



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2056

Date Filmed 3/13/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

blue routing cards; reports and correspondence
pertaining to conciliation; draft conciliation agreements
pre-brief reports and comments

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):

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

Signed Louise E. Tabe
date ~~March 3, 1986~~ March 3, 1986

FEC 9-21-77

T. J. [unclear]

3/4/86

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2056
Footwear Distributors Political)	
Action Committee)	
Robert Campbell, as Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 10, 1986, the Commission decided by a vote of 4-0 to take the following actions in MUR 2056:

1. Accept the conciliation agreement and civil penalty with the amendments proposed by the Respondents as attached to the General Counsel's Report signed February 5, 1986.

2. Close the file.

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

Attest:

2-10-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	2-6-86,	10:46
Circulated on 48 hour tally basis:	Thurs.,	2-6-86,	4:00
Deadline for vote:	Mon.,	2-6-86,	4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2056
Footwear Distributors)	
Political Action Committee)	
Robert Campbell, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 23, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2056:

1. Enter into conciliation with the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the proposed conciliation agreement and letter attached to the General Counsel's Report signed September 18, 1985.

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

Attest:

9-24-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thur., 9-19-85, 12:03
Circulated on 48 hour tally basis:	Thur., 9-19-85, 4:00
Deadline for votes:	Mon., 9-23-85, 4:00

25040:71727

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral 85L-16
Footwear Distributors Political)
Action Committee)
Robert Campbell, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85L-16:

1. Open a MUR.
2. Find reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Find reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).
4. Approve the General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed June 26, 1985.
5. Approve and send the letter attached to the First General Counsel's Report signed June 26, 1985.

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

Attest:

7-2-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040371798



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 13, 1986

Douglas R. Stevens, Esquire
2550 M Street, N.W. #405
Washington, D.C. 20037

RE: MUR 2056
Footwear Distributors
Political Action Committee,
and Robert Campbell, as
treasurer

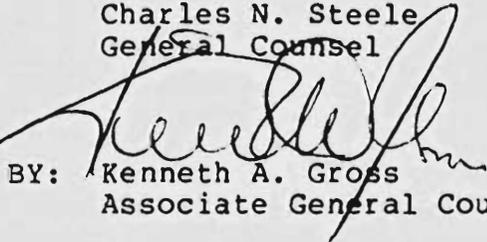
Dear Mr. Stevens:

On February 10 , 1986, the Commission accepted the conciliation agreement signed by Robert Campbell as treasurer of the Footwear Distributors Political Action Committee, and a civil penalty in settlement of violations of 2 U.S.C. §§ 434(a)(4)(B) and 434(b)(5)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should your client 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

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2. Robert Campbell is the treasurer of Footwear PAC.

3. The Respondents were required to file the 1983 February monthly report by February 20, 1983. The report was filed on August 9, 1985, 901 days late. Respondents contend that the report was prepared and properly mailed.

4. The Respondents were required to file the 1984 August monthly report by August 20, 1984. The report was filed on December 14, 1984, 116 days late.

5. The Respondents were required to file the 1984 September monthly report by September 20, 1984. The report was filed on December 14, 1984, 85 days late.

6. The Respondents were required to file the 1984 October monthly report on October 20, 1984. The report was filed on December 14, 1984, 55 days late.

7. The Respondents were required to file the 1984 12-day pre-general election report on October 25, 1984. The report was filed on December 14, 1984, 50 days late.

8. The Respondents were required to file the 1984 30 day post-general election report on December 6, 1984. The report was filed on January 29, 1985, 54 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(B) by failing to file timely the 1983 February monthly report, 1984 August monthly report, 1984 September monthly report, 1984 October monthly report, 1984 12-day pre-general election report, and 1984 30 day post general election report.

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VI. Respondents violated 2 U.S.C. § 434 (b) (5) (A) by failing to itemize administrative expenses on the October 1984 monthly report as required.

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Four hundred and Fifty dollars (\$450), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. 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.

IX. 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.

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

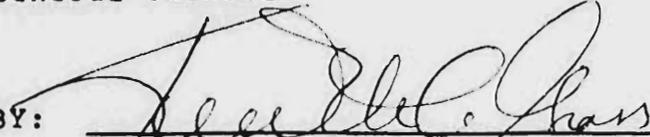
XI. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

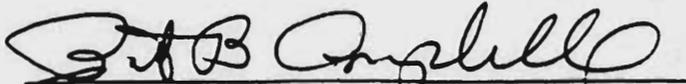
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel


February 12, 1986
Date

FOR THE RESPONDENTS:


Robert Campbell, as treasurer
Footwear Distribution Political
Action Committee

1/16/86
Date

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Law Offices

Douglas R. Stevens
2550 M Street, N. W., Suite 405
Washington, D. C. 20037

57 Linden Street
Manhasset, New York 11030
316-869-8400

202-775-0500

5408 Woodacre Drive
Lutland, Maryland 20083
202-775-0500

August 8, 1985

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Laurence E. Toby, Esquire
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

In re: MUR 2056; Footwear Distributors Political
Action Committee

Dear Mr. Toby:

This letter and its attachments are provided to the Commission for the purpose of demonstrating that no action should be taken against the Footwear Distributors Political Action Committee or its treasurer and to request pre-probable cause conciliation in this matter.

