



FEDERAL ELECTION COMMISSION

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

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THIS IS THE END OF MUR # 1817

Date Filmed 4/19/85 Camera No. --- 3

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MUR 1817

FEDERAL ELECTION COMMISSION

12 Day Report and Comment Sheets

All routing cards

Extra copies of correspondence

Original page 2 of General Counsel's Report dated 12/22/84

Documents relating to conciliation

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

- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute 437g
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Banking Information
- (9) Well Information (geographic or geophysical)

Signed Marybeth Tarant  
date 4/17/85

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1985

Irvin B. Charne, Esquire  
Charne, Glassner, Tehan, Clancy & Taitelman  
First Bank Building - Suite 800  
211 West Wisconsin Avenue  
Milwaukee, Wisconsin 53203-2377

RE: MUR 1817  
Adelman for Congress Committee  
Raymond J. Brooks, as treasurer  
Albert Adelman

Dear Mr. Charne:

On March 8, 1985, the Commission accepted the conciliation agreement signed by you on behalf of your clients and a civil penalty in settlement of violations of 2 U.S.C. § 441a, 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 Respondents 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

85040522920

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
)
Adelman for Congress Committee ) MUR 1817
Raymond J. Brooks, as treasurer )
Albert Adelman )

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 Adelman for Congress Committee (the "Committee"), Raymond J. Brooks, as treasurer, and Albert Adelman ("Respondents") violated 2 U.S.C. §441a in connection with the making and acceptance of an excessive contribution.

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. Lynn Adelman was a congressional candidate in the Democratic primary, held in Wisconsin on February 21, 1984.

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2. The Committee was the principal campaign committee of candidate Lynn Adelman.

3. Albert Adelman is the father of Lynn Adelman.

4. On February 21, 1984, Albert Adelman, at Lynn Adelman's request, loaned his son \$20,000. Lynn Adelman then loaned the \$20,000 to the Committee. This loan was reported to the Commission on the April 15, 1984 quarterly report.

5. In early May 1984, after discovering the loan from Albert Adelman was excessive, Lynn Adelman obtained a \$20,000 loan from a bank, which he then loaned to the Committee. The Committee then made a payment by check of \$20,000 to Lynn Adelman who, in turn, endorsed the check over to Albert Adelman. The Committee notified the Commission of its prior error and the action taken to remedy the situation.

V. Pursuant to 2 U.S.C. §441a(a)(1)(A), a person is prohibited from making contributions to any candidate and his authorized political committee with respect to any election for federal office which, in the aggregate, exceed \$1,000. A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. 2 U.S.C. §431(8)(A)(i); 11 C.F.R. §100.7(a)(1)(i)(B).

VI. Pursuant to 2 U.S.C. §441a(f), a political committee is prohibited from knowingly accepting a contribution which is in excess of the limitations set forth in section 441a.

VII. Respondent, Albert Adelman, made an excessive contribution and Respondents, Committee and Raymond J. Brooks, as treasurer, accepted an excessive contribution.

VIII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Five Hundred Dollars (\$1,500), pursuant to 2 U.S.C §437g(a)(5)(A).

IX. 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.

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X. 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.

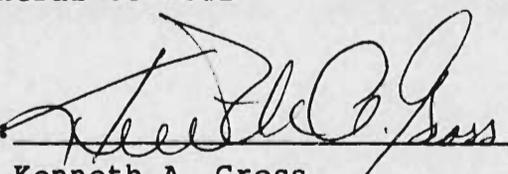
XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XII. 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.

XIII. The 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.

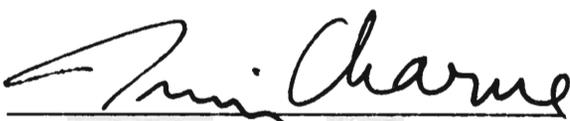
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

March 18, 1985  
Date

FOR THE RESPONDENTS:

  
Irvin B. Charne  
Attorney for Respondent

Feb. 4, 1985  
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	MUR 1817
	)	
Adelman for Congress Committee	)	
Raymond J. Brooks, as treasurer	)	
Albert Adelman	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 8, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1817:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed March 6, 1985.
2. Approve the letter attached to the General Counsel's Report signed March 6, 1985.
3. Close the file.

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

Attest:

3-8-85  
Date

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

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Received in Office of Commission Secretary:	3-6-85, 12:04
Circulated on 48 hour tally basis:	3-6-85, 4:00

*Sent 2/12/85*

MEMORANDUM

TO: CHERYL THOMAS TO: JOAN HARRIS  
FROM: JOAN HARRIS FROM: CHERYL THOMAS

CHECK NO. 1011 (a copy of which is attached) RELATING  
TO MUR 1817 AND NAME Attorney for Congress Cmte..  
Raymond G. Brooks, Treas

WAS RECEIVED ON February 12, 1985. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Cheryl R. Thomas DATE 2-12-85

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ADELMAN FOR CONGRESS COMMITTEE

1011

FEB 3

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79-1198/759

Pay to the order of Treasurer of the United States \$ 1,500.00  
ONE Thousand five hundred and 00/100 ~~DOLLARS~~



First Interstate Bank  
of Wisconsin #41  
16001 West Cleveland Avenue  
New Berlin, WI 53151

MEMO FEC. Conciliation Agm. Kay Brown

@:0759119881:    ⑈40⑈⑈358⑈    1011

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Adelman for Congress Committee	)	MUR 1817
Raymond J. Brooks, as treasurer	)	
Albert Adelman	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 2, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1817:

1. Enter into pre-probable cause conciliation with the Adelman for Congress Committee, Raymond J. Brooks, as treasurer, and Albert Adelman.
2. Approve the conciliation agreement submitted with the General Counsel's Report signed December 21, 1984.
3. Approve the letter attached to the General Counsel's Report signed December 21, 1984.

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

Attest:

1-2-85  
Date

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

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Received in Office of Commission Secretary:	12-21-84, 1:25
Circulated on 48 hour tally basis:	12-24-84, 11:00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *OC*  
DATE: December 21, 1984  
SUBJECT: MUR 1817 - General Counsel's Report

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

CIRCULATIONS

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

Other [ ]

DISTRIBUTION

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

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RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
 )  
Adelman for Congress Committee )  
Raymond J. Brooks, as treasurer )  
Albert Adelman )

MUR 18194 DEC 21 10:41

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On October 10, 1984, the Commission found reason to believe that Albert Adelman had violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution to the Adelman for Congress Committee ("Committee") and that the Committee and Raymond J. Brooks, as treasurer, had violated 2 U.S.C. § 441a(f) by accepting an excessive contribution. Notification of the reason to believe determinations were mailed on October 12, 1984.

On October 23, 1984, counsel for the Respondents phoned this Office to request an extension until November 12, 1984, to file responses. A written request was received on October 29, 1984. The Office of the General Counsel granted counsel's request. On November 9, 1984, counsel filed a response. See Attachment 1. On November 26, 1984, counsel filed a request for pre-probable cause conciliation. See Attachment 2.

**II. ANALYSIS**

Albert Adelman is the father of Lynn Adelman, who was a candidate in the Democratic primary election held February 21, 1984, in Wisconsin. \*/ On the day of the primary Albert Adelman

\*/ Lynn Adelman lost the primary, receiving 25.9% of the vote.

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loaned \$20,000 to his son who, in turn, loaned the money to the Committee. Albert Adelman has stated that the loan was made at his son's request. Mr. Brooks, as treasurer, reported Albert Adelman as the source of the loan on the Committee's report. After filing the report, Mr. Brooks determined that the loan from Albert Adelman was probably in violation of the Act and called the Reports Analysis Division ("RAD") on May 3, 1984. Mr. Brooks explained to RAD that the candidate had obtained a new \$20,000 loan from the bank and had loaned the money to the Committee. The Committee, in turn, made a payment of \$20,000 to Lynn Adelman who then endorsed the check over to Albert Adelman. As it appears that the facts of this matter have been established, it is the recommendation of this Office that the Commission grant Respondents' request and enter into pre-probable cause conciliation.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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**IV. RECOMMENDATIONS**

1. Enter into pre-probable cause conciliation with the Adelman for Congress Committee, Raymond J. Brooks, as treasurer, and Albert Adelman.
2. Approve the attached conciliation agreement.
3. Approve the attached letter.

Charles N. Steele  
General Counsel

Dec 21, 1974  
Date

By:   
Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Response from counsel
2. Request for pre-probable cause conciliation
3. Proposed Agreement
4. Proposed letter

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CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.  
ATTORNEYS AT LAW

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. MCCARTY  
RONALD S. JACOBS  
BRENDAN M. COMER  
MICHAEL C. RUNDE  
RICHARD T. LENZ  
F. THOMAS OLSON  
RAYMOND R. KRUEGER  
ROBERT B. CORRIS  
HOWARD A. POLLACK

MYRON L. JOSEPH  
HOWARD B. TOLKAN  
ARTHUR J. HARRINGTON  
FORREST HENRI DUPRE  
JOHN T. BANNEN  
BARBARA J. BECKER  
JAMES H. HALL, JR.  
GREGORY C. BURCE  
JOHN M. VAN LIESHOUT  
ADRIAN N. COHEN  
CHARLES S. LEWIS  
THOMAS P. McELLIOTT  
MICHAEL A. LEVEY  
E. ANN KERNS

FIRST BANK BUILDING  
SUITE 800  
211 WEST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377  
TELEPHONE (414) 273-2000  
OF COUNSEL  
HENRY S. REUSS

November 7, 1984

Lee Ann Elliott, Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Chairman Elliott:

This letter is submitted on behalf of the respondents in the above matter in reply to the briefs of the Federal Election Commission's General Counsel dated October 11, 1984, recommending that the Commission find reason to believe that the Adelman for Congress Committee, Raymond J. Brooks, as Treasurer, and Albert Adelman violated provisions of federal law governing federal election campaigns. Accompanying this letter are affidavits of Raymond J. Brooks and Albert Adelman.

Because there are inaccuracies in the General Counsel's description of the facts giving rise to this matter, we must briefly set forth the chronology of events.

Albert Adelman is the father of Lynn Adelman, who was a candidate in the Democratic primary election held February 21, 1984, in Wisconsin. Albert Adelman is a private citizen who has had little exposure to federal regulations or laws governing contributions to political campaigns. On the day of the primary election, Albert Adelman made a loan of \$20,000.00 to Lynn Adelman. Lynn Adelman in turn wrote a check in the same amount as a loan to his campaign committee.

