554  
 Att: Paul Brown

86040565200





**Brenner Credit Adjustment Bureau**

100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 764-4400  
(212) 532-8734

11/30/81

124675

Life Amendment Political  
Action Committee  
6 Library Court SE  
Washington, DC 20003

Att: Jim Kappus, Adm. Asst.

Gentlemen: WEBCRAFT PACKAGING N. BRUNWICK, NJ

It will be a mistake for you to continue disregarding this obligation.

We have been given to understand by your creditor that every means legally available to them will be utilized in order to obtain what is rightfully due.

Do not make further action necessary on the part of your creditor, and voluntarily communicate with us if you cannot, or feel you should not forward at once the amount requested of \$2450.56.

Very truly yours,

*Robert Thomas Jr.*

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:mf  
124675  
L.A.P.A.C.  
P.O. Box 488  
Stafford, VA 22554  
Att: Paul Brown

86040565201





**Brenner Credit Adjustment Bureau**  
100 Merrick Road  
Rockville Centre, New York 11571

Phone: (516) 784-4400  
(212) 632-6734

12/04/81

124675  
Life Amendment Political  
Action Committee  
6 Library Court S.E.  
Washington, DC 20003

Att: Judy & Paul Brown

Gentlemen: WESCRAFT PACKAGING N. BRUNSWICK, NJ

Thank you for your remittance in the sum of \$500.00 which has been credited to the above account leaving a balance due of \$1950.56.

We do not know of any advices which may have accompanied your payment relative to this remaining balance, but are dating our files ahead until 12/11/81 to await your further payment in the sum of \$500.00 to apply on the account.

Please use the enclosed self-addressed envelope when remitting and thank you for your cooperation.

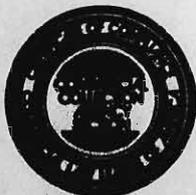
Very truly yours, *Robert Thomas Jr.*

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

124576  
L.A.P.A.C.  
PO Box 488  
Stafford, VA 22554  
Att: Paul Brown

86040565202





**Brenner Credit Adjustment Bureau**

100 Merrick Road  
Rockville Centre, New York 11571

Phones: (516) 764-4400  
(212) 532-8734

1/06/82

124675  
Life Amendment Political  
Action Committee  
6 Library Colurt S.E.  
Washington DC 20003

Att: Judy And Paul Brown

Gentlemen: WEBCRAFT PACKAGING

N. BRUNSWICK, NJ

Thank you for your remittance in the sum of \$500.00 which has been credited to the above account leaving a balance due of \$1450.56.

We do not know of any advices which may have accompanied your payment relative to this remaining balance, but are dating our files ahead until 1/13/82 to await your further payment in the sum of \$500.00 to apply on the account.

Please use the enclosed self-addressed envelope when remitting and thank you for your cooperation.

Very truly yours,

*Robert Thomas Jr.*

BRENNER CREDIT ADJUSTMENT BUREAU

CPT:rc

124675  
L.A. P.A.C.  
P.O. Box 488  
Stafford, VA 22554  
Att: Paul Brown

*# 2005  
Settlement of \$ 900.<sup>00</sup>  
2-3-82*

86040565203



ITEM IS IN PAYMENT OF FOLLOWING	
DATE	AMOUNT

LAPAC, INC. 1077  
P. O. BOX 14263  
WASHINGTON, D. C. 20044  
BEN FRANKLIN STATION

1551

2/8 1981 1551

PAY TO THE ORDER OF Webcraft

\$ 100.00

One Hundred & 00/100 DOLLARS

CORRECT ENDORSEMENT IS RECEIPT

SECURITY NATIONAL BANK  
WASHINGTON, D. C.

*[Signature]*

⑆0001551⑆ ⑆054000807⑆ ⑆05114024001⑆ ⑆0000010000⑆

86040565204

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1657

PAY Five hundred & 00/100

DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1657	Webcraft	5-13-81		500.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024001⑆ ⑆0000050000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1751

PAY FIVE HUNDRED EXACTLY

DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1751	WEBCKRAFT	6-19-81		500.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024001⑆ ⑆0000050000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

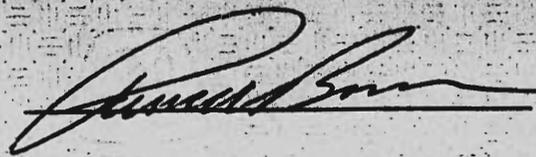
1796

PAY FIVE HUNDRED DOLLARS

DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1796	Webcraft	7-28-81	Voter ED GUIDE	500.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆ ⑆0511402401⑆ ⑆0000050000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

1815

PAY FIVE HUNDRED EXACTLY

DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1815	Webcraft Packaging	8-28-81	Voter Guide 1980	500.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆ ⑆0511402401⑆ ⑆0000050000⑆

LAPAC, INC.  
6 LIBRARY COURT, S.E.  
WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
540

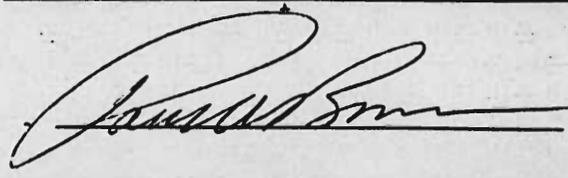
1842

PAY five hundred & 00/100

DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1842	Webcraft	9-14-81		500.00

SECURITY NATIONAL BANK  
WASHINGTON, D.C.



⑆054000807⑆ ⑆0511402401⑆ ⑆0000050000⑆

86040565205

LAPAC, INC.  
 8 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
 540  
 1919

PAY Five Hundred <sup>00</sup>/<sub>100</sub> DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
1919	Weberatt	2-2-82	100.00	500.00

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

⑆054000807⑆ ⑆05114024⑆ ⑆0000050000⑆

ITEM IS IN PAYMENT OF FOLLOWING

DATE	AMOUNT

CORRECT ENDORSEMENT IS RECEIPT

LAPAC, INC. 1077  
 P. O. BOX 14263  
 WASHINGTON, D. C. 20044  
 BEN FRANKLIN STATION

1508

2-2 1982 15-80 540

PAY TO THE ORDER OF Weberatt \$ 100.00  
One hundred and 00/100 DOLLARS



SECURITY NATIONAL BANK  
 WASHINGTON, D. C.