The Committee does not contest that certain of its reports were not timely filed. The Committee would like the Commission to consider the fact that it has been a regular and faithful monthly filer since its inception. The Committee also wishes the Commission to consider the fact that although it is not a justification for its occasional late filing, much of the information made available by the Committee was on the public record earlier than it would have been had the Committee chosen to be a non-monthly filer. The Committee asks that the Commission not be too harsh with the Committee due to its late filing.

The Committee is unable to find a copy of a report for the period of January 1983, and due to the time elapsed, is unable to determine whether such a report was filed. The Committee is herewith filing a report for that period, and asks that the Commission take into consideration the fact that the Committee had no financial activity during the month in question.

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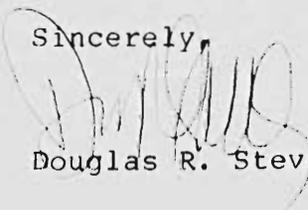
The Matter Under Review also raised the question of the itemization of administrative expenses by the Committee for the 1983 October report, the 1984 June report, the 1984 July report, and the 1984 October report. There were no operating expenses in the month of September 1983, as indicated on line 19 of the report for that period. With regard to the 1984 June report, the Committee made expenditures for operating expenses that were each less than \$200.00 and therefore these operating expenses were not itemized. Their aggregate total, as reported by the Committee on line 19, was \$333.00. With regard to the 1984 July report, there were no operating expenses paid during the month of June 1984, as indicated on line 19. With regard to the 1984 October report, the Committee has previously filed an amended report itemizing all disbursements in excess of \$200.00, as noted in the Factual and Legal Analysis. The remaining \$119.00 of disbursements were, as stated in my letter of March 26, 1985, for postage and for stationery, below the reportable limit. If any further reporting of these items is required, please let me know.

In reviewing the Committee records in response to the Commission's letter, the Committee has discovered certain other reporting matters which it is attempting to rectify with amended reports filed with this letter.

In these amendments, please note that the amount of unitemized contributions received by the Committee during the month of May 1984 has been corrected. Please also note that the contributions made in the month of September, 1984 have been corrected to reflect that one contribution was erroneously reported and two reported contributions were never delivered to the reported recipient Committees. In addition, please note that one contributor has had his total contribution adjusted upward from the original inadvertently erroneous reported amount of \$2,500 to the full actual amount of \$5,000.00. Additionally, two contributions made by the Committee were omitted in the original report, aggregating \$6,000.00, and this omission is now corrected. The other amended reports are filed for the purpose of showing the corrected aggregate amounts and year-to-date totals.

Please let me know what else is required of the Committee, and let me know the next step in our conciliation of this matter.

Sincerely,



Douglas R. Stevens

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
Footwear Distributors Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO NY, New York 10116

Check if address is different than previously reported.

2. FEC Identification Number
C00121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for **January 1983**
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

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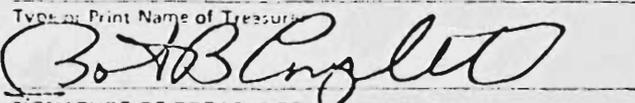
SUMMARY	Column A This Period	Column B Calendar Year to-Date
5. Covering Period <u>1/1/83</u> Through <u>1/31/83</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period	\$ 24,642	
(c) Total Receipts (from Line 18)	\$ -0-	\$ -0-
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 24,642	\$ 24,642
7. Total Disbursements (from Line 28)	\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 24,642	\$ 24,642
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

Robert B. Campbell

Type or Print Name of Treasurer

 SIGNATURE OF TREASURER

July 30, 1985
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full) Footwear Distributors Political Action Committee	Report Covering the Period:	
	From:	To:
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(Memo Entry Unitemized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	-0-	-0-
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)		
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-0-	-0-
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	-0-	-0-
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	-0-	-0-
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	-0-	-0-
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	-0-
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	-0-	-0-

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INSTRUCTION FOR DETAILED SUMMARY PAGE — FORM 3X

A political committee must report the total amount of receipts and disbursements during the reporting period and during the calendar year for each category of receipts and disbursements on FEC FORM 3X. The committee's full name and the coverage dates of the report must be entered in the appropriate blocks. If there are no receipts or disbursements for a particular category for a reporting period or calendar year, enter "0".