Upon receipt of the check, the Committee's treasurer, Raymond J. Brooks, was uncertain how to record the loan. Mr. Brooks therefore reviewed 11 C.F.R. §110.7(a)(1)(i) and (a)(1)(i)(C). Mr. Brooks determined that in practical effect the source of the \$20,000.00 loan was Albert Adelman, with Lynn Adelman acting as guarantor. Lynn Adelman had been the guarantor of loans the Committee had obtained from banks earlier in the campaign. Mr. Brooks' view of the transaction involving Albert Adelman was consistent with the way these prior loans had been treated by the Committee. Mr. Brooks'

Attachment 1

①

CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.

reading of the regulations led him to believe that the "guarantor" of the loan is the "contributor" for purposes of federal election contribution limits. He believed this because the term "loan" is defined in the regulations as the guarantee of a loan from a source other than the guarantor. Mr. Brooks viewed the transaction as consisting of one loan to the Committee, coming from one "lender"--the guarantor-- just as had been the case with loans to the Committee obtained from banks. Mr. Brooks did not discuss the handling of the loan with Albert Adelman.

When Mr. Brooks began compiling information for the Committee's April quarterly report, he once again addressed the issue of the loan. He called the Federal Election Commission hotline on April 10 and April 13 to ask how to record the loan. He was told to record on Schedule C of the quarterly report the source and guarantor of the loan in the same manner in which he recorded loans from banks. He was also told how to record the candidate as the contributor on Schedule A, which was the same way in which Mr. Brooks reflected Lynn Adelman's role as guarantor of loans from banks.

Upon further review of the loan after filing the April quarterly report, Mr. Brooks determined the loan as recorded probably violated federal election contribution limitations. On May 3, he contacted a Commission analyst to explain his concerns. Mr. Brooks told the analyst that Lynn Adelman had obtained a new \$20,000.00 loan from a bank, and that Lynn Adelman had then made a loan to the Committee in that amount in his own name. The General Counsel's statement in the factual analysis dated October 11, 1984 that Mr. Brooks told the analyst that the Committee obtained the loan thus is inaccurate. Mr. Brooks also told the analyst that the Committee had repaid the loan. The payment consisted of a check for \$20,000.00, made out to Lynn Adelman, which Lynn Adelman then endorsed over to Albert Adelman. The transaction occurred through the Committee's account. The General Counsel's statement to the contrary is inaccurate.

On July 11, Mr. Brooks again contacted a Commission analyst for assistance in recording the transaction that resulted in the payment to Albert Adelman. Mr. Brooks was told to report the original loan as a loan from a source other than the candidate on lines 13a and 13b of the "Detailed Summary Page" of FEC Form 3. Mr. Brooks followed these instructions, although he pointed out to the analyst that the resulting total reflected \$20,000.00 more in loans than in fact had been received. The Committee's July quarterly report reflects the repayment of the loan to Albert Adelman and the new loan obtained by Lynn Adelman.

As the facts demonstrate, Albert Adelman in his loan to Lynn Adelman and Raymond J. Brooks in his handling of the loan Lynn Adelman made on February 21 to the Committee acted with no intention of circumventing federal election campaign laws. Albert Adelman was

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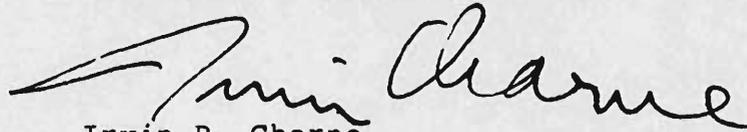
CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.

unaware of the laws, or that the laws might have any application to the loan he made to his son. He had no contact with the Committee concerning that money until April of 1984, when he was informed that the money would be returned to him. Albert Adelman's involvement was tangential to the Committee's receipt and handling of the money.

Raymond J. Brooks misunderstood the applicable regulations in determining how the Committee should record the receipt of the money involved here. His misunderstanding was an innocent one, however, and he made no attempt to conceal either the receipt of the money or its source. Indeed, he raised the question to the Commission analysts and sought guidance concerning how best to comply with the federal campaign contribution laws. Mr. Brooks attempted to fit the transaction within the literal language of the regulations and his experience with handling loans from banks to the Committee. Although he read the regulatory language too literally, he corrected the mistake as soon as he understood the nature of the problem. Lynn Adelman immediately loaned money to the Committee in order to replace the money attributed to Albert Adelman, and to allow repayment of the full amount of Albert Adelman's loan to Lynn Adelman. Mr. Brooks contacted the Commission every step of the way, and recorded each transaction as instructed by Commission personnel. Throughout these events, Mr. Brooks tried as best he could to comply with the law.

Neither Albert Adelman nor Raymond J. Brooks intended to avoid the effect of any federal campaign contribution laws. Albert Adelman was not involved in the Committee's handling of the loan he made to his son. Mr. Brooks did everything he could to immediately rectify the error in the Committee's handling of the money. His actions were taken openly, and were reported to the Commission. Albert Adelman and Raymond J. Brooks should not be put to further expense of time and money for their innocent actions.

Respectfully submitted,

  
Irvin B. Charne

IBC/mrk/19

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AFFIDAVIT OF RAYMOND J. BROOKS

STATE OF WISCONSIN )  
 )SS.  
MILWAUKEE COUNTY )

Raymond J. Brooks, being first duly sworn, says as follows:

1. I make this affidavit in connection with the Federal Election Commission MUR 1817. I was treasurer for the Adelman for Congress Committee, which supported the candidacy of Lynn Adelman during the Democratic primary election held February 21, 1984 in Wisconsin. I have been treasurer throughout the existence of the Committee.

2. I had no experience with federal regulations or laws governing contributions to political campaigns prior to my work with the Committee.

3. Throughout the primary campaign, candidate Lynn Adelman had obtained loans from banks on behalf of the Committee. In each instance the loan source was designated in the appropriate space on Schedule C of the quarterly reports filed by the Committee with the Federal Election Commission. When Lynn Adelman guaranteed the bank loan, that fact was noted in the appropriate space on Schedule C. Schedule A of the Committee's quarterly report would reflect the loan as a loan from the candidate.

4. On February 21, 1984, the day of the primary election, Lynn Adelman obtained a loan from his father, Albert Adelman. Lynn Adelman then loaned that money to the Committee.

5. As treasurer for the Committee, I was uncertain how to record the loan. I believed it was similar to a situation in which the Committee would receive a loan from a bank guaranteed by the candidate and therefore I determined by applying the text of 11

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C.F.R. §100.7(a)(1)(i) and (a)(1)(i)(C), that the loan was a contribution by the "guarantor" of the loan, in this case candidate Lynn Adelman. I decided that it was appropriate to record the loan source as being Albert Adelman, but the contributor as Lynn Adelman, because the regulations referred to in this affidavit provided that the term "loan" means a guarantee of a loan from a source other than the guarantor. I thought there was only one loan to the Committee and hence, I believed, only one person making the loan: in this case, the guarantor, according to the literal terms of the regulations. The person making the loan, and therefore making the contribution, was, in my understanding, the guarantor, Lynn Adelman. I had no intent to circumvent the regulations, but in good faith believed that under the regulations only the guarantor was a contributor on the loan. Had the Committee understood the regulations to make both the loan source and the guarantor contributors to the full extent of the loan, the loan would not have been made as it was.

6. In compiling information for the quarterly report due April 15, 1984, the issue of the loan once more arose. I called the Federal Election Commission hotline on or about April 10 and April 13, 1984 to ask how to record and handle the loan. I was told only that the source should be disclosed on Schedule C, in the top block of the Schedule, and the guarantor should be recorded in the lower block of the Schedule. I conformed the Committee's report to these instructions.

7. Subsequent to submitting the April 15 quarterly report, I determined that there probably was an impropriety in the loan transaction between Lynn Adelman and Albert Adelman, and that the money would have to be returned to Albert Adelman. On May 3, 1984, I again contacted one of the Commission's analysts to confirm my determination, and to ask how to report the Committee's action. I told the analyst that Lynn Adelman had made a new loan to the Committee of \$20,000.00. The statement on page 2 of the Federal Election Commission General Counsel's Federal and Legal Analysis (appended

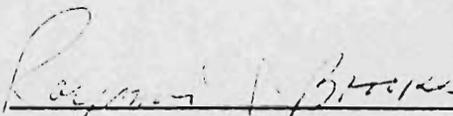
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to the Commission's October 12, 1984 letter to me) that I told the analyst the Committee had obtained the new loan is inaccurate.

8. Albert Adelman never discussed the handling of the loan with either myself or any member of the Committee to my knowledge.

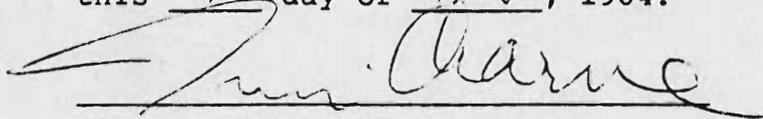
9. Albert Adelman was repaid from Committee funds through a check made out to Lynn Adelman, and endorsed over to Albert Adelman. Thus, the statement on page 2 of the General Counsel's Factual and Legal Analysis is inaccurate to the extent it suggests the transaction did not go through the Committee's account. The repayment of the loan which was originally recorded as having been obtained from Albert Adelman was made with Committee funds and was noted in the July 1984 quarterly report as having been repaid. A Commission analyst on July 11, 1984, told me to record the new loan and the old loan on lines 13a and 13b of the Detailed Summary Page, despite my pointing out that such a procedure would reflect more in loan receipts than actually existed. In any event, all money used to repay Albert Adelman's loan to Lynn Adelman in fact went through the Committee's account.

85040522937



Raymond J. Brooks

Subscribed and sworn to before me  
this 3 day of Nov, 1984.



Notary Public, Milwaukee County

My commission is permanent.

AFFIDAVIT OF ALBERT ADELMAN

STATE OF WISCONSIN )  
 )SS.  
MILWAUKEE COUNTY )

Albert Adelman, being first duly sworn, says as follows:

1. I make this affidavit in connection with the Federal Election Commission MUR 1817. I am the father of Lynn Adelman, who was a candidate for Congress in the Democratic primary election held in Wisconsin on February 21, 1984.

2. On February 21, 1984, at his request, I made a loan to my son. He then made a loan of these funds to his campaign committee. The loan totaled \$20,000.00.

3. I was at the time unfamiliar with any federal laws or regulations limiting the application of such loans to federal candidates' campaigns. I had no idea that the loan might constitute a contribution in violation of federal laws or regulations until April of 1984, when I was told that the loan might be such a violation, and that the money would be returned to me.

4. In early May of 1984, the full amount of my loan was returned to me in the form of a check from the committee payable to Lynn Adelman, which check was then endorsed over to me.

Albert B Adelman  
Albert Adelman

Subscribed and sworn to before me  
this 7 day of Nov, 1984.