*[Signature]*

⑆0001508⑆ ⑆054000807⑆ ⑆05114024⑆ ⑆0000010000⑆

LAPAC, INC.  
 6 LIBRARY COURT, S.E.  
 WASHINGTON, D.C. 20003

DATE	INVOICE	AMOUNT

15-80  
 540  
 2005

PAY Nine hundred-fifty <sup>00</sup>/<sub>100</sub> DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	DESCRIPTION	CHECK AMOUNT
2005	Brenner Credit Corp.	2-3-82	Weberatt - 100.00 Full of payment	950.00

SECURITY NATIONAL BANK  
 WASHINGTON, D.C.

*[Signature]*

10 full of payment

⑆054000807⑆ ⑆05114024⑆ ⑆0000095000⑆

86040565207

LAW OFFICES

**SCOTT, HARRISON & McLEOD**

2501 M STREET, N. W.

WASHINGTON, D. C. 20037

---

Mr. Conley Edwards, Jr.  
Federal Election Commission  
Washington, D. C. 20463

BY HAND



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 29, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: CONLEY EDWARDS

FROM: SHAWN WOODHEAD  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1595 - LIFE AMENDMENT POLITICAL ACTION  
COMMITTEE (LAPAC)

Please review the attached Request for Additional Information (RFAI) for the 1984 June Monthly Report and Information Notices (INs) for the 1984 May and July Monthly Reports to be sent to LAPAC. If no response or an inadequate response is received for the RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Friday, August 31, 1984. Thank you.

COMMENTS:

Attachment

86040565208



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

PQ-2

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
6176 Strasburg Drive  
Centreville, VA 22020

Identification Number: C00082297

Reference: June Monthly Report (5/1/84-5/31/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

-On Schedule D you report a \$150 payment to Jon Minaric. The outstanding balance owed to this creditor at the beginning of the period was \$850. You disclose the outstanding balance at the end of the period as \$250. Please clarify this discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565209



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
6176 Strasburg Drive  
Centreville, VA 22020

Identification Number: C00082297

Reference: May Monthly Report (4/1/84-4/30/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the Column B totals for the Detailed Summary Page.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565210



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RO-5

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
6176 Strasburg Drive  
Centreville, VA 22020

Identification Number: C00082297

Reference: July Monthly Report (6/1/84-6/30/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565211



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 6, 1984

Paul A. Brown, Treasurer  
Life Amendment Political  
Action Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

RE: MUR 1595

Dear Mr. Brown:

On February 7, 1984, the Commission determined that your committee and you, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. An investigation of this matter is being conducted and it has been determined that certain information is needed from you. This information was requested from your committee, but it was not supplied.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and 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 Conley Edwards, Jr. at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

*Handwritten signature of Kenneth A. Gross*  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Subpoena and Order

cc: Marion Edwyn Harrison, Esquire

86040565212



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

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

DATE: AUGUST 3, 1984

SUBJECT: MUR 1595 - Subpoena and Order

The attached subpoena and order, which was Commission approved on July 31, 1984 by a vote of 5-0, has been signed and sealed this date.

86040565213

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. )  
Paul A. Brown, Treasurer )

SUBPOENA AND ORDER FOR THE  
PRODUCTION OF DOCUMENTS

To: Paul A. Brown, Treasurer  
Life Amendment Political Action  
Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

8  
6  
0  
4  
0  
5  
6  
5  
2  
1  
4  
PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all books, records, memoranda and other written materials in your possession which pertain to the business transactions between the Life Amendment Political Action Committee and the following creditors:

Barnett, Alagia and Carey  
Insta-Print  
Phoenix Communications  
Webcraft Packaging

Definitions

As used in this subpoena and order, the terms listed below are defined as follows:

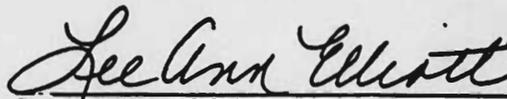
1. The term "documents and materials" shall mean all tangible things by which human communication is transmitted or stored including the original, all copies, and drafts of writings of any kind, printed, visual, or electronic materials to be produced with respect to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary

entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

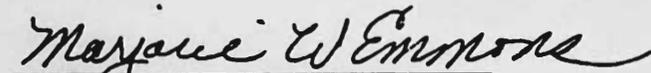
2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from January 1, 1981, up to and including July 20, 1984, unless otherwise specified.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this 3rd day of August, 1984.

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

ATTEST:

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

86040565215

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1595
Life Amendment Political	)	
Action Committee, Inc.	)	
Paul A. Brown, Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 31, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1595:

1. Authorize the subpoena and order for the production of documents to Paul A. Brown, submitted with the General Counsel's Report signed July 26, 1984.
2. Approve the letter attached to the General Counsel's Report signed July 26, 1984.

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

Attest:

7-31-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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

7-27-84, 9:57  
7-27-84, 2:00

86040565216

In the Matter of )  
Life Amendment Political )  
Action Committee, Inc. )  
Paul A. Brown, Treasurer )

84 JUL 27 A 9: 57  
MUR 1595

**SENSITIVE**

GENERAL COUNSEL'S REPORT

On February 7, 1984, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. Additionally, interrogatories were mailed along with the notification letter on February 8, 1984.

On March 14, 1984, this Office received the answers to the interrogatories to Paul A. Brown through the Committee's counsel. However, the documents promised were not included as attachments as indicated in the answers to the interrogatories.

On April 13, 1984, after several attempts to contact counsel in an effort to secure the documents that were referred to in the answers to the interrogatories, we finally spoke with counsel concerning the missing documents.

On April 30, 1984, in response to our request, we received two duly executed settlement agreements that were negotiated by the Committee and two creditors: Phoenix Communications and Webcraft Packaging.

On May 11, 1984, this Office contacted counsel to request a date for the production of the remaining documents. Counsel stated that the documents would be provided as soon as possible.