To derive the "Calendar Year-to-Date" figure for each category, the political committee should add the "Calendar Year-to-Date" total from the previous report to the "Total This Period" from Column A for the current report. For the first report filed for a calendar year, the "Calendar Year-to-Date" figure is equal to the "Total This Period" figure.

LINE 11(a) Enter the total amount of contributions (other than loans) from individuals, partnerships, and other persons who are not political committees on Line 11(a). For each such person who has made one or more contributions during the calendar year aggregating in excess of \$200, the committee must provide on Schedule A the identification (full name, mailing address, occupation and name of employer) of the person, date and amount of each contribution aggregating in excess of \$200 and the aggregate year-to-date total. Each additional contribution from any such person must be separately itemized except that for contributions by payroll deduction (see 11 CFR 104.8(b) of the Commission's regulations). If a contribution is received from a business entity or is drawn on what is or appears to be a business account, the committee must determine that the contribution is not from a corporation, government contractor, or other prohibited source. A contribution from a partnership must be attributed to each partner in accordance with 11 CFR 110.1(e). The total amount of all contributions from individuals/persons other than political committees not itemized during the reporting period on Schedule A must be entered on the Memo Entry Line.

LINE 11(b) For political committees other than political party committees, enter the total amount of contributions (other than loans) from political party committees on Line 11(b). These contributions must be itemized on Schedule A, regardless of the amount. For each contribution, provide the identification (full name and address) of the committee, date and amount of the contribution and the aggregate year-to-date total. Political party committees should use Line 12.

LINE 11(c) Enter the total amount of contributions (other than loans) from other political committees on Line 11(c). These contributions must be itemized on Schedule A, regardless of the amount. For each contribution, provide the identification (full name and address) of the committee, date and amount of the contribution and the aggregate year-to-date total.

LINE 11(d) For both Column A and Column B add Lines 11(a), 11(b) and 11(c) to derive the figures for Line 11(d).

LINE 12 Political party committees must enter the total amount of transfers from other political party committees on Line 12. All other political committees must enter the total amount of transfers from other affiliated committees on Line 12 (see also, 11 CFR 102.5 and 102.6 of the Commission's regulations). Loans and loan repayments received from other political party committees or affiliated committees (as appropriate) must be included on Line 12, and not on Line 13. These transfers must be itemized on Schedule A, regardless of the amount. For each transfer provide the identification (full name and mailing address) of the committee, date and amount of the transfer and the aggregate year-to-date total.

LINE 13 Enter the total amount of loans received (other than loans from affiliated/other party committees) on Line 13. All loans received by the committee must be itemized on Schedule A, regardless of the amount. For each loan, provide the identification (full name, mailing address and, where applicable, occupation and name of employer) of the person making the loan, date and amount of the loan and the aggregate year-to-date total. The committee must also provide on Schedule C the identification of any endorser or guarantor and the amount of the endorsement or guarantee (see also instructions for Schedule C).

LINE 14 Enter the total amount of loan repayments received (other than loan repayments from affiliated/other party committees) on Line 14. All loan repayments received by the committee must be itemized on Schedule A, regardless of the amount. For each loan repayment, provide the identification of the person making the loan repayment, date and amount of the loan repayment and the aggregate year-to-date total.

LINE 15 Enter the total amount of offsets to operating expenditures (including refunds, rebates, and returns of deposits) on Line 15. For each person who provides rebates, refunds and other offsets to operating expenditures aggregating in excess of \$200 for the calendar year, the committee must provide on Schedule A the identification of the person, date and amount of each receipt aggregating in excess of \$200 and the aggregate year-to-date total.

LINE 16 Enter the total amount of refunds of contributions made to Federal candidates and other political committees on Line 16. If the original check was passed through the account of the recipient committee and a check for the refund is written on the recipient committee's account, the refund must be itemized as a receipt on Schedule A, regardless of the amount, and the amount of the refund must be included in the total figure for Line 16. For each contribution refund received, provide the full name and address of the Federal candidate or political committee, date and amount of the refund and the aggregate year-to-date total. DO NOT use this line if the original check is returned uncashed. The return

must be reported as a negative entry on Schedule B and subtracted from the total amount for Line 21.

LINE 17 Enter the total amount of other receipts (including dividends and interest) on Line 17. For each person who provides any dividends, interest or other receipts aggregating in excess of \$200 for the calendar year, the committee must provide on Schedule A the identification of the person, the date and amount of each receipt aggregating in excess of \$200 and the aggregate year-to-date total.