[Signature]  
Notary Public, Milwaukee County

My commission is permanent.

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CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.  
ATTORNEYS AT LAW

04 NOV 26 09:01

R. N. B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
RONALD S. JACOBS  
BRENDAN M. COMER  
MICHAEL C. RUNDE  
RICHARD T. LENZ  
F. THOMAS OLSON  
RAYMOND R. PRILEGER  
ROBERT E. CORRIE  
HOWARD A. POLLACK

MYRON L. JOSEPH  
HOWARD B. TOLKAN  
ARTHUR J. HARRINGTON  
FORREST HENRI DUPRE  
JOHN T. BANNEN  
BARBARA J. BECKER  
JAMES H. HALL, JR.  
GREGORY C. BURCE  
JOHN M. VAN LIESHOUT  
ADRIAN N. COHEN  
CHARLES S. LEWIS  
THOMAS F. McELLIOTT  
MICHAEL A. LEVEY  
E. ANN KERNS

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MILWAUKEE, WISCONSIN 53203-2377  
TELEPHONE 414/271-2000  
OF COUNSEL  
HENRY S. REUSS

November 20, 1984

NOV 28 1984  
P12:07

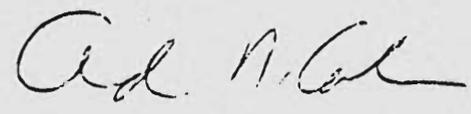
Ms. Marybeth Tarrant  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Ms. Tarrant:

In accordance with our telephone conversation last week, we are writing to ask that you contact us regarding the possibility of conciliation in the above matter prior to taking any further steps concerning a determination as to probable cause.

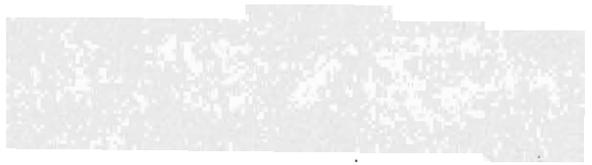
Sincerely yours,



Adrian N. Cohen

ANC/mrk/19

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GCC#5786

CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN

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AD: 00

S. C.

ATTORNEYS AT LAW

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
RONALD S. JACOBS  
BRENDAN M. COMER  
MICHAEL C. RUNDE  
RICHARD T. LENZ  
F. THOMAS OLSON  
RAYMOND R. KRUEGER  
ROBERT B. CORRIS  
HOWARD A. POLLACK

MYRON L. JOSEPH  
HOWARD S. TOLKAN  
ARTHUR J. HARRINGTON  
FORREST HENRI DUPRE  
JOHN T. SANNEN  
BARBARA J. BECKER  
JAMES H. HALL, JR.  
GREGORY C. BURCE  
JOHN M. VAN LIESHOUT  
ADRIAN N. COHEN  
CHARLES S. LEWIS  
THOMAS P. McELLIOTT  
MICHAEL A. LEVEY  
E. ANN KERNS

FIRST BANK BUILDING  
SUITE 800  
211 WEST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377  
TELEPHONE (414) 224-0000  
OF COUNSEL  
HENRY S. REUSS

November 20, 1984

NOV 26 1984  
12:07  
GENERAL COUNSEL

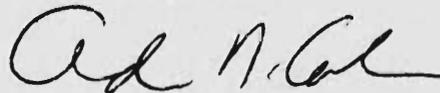
Ms. Marybeth Tarrant  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Ms. Tarrant:

In accordance with our telephone conversation last week, we are writing to ask that you contact us regarding the possibility of conciliation in the above matter prior to taking any further steps concerning a determination as to probable cause.

Sincerely yours,



Adrian N. Cohen

ANC/mrk/19

8504052940

ARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.

ATTORNEYS AT LAW

FIRST BANK BUILDING

211 WEST WISCONSIN AVENUE

MILWAUKEE, WISCONSIN 53203-2377




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Ms. Marybeth Tarrant  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 16, 1984

Adrian N. Cohen, Esquire  
Charne, Glassner, Tehan, Clancy  
& Taitelman  
First Bank Building, Suite 800  
211 West Wisconsin Avenue  
Milwaukee, Wisconsin 53203-2377

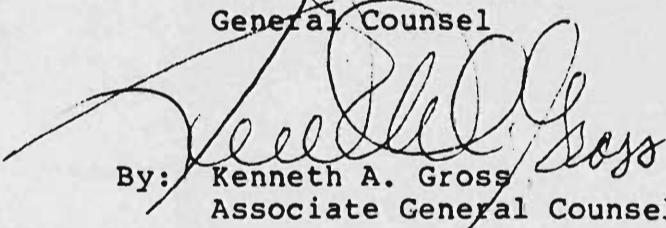
Re: MUR 1817

Dear Mr. Cohen:

Pursuant to your letter dated November 7, 1984, requesting a copy of the rules governing the Federal Election Commission, enclosed please find copies of the Federal Election Campaign Act of 1971, as amended, and the Commission's Regulations. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to MUR 1817, at (202)523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures

85040522942

GCC # 5625



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 14, 1984

Adrian N. Cohen, Esquire  
Charne, Glassner, Tehan, Clancy  
& Taitelman, Attorneys at Law  
First Bank Building, Suite 800  
211 West Wisconsin Avenue  
Milwaukee, Wisconsin 53203-2377

RE: MUR 1817

Dear Counselor:

By this letter I am acknowledging receipt of your letter today stating that you represent the respondents in MUR 1817 and requesting a copy of the current procedural rules governing the FEC's investigation and determination of possible election law violations.

Your letter has been given to our Office of General Counsel today, and you will receive a fuller response from that office.

Sincerely yours,

Marjorie W. Emmons  
Secretary of the Commission

CC: FEC General Counsel

85040522943

CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.  
ATTORNEYS AT LAW

84 NOV 13 9:05

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
RONALD S. JACOBS  
BRENDAN M. COMER  
MICHAEL C. RUNDE  
RICHARD T. LENZ  
F. THOMAS OLSON  
RAYMOND R. KRUEGER  
ROBERT B. CORRIS  
HOWARD A. POLLACK

MYRON L. JOSEPH  
HOWARD S. TOLKAN  
ARTHUR J. HARRINGTON  
FORREST HENRI DUPRE  
JOHN T. BANNEN  
BARBARA J. BECKER  
JAMES H. HALL, JR.  
GREGORY C. SURCE  
JOHN M. VAN LIESHOUT  
ADRIAN N. COHEN  
CHARLES S. LEWIS  
THOMAS P. McELLIGOTT  
MICHAEL A. LEVEY  
E. ANN KERNS

FIRST BANK BUILDING  
SUITE 800  
211 WEST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377  
  
TELEPHONE (414) 273-2000  
  
OF COUNSEL  
HENRY S. REUSS

November 7, 1984

Secretary  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Secretary:

We represent the respondents in the above matter. We would appreciate it if your office would send to us a copy of the current procedural rules governing the Federal Election Commission's investigation and determination of possible election law violations. If there is a charge for the copies of these rules, please forward for payment an invoice reflecting the charge.

Sincerely yours,



Adrian N. Cohen

ANC/mrk/19

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THE FEC  
SECRETARY  
NOV 13 1984 4:42

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GENERAL COUNSEL  
NOV 14 1984 3:51

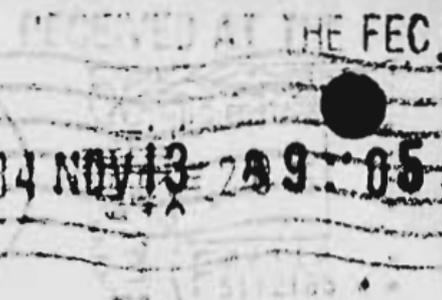
ARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S.C.

ATTORNEYS AT LAW

FIRST BANK BUILDING

211 WEST WISCONSIN AVENUE

MILWAUKEE, WISCONSIN 53203-2377



Secretary  
Federal Election Commission  
Washington, D.C. 20463

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GCC # 5558  
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CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.  
ATTORNEYS AT LAW

84 NOV 9 10:45

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
RONALD S. JACOBS  
BRENDAN M. COMER  
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F. THOMAS OLSON  
RAYMOND R. KRUEGER  
ROBERT S. CORRIS  
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MYRON L. JOSEPH  
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JOHN T. BANNEN  
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E. ANN KERNS

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211 WEST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377  
TELEPHONE (414) 273-2000  
OF COUNSEL  
HENRY S. REUSS

November 7, 1984

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Secretary  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Secretary:

Enclosed for filing in the above matter are ten copies of the respondents' reply letter to the Commission's determination that there is reason to believe the respondents violated federal election campaign laws. Also enclosed are ten copies of the affidavits of Albert Adelman and Raymond J. Brooks, which are incorporated in the reply.

Under cover of a copy of this letter, three copies of each of the above documents are being sent to the Commission's General Counsel.

Sincerely yours,

Adrian N. Cohen

ANC/mrk/19  
cc: General Counsel  
Federal Election Commission

34 NOV 9 11:45  
RECEIVED  
GENERAL COUNSEL

CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.  
ATTORNEYS AT LAW

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
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SUITE 800  
211 WEST WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377

TELEPHONE (414) 273-2000

OF COUNSEL  
HENRY B. REUSS

November 7, 1984

Lee Ann Elliott, Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Chairman Elliott:

This letter is submitted on behalf of the respondents in the above matter in reply to the briefs of the Federal Election Commission's General Counsel dated October 11, 1984, recommending that the Commission find reason to believe that the Adelman for Congress Committee, Raymond J. Brooks, as Treasurer, and Albert Adelman violated provisions of federal law governing federal election campaigns. Accompanying this letter are affidavits of Raymond J. Brooks and Albert Adelman.

Because there are inaccuracies in the General Counsel's description of the facts giving rise to this matter, we must briefly set forth the chronology of events.

Albert Adelman is the father of Lynn Adelman, who was a candidate in the Democratic primary election held February 21, 1984, in Wisconsin. Albert Adelman is a private citizen who has had little exposure to federal regulations or laws governing contributions to political campaigns. On the day of the primary election, Albert Adelman made a loan of \$20,000.00 to Lynn Adelman. Lynn Adelman in turn wrote a check in the same amount as a loan to his campaign committee.