86040565217

To date, the Respondents have failed to provide the remaining documents requested by this Office.

Accordingly, the Office of General Counsel recommends that the Commission authorize a subpoena and order for production of all books, records, memoranda and other written materials in Respondent's possession which pertain to the business transactions between the Respondents and the following creditors: Barnett, Alagia and Carey; Insta-Print; Phoenix Communications; and Webcraft Packaging.

Recommendation:

The Office of General Counsel recommends that the Commission:

1. Authorize the attached subpoena and order for the production of documents to Paul A. Brown; and
2. Approve the attached letter.

Charles N. Steele  
General Counsel

July 26, 1984  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

- Copy of Subpoena
- Copy of Letter

86040565218



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Paul A. Brown, Treasurer  
Life Amendment Political  
Action Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

RE: MUR 1595

Dear Mr. Brown:

On February 7, 1984, the Commission determined that your committee and you, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished. An investigation of this matter is being conducted and it has been determined that certain information is needed from you. This information was requested from your committee, but it was not supplied.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and 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 Conley Edwards, Jr. at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Subpoena and Order

cc: Marion Edwyn Harrison, Esquire

86040565219

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Life Amendment Political ) MUR 1595  
Action Committee, Inc. )  
Paul A. Brown, Treasurer )

SUBPOENA AND ORDER FOR THE  
PRODUCTION OF DOCUMENTS

To: Paul A. Brown, Treasurer  
Life Amendment Political Action  
Committee  
P.O. Box 1982  
Garrisonville, Virginia 22463

Definitions

As used in this subpoena and order, the terms listed below  
are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is transmitted or stored including the original, all copies, and drafts of writings of any kind, printed, visual, or electronic materials to be produced with respect to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."
2. All requests contained herein are for information, documents and materials dating from January 1, 1981, up to and including July 20, 1984, unless otherwise specified.

86040565220

PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all books, records, memoranda and other documents and materials in your possession which pertain to the business transactions between the Life Amendment Political Action Committee and the following creditors:

Barnett, Alagia and Carey  
Insta-Print  
Phoenix Communications  
Webcraft Packaging

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this \_\_\_\_\_ day of \_\_\_\_\_, 1984.

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

ATTEST:

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

86040565221



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 11, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: CONLEY EDWARDS

FROM: SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1595 - LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.  
(LAPAC)

---

Please review the attached Request for Additional Information (RAI) which is to be sent to LAPAC for the 1984 April Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by the close of business on Friday, July 13<sup>th</sup>. Thank you.

COMMENTS:

Attachment

86040565222



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee, Inc.  
P.O. Box 1984  
Garrisonville, VA 22463

Identification Number: C00082297

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule A to support the entry of \$1,000 reported on Line 13 and/or 14 of the Detailed Summary Page. All loans and loan repayments received by your committee must be itemized on Schedule A, regardless of the amount loaned or repaid. (2 U.S.C. 434(b)(3)(E) & (5)(D))

-Please provide a Schedule B to support the entry of \$1,600 reported on Line 21 of the Detailed Summary Page. Each contribution made by a committee to a federal candidate committee must be itemized on Schedule B, regardless of the amount contributed. (11 CFR 104.3(b)(3)(v))

-Please provide a Schedule E to support the entry of \$22,360.74 reported on Line 22 of the Detailed Summary Page. Each independent expenditure made by your committee which aggregates in excess of \$200 in a calendar year, must be itemized on Schedule E. Additionally, Schedule E must be notarized. (2 U.S.C. 434(b)(6)(B)(iii) and 11 CFR 104.3(b)(3)(vii)(B))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

8604056223

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565224

LAW OFFICES  
**BARNETT & ALAGIA**  
1000 THOMAS JEFFERSON STREET  
WASHINGTON, D.C. 20007  
(202) 342-0342  
TELECOPIER (202) 773-9089  
CABLE ALBAR  
TELEX 89-2445

600307  
84 APR 30 PM 3:54

MARION EDWYN HARRISON, P.C.  
PARTNER

OFFICES  
KANSAS CITY  
MIAMI BEACH  
MEMPHIS  
NASHVILLE  
JACKSON  
ATLANTA  
NEW ALBANY

April 26, 1984

MUR 1595  
Edwards

Mr. Conley Edwards, Jr.  
Federal Election Commission  
Washington, D. C. 20463

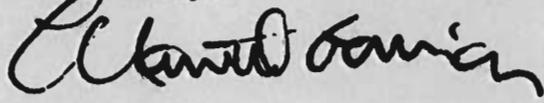
Re: MUR 1595

Dear Mr. Edwards:

We refer to the Answers to Interrogatories of Mr. Paul A. Brown, dated March 12, 1984, photocopy attached.

1. We have requested the documents referred to in ¶3C and ¶3F.
2. We attach an executed Settlement Agreement pertaining to Webcraft Packaging, Inc., in further response to Interrogatory #7.
3. We attach an executed Settlement pertaining to Phoenix Communications, in further response to Interrogatory #8.

Sincerely, .



MARION EDWYN HARRISON

Enclosures

MEH:bh

86040565225

# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P. O. BOX 1984 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 690-2049



## SETTLEMENT AGREEMENT

Between Webcraft Packaging (hereinafter the "Creditor") and the Life Amendment Political Action Committee which was organized to support and finance campaigns for elections of candidates for the U.S. House of Representatives and U.S. Senate (hereinafter the "Committee").

WHEREAS, the Creditor has a claim against the Committee in the amount of \$1460.56 as the result of providing services and/or materials in connection with campaigns for the U.S. House and U.S. Senate said claim constitutes the only claim which the Creditor has in connection with said campaigns; and

WHEREAS, the Committee has made good faith, diligent efforts to raise funds to pay off all debts left over from said campaign, it now appears unlikely that the Committee will be able to raise more funds and the Committee has undertaken all reasonable efforts to satisfy this debt: and

WHEREAS, the Creditor has treated the debt of the Committee in a commercially reasonable manner, having pursued its remedies in a manner similar to that employed with respect of claims against other debtors: and

WHEREAS, after taking into account the limited funds available to the Committee, the costs of litigation and the prospects for collection, it appears prudent and reasonable to compromise and settle said claim on a negotiated basis regarded as fair by both parties under the circumstances.