LINE 18 For both Column A and Column B add the totals on Lines 11(d), 12, 13, 14, 15, 16 and 17 to derive the figures for Line 18.

LINE 19 Enter the total amount of operating expenditures on Line 19. Examples of operating expenditures are: media advertising, newspaper advertising, salaries, travel, rent and telephones. Committees report only those operating expenditures paid for from committee funds. For each person who receives payments for operating expenditures aggregating in excess of \$200 for the calendar year, the committee must provide on Schedule B the full name and mailing address, date and amount of each operating expenditure aggregating in excess of \$200, and the purpose of the expenditure. (See also instructions for Schedule B.)

LINE 20 Political party committees must enter the total amount of transfers to all other political party committees on Line 20. All other political committees must enter the total amount of transfers to other affiliated committees on Line 20. Loans and loan repayments made to other political party committees or affiliated committees (as appropriate) must be included on Line 20, and not on Line 24 or 25. These transfers must be itemized on Schedule B, regardless of the amount. For each transfer, provide the full name and mailing address of the recipient committee, date, amount and state that the purpose of the disbursement is a "transfer".

LINE 21 Enter the total amount of contributions to Federal candidates and other political committees on Line 21. These contributions must be itemized on Schedule B, regardless of the amount. DO NOT include transfers reported on Line 20 on this line. Contributions made to non-Federal candidates should not be entered on this line, but on Line 27. For each contribution to a Federal candidate or political committee, provide the full name and address of the political committee or candidate, date and amount of the contribution and, in the case of a candidate or authorized committee provide under "Purpose" the office sought by the candidate (including State and congressional district, where applicable).

LINE 22 Enter the total amount of independent expenditures on Line 22. Note: Political party committees may not make independent expenditures in connection with a general election. (See also instructions for Schedule E.)

LINE 23 For political party committees, enter the total amount of coordinated expenditures made by the committee pursuant to 2 U.S.C. 441a(d) on Line 23. Note: Political committees which are not political party committees may not make coordinated expenditures. (See also instructions for Schedule F.)

LINE 24 Enter the total amount of loan repayments made on Line 24. All loan repayments made must be itemized on Schedule B, regardless of the amount. For each person who receives a loan repayment, provide the full name, mailing address, date, amount, and state that the purpose of the disbursement is a "loan repayment".

LINE 25 Enter the total amount of loans made (excluding transfers reported on Line 20) on Line 25. For each loan made by the committee provide the full name and mailing address of the person, date and amount of the loan, and state that the purpose of the disbursement is a "loan".

LINE 26(a) Enter the total amount of contribution refunds to individuals/persons other than political committees on Line 26(a). For each person who receives a refund of a contribution which was previously itemized on Schedule A, the committee must provide on Schedule B the full name, mailing address, date, amount and state that the purpose of the disbursement is a "contribution refund".

LINE 26(b) Enter the total amount of contribution refunds from political party committees on Line 26(b). All such refunds must be itemized on Schedule B, regardless of the amount. For each contribution refund, provide the full name, mailing address, date, amount and state that the purpose of the disbursement is a "contribution refund".

LINE 26(c) Enter the total amount of contribution refunds from other political committees on Line 26(c). (See instructions for Line 26(b) for other reporting requirements.)

LINE 26(d) For both Column A and Column B add the totals on Lines 26(a), 26(b) and 26(c) to derive the figures for Line 26(d).

LINE 27 Enter the total amount of other disbursements (including contributions to non-Federal candidates) on Line 27. For each such person who receives any disbursement(s) not otherwise disclosed where the aggregate amount or value is in excess of \$200, the committee must provide the full name and address of each such person, together with the date, amount and purpose of any such disbursement.

LINE 28 For Column A and Column B add the totals on Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27 to derive the figures for Line 28.

LINES 29-34 Enter the figures requested and complete the calculations as noted.

Statement of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Report Covering the Period

From: _____ To: _____

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
CONTRIBUTIONS (other than loans) FROM:			
1) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ <u>3,431</u>)	22,831	26,131	11(a)
2) Political Party Committees			11(b)
3) Other Political Committees			11(c)
4) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	22,831	26,131	11(d)
TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
ALL LOANS RECEIVED			13
LOAN REPAYMENTS RECEIVED			14
OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
OTHER RECEIPTS (Dividends, Interest, etc.)			17
TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	22,831	26,131	18
II. DISBURSEMENTS			
OPERATING EXPENDITURES	333	608	19
TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,100	17,350	21
DEPENDENT EXPENDITURES (use Schedule E)			22
COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
LOAN REPAYMENTS MADE			24
LOANS MADE			25
REFUNDS OF CONTRIBUTIONS TO			
a) Individuals/Persons Other Than Political Committees			26(a)
b) Political Party Committees			26(b)
c) Other Political Committees			26(c)
d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
OTHER DISBURSEMENTS			27
TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	15,433	17,958	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	22,831	26,131	29
TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	22,831	26,131	31
TOTAL OPERATING EXPENDITURES from Line 19	333	608	32
OFFSETS TO OPERATING EXPENDITURES from Line 15			33
NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	333	608	34

REPORT OF RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
Footwear Distributors
Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO N.Y., N.Y. 10166

Check if address is different than previously reported.