Upon receipt of the check, the Committee's treasurer, Raymond J. Brooks, was uncertain how to record the loan. Mr. Brooks therefore reviewed 11 C.F.R. §110.7(a)(1)(i) and (a)(1)(i)(C). Mr. Brooks determined that in practical effect the source of the \$20,000.00 loan was Albert Adelman, with Lynn Adelman acting as guarantor. Lynn Adelman had been the guarantor of loans the Committee had obtained from banks earlier in the campaign. Mr. Brooks' view of the transaction involving Albert Adelman was consistent with the way these prior loans had been treated by the Committee. Mr. Brooks'

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CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.

reading of the regulations led him to believe that the "guarantor" of the loan is the "contributor" for purposes of federal election contribution limits. He believed this because the term "loan" is defined in the regulations as the guarantee of a loan from a source other than the guarantor. Mr. Brooks viewed the transaction as consisting of one loan to the Committee, coming from one "lender"--the guarantor-- just as had been the case with loans to the Committee obtained from banks. Mr. Brooks did not discuss the handling of the loan with Albert Adelman.

When Mr. Brooks began compiling information for the Committee's April quarterly report, he once again addressed the issue of the loan. He called the Federal Election Commission hotline on April 10 and April 13 to ask how to record the loan. He was told to record on Schedule C of the quarterly report the source and guarantor of the loan in the same manner in which he recorded loans from banks. He was also told how to record the candidate as the contributor on Schedule A, which was the same way in which Mr. Brooks reflected Lynn Adelman's role as guarantor of loans from banks.

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Upon further review of the loan after filing the April quarterly report, Mr. Brooks determined the loan as recorded probably violated federal election contribution limitations. On May 3, he contacted a Commission analyst to explain his concerns. Mr. Brooks told the analyst that Lynn Adelman had obtained a new \$20,000.00 loan from a bank, and that Lynn Adelman had then made a loan to the Committee in that amount in his own name. The General Counsel's statement in the factual analysis dated October 11, 1984 that Mr. Brooks told the analyst that the Committee obtained the loan thus is inaccurate. Mr. Brooks also told the analyst that the Committee had repaid the loan. The payment consisted of a check for \$20,000.00, made out to Lynn Adelman, which Lynn Adelman then endorsed over to Albert Adelman. The transaction occurred through the Committee's account. The General Counsel's statement to the contrary is inaccurate.

On July 11, Mr. Brooks again contacted a Commission analyst for assistance in recording the transaction that resulted in the payment to Albert Adelman. Mr. Brooks was told to report the original loan as a loan from a source other than the candidate on lines 13a and 13b of the "Detailed Summary Page" of FEC Form 3. Mr. Brooks followed these instructions, although he pointed out to the analyst that the resulting total reflected \$20,000.00 more in loans than in fact had been received. The Committee's July quarterly report reflects the repayment of the loan to Albert Adelman and the new loan obtained by Lynn Adelman.

As the facts demonstrate, Albert Adelman in his loan to Lynn Adelman and Raymond J. Brooks in his handling of the loan Lynn Adelman made on February 21 to the Committee acted with no intention of circumventing federal election campaign laws. Albert Adelman was

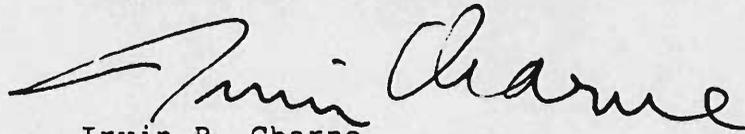
CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C.

unaware of the laws, or that the laws might have any application to the loan he made to his son. He had no contact with the Committee concerning that money until April of 1984, when he was informed that the money would be returned to him. Albert Adelman's involvement was tangential to the Committee's receipt and handling of the money.

Raymond J. Brooks misunderstood the applicable regulations in determining how the Committee should record the receipt of the money involved here. His misunderstanding was an innocent one, however, and he made no attempt to conceal either the receipt of the money or its source. Indeed, he raised the question to the Commission analysts and sought guidance concerning how best to comply with the federal campaign contribution laws. Mr. Brooks attempted to fit the transaction within the literal language of the regulations and his experience with handling loans from banks to the Committee. Although he read the regulatory language too literally, he corrected the mistake as soon as he understood the nature of the problem. Lynn Adelman immediately loaned money to the Committee in order to replace the money attributed to Albert Adelman, and to allow repayment of the full amount of Albert Adelman's loan to Lynn Adelman. Mr. Brooks contacted the Commission every step of the way, and recorded each transaction as instructed by Commission personnel. Throughout these events, Mr. Brooks tried as best he could to comply with the law.

Neither Albert Adelman nor Raymond J. Brooks intended to avoid the effect of any federal campaign contribution laws. Albert Adelman was not involved in the Committee's handling of the loan he made to his son. Mr. Brooks did everything he could to immediately rectify the error in the Committee's handling of the money. His actions were taken openly, and were reported to the Commission. Albert Adelman and Raymond J. Brooks should not be put to further expense of time and money for their innocent actions.

Respectfully submitted,

  
Irvin B. Charne

IBC/mrk/19

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C.F.R. §100.7(a)(1)(i) and (a)(1)(i)(C), that the loan was a contribution by the "guarantor" of the loan, in this case candidate Lynn Adelman. I decided that it was appropriate to record the loan source as being Albert Adelman, but the contributor as Lynn Adelman, because the regulations referred to in this affidavit provided that the term "loan" means a guarantee of a loan from a source other than the guarantor. I thought there was only one loan to the Committee and hence, I believed, only one person making the loan: in this case, the guarantor, according to the literal terms of the regulations. The person making the loan, and therefore making the contribution, was, in my understanding, the guarantor, Lynn Adelman. I had no intent to circumvent the regulations, but in good faith believed that under the regulations only the guarantor was a contributor on the loan. Had the Committee understood the regulations to make both the loan source and the guarantor contributors to the full extent of the loan, the loan would not have been made as it was.

6. In compiling information for the quarterly report due April 15, 1984, the issue of the loan once more arose. I called the Federal Election Commission hotline on or about April 10 and April 13, 1984 to ask how to record and handle the loan. I was told only that the source should be disclosed on Schedule C, in the top block of the Schedule, and the guarantor should be recorded in the lower block of the Schedule. I conformed the Committee's report to these instructions.

7. Subsequent to submitting the April 15 quarterly report, I determined that there probably was an impropriety in the loan transaction between Lynn Adelman and Albert Adelman, and that the money would have to be returned to Albert Adelman. On May 3, 1984, I again contacted one of the Commission's analysts to confirm my determination, and to ask how to report the Committee's action. I told the analyst that Lynn Adelman had made a new loan to the Committee of \$20,000.00. The statement on page 2 of the Federal Election Commission General Counsel's Federal and Legal Analysis (appended

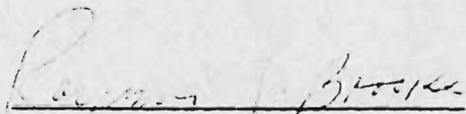
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to the Commission's October 12, 1984 letter to me) that I told the analyst the Committee had obtained the new loan is inaccurate.

8. Albert Adelman never discussed the handling of the loan with either myself or any member of the Committee to my knowledge.

9. Albert Adelman was repaid from Committee funds through a check made out to Lynn Adelman, and endorsed over to Albert Adelman. Thus, the statement on page 2 of the General Counsel's Factual and Legal Analysis is inaccurate to the extent it suggests the transaction did not go through the Committee's account. The repayment of the loan which was originally recorded as having been obtained from Albert Adelman was made with Committee funds and was noted in the July 1984 quarterly report as having been repaid. A Commission analyst on July 11, 1984, told me to record the new loan and the old loan on lines 13a and 13b of the Detailed Summary Page, despite my pointing out that such a procedure would reflect more in loan receipts than actually existed. In any event, all money used to repay Albert Adelman's loan to Lynn Adelman in fact went through the Committee's account.

85040522952

  
\_\_\_\_\_  
Raymond J. Brooks

Subscribed and sworn to before me  
this 7 day of Nov, 1984.

  
\_\_\_\_\_  
Notary Public, Milwaukee County

My commission is permanent.

AFFIDAVIT OF ALBERT ADELMAN

STATE OF WISCONSIN )  
 )SS.  
MILWAUKEE COUNTY )

Albert Adelman, being first duly sworn, says as follows:

1. I make this affidavit in connection with the Federal Election Commission MUR 1817. I am the father of Lynn Adelman, who was a candidate for Congress in the Democratic primary election held in Wisconsin on February 21, 1984.

2. On February 21, 1984, at his request, I made a loan to my son. He then made a loan of these funds to his campaign committee. The loan totaled \$20,000.00.

3. I was at the time unfamiliar with any federal laws or regulations limiting the application of such loans to federal candidates' campaigns. I had no idea that the loan might constitute a contribution in violation of federal laws or regulations until April of 1984, when I was told that the loan might be such a violation, and that the money would be returned to me.

4. In early May of 1984, the full amount of my loan was returned to me in the form of a check from the committee payable to Lynn Adelman, which check was then endorsed over to me.

*Albert B Adelman*

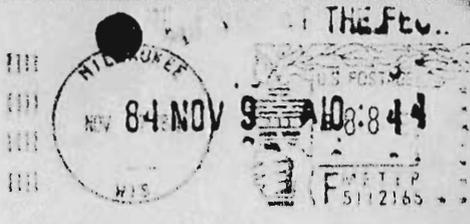
Albert Adelman

Subscribed and sworn to before me  
this 7 day of Nov, 1984.

*[Signature]*  
Notary Public, Milwaukee County

My commission is permanent.

85040522953



85040522954

**CHARNE, GLASSNER, TEHAN,  
CLANCY & TAITELMAN S.C.**  
211 W. WISCONSIN AVENUE  
MILWAUKEE, WISCONSIN 53203-2377

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 1, 1984

Irvin B. Charne, Esquire  
Charne, Glassner, Tehan, Clancy  
& Taitelman  
First Bank Building  
Suite 800  
211 West Wisconsin Avenue  
Milwaukee, Wisconsin 53203-2377

Re: MUR 1817  
Adelman for Congress Committee  
Raymond J. Brooks, as treasurer  
Albert Adelman

Dear Mr. Charne:

This is in reference to your telephone conversation with Marybeth Tarrant of this Office on October 23, 1984, and to a letter from Adrian N. Cohen of your office dated October 26, 1984. During that phone conversation, you explained to Ms. Tarrant that you had just been retained as counsel by the Respondents in this matter and would need additional time to respond to the Commission's findings that there was reason to believe your clients had violated the Federal Election Campaign Act of 1971, as amended. Ms. Tarrant advised you that a written request must be made to this Office asking for an extension. Based on the dates you discussed and the reasons for the request, Ms. Tarrant indicated to you that such a request would probably be granted.

In light of your telephone conversation with Ms. Tarrant and Mr. Cohen's letter, the Office of the General Counsel has determined to grant you your requested extension. Accordingly, your response will be due on or before November 12, 1984.