NOW, THEREFORE, in consideration of the premises hereinabove stated and the undertakings of the parties herein stated, it is agreed:

1. That in full and final satisfaction of said claim, the Committee or its agent shall pay to the Creditor the sum of \$950.60.
2. That upon receipt by the Creditor of said sum, the Committee, its officers, members, consultants, agents and employees, and any and all parties in any manner associated with said Committee, as well as the candidates on whose behalf the Committee was organized shall stand, and each of them shall

*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

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SETTLEMENT AGREEMENT

be, released, acquitted and discharged from such judgment debt and from any and all indebtedness and liability to the Creditor, his assigns successors, administrators, executor or any party claiming by or through said Creditor in connection with said claim or any claims which said Creditor may have in connection with the aforementioned campaign.

Signed this 28 day of Feb, 1984

Life Amendment Political Action Committee

  
Paul Brown, Treasurer

2-28-84  
Date

Name of Creditor

Libcraft  
(Charlotte Ellison)

April 18, 1984  
Date

86040565227

# LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P. O. BOX 1984 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 650-2049



## SETTLEMENT AGREEMENT

Between Phoenix Communications (hereinafter the "Creditor") and the Life Amendment Political Action Committee which was organized to support and finance campaigns for elections of candidates for the U.S. House of Representatives and U.S. Senate (hereinafter the "Committee").

WHEREAS, the Creditor has a claim against the Committee in the amount of \$3,128.75 as the result of providing services and/or materials in connection with campaigns for the U.S. House & Senate said claim constitutes the only claim which the Creditor has in connection with said campaigns; and

WHEREAS, the Committee has made good faith, diligent efforts to raise funds to pay off all debts left over from said campaign, it now appears unlikely that the Committee will be able to raise more funds and the Committee has undertaken all reasonable efforts to satisfy this debt: and

WHEREAS, the Creditor has treated the debt of the Committee in a commercially reasonable manner, having pursued its remedies in a manner similar to that employed with respect of claims against other debtors: and

WHEREAS, after taking into account the limited funds available to the Committee, the costs of litigation and the prospects for collection, it appears prudent and reasonable to compromise and settle said claim on a negotiated basis regarded as fair by both parties under the circumstances.

NOW, THEREFORE, in consideration of the premises hereinabove stated and the undertakings of the parties herein stated, it is agreed:

1. That in full and final satisfaction of said claim, the Committee or its agent shall pay to the Creditor the sum of \$1746.80

2. That upon receipt by the Creditor of said sum, the Committee, its officers, members, consultants, agents and employees, and any and all parties in any manner associated with said Committee, as well as the candidates on whose behalf the Committee was organized shall stand, and each of them shall

*"Protecting the American Family and the Preborn Child...  
Through Political Action!"*

Authorized and paid for by LAPAC, Inc. Paul A. Brown, Treasurer

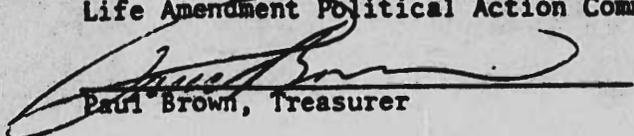
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SETTLEMENT AGREEMENT

be, released, acquitted and discharged from such judgment debt and from any and all indebtedness and liability to the Creditor, his assigns successors, administrators, executor or any party claiming by or through said Creditor in connection with said claim or any claims which said Creditor may have in connection with the aforementioned campaign.

Signed this 28 day of Feb, 1984

Life Amendment Political Action Committee

  
Paul Brown, Treasurer

2-28-84  
Date

Name of Creditor

Phoenix Direct Response, Inc.

Geranaga S. Conroy  
Date

Pres. 4/12/84

86040565229

## FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.]  
]

MUR 1595

ANSWERS TO INTERROGATORIES  
OF MR. PAUL A. BROWN

1. What are your duties as Treasurer of the Committee?

I keep the books, administer LAPAC and implement the wishes of the Board of Directors.

2. How long have you served in this capacity?

Since LAPAC was founded. I was elected at the First Meeting of the Board of Directors on December 5, 1977.

3. Did you have a written contract with any of the following?

A. Barnett, Alagia & Carey

No.

**B. Creative Mailing Consultants**

Yes, photocopy attached.

**C. Insta-Print**

No.

**D. Phoenix Communications**

No.

**E. Word Processing Exchange**

No.

**F. Webcraft Packaging**

No. However, there is a written bid, photocopy attached.

4. If the answer is yes to any of the above, please provide copies of each written contract.

No documentation.

5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.

The obligation had been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.

6. Please explain the \$208.37 credit received from Insta-Print.

Inadvertent overpayment to Insta-Print from LAPAC.

7. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$510.56 Webcraft Packaging settlement.

To be provided. None was prepared heretofore.

8. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. §114.10 for the \$1,381.95 Phoenix Communications settlement.

To be provided. None was prepared heretofore.

9. Please provide a detailed explanation and documentation of the \$784.00 credit received from Word Processing Exchange.

Word Processing Exchange granted to LAPAC, with an option to buy, two IBM MTST automatic memory typewriters. Subsequently LAPAC bought the two typewriters from Word Processing Exchange. The purchase price was less than the rental theretofore paid. The credit of \$784.00 reflects the difference.

10. Please provide a detailed explanation and documentation of the \$9,252.26 credit received from Creative Mailing Consultants.

LAPAC was indebted to Creative Mailing Consultants and had a cash flow deficiency. LAPAC sold a mailing list to Creative Mailing Consultants. As Creative Mailing Consultants utilized the list it then credited LAPAC with the value of the list. The aggregate figure is the amount of the credit, \$9,252.26.

  
PAUL A. BROWN

DISTRICT OF COLUMBIA     |  
                                  | ss.  
CITY OF WASHINGTON        |

Subscribed and sworn to before me, a Notary Public, this 12th day of March, 1984.