2. FEC Identification Number
C00121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non election Year Only)
 Monthly Report for June, 1984
 Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
 Thirtieth day report following the General Election
on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
XXXX YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>June 1, 1984</u> Through <u>June 30, 1984</u>		
6. (a) Cash on Hand January 1, 19		\$ 14,992
(b) Cash on Hand at Beginning of Reporting Period	\$ 23,165	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 26,131
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 23,165	\$ 41,123
7. Total Disbursements (from Line 28)	\$ 15,000	\$ 32,958
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 8,165	\$ 8,165
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Type or Print Name of Treasurer
Bo B. English
SIGNATURE OF TREASURER

July 30, 1985
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
 Footwear Distributors
 Political Action Committee
 Address (Number and Street)
 P.O. Box 2313
 City, State and ZIP Code
 GPO N.Y., N.Y. 10116
 Check if address is different than previously reported.

2. FEC Identification Number
 C00121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for July, 1984
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 XXXX YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>July 1, 1984</u> Through <u>July 31, 1984</u>		
6. (a) Cash on Hand January 1, 19 _____		\$ 14,992
(b) Cash on Hand at Beginning of Reporting Period _____	\$ 8,165	
(c) Total Receipts (from Line 18) _____	\$ -0-	\$ 26,131
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) _____	\$ 8,165	\$ 41,123
7. Total Disbursements (from Line 28) _____	\$ -0-	\$ 32,958
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) _____	\$ 8,165	\$ 8,165
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) _____	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) _____	\$ -0-	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4068

Robert B. Campbell

Type or Print Name of Treasurer



SIGNATURE OF TREASURER

July 30, 1985

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

35040371812

Name of Committee (in Full)

Footwear Distributors Political Action
Committee

Report Covering the Period:

From:

To:

COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

86040571315

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	-0-	26,131
	-0-	26,131
	-0-	
	-0-	26,131
	-0-	
	-0-	
	-0-	
	-0-	
	-0-	26,131
	-0-	
	-0-	608
	-0-	
	-0-	32,350
	-0-	
	-0-	
	-0-	
	-0-	
	-0-	
	-0-	32,958
	-0-	
	-0-	26,131
	-0-	26,131
	-0-	
	-0-	608
	-0-	608

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
Footwear Distributors Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO NY New York 10116

Check if address is different than previously reported.

2. FEC Identification Number
C00

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for August, 1984
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

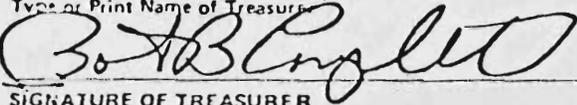
	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>August 1, 1984</u> through <u>August 31, 1984</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 14,992
(b) Cash on Hand at Beginning of Reporting Period	\$ 8,165	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 26,131
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 8,165	\$ 41,123
7. Total Disbursements (from Line 28)	\$ 3,540	\$ 36,498
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 4,625	\$ 4,625
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Robert B. Campbell
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

July 30, 1985
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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85040371314

Name of Committee (in Full)

Footwear Distributors
Political Action Committee

Address (Number and Street)

P.O. Box 2313

City, State and ZIP Code

GPO N.Y., N.Y. 10116

Check if address is different than previously reported.

2. FEC Identification Number

000121947

3. This committee qualified as a multicandidate com-

mittee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Monthly Report for Sept., 1984
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

(b) Is this Report an Amendment?
 YES NO

XXXX

SUMMARY

- 5. Covering Period Sept. 1, 1984 through Sept. 30, 1984
- 6. (a) Cash on Hand January 1, 19_____
- (b) Cash on Hand at Beginning of Reporting Period
- (c) Total Receipts (from Line 18)
- (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)
- 7. Total Disbursements (from Line 28)
- 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...
- 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)
- 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year to-Date
6(a)		\$14,992
6(b)	\$ 4,625	
6(c)	\$ 69,902	\$96,033
6(d)	\$ 74,527	\$111,025
7	\$ 20,239	\$56,737
8	\$ 54,288	\$54,288
9	\$ -0-	
10	\$ -0-	

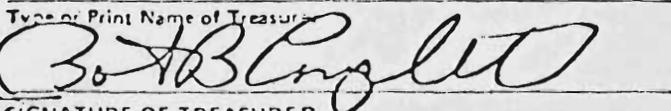
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Robert B. Campbell

Type or Print Name of Treasurer



SIGNATURE OF TREASURER

July 30, 1985

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

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Distributors Political Action Comm.