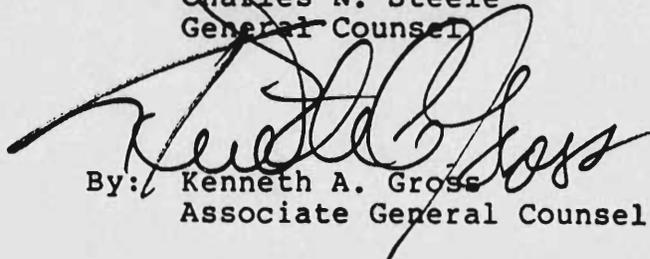
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Letter to Irvin B. Charne  
Page 2

If you have any questions, please contact Ms. Tarrant at  
(202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name and title.

By: Kenneth A. Gross  
Associate General Counsel

85040522956

GCC#5363

CHARNE, GLASSNER, TEHAN, CLANCY & TAITELMAN  
S. C. ATTORNEYS AT LAW

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SECRETARY

84 OCT 29 P4:03

IRVIN B. CHARNE  
WILLIAM E. GLASSNER, JR.  
ROBERT E. TEHAN, JR.  
LAWRENCE CLANCY  
DONALD S. TAITELMAN  
WILLIAM E. McCARTY  
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MILWAUKEE, WISCONSIN 53203-2377

TELEPHONE (414) 273-2000

OF COUNSEL  
HENRY S. REUSS

October 26, 1984

*Tarrant*

14 OCT 29 P4:58

GENERAL COUNSEL

Lee Ann Elliott, Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 1817

Dear Chairman Elliott:

In accordance with your correspondence of October 12, 1984 to Mr. Albert Adelman and Mr. Raymond J. Brooks, Irvin B. Charne, as counsel for Mr. Adelman and Mr. Brooks, on October 23, 1984 contacted Marybeth Tarrant, the Federal Election Commission staff member assigned to the above-referenced matter. Ms. Tarrant agreed to an extension of time to and including November 12, 1984, for filing responses on behalf of Mr. Adelman and Mr. Brooks to the Commission's findings set forth in the October 12 correspondence. This letter confirms the extension of time, and conveys the completed Statement of Designation of Counsel forms for Mr. Adelman and Mr. Brooks.

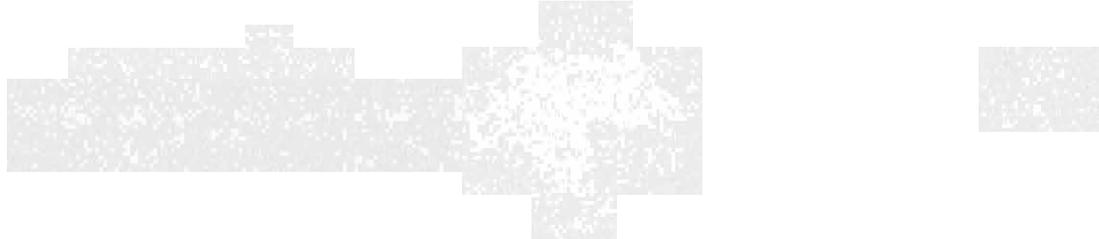
Sincerely yours,

Adrian N. Cohen

ANC/mrk/18

cc: General Counsel  
Federal Election Commission  
Ms. Marybeth Tarrant  
Mr. Albert Adelman  
Mr. Raymond J. Brooks

85040522957



STATEMENT OF DESIGNATION OF COUNSEL

MUR 1817

NAME OF COUNSEL: Irvin B. Charne

ADDRESS: Charne, Glassner, Tehan, Clancy & Taitelman s.c.

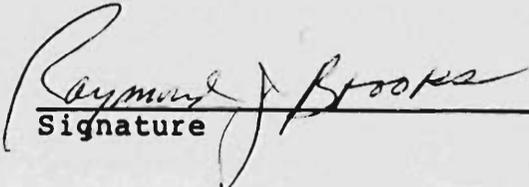
211 West Wisconsin Avenue

Milwaukee, Wisconsin 53202-2377

TELEPHONE: (414) 273-2000

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.

October 26, 1984  
Date

  
Signature

RESPONDENT'S NAME: Raymond J. Brooks

ADDRESS: 13865 West Thomas Drive

New Berlin, Wisconsin 53151

HOME PHONE: (414) 782-9137

BUSINESS PHONE: (414) 678-4753

85040522953

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1817

NAME OF COUNSEL: Irvin B. Charne

ADDRESS: Charne, Glassner, Tehan, Clancy & Taitelman s.c.

211 West Wisconsin Avenue

Milwaukee, Wisconsin 53202-2377

TELEPHONE: (414) 273-2000

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.

October 26, 1984  
Date

Albert B. Adelman  
Signature

RESPONDENT'S NAME: Albert Adelman

ADDRESS: 7111 North Barnett Lane

Milwaukee, Wisconsin 53217

HOME PHONE: (414) 352-2313

BUSINESS PHONE: (414) 224-1040

85040522959



CHARNE, GLASSNER, TEH, G. CLANON & TAYFELMAN

ATTORNEYS AT LAW

FIRST BANK BUILDING

211 WEST WISCONSIN AVENUE

MILWAUKEE, WISCONSIN 53203-2377

2 9 5 0



84 OCT 29 8:59

Lee Ann Elliott, Chairman  
Federal Election Commission  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
SECRETARY

84 OCT 17 A 9: 32

**SENSITIVE**

October 16, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel *KAG*  
SUBJECT: RAD Referral 84L-25

On October 10, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84L-25 should now become MUR 1817.

Attachment  
Copy of Certification

85040522961



BEFORE THE FEDERAL ELECTION COMMISSION

1817  
Current

In the Matter of	)	
	)	RAD Referral 84L-25
Adelman for Congress Committee	)	
Raymond J. Brooks, as treasurer	)	
Albert Adelman	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 10, 1984, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 84L-25:

1. Open a MUR.
2. Find reason to believe that the Adelman for Congress Committee and Raymond J. Brooks, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the letters attached to the First General Counsel's Report signed October 3, 1984.

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

Attest:

10-11-84

Date

Judy C. Ransom

for Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	10-4-84, 9:02
Circulated on 48 hour tally basis:	10-5-84, 2:00

85040522962



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 12, 1984

Raymond J. Brooks, Treasurer  
Adelman for Congress Committee  
13865 West Thomas Drive  
New Berlin, Wisconsin 53151

Re: MUR 1817

Dear Mr. Brooks: ..

On October 10, 1984, the Federal Election Commission determined that there is reason to believe the Adelman for Congress Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 and you, as treasurer, 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 so desired. 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.

35040522963

Letter to Raymond J. Brooks  
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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures

- General Counsel's Factual and Legal Analysis
- Procedures
- Designation of Counsel Statement

85040522964





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 12, 1984

Albert Adelman  
7111 North Barnett Lane  
Milwaukee, Wisconsin 53217

Re: MUR 1817

Dear Mr. Adelman:

On October 10, 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 you, 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 so desired. 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.

85040522965

Letter to Albert Adelman  
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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040522966

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Adelman for Congress Committee ) RAD Referral 84L-25  
Raymond J. Brooks, as treasurer )  
Albert Adelman )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 10, 1984, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 84L-25:

1. Open a MUR.
2. Find reason to believe that the Adelman for Congress Committee and Raymond J. Brooks, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the letters attached to the First General Counsel's Report signed October 3, 1984.

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

Attest:

10-11-84

Date

Judy C. Ransom

for Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: 10-4-84, 9:02  
Circulated on 48 hour tally basis: 10-5-84, 2:00

85040522967



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
 FROM: Office of General Counsel *CK*  
 DATE: October 4, 1984  
 SUBJECT: RAD 84L-25: First General Counsel's Report

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

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

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

85040522963

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

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

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

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT 84 OCT 4 A 9: 02

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 10/4/84-9:05

RAD Referral 84L-25  
STAFF MEMBER  
Marybeth Tarrant

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

RESPONDENTS' NAMES: Adelman for Congress Committee  
Raymond J. Brooks, as treasurer  
Albert Adelman

**SENSITIVE**

RELEVANT STATUTE: 2 U.S.C. §§ 431(8)(A)(i), 441a(a)(1)(A),  
441a(f)

INTERNAL REPORTS CHECKED: Reports filed by Adelman Committee

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD").

**SUMMARY OF ALLEGATIONS**

It is alleged that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution and that the Adelman for Congress Committee ("Committee") violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

**FACTUAL AND LEGAL ANALYSIS**

On its 1984 April Quarterly Report the Committee disclosed the receipt of a loan on February 21, 1984, totalling \$20,000. The loan was designated for the primary election which was held on that same date. Schedule C of the report disclosed the source of the loan as Albert Adelman. The loan was guaranteed by the

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candidate, Lynn Adelman, \*/ and resulted in an excessive contribution of \$19,000 from Albert Adelman.

On May 3, 1984, Mr. Raymond Brooks, treasurer of the Committee, contacted a RAD analyst. Mr. Brooks explained that Albert Adelman was the father of the candidate and that the Committee had realized that the loan was improper. Therefore, the Committee secured a bank loan, guaranteed by the candidate, and repaid Mr. Adelman on April 30, 1984.

The Committee filed a letter, dated May 3, 1984, explaining the circumstances of the loan and the Committee's repayment to Albert Adelman. On May 22, 1984, an Informational Notice was sent to the Committee, informing the treasurer that the Commission noted the receipt and refund of the excessive contribution.

On July 11, 1984, the treasurer again contacted RAD. Mr. Brooks explained that the candidate had obtained a bank loan in order to repay Albert Adelman and that the transaction did not go through the Committee's account. The Committee's 1984 July Quarterly Report disclosed this transaction as an in-kind contribution from the candidate on April 30, 1984. The new loan owed to the First National Bank of Glendale was properly disclosed on Schedule C. The loan from Albert Adelman was disclosed as repaid in full on Schedule C.

---

\*/ On February 21, 1984, a Democratic primary was held in order to determine the candidate who would run in the special election held April 3, 1984. Lynn Adelman lost the primary, receiving 25.9% of the vote.

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Pursuant to 2 U.S.C. § 441a(a)(1)(A), a person is prohibited from making contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of this section. A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. 2 U.S.C. § 431(8)(A)(i), 11 C.F.R. § 100.7(a)(1)(i)(B).

In light of the foregoing, the Office of General Counsel recommends that the Commission find reason to believe that the Adelman for Congressman Committee, Raymond J. Brooks, as treasurer, and Albert Adelman violated 2 U.S.C. § 441a.