  
HARLENE LESBROCK

My commission expires April 14, 1988.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
DATE: APRIL 6, 1984  
SUBJECT: MUR 1595 - Comprehensive Investigative  
Report #1 signed April 4, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, April 5, 1984.

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

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FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.

] ]

MUR 1595

ANSWERS TO INTERROGATORIES  
OF MR. PAUL A. BROWN

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3. Did you have a written contract with any of the following?

A. Barnett, Alagia & Carey

No.

## FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL  
ACTION COMMITTEE, INC.]  
]

MUR 1595

ANSWERS TO INTERROGATORIES  
OF MR. PAUL A. BROWN

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2. How long have you served in this capacity?

Since LAPAC was founded. I was elected at the First Meeting of the Board of Directors on December 5, 1977.

3. Did you have a written contract with any of the following?

A. Barnett, Alagia & Carey

No.

**B. Creative Mailing Consultants**

Yes, photocopy attached.

**C. Insta-Print**

No.

**D. Phoenix Communications**

No.

**E. Word Processing Exchange**

No.

**F. Webcraft Packaging**

No. However, there is a written bid, photocopy attached.

4. If the answer is yes to any of the above, please provide copies of each written contract.

No documentation.

5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.

The obligation had been accumulating and was not being curtailed. After discussion, the firm advised me that it would be willing to write off the sum, inasmuch as the cost of carrying it over 90 days was excessive, provided in the future LAPAC (1) requested fewer legal services and (2) paid the firm's statements more promptly.

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PAUL A. BROWN

DISTRICT OF COLUMBIA     |  
  | ss.  
CITY OF WASHINGTON        |

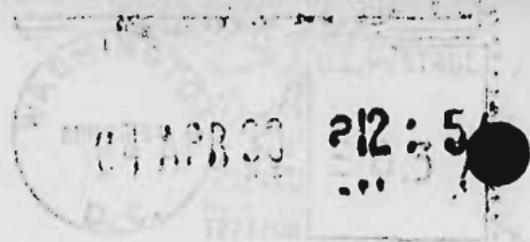
Subscribed and sworn to before me, a Notary Public, this 12th day of March, 1984.

  
MARIENE LESHNICK

My commission expires April 14, 1988.

**ARNETT & ALAGIA**

THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, D.C. 20007



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Mr. Conley Edwards, Jr.  
Federal Election Commission  
Washington, D. c. 20463





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTN: CONLEY EDWARDS

FROM: SHAWN WOODHEAD *SW*  
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1595 - LIFE AMENDMENT PAC

---

Please review the attached Requests for Additional Information (RFAs) which are to be sent to the Life Amendment PAC for the 1983 Mid-Year and Year End Reports. If no response or an inadequate response is received for either RFA, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by the close of business on Monday, April 2, 1984. Thank you.

COMMENTS:

Attachments

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Paul A. Brown, Treasurer  
Life Amendment Political  
Action Committee  
Box 1983  
Garrisonville, VA 22463

Identification Number: C00082297

Reference: Mid-Year Report (1/1/83-6/30/83)

Dear Mr. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 1982 Year End report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next. The Amended 1982 Year End Report shows an ending balance to TDX Telephone Service of \$423.29, while this report shows a beginning balance of \$0. (11 CFR 104.3(d))

-Please clarify if you have a connected organization. A review of your reports show no operating expenditures, including payments for rent or payroll. This suggests that these expenses may have been paid by a sponsoring or connected organization. (2 U.S.C. 433(b)(2))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

8604056242



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

EQ-2

Paul Brown, Treasurer  
Life Amendment Political  
Action Committee  
P.O. Box 1983  
Garrisonville, VA 22463

Identification Number: C00082297

Reference: Year End Report (7/1/83-12/31/83)

Dear Mr. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 1983 Mid Year report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-On Schedule A supporting Line 11a of the Detailed Summary Page, your report disclosed contributions from individuals which omit occupations/employers. Please amend your report by supplying the omitted information.

Note: If your committee has made at least one effort per solicitation, either by a written documentation or by an oral request documented in writing, to obtain this information from the contributor, your committee may have exercised "best efforts" and need only confirm this effort in writing. (11 CFR 104.3(a)(4)(i) and 104.7)

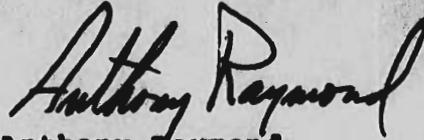
-Please provide a Schedule A to support the entry of \$1,500 reported on Line 13 and/or 14 of the Detailed Summary Page. All loans and loan repayments received by your committee must be itemized on Schedule A, regardless of the amount loaned or repaid. (2 U.S.C. 434(b)(3)(E) & (5)(D))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Anthony Raymond  
Reports Analyst  
Reports Analysis Division

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RECEIVED AT THE POC

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1595  
Edwards

NAME OF COUNSEL: MARION EDWYN HARRISON, ESQUIRE

ADDRESS: Barnett & Alagia  
Sixth Floor  
1000 Thomas Jefferson Street, NW  
Washington, D. C. 20007

TELEPHONE: 342-0342

MAR 14 9:38

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

3-12-84  
Date

  
Signature

Paul A. Brown  
Treasurer  
Life Amendment Political Action  
Committee, Inc.

NAME: Paul A. Brown

ADDRESS: Box 1982  
Garrisonville, Virginia 22463

HOME PHONE: 703-659-4194

BUSINESS PHONE: 703-659-4171

MUR #1595

86040565245



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 4, 1985

MEMORANDUM

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

**ATTENTION:** CONLEY EDWARDS

**FROM:** SHAWN WOODHEAD *W*  
SENIOR COMPLIANCE ANALYST  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

**SUBJECT:** MUR 1595: LIFE AMENDMENT PAC (LAPAC)

Please review the attached Request for Additional Information which is to be sent to the LAPAC for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Wednesday, February 6, 1985. Thank you.