Report Covering the Period

From:

To:

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
CONTRIBUTIONS (other than loans) FROM:	65,652	91,783	
(a) Individuals/Persons Other Than Political Committees			11(a)
(Memo Entry Unitemized \$ 400)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	65,652	91,783	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	4,250	4,250	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	69,902	96,033	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,989	2,637	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	18,250	54,100	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	20,239	56,737	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	65,652	91,783	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	65,652	91,783	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,989	2,637	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,989	2,637	34

INSTRUCTIONS FOR PREPARING SCHEDULE A

The Detailed Summary Page is broken down into various categories of receipts. Use Schedule A to list each receipt required to be itemized. DO NOT combine more than one category of receipts on the same Schedule A. Instead, use a separate Schedule A for each category of receipts. The line number of the Detailed Summary Page to which each Schedule A pertains should be identified in the upper right corner of each Schedule. In addition, the committee's full name must be entered in the appropriate block. For each receipt required to be itemized during the reporting period, the political committee must provide the identification, date and amount of the receipt, and the aggregate year-to-date total.

The term "identification" means, in the case of an individual, his or her full name, including: first name, middle name or initial, if available, and last name, mailing address; occupation; and the name of his or her employer; and, in the case of any other person, the person's full name and address.

The occupation and name of employer is only required to be provided for receipts from individuals. "Occupation" means the principal job title or position of an individual and whether or not self-employed. "Employer" means the organization or person by whom an individual is employed, and not the name of his or her supervisor.

Authorized committees must indicate the election for which the receipt was given. In the event the receipt was given for an election other than the current primary or general election, the "Other" block must be checked and the type of election specified (i.e., "General 1976", "Primary 1978").

The "receipt for" block does not apply to political committees which are not authorized committees. The "aggregate year-to-date" total must be given for each receipt and must equal the total amount that the person has given to the committee for that particular category of receipts for the calendar year. If a receipt is the only receipt from a person during the calendar year, the aggregate year-to-date total must still be entered.

The "Total This Period" amount (the last line on Schedule A) must be added to all other receipts for that category which are not itemized and carried forward to Column A of the corresponding line of the Detailed Summary Page.

If a contribution is received from a business entity or is drawn on what is or appears to be a business account, the political committee must determine that the contribution is not from a corporation, government contractor, or other prohibited source. If the contribution is from a prohibited source, it must be immediately refunded.

Absent evidence to the contrary, any contribution made by check, money order, or other written instruments must be reported as a contribution by the last person signing the instrument prior to delivery to the committee.

A contribution which represents contributions by more than one person must indicate on the written instrument, or on an accompanying written instrument signed by all contributors, the amount to be attributed to each contributor.

MISCELLANEOUS

Contributions In-Kind. Contributions in-kind (i.e., goods and services provided to a political committee) are treated as any other contribution and must be reported and itemized under the appropriate category of receipts. For example, a contribution in-kind from an individual must be itemized on Schedule A and reported under the category for "Contributions From Individuals/Persons Other Than Political Committees". The value of each contribution in-kind must be entered in the "Amount of Each Receipt This Period" column. The amount or value of the contribution in-kind is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. The "aggregate year-to-date" total must include the total amount of all contributions which the person has contributed to the committee during the calendar year. The item must be labeled "contribution in-kind" and include the nature of the contribution (e.g., consulting, polling, etc.). Each contribution in-kind must also be reported in the same manner as an operating expense on Schedule B and included in the total for "Operating Expenditures" (NOTE: A political committee which makes a contribution in-kind only reports it as a disbursement and itemizes the transaction on Schedule B with a notation "contribution in-kind". The purpose of the expenditure (e.g., consulting, polling, etc.) and the aggregate year-to-date amount must also be provided. The committee receiving the contribution in-kind must report it as both a receipt and an expenditure.)

Contributions of stocks, bonds, art objects, and other similar items to be liquidated must be reported as follows:

(1) If the item has not been liquidated at the close of the reporting period, the committee must record as a memo entry (not as cash) on Schedule A the item's fair market value on the date received, including the name and mailing address (and when in excess of \$200, the occupation and name of the employer) of the contributor. The total amount of items to be liquidated must be entered under "Total This Period" on the last line of Schedule A. This amount must NOT be carried forward to the Detailed Summary Page.