**RECOMMENDATIONS**

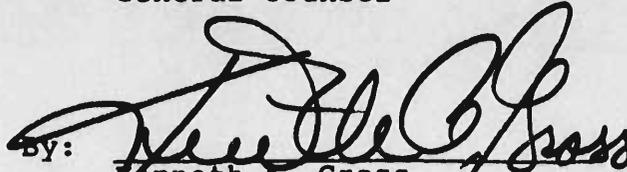
1. Open a MUR.
2. Find reason to believe that the Adelman for Congress Committee and Raymond J. Brooks, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A).

85040522971

4. Approve the attached letters.

Charles N. Steele  
General Counsel

October 3, 1984  
Date

By:   
Kenneth A. Gross  
Associate General Counsel

Attachments

1. RAD Referral
2. Proposed letters
3. General Counsel's Factual and Legal Analysis

85040522972

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 23 August 1984

ANALYST: Susan Kaltenbaugh

I. COMMITTEE: Adelman for Congress Committee  
C00174441  
Raymond J. Brooks, Treasurer  
13865 West Thomas Drive  
New Berlin, WI 53151

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

III. BACKGROUND:

Receipt of an Excessive Contribution

The Adelman for Congress Committee's ("the Committee's") 1984 April Quarterly report disclosed the receipt of a loan on February 21, 1984 totalling \$20,000. The loan was designated for the primary. Schedule C of the report disclosed the source of the loan as Albert Adelman (Attachment 2). This loan was guaranteed by the candidate, Lynn Adelman. This resulted in an excessive contribution from Mr. Adelman of \$19,000.

On May 3, 1984, Mr. Raymond Brooks, treasurer of the Committee, contacted an analyst in the Reports Analysis Division ("RAD") (Attachment 3). Mr. Brooks explained that Albert Adelman was the father of the candidate and that the Committee had realized that the loan was improper. The Committee secured a bank loan, guaranteed by the candidate, and repaid Mr. Adelman.

The Committee filed a letter, dated May 3, 1984, explaining the circumstances of the loan and the Committee's repayment to Albert Adelman (Attachment 4).

On May 22, 1984, an Informational Notice ("IN") was sent to the Committee, informing the treasurer that the Commission noted the receipt and refund of the excessive contribution (Attachment 5).

85040522973

ADELMAN FOR CONGRESS COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

On July 11, 1984, the treasurer again contacted RAD. Mr. Brooks explained that the candidate obtained a bank loan with which to repay Mr. Adelman. The transaction did not go through the Committee's account (Attachment 6). The Committee's 1984 July Quarterly Report disclosed this transaction as an in-kind contribution from the candidate on April 30, 1984 (Attachments 7 and 8). The new loan owed to the First National Bank of Glendale is properly disclosed on Schedule C (Attachment 9). The loan from Albert Adelman is disclosed as repaid in full on Schedule C (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

85040522974

Attachment 1

3

FEDERAL ELECTION COMMISSION  
1983-1984

DATE 14AUG84

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
ADELMAN, LYNN S	HOUSE 04	DEMOCRATIC PARTY			WISCONSIN		1984 ELECTION	ID# H2WI04013	
1. STATEMENT OF CANDIDATE							23DEC83	1	83HSE/250/5048 ✓
1983 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
PRINCIPAL CAMPAIGN COMMITTEE									
ADELMAN FOR CONGRESS COMMITTEE									
1983 STATEMENT OF ORGANIZATION									
YEAR-END			14,390		9,833		23DEC83 - 31DEC83	8	84HSE/252/3672 ✓
1984 48 HOUR CONTRIBUTION NOTICE							13FEB84	1	84HSE/255/0158 ✓
48 HOUR CONTRIBUTION NOTICE							14FEB84	2	84HSE/255/0289 ✓
48 HOUR CONTRIBUTION NOTICE							16FEB84	1	84HSE/255/0575 ✓
48 HOUR CONTRIBUTION NOTICE							17FEB84	1	84HSE/255/0556 ✓
48 HOUR CONTRIBUTION NOTICE							17FEB84	1	84HSE/255/0592 ✓
48 HOUR CONTRIBUTION NOTICE							21FEB84	1	84HSE/255/0668 ✓
48 HOUR CONTRIBUTION NOTICE							21FEB84	1	84HSE/255/0676 ✓
48 HOUR CONTRIBUTION NOTICE							22FEB84	1	84HSE/255/1067 ✓
48 HOUR CONTRIBUTION NOTICE							23FEB84	1	84HSE/255/2047 ✓
PRE-SPECIAL			115,479		108,790		1JAN84 - 1FEB84	32	84HSE/254/4713 ✓
PRE-SPECIAL - AMENDMENT			115,479		113,914		1JAN84 - 1FEB84	4	84HSE/255/0669 ✓
PRE-SPECIAL - AMENDMENT			115,479		113,914		1JAN84 - 1FEB84	3	84HSE/256/0996 ✓
PRE-SPECIAL - AMENDMENT			115,479		115,020		1JAN84 - 1FEB84	3	84HSE/260/1306 ✓
REQUEST FOR ADDITIONAL INFORMATION							1JAN84 - 1FEB84	1	84FEC/297/5296 ✓
REQUEST FOR ADDITIONAL INFORMATION							1JAN84 - 1FEB84	1	84FEC/312/1551 ✓
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN84 - 1FEB84	2	84FEC/314/3155 ✓
APRIL QUARTERLY			120,349		124,246		2FEB84 - 31MAR84	31	84HSE/258/4275 ✓
APRIL QUARTERLY - AMENDMENT			-		-		2FEB84 - 31MAR84	1	84HSE/260/1341 ✓
REQUEST FOR ADDITIONAL INFORMATION							2FEB84 - 31MAR84	4	84FEC/315/2284 ✓
JULY QUARTERLY			56,045		57,416		1APR84 - 30JUN84	17	84HSE/265/4284
TOTAL			307,263	0	306,515	0		118	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
ADELMAN COMMITTEE									
1983 STATEMENT OF ORGANIZATION - AMENDMENT									
APRIL QUARTERLY			10,492		9,723		9JAN83	2	83HSE/240/4858 ✓
MID-YEAR REPORT			5,135		5,581		1JAN83 - 31MAR83	12	83HSE/245/2883 ✓
YEAR-END			5,049		5,111		1APR83 - 30JUN83	8	83HSE/247/1877 ✓
YEAR-END - AMENDMENT			-		-		1JUL83 - 31DEC83	8	84HSE/251/1406 ✓
REQUEST FOR ADDITIONAL INFORMATION							1JUL83 - 31DEC83	2	84HSE/256/0933 ✓
1984 MID-YEAR REPORT			492		500		1JUL83 - 31DEC83	1	84FEC/319/1111 ✓
							1JAN84 - 30JUN84	5	84HSE/265/1634
								38	TOTAL PAGES
								38	TOTAL PAGES

Handwritten notes and numbers: 29250458

40. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES

LOANS

1959 Report to Grant Report

Adelman for Congress Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Albert Adelman 7111 N Barnett Lane Milwaukee, WI 53217 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	\$20,000.00	\$ 0	\$20,000.00

Terms: Date Incurred 2-21-84 Date Due 2-21-85 Interest Rate 10 % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code Ivylin S. Adelman 4330 S. Moorland Road New Berlin, WI 53151	Name of Employer Wisconsin State Senator Candidate Occupation	Amount Guaranteed Outstanding \$ 20,000.00
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding \$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

Terms: Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding \$

SUBTOTALS This Period This Page (optional) . . . . .	\$20,000.00
TOTALS This Period (last page in this line only) . . . . .	\$98,500.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

340123070076  
85040522975

MEMORANDUM FOR FILES

RE: TELECON

DATE: May 3, 1984

FROM: Raymond Brooks

TO: Susan Kaltenbaugh

NAME OF COMMITTEE: Adelman for Congress Committee Wisconsin

Mr. Brooks called regarding a \$20,000 loan from the candidate's father. The committee has realized that the loan was excessive, and has now secured a bank loan to repay the father. The loan was guaranteed by the candidate. The committee will report everything on the July 15 Report, and will write a letter immediately to describe the situation.

85040522977



MAY 5 1984

CERTIFIED MAIL

**Adelman**

**Congress**

4th District

Attachment  
Amended April 15 Quarterly Report  
**Democratic Primary**  
**Tuesday, February 21**

May 3, 1984

RECEIVED  
OFFICE OF RECORDS & REGISTRATION  
MAY - 8 AM 9 23

Clerk of the House  
Office of Records and Registration  
1036 Longworth Office Building  
Washington, DC 20515

Identification Number: C00174441

Re: Adelman for Congress Committee

108073

Gentlemen:

This letter is in reference to our April 15, 1984 FEC Report. That report indicates on page 1 of Schedule A (Line 13a) a receipt of a loan from the candidate of \$20,000.00. Page 2 of Schedule C (Line 13a) indicates that the loan source was Albert Adelman. Subsequent to filing this report we discovered that the loan was improper. To correct the situation the full amount of the loan has been refunded to the loan source.

It is our understanding that because the refund occurred after April 15th it is to be reflected on the next quarterly report rather than by an amendment to the April 15th report. We are sending this letter now, however, to apprise you as soon as possible of our action to correct the situation.

Sincerely,

*Ray Brooks*

Ray Brooks, Treasurer  
Adelman for Congress

Postmaster: please address  
812 West Mitchell Street  
Milwaukee, Wisconsin 53204  
645 4355

161 Bank Street  
Waukesha, Wisconsin 53188  
947 7450

Post to be Address to Congress Committee



6

840126U1341  
85040522978

Attachment 5  
(2 pages)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2  
May 22, 1984

Raymond J. Brooks, Treasurer  
Adelman for Congress Committee  
13865 West Thomas Drive  
New Berlin, WI 53151

Identification Number: C00174441

Reference: April Quarterly Report (2/2/84-3/31/84)

Dear Mr. Brooks:

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:

85040522979

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. 441a(a) and (f))

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your action in refunding the excessive amount(s) will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your Amended 12 Day Pre-Special Primary report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction. Additionally, Lines 17 and 22, Column B, should equal the sum of Column A of this report and Column B of the previous report for those lines. Please amend your report, as necessary.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst  
Reports Analysis Division

85040522980

8

MEMORANDUM FOR FILES

RE: TELECON

DATE: 7/11/84

FROM: Ray Brooks, Treasurer

TO: Sue Kaltenbaugh

NAME OF COMMITTEE: Adelman for Congress Wisconsin

Mr. Brooks called to discuss the reporting of the loan repayment to the candidate's father. The candidate obtained a bank loan and repaid his father. The transaction did not go through the committee's account. The committee will report this as an in-kind contribution from the candidate, with the loan to the bank reported on Schedule C.