COMMENTS:

Attachment

86040565246



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Rick Woodrow, Treasurer  
Life Amendment Political  
Action Committee  
14618 Stone Crossing Court  
Centreville, VA 22020

Identification Number: C00082297

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule C you disclose two \$5,000 loans received during this reporting period. These loans, however, were not disclosed on the Detailed Summary Page nor on Schedule A. Please amend your report accordingly.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan; original amount; cumulative payment; outstanding balance; date incurred; date due; and interest rate for all loans that your committee has received. Please amend Schedule C by providing the terms of the new loans. 11 CFR 104.3(d) and 104.11(a).

-Please amend your report by providing the address for each disbursement itemized on Schedule B supporting Line 19.

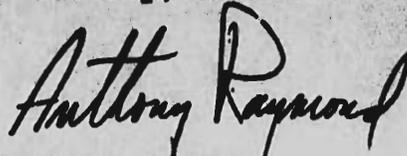
-Please provide mailing address for the independent expenditures(s) disclosed on Schedule E.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

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assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Raymond". The signature is written in dark ink and is positioned above the typed name.

Anthony Raymond  
Reports Analyst  
Reports Analysis Division

86040565248



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 8, 1984

Paul A. Brown, Treasurer  
Life Amendment Political Action  
Committee, Inc.  
P.O. Box 1982  
Garrisonville, Virginia 22463

RE: MUR 1595

Dear Mr. Brown:

On February 7, 1984, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to continuously disclose certain debts until properly extinguished. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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.

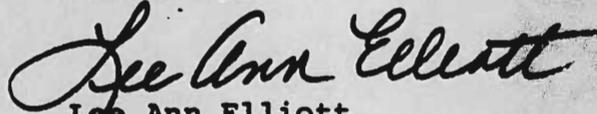
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Paul A. Brown, Treasurer  
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4060.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement  
Interrogatories

86040565250

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Life Amendment Political Action Committee, Inc.  
Paul A. Brown, Treasurer

MUR NO. 1595  
STAFF MEMBER AND TELEPHONE NUMBER  
Conley Edwards, Jr.  
(202) 523-4060

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

SUMMARY OF ALLEGATIONS

The Life Amendment Political Action Committee, Inc. (hereinafter "the Committee") may have failed to properly disclose its debts and obligations in violation of 2 U.S.C. § 434(b)(8).

FACTUAL BASIS AND LEGAL ANALYSIS

The audit covered the period January 1, 1981, through October 21, 1982. The Committee reported a cash balance on January 1, 1981 of \$4,412.00; total receipts for the period of \$351,606.35; total disbursements for the period of \$356,545.43 and a cash balance on October 21, 1982, of \$2,337.00.

The audit revealed possible violations of 2 U.S.C. §§ 434(b)(8), 441a, and 441b during the period audited.

2 U.S.C. § 434(b)(8) requires that:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.<sup>1/</sup>

<sup>1/</sup> See 11 C.F.R. § 114.10 for the requirements of a debt settlement.

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According to Audit, the Committee credited or adjusted six (6) of its debts and obligations; these credits and adjustments caused the Committee's debts and obligations to be reduced by \$23,196.70. However, an examination of Committee records during the audit fieldwork provided no further explanation of how and why these particular debts were reduced.

<u>CREDITORS</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
Barnett, Alagia & Carey	\$10,578.19	\$ 881.37	\$ 400.00	\$11,059.56	-0-
Creative Mailing Consultants	41,139.43	3,103.51	7,500.00	1,854.74 6,888.34	\$34,888.26 <sup>2/</sup> 27,990.92 <sup>2/</sup>
		272.18		272.18 237.00	27,990.00 <sup>2/</sup> 27,543.00 <sup>2/</sup>
Insta-Print	855.53		647.16	208.37	-0-
Phoenix Communications	3,128.75		1,746.80	1,381.95	-0-
Word Processing Exchange	784.00			784.00	-0-
Webcraft Packaging	1,460.56		950.00	510.56	-0-
	<u>\$57,946.46</u>	<u>\$4,257.06</u>	<u>\$11,243.96</u>	<u>\$23,196.70</u>	<u>\$27,543.00<sup>3/</sup></u>

In a letter dated March 30, 1983, the Committee provides explanations of the credits and adjustments that were negotiated with four (4) of the above six (6) creditors.

- 
- 2/ According to Audit, "[T]hese balances do not cross foot due to apparent arithmetical errors."
  - 3/ Audit places the actual balance at \$22,762.86.

Because these credits and adjustments are quite substantial, we believe that additional documentation of the transactions cited is necessary in order to view the Committee's financial dealings in a brighter light.

Based on the above statement of facts, it appears that the Committee and Paul A. Brown,<sup>4/</sup> as treasurer of the Committee, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts and obligations until properly extinguished. Therefore, the Office of General Counsel recommends that reason to believe be found against the Committee and Paul A. Brown, as treasurer of the Committee.

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<sup>4/</sup> 2 U.S.C. § 434(a)(1) states:

each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report.

INTERROGATORIES

TO: Paul A. Brown  
as Treasurer of the Life Amendment  
Political Action Committee, Inc.

Please provide detailed answers and/or explanations to the following:

1. What are your duties as Treasurer of the Committee?
2. How long have you served in this capacity?
3. Did you have a written contract with any of the following?

- A. Barnett, Alagia & Carey
- B. Creative Mailing Consultants
- C. Insta-Print
- D. Phoenix Communications
- E. Word Processing Exchange
- F. Webcraft Packaging

4. If the answer is yes to any of the above, please provide copies of each written contract.

If the answer is no, please provide copies of any documentation you may deem relevant to issues presented in this case.

5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.
6. Please explain the \$208.37 credit received from Insta-Print.
7. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. § 114.10 for the \$510.56 Webcraft Packaging settlement.
8. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. § 114.10 for the \$1,381.95 Phoenix Communications settlement.
9. Please provide a detailed explanation and documentation of the \$784.00 credit received from Word Processing Exchange.
10. Please provide a detailed explanation and documentation of the \$9,252.26 credit received from Creative Mailing Consultants.

86040565254

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1595
Life Amendment Political	)	
Action Committee, Inc.	)	
Paul A. Brown	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 7, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1595:

1. Find reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown as treasurer of the Life Amendment Political Action Committee, Inc., violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished.
2. Approve and send the letter and General Counsel's Factual and Legal Analysis as attached to the First General Counsel's Report dated February 2, 1984.
3. Send the interrogatories as submitted with the First General Counsel's Report.