(2) When the item is sold, the committee must report the proceeds and include them in the appropriate categories on the Detailed Summary Page. It must also report the (i) name and mailing address (and, where in excess of \$200, the occupation and name of employer) of the purchaser on Schedule A, if purchased directly from the committee (the purchaser is considered to have made a contribution to the committee); and (ii) the identification of the original contributor on Schedule A.

Exempt Legal or Accounting Services. Legal or accounting services rendered to or on behalf of an authorized committee of a candidate or any other political committee are not contributions or expenditures and are not, therefore, subject to the contribution limitations and prohibitions, if the person paying for the services is the regular employer of the individual rendering the services and if the services are solely to ensure compliance with the Act.

Legal or accounting services rendered to or on behalf of any political committee of a political party are not contributions or expenditures and are not, therefore, subject to the contribution limitations and prohibitions, if the person paying for the services is the regular employer of the individual rendering the services and the services are not attributable to activities which directly further the election of any designated candidate for Federal office.

The political committee must itemize as a memo entry on a separate Schedule A each person who provides legal or accounting services to the political committee in an aggregate value or amount in excess of \$200 within the calendar year, together with the date of receipt and amount or value of the exempt legal or accounting services, and state that the receipt is for "exempt legal or accounting service". The total amount of exempt legal or accounting services must be entered on the line for "Total This Period" on the bottom of Schedule A, but the total amount may not be

carried forward to any category or line number on the Detailed Summary Page.

Earmarked Contributions. For each earmarked contribution received (regardless of the amount), the political committee must report on Schedule A the name and address of the original contributor, the date of receipt and the amount of the contribution and, if the original contributor makes contributions aggregating in excess of \$200 to the political committee during the calendar year, the occupation and name of employer. If the contribution passes through the political committee's account and is forwarded to another political committee or Federal candidate, the conduit committee must disclose each contribution, regardless of the amount, on both Schedule A and Schedule B and include the amount under the appropriate category of receipts and disbursements. If the contribution was passed on in the form of the contributor's check, the conduit must disclose each contribution on a separate Schedule A attached to the conduit's (intermediary) next report and the amounts of such contributions are not required to be included in the totals for the appropriate categories of receipts and disbursements. If a political committee is not a conduit, but is the intended recipient, the political committee must report each conduit through which the earmarked contribution passed, including the name and address of the conduit, and whether the contribution was passed on in cash, by the contributor's check, or by the conduit's check. If the conduit exercises direction and control over the contribution, the earmarked contribution must also be attributed to the contribution limitations of the conduit.

Checks Returned Due to Insufficient Funds. If a contributor's check is returned to the political committee due to insufficient funds and the receipt of the check was previously reported, the political committee must report the return under the appropriate category of receipts as a negative entry and net out the amount of the check from the total for that category. If the original receipt of the check was itemized on Schedule A, the return of the check must also be itemized as a negative entry on Schedule A. If the receipt of the check was never reported, the return of the check should not be reported.

Check Refunded to the Committee. A contribution may be refunded to the committee in one of two ways:

(1) The original check is returned uncashed. If the contribution was reported, the refund should be reported as a negative entry on Schedule B, and the amount of the contribution refund subtracted from the disbursement totals on the line of the Detailed Summary Page that it was reported on.

(2) The original check is not returned and the refund is made by a check from the recipient of the contribution. Such a transaction should be reported as a receipt on Schedule A for the appropriate line of the Detailed Summary Page. This procedure is applicable regardless of whether the amount refunded is the full or only a partial refund of the contribution or whether the contribution was previously reported.

Best Efforts. When the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required, the committee shall be considered in compliance with the Act.

With regard to reporting the identification of each person whose contribution(s) to the committee and its affiliated committees aggregate in excess of \$200 in a calendar year, the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she has made at least one effort per solicitation either by written request or by an oral request documented in writing to obtain the information from the contributor. The effort shall consist of a clear request for the information (i.e., name, mailing address, occupation, name of employer) which informs the contributor that the reporting of the information is required by law.

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)

Footwear Distributors Political Action Committee

3504071300

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Tribute to the Chairman Democratic Congressional Campaign Comm. 444 North Capitol St. Washington, D.C. 20001 (See below)	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/24/84	5,000
B. Full Name, Mailing Address and ZIP Code Campaign America 919 Prince St. Ste 200 Alex. Va. 22314 (See below)	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/28/84	1,000
C. Full Name, Mailing Address and ZIP Code The two above listed contributions were erroneously not reported in the previous report for this period			
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	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)			6,000

INSTRUCTIONS FOR PREPARING SCHEDULE B

The Detailed Summary Page is broken down into various categories of disbursements. Use Schedule B to list each disbursement required to be itemized. DO NOT combine more than one category of disbursements on the same Schedule B. Instead, use a separate Schedule B for each category of disbursements. The line number of the Detailed Summary Page to which each Schedule B pertains should be identified in the upper right corner of each Schedule. In addition, the committee's full name must be entered in the appropriate block.