85040522981



SCHEDULE A

ITEMIZED RECEIPTS

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

Name of Committee (in Full)			
Adelman for Congress			
A. Full Name, Mailing Address and ZIP Code Lynn S Adelman 4380 S Moorland Road New Berlin, WI 53151 (Receipt of loan made by Candidate)		Name of Employer Wisconsin State Senator	Date (month, day, year) 7-30-84
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Candidate	Amount of Each Receipt This Period \$20,000.00
B. Full Name, Mailing Address and ZIP Code		Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Name of Employer	Date (month, day, year)
C. Full Name, Mailing Address and ZIP Code		Occupation	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code		Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Name of Employer	Date (month, day, year)
F. Full Name, Mailing Address and ZIP Code		Occupation	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)		Aggregate Year-to-Date-\$	
TOTAL This Period (last page this line number only)		\$20,000.00	

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

Name of Committee (in Full)

Adelman for Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lynn S. Adelman 4380 South Moorland Road New Berlin, WI 53151	Committee repayment of loan made by candidate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4-30-84	\$20,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$20,000.00

Name of Lender (in Full) <b>Adelman for Congress</b>			
A Full Name, Mailing Address and ZIP Code of Loan Source <b>Lynn S Adelman 4380 S Moorland Road New Berlin, WI 53151</b>	Original Amount of Loan <b>20,000.00</b>	Cumulative Payments To Date <b>0</b>	Balance Outstanding at Close of This Period <b>20,000.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms Date Incurred <b>7-20-84</b> Date Due <b>8-2-84</b> Interest Rate _____ % (ap) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1 Full Name, Mailing Address and ZIP Code <b>First National Bank of Glendale 5800 N. Port Washington Road Glendale, WI 53217</b>	Name of Employer <b>Candidate</b>	Occupation <b>Wisconsin State Senator</b>	Amount Guaranteed Outstanding <b>\$ 20,000.00</b>
2 Full Name, Mailing Address and ZIP Code			
3 Full Name, Mailing Address and ZIP Code			
E Full Name, Mailing Address and ZIP Code of Loan Source			
Original Amount of Loan			
Cumulative Payments To Date			
Balance Outstanding at Close of This Period			
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms Date Incurred _____ Date Due _____ Interest Rate _____ % (ap) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1 Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding
2 Full Name, Mailing Address and ZIP Code			
3 Full Name, Mailing Address and ZIP Code			
SUBTOTALS This Period This Page (optional) .....			<b>20,000.00</b>
TOTALS This Period (last page in this line only) .....			<b>67,000.00</b>
Carry outstanding balance only to LINE J, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

LOANS

784 July 15 Report  
Page of 23  
List number 23  
See instructions  
for each numbered line

Name of Committee (in Full) <b>Adelman for Congress</b>			
A Full Name, Mailing Address and ZIP Code of Loan Source <b>Albert Adelman 7111 North Barnett Lane Milwaukee, WI 53217</b>		Original Amount of Loan <b>\$20,000.00</b>	Cumulative Payment To Date <b>\$20,000.00</b>
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <b>2-21-84</b> Date Due <b>2-21-85</b> Interest Rate <b>10</b> % (or)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code <b>Lynn S. Adelman 4380 South Moorland Road New Berlin, WI 53151</b>		Name of Employer <b>Candidate Wisconsin State Senator</b>	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (or)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			0
Carry outstanding balance only to LINC 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Attachment 2

Raymond J. Brooks, Treasurer  
Adelman for Congress Committee  
13865 West Thomas Drive  
New Berlin, Wisconsin 53151

Re: MUR

Dear Mr. Brooks:

On \_\_\_\_\_, 1984, the Federal Election Commission determined that there is reason to believe the Adelman for Congress Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 and you, as treasurer, 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 so desired. 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.

85040522936

Letter to Raymond J. Brooks  
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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040522987

15



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Albert Adelman  
7111 North Barnett Lane  
Milwaukee, Wisconsin 53217

Re: MUR

Dear Mr. Adelman:

On \_\_\_\_\_, 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 you, 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 so desired. 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.

85040522933

Letter to Albert Adelman  
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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Enclosures  
General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

Date \_\_\_\_\_

MUR No. \_\_\_\_\_  
Staff Member and Tel. No.  
Marybeth Tarrant

(202) 523-4143

Respondents Adelman for Congress Committee  
Raymond J. Brooks, as treasurer

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

It is alleged that the Adelman for Congress Committee ("Committee") and Raymond J. Brooks, as treasurer, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Albert Adelman.

FACTUAL BASIS AND LEGAL ANALYSIS

On its 1984 April Quarterly Report the Committee disclosed the receipt of a loan on February 21, 1984, totalling \$20,000. The loan was designated for the primary election which was held on that same date. Schedule C of the report disclosed the source of the loan as Albert Adelman. The loan was guaranteed by the candidate, Lynn Adelman, \*/ and resulted in an excessive contribution of \$19,000 from Albert Adelman.

\*/ On February 21, 1984, a Democratic primary was held in order to determine the candidate who would run in the special election held April 3, 1984. Lynn Adelman lost the primary, receiving 25.9% of the vote.

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On May 3, 1984, Mr. Raymond Brooks, treasurer of the Committee, contacted a RAD analyst. Mr. Brooks explained that Albert Adelman was the father of the candidate and that the Committee had realized that the loan was improper. Therefore, the Committee secured a bank loan, guaranteed by the candidate, and repaid Mr. Adelman on April 30, 1984.

The Committee filed a letter, dated May 3, 1984, explaining the circumstances of the loan and the Committee's repayment to Albert Adelman. On May 22, 1984, an Informational Notice was sent to the Committee, informing the treasurer that the Commission noted the receipt and refund of the excessive contribution.

On July 11, 1984, the treasurer again contacted RAD. Mr. Brooks explained that the candidate had obtained a bank loan in order to repay Albert Adelman and that the transaction did not go through the Committee's account. The Committee's 1984 July Quarterly Report disclosed this transaction as an in-kind contribution from the candidate on April 30, 1984. The new loan owed to the First National Bank of Glendale was properly disclosed on Schedule C. The loan from Albert Adelman was disclosed as repaid in full on Schedule C.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), a person is prohibited from making contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1000. Pursuant to

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2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of this section. A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. 2 U.S.C. § 431(8)(A)(i), 11 C.F.R. § 100.7(a)(1)(i)(B).

In light of the foregoing, the Office of General Counsel recommends that the Commission find reason to believe that the Committee and Raymond J. Brooks, as treasurer, violated 2 U.S.C. § 441a(f).

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FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE \_\_\_\_\_

MUR NO. \_\_\_\_\_  
STAFF MEMBER AND TEL. NO.  
Marybeth Tarrant  
(202) 523-4143

RESPONDENT Albert Adelman

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

It is alleged that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution to the Adelman for Congress Committee ("Committee").

FACTUAL BASIS AND LEGAL ANALYSIS

On its 1984 April Quarterly Report the Committee disclosed the receipt of a loan on February 21, 1984, totalling \$20,000. The loan was designated for the primary election which was held on that same date. Schedule C of the report disclosed the source of the loan as Albert Adelman. The loan was guaranteed by the candidate, Lynn Adelman, \*/ and resulted in an excessive contribution of \$19,000 from Albert Adelman.

\*/ On February 21, 1984, a Democratic primary was held in order to determine the candidate who would run in the special election held April 3, 1984. Lynn Adelman lost the primary, receiving 25.9% of the vote.

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On May 3, 1984, Mr. Raymond Brooks, treasurer of the Committee, contacted a RAD analyst. Mr. Brooks explained that Albert Adelman was the father of the candidate and that the Committee had realized that the loan was improper. Therefore, the Committee secured a bank loan, guaranteed by the candidate, and repaid Mr. Adelman on April 30, 1984.

The Committee filed a letter, dated May 3, 1984, explaining the circumstances of the loan and the Committee's repayment to Albert Adelman. On May 22, 1984, an Informational Notice was sent to the Committee, informing the treasurer that the Commission noted the receipt and refund of the excessive contribution.

On July 11, 1984, the treasurer again contacted RAD. Mr. Brooks explained that the candidate had obtained a bank loan in order to repay Albert Adelman and that the transaction did not go through the Committee's account. The Committee's 1984 July Quarterly Report disclosed this transaction as an in-kind contribution from the candidate on April 30, 1984. The new loan owed to the First National Bank of Glendale was properly disclosed on Schedule C. The loan from Albert Adelman was disclosed as repaid in full on Schedule C.

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Pursuant to 2 U.S.C. § 441a(a)(1)(A), a person is prohibited from making contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of this section. A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. 2 U.S.C. § 431(8)(A)(i), 11 C.F.R. § 100.7(a)(1)(i)(B).

In light of the foregoing, the Office of General Counsel recommends that the Commission find reason to believe that Albert Adelman violated 2 U.S.C. § 441a(a)(1)(A).

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 23 August 1984

ANALYST: Susan Kaltenbaugh

I. COMMITTEE: Adelman for Congress Committee  
C00174441  
Raymond J. Brooks, Treasurer  
13865 West Thomas Drive  
New Berlin, WI 53151

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

III. BACKGROUND:

Receipt of an Excessive Contribution

The Adelman for Congress Committee's ("the Committee's") 1984 April Quarterly report disclosed the receipt of a loan on February 21, 1984 totalling \$20,000. The loan was designated for the primary. Schedule C of the report disclosed the source of the loan as Albert Adelman (Attachment 2). This loan was guaranteed by the candidate, Lynn Adelman. This resulted in an excessive contribution from Mr. Adelman of \$19,000.

On May 3, 1984, Mr. Raymond Brooks, treasurer of the Committee, contacted an analyst in the Reports Analysis Division ("RAD") (Attachment 3). Mr. Brooks explained that Albert Adelman was the father of the candidate and that the Committee had realized that the loan was improper. The Committee secured a bank loan, guaranteed by the candidate, and repaid Mr. Adelman.

The Committee filed a letter, dated May 3, 1984, explaining the circumstances of the loan and the Committee's repayment to Albert Adelman (Attachment 4).

On May 22, 1984, an Informational Notice ("IN") was sent to the Committee, informing the treasurer that the Commission noted the receipt and refund of the excessive contribution (Attachment 5).

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**ADELMAN FOR CONGRESS COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

On July 11, 1984, the treasurer again contacted RAD. Mr. Brooks explained that the candidate obtained a bank loan with which to repay Mr. Adelman. The transaction did not go through the Committee's account (Attachment 6). The Committee's 1984 July Quarterly Report disclosed this transaction as an in-kind contribution from the candidate on April 30, 1984 (Attachments 7 and 8). The new loan owed to the First National Bank of Glendale is properly disclosed on Schedule C (Attachment 9). The loan from Albert Adelman is disclosed as repaid in full on Schedule C (Attachment 10).