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

Attest:

2-7-84  
Date

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

86040565255

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

64 FEB 2 P 2: 01

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION 2/6/84 - 1:30

MUR NO. 1595  
STAFF MEMBER  
Conley Edwards, Jr.

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

RESPONDENT'S NAME: Life Amendment Political Action  
Committee, Inc.  
Paul A. Brown, Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(b)(8)

INTERNAL REPORTS  
CHECKED: Committee Reports

FEDERAL AGENCIES  
CHECKED: None

GENERATION OF MATTER

This matter was internally generated as a result of a referral by the Audit Division (hereinafter "Audit"). The referral is based on findings made by that Division during the audit of the Life Amendment Political Action Committee, Inc. (hereinafter "the Committee").

SUMMARY OF ALLEGATIONS

The audit covered the period January 1, 1981, through October 21, 1982. The Committee reported a cash balance on January 1, 1981 of \$4,412.00; total receipts for the period of \$351,606.35; total disbursements for the period of \$356,545.43 and a cash balance on October 21, 1982, of \$2,337.00.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b)(8) requires that:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and

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obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.<sup>1/</sup>

According to Audit, the Committee credited or adjusted six (6) of its debts and obligations; these credits and adjustments caused the Committee's debts and obligations to be reduced by \$23,196.70. However, an examination of Committee records during the audit fieldwork provided no further explanation of how and why these particular debts were reduced. See Attachment I.

	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
<b>CREDITORS</b>					
Barnett, Alagia & Carey	\$10,578.19	\$ 881.37	\$ 400.00	\$11,059.56	-0-
Creative Mailing Consultants	41,139.43	3,103.51	7,500.00	1,854.74	\$34,888.26
		272.18		6,888.34	27,990.92
				272.18	27,990.00
				237.00	27,543.00
Insta-Print	855.53		647.16	208.37	-0-
Phoenix Com- munications	3,128.75		1,746.80	1,381.95	-0-
Word Processing Exchange	784.00			784.00	-0-
Webcraft Packaging	1,460.56		950.00	510.56	-0-
	<u>\$57,946.46</u>	<u>\$4,257.06</u>	<u>\$11,243.96</u>	<u>\$23,196.70</u>	<u>\$27,543.00<sup>2/</sup></u>

<sup>1/</sup> See 11 C.F.R. § 114.10 for the requirements of a debt settlement.

<sup>2/</sup> Audit places the actual balance at \$22,762.86.

In a letter dated March 30, 1983, the Committee provides the following explanations of the credits and adjustments that were negotiated with four (4) of the above six (6) creditors (see Attachment II):

Word Processing Exchange... was a credit. We terminated a contract for rented equipment. It in no way should be construed to be a contribution.

Webcraft Packaging... accepted the \$950.00 as a settlement for the long overdue account. This in no way should be construed to be a contribution.

Phoenix Communications... accepted a settlement of \$1,746.80 and the balance was in no way to be construed as a donation.

Creative Mailing Consultants... was the owner of our house computer donor list. The credit which appears is the rental fee for their use of our list.

Because these credits and adjustments are quite substantial, we believe that additional documentation of the transactions cited is necessary in order to view the Committee's financial dealings.

Based on the above statement of facts, it appears that the Committee and Paul A. Brown,<sup>3/</sup> as treasurer of the Committee, violated 2 U.S.C. § 434(b)(8).

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<sup>3/</sup> 2 U.S.C. § 434(a)(1) states:

each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report.

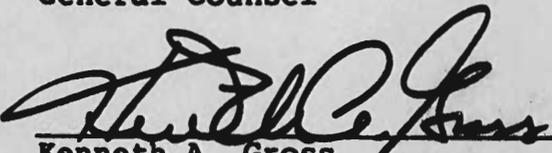
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RECOMMENDATIONS

1. Find reason to believe that the Life Amendment Political Action Committee, Inc., and Paul A. Brown as treasurer of the Life Amendment Political Action Committee, Inc., violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts until properly extinguished.
2. Approve and send attached letter and General Counsel's Factual and Legal Analysis.
3. Send attached interrogatories.

Charles N. Steele  
General Counsel

February 2, 1984  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

Attachments

- Attachments I and II
- Notification Letter
- General Counsel's Factual and Legal Analysis
- Interrogatories

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1983

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON *[Signature]*  
ACTING STAFF DIRECTOR

FROM: BOB COSTA *[Signature]*

SUBJECT: SETTLEMENT OF DEBTS BY  
LIFE AMENDMENT POLITICAL ACTION  
COMMITTEE, INC.

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On June 16, 1983 the Commission approved the final audit report of the Audit Division on the Life Amendment Political Action Committee, Inc. Attached at Exhibit A is the matter noted in the final audit report which pursuant to the Commission's vote of June 16, 1983 is being referred to your office for your review and consideration.

Should you have any questions, please contact Lorenzo David or Tom Nurthen at 523-4155.

Attachment as stated

Attachment I

Settlement of Debts

Section 434(b) (8) of Title 2 of the United States Code states, in part, that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished.

Section 114.10(c) of Title 11 of the Code of Federal Regulations states, in part, that the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor.

During the pre-audit review, the Audit staff noted that the Committee had credited or adjusted six <sup>\*</sup>/<sub>6</sub> of its debts and obligations, thereby reducing the Committee's obligations by \$23,196.70. An examination of Committee records during the audit fieldwork provided no further explanation of the reduced amounts.

In the interim audit report, it was recommended that the Committee determine the circumstances surrounding the reduction of the six debts and provide such evidence to the Audit staff. In addition, the Committee was advised that further recommendations may be required after review of such evidence, and if appropriate, debt settlement statements should be filed with the Commission.

On April 4 and 18, 1983, the Committee provided new information and/or copies of letters to vendors with respect to five of the debt reductions. However, the Committee did not make any response concerning the sixth debt reduction.