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

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Attachment 1

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FEDERAL ELECTION COMMISSION  
1983-1984  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 14AUG84

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ADELMAN, LYNN S	HOUSE 04 DEMOCRATIC PARTY					1984 ELECTION	ID# H2WI04013	
1. STATEMENT OF CANDIDATE 1983 STATEMENT OF CANDIDATE						23DEC83	1 83HSE/250/5048 ✓	
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES								
3. PRINCIPAL CAMPAIGN COMMITTEE ADELMAN FOR CONGRESS COMMITTEE						ID# C00174441 HOUSE		
1983 STATEMENT OF ORGANIZATION YEAR-END		14,890		9,833		23DEC83	1 84HSE/250/5047 ✓	
1984 48 HOUR CONTRIBUTION NOTICE						13DEC83 -31DEC83	8 84HSE/252/3672 ✓	
48 HOUR CONTRIBUTION NOTICE						13FEB84	1 84HSE/255/0158 ✓	
48 HOUR CONTRIBUTION NOTICE						14FEB84	2 84HSE/255/0289 ✓	
48 HOUR CONTRIBUTION NOTICE						16FEB84	1 84HSE/255/0575 ✓	
48 HOUR CONTRIBUTION NOTICE						17FEB84	1 84HSE/255/0556 ✓	
48 HOUR CONTRIBUTION NOTICE						17FEB84	1 84HSE/255/0592 ✓	
48 HOUR CONTRIBUTION NOTICE						21FEB84	1 84HSE/255/0668 ✓	
48 HOUR CONTRIBUTION NOTICE						21FEB84	1 84HSE/255/0676 ✓	
48 HOUR CONTRIBUTION NOTICE						22FEB84	1 84HSE/255/1067 ✓	
48 HOUR CONTRIBUTION NOTICE						23FEB84	1 84HSE/255/2047 ✓	
PRE-SPECIAL		115,479		108,790		1JAN84 - 1FEB84	32 84HSE/254/4713 ✓	
PRE-SPECIAL - AMENDMENT		115,479		113,914		1JAN84 - 1FEB84	4 84HSE/255/0669 ✓	
PRE-SPECIAL - AMENDMENT		115,479		113,914		1JAN84 - 1FEB84	3 84HSE/256/0996 ✓	
PRE-SPECIAL - AMENDMENT		115,479		115,020		1JAN84 - 1FEB84	3 84HSE/260/1306 ✓	
REQUEST FOR ADDITIONAL INFORMATION						1JAN84 - 1FEB84	1 84FEC/297/5296 ✓	
REQUEST FOR ADDITIONAL INFORMATION						1JAN84 - 1FEB84	1 84FEC/312/1551 ✓	
REQUEST FOR ADDITIONAL INFORMATION 2ND						1JAN84 - 1FEB84	2 84FEC/314/3155 ✓	
APRIL QUARTERLY		120,849		124,246		2FEB84 -31MAR84	31 84HSE/258/4275 ✓	
APRIL QUARTERLY - AMENDMENT		-		-		2FEB84 -31MAR84	1 84HSE/260/1341 ✓	
REQUEST FOR ADDITIONAL INFORMATION						2FEB84 -31MAR84	4 84FEC/315/2284 ✓	
JULY QUARTERLY		56,045		57,416		1APR84 -30JUN84	17 84HSE/265/4284	
TOTAL		307,263	0	306,515	0		118 TOTAL PAGES	
4. AUTHORIZED COMMITTEES ADELMAN COMMITTEE						ID# C00155143 HOUSE		
1983 STATEMENT OF ORGANIZATION - AMENDMENT						9JAN83	2 83HSE/240/4858 ✓	
APRIL QUARTERLY		10,392		9,728		1JAN83 -31MAR83	12 83HSE/245/2883 ✓	
MID-YEAR REPORT		5,135		5,581		1APR83 -30JUN83	8 83HSE/247/1877 ✓	
YEAR-END		5,039		5,111		1JUL83 -31DEC83	8 84HSE/251/1406 ✓	
YEAR-END - AMENDMENT		-		-		1JUL83 -31DEC83	2 84HSE/256/0933 ✓	
REQUEST FOR ADDITIONAL INFORMATION						1JUL83 -31DEC83	1 84FEC/319/1111 ✓	
1984 MID-YEAR REPORT		392		500		1JAN84 -30JUN84	5 84HSE/265/1634	
							38 TOTAL PAGES	
							38 AUTH TOT PAGES	
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES								

All reports with check (✓) have received review.

Cash on hand 6/30/84 = \$ 746.98

Debts owed by committee 6/30/84 = \$ 99,974.17

1st Quarter Report

Adelman for Congress Committee

A Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Albert Adelman 2111 N Barnett Lane Milwaukee, WI 53217 <small>Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</small>	\$20,000.00	\$ 0	\$20,000.00

Terms Date Incurred 2-21-84 Date Due 2-21-85 Interest Rate 10 % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding
Lynn S. Adelman 4330 S. Moorland Road New Berlin, WI 53151	Wisconsin State Senator Candidate	\$ 20,000.00
2. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding	\$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding	\$

B Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period

Terms Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding
	Occupation	
	Amount Guaranteed Outstanding	\$
2. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding	\$
3. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding	\$

SUBTOTALS This Period This Page (optional) .....	\$20,000.00
TOTALS This Period (last page in this line only) .....	\$98,500.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

85040522992 34012534302

MEMORANDUM FOR FILES

RE: TELECON  
DATE: May 3, 1984  
FROM: Raymond Brooks  
TO: Susan Kaltenbaugh  
NAME OF COMMITTEE: Adelman for Congress Committee Wisconsin

---

Mr. Brooks called regarding a \$20,000 loan from the candidate's father. The committee has realized that the loan was excessive, and has now secured a bank loan to repay the father. The loan was guaranteed by the candidate. The committee will report everything on the July 15 Report, and will write a letter immediately to describe the situation.

85040523000



MAY 5 1984

CERTIFIED MAIL

# Adelman Congress

4th District

## Democratic Primary Tuesday, February 21

Attachment  
Amended April 15 Quarterly

4  
Pg. 11

May 3, 1984

Clerk of the House  
Office of Records and Registration  
1036 Longworth Office Building  
Washington, DC 20515

RECEIVED  
OFFICE OF RECORDS & REGISTRATION  
MAY - 8 AM 9 23

Identification Number: C00174441

Re: Adelman for Congress Committee

105073

Gentlemen:

This letter is in reference to our April 15, 1984 FEC Report. That report indicates on page 1 of Schedule A (Line 13a) a receipt of a loan from the candidate of \$20,000.00. Page 2 of Schedule C (Line 13a) indicates that the loan source was Albert Adelman. Subsequent to filing this report we discovered that the loan was improper. To correct the situation the full amount of the loan has been refunded to the loan source.

It is our understanding that because the refund occurred after April 15th it is to be reflected on the next quarterly report rather than by an amendment to the April 15th report. We are sending this letter now, however, to apprise you as soon as possible of our action to correct the situation.

Sincerely,

*Ray Brooks*

Ray Brooks, Treasurer  
Adelman for Congress

Headquarters office  
812 West Mitchell Street  
Milwaukee, Wisconsin 53204  
849 4339

161 Bank Street  
Waukesha, Wisconsin 53186  
947-7430

Post to By Address to Congress Committee



840126U1541  
305040523001



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Attachment 5  
(2 pages)

RQ-2  
May 22, 1984

Raymond J. Brooks, Treasurer  
Adelman for Congress Committee  
13865 West Thomas Drive  
New Berlin, WI 53151

Identification Number: C00174441

Reference: April Quarterly Report (2/2/84-3/31/84)

Dear Mr. Brooks:

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:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. 441a(a) and (f))

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your action in refunding the excessive amount(s) will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your Amended 12 Day Pre-Special Primary report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction. Additionally, Lines 17 and 22, Column B, should equal the sum of Column A of this report and Column B of the previous report for those lines. Please amend your report, as necessary.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of

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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,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst  
Reports Analysis Division

85040523003

MEMORANDUM FOR FILES

RE: TELECON  
DATE: 7/11/84  
FROM: Ray Brooks, Treasurer  
TO: Sue Kaltenbaugh  
NAME OF COMMITTEE: Adelman for Congress Wisconsin

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Mr. Brooks called to discuss the reporting of the loan repayment to the candidate's father. The candidate obtained a bank loan and repaid his father. The transaction did not go through the committee's account. The committee will report this as an in-kind contribution from the candidate, with the loan to the bank reported on Schedule C.

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Page 7 of 7 for  
LAW NUMBER 111  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

SCHEDULE A

ITEMIZED RECEIPTS

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

Name of Committee (in Full)  
Acclimat. for Congress

A. Full Name, Mailing Address and ZIP Code Lynn S. Acclimat 4380 S Moorland Road New Berlin, WI 53151 (Receipt of loan made by Candidate)	Name of Employer Wisconsin State Senator	Date (month, day, year) 7-30-84	Amount of Each Receipt This Period \$20,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Candidate	
		Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	
		Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			\$20,000.00

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ITEMIZED DISBURSEMENTS

Attachment  
1984 July 15 Report

Page 1 of 1  
LINE NUMBER 138  
(Use separate schedules for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Adelman for Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Committee Repayment of loan made by candidate	Date (month, day, year)	Amount of Each Disbursement This Period
Lynn S. Adelman 4380 South Moorland Road New Berlin, WI 53151	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4-30-84	\$20,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			\$20,000.00



LOANS

784 Attachment 10  
July 15 Report  
Page 1 of 1  
Line Number 135  
Use separate schedule  
for each numbered line

Name of Committee (in Full) <b>Adelman for Congress</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>Albert Adelman 7111 North Barnett Lane Milwaukee, WI 53217</b>		Original Amount of Loan <b>\$20,000.00</b>	Cumulative Payment To Date <b>\$20,000.00</b>
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <b>2-21-84</b> Date Due <b>2-21-85</b>		Interest Rate <b>10 % (per)</b>	<input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code <b>Lynn S. Adelman 4380 South Moorland Road New Berlin, WI 53151</b>		Name of Employer <b>Candidate Wisconsin State Senator</b>	Amount Guaranteed Outstanding <b>\$</b>
2. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding <b>\$</b>
3. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding <b>\$</b>
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred _____ Date Due _____		Interest Rate _____ % (per)	<input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding <b>\$</b>
2. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding <b>\$</b>
3. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding <b>\$</b>
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			<b>0</b>
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 1817

Date Filmed 4/19/85 Camera No. --- 3

Cameraman AS