Based on our review of the information provided, the Audit staff determined that two of the debt reductions were not debt settlements.

The Committee was notified on May 24, 1983, that it had an additional 15 days to respond to this matter (the remaining 4 debt reductions). The Committee's response was due on June 8, 1983. However, in a telephone conversation with a committee official on June 8, we were advised that the Committee was not in a position to respond at this time, as they are awaiting responses from the respective vendors.

Absent additional evidence to the contrary, it appears that four of the debt reductions may have been debt settlements.

<sup>\*</sup>/ It has been confirmed that three of the debts were corporate, two were not, and the sixth cannot be confirmed at this time due to the unavailability of records at the respective Secretary of State's office.

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P. O. BOX 1983 • GARRISONVILLE, VA 22463 • (703) 659-4171 or (703) 690-2049



March 30, 1983

Mr. Lorenzo David  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. David:

Regarding your questions concerning the adjustments on the Debts and Obligations Schedule D for January through March, 1982 I have ascertained the following information.

Word Processing Exchange, 117 North First Street, Ann Arbor, MI 48104 was a credit. We terminated a contract for rented equipment. It in no way should be construed to be a contribution.

Webcraft Packaging, P.O. Box 520, New York, New York 10016 accepted the \$950.00 as a settlement for the long overdue account. This in no way should be construed to be a contribution.

Phoenix Communications, 1681 Walleye St, Crofton, MD 21114 accepted a settlement of \$1746.80 and the balance was in no way to be construed as a donation.

Creative Mailing Consultants, 8800 Edgeworth Ave., Capitol Heights, MD. was the owner of our house computer donor list. The credit which appears is the rental fee for their use of our list.

If you should have any further questions on this matter, please let me know so that we can finish up the audit.

I appreciate your help and your patience with us.

Sincerely,

Paul A. Brown

"Protecting the American Family and the Preborn Child...  
Through Political Action!"

Authorized and paid for by LAPAC, Inc. Paul A. Brown, Treasurer

Attachment II

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Paul A. Brown, Treasurer  
Life Amendment Political Action  
Committee, Inc.  
P.O. Box 1982  
Garrisonville, Virginia 22463

RE: MUR 1595

Dear Mr. Brown:

On \_\_\_\_\_, 1984, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to continuously disclose certain debts until properly extinguished. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed questions within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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.

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Paul A. Brown, Treasurer  
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

**Enclosures**

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement  
Interrogatories

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Life Amendment  
Political Action  
Committee, Inc.  
Paul A. Brown, Treasurer

MUR NO. 1595  
STAFF MEMBER AND TELEPHONE NUMBER  
Conley Edwards, Jr.  
(202) 523-4060

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

SUMMARY OF ALLEGATIONS

The Life Amendment Political Action Committee, Inc. (hereinafter "the Committee") may have failed to properly disclose its debts and obligations in violation of 2 U.S.C. § 434(b)(8).

FACTUAL BASIS AND LEGAL ANALYSIS

The audit covered the period January 1, 1981, through October 21, 1982. The Committee reported a cash balance on January 1, 1981 of \$4,412.00; total receipts for the period of \$351,606.35; total disbursements for the period of \$356,545.43 and a cash balance on October 21, 1982, of \$2,337.00.

2 U.S.C. § 434(b)(8) requires that:

the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.<sup>1/</sup>

According to Audit, the Committee credited or adjusted six (6) of its debts and obligations; these credits and adjustments

<sup>1/</sup> See 11 C.F.R. § 114.10 for the requirements of a debt settlement.

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caused the Committee's debts and obligations to be reduced by \$23,196.70. However, an examination of Committee records during the audit fieldwork provided no further explanation of how and why these particular debts were reduced.

<u>CREDITORS</u>	<u>Balance Reported Beginning of Period</u>	<u>Reported Amount Incurred During Period</u>	<u>Reported Payments During Period</u>	<u>Reported Amounts Credited</u>	<u>Reported Balance at Close of Period</u>
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				272.18	27,990.00
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In a letter dated March 30, 1983, the Committee provides explanations of the credits and adjustments that were negotiated with four (4) of the above six (6) creditors.

Because these credits and adjustments are quite substantial, we believe that additional documentation of the transactions cited is necessary in order to view the Committee's financial dealings.

<sup>2/</sup> Audit places the actual balance at \$22,762.86.

Based on the above statement of facts, it appears that the Committee and Paul A. Brown,<sup>3/</sup> as treasurer of the Committee, violated 2 U.S.C. § 434(b)(8) by failing to continuously disclose certain debts and obligations until properly extinguished. Therefore, the Office of General Counsel recommends that reason to believe be found against the Committee and Paul A. Brown, as treasurer of the Committee.

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<sup>3/</sup> 2 U.S.C. § 434(a)(1) states:

each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report.

INTERROGATORIES

TO: Paul A. Brown  
as Treasurer of the Life Amendment  
Political Action Committee, Inc.

Please provide detailed answers and/or explanations to the following:

1. What are your duties as Treasurer of the Committee?
2. How long have you served in this capacity?
3. Did you have a written contract with any of the following?
  - A. Barnett, Alagia & Carey
  - B. Creative Mailing Consultants
  - C. Insta-Print
  - D. Phoenix Communications
  - E. Word Processing Exchange
  - F. Webcraft Packaging
4. If the answer is yes to any of the above, please provide copies of each written contract.  
  
If the answer is no, please provide copies of any documentation you may deem relevant to issues presented in this case.
5. Please explain the \$11,059.56 credit received from Barnett, Alagia & Carey.
6. Please explain the \$208.37 credit received from Insta-Print.
7. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. § 114.10 for the \$510.56 Webcraft Packaging settlement.
8. Please provide a properly executed debt settlement statement pursuant to 11 C.F.R. § 114.10 for the \$1,381.95 Phoenix Communications settlement.
9. Please provide a detailed explanation and documentation of the \$784.00 credit received from Word Processing Exchange.
10. Please provide a detailed explanation and documentation of the \$9,252.26 credit received from Creative Mailing Consultants.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF RUR # 1595

Date Filmed 2/8/86 Camera No. --- 2

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