For each disbursement required to be itemized during the reporting period, the political committee must provide the full name, mailing address, date, amount, and purpose of the disbursement.

The term "purpose" means a brief statement or description of why the disbursement was made. Examples of adequate descriptions include the following: dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement, and catering costs. However, statements or descriptions such as "advance", "election day expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote", and "voter registration", would not meet the requirement for reporting the purpose of an expenditure. If the disbursement is a "loan repayment", "contribution refund", or other similar category of disbursement (other than an operating expenditure), the name of the category of disbursement (i.e., "loan repayment", etc.) is sufficient to meet the requirement for reporting the purpose of an expenditure.

For disbursements that are contributions to Federal candidates, or authorized committees, the committee must include under "Purpose of Disbursement" the name of the candidate and office sought (including State and congressional district, where applicable) and the aggregate year-to-date total of contributions made to that candidate or committee in the purpose of disbursement box.

For each contribution to a Federal candidate or authorized committee indicate in the election check-off box the election for which the contribution was made. In the event the contribution was made for an election prior to the current election cycle, the "Other" block must be checked and the type of election specified (e.g., "General 1976", "Primary 1978"). The election check-off boxes provided for each itemized entry on Schedule B should not be used when itemizing operating expenditures.

The "Total This Period" amount (the last line on Schedule B) must be added to all other disbursements for that category which are not itemized and carried forward to Column A of the corresponding line of the Detailed Summary Page.

CONTRIBUTION IN-KIND RECEIVED

Contributions in-kind received by the committee which are itemized on Schedule A must also be itemized as an operating expenditure on Schedule B. In addition, in the "Purpose of Disbursement" box include the notation "Contribution In-Kind", and the nature of the expenditure (e.g., consulting, polling, etc.).

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED AT THE FEC
85 JAN 29 12:48

1. Name of Committee (in Full)
Footwear Distributors Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO New York, NY 10116

Check if address is different than previously reported.

2. FEC Identification Number
00121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding General (Type of Election) election on 11/6/84 in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

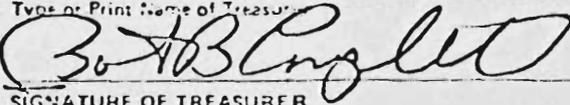
	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>10/1/84</u> Through <u>10/17/84</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 14,992
(b) Cash on Hand at Beginning of Reporting Period	\$ 54,288	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 96,033
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 54,288	\$ 111,025
7. Total Disbursements (from Line 28)	\$ 9,090	\$ 65,827
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 45,198	\$ 45,198
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Robert B. Campbell
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

July 30, 1985
Date

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

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

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15040171822

Committee (in Full)

**Footwear Distributors Political Action
Committee**

Report Covering the Period

From: _____ To: _____

	COLUMN A Total This Period	COLUMN B Calendar Year-To Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	- 0 -	91,783	11(a)
(Memo Entry Unitemized \$ _____)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	- 0 -	91,783	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	- 0 -	4,250	16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	- 0 -	96,033	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	90	2,727	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND	0,000	63,100	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	9,090	65,827	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	- 0 -	91,783	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	- 0 -	91,783	31
32. TOTAL OPERATING EXPENDITURES from Line 19	90	2,727	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	90	2,727	34

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED AT THE FEC
85 JAN 29 12:48

1. Name of Committee (in Full)
Footwear Distributors Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO New York, NY 10116

Check if address is different than previously reported.

2. FEC Identification Number
COO

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____ (Type of Election)
 Twelfth day report preceding _____ election on _____ in the State of _____
 Thirtieth day report following the General Election on **Nov** in the State of **1984**
 Termination Report

(b) Is this Report an Amendment?
~~XXXX~~ YES NO

04071324

SUMMARY

5. Covering Period **Oct. 18, 1984** through **Nov. 26, 1984**

6. (a) Cash on Hand January 1, 19_____		\$ 14,992
(b) Cash on Hand at Beginning of Reporting Period	\$ 45,198	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 96,033
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 45,198	\$ 111,025
7. Total Disbursements (from Line 28)	\$ 2,500	\$ 68,327
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 42,698	\$ 42,698
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

	Column A This Period	Column B Calendar Year-to-Date
		\$ 14,992
	\$ 45,198	
	\$ -0-	\$ 96,033
	\$ 45,198	\$ 111,025
	\$ 2,500	\$ 68,327
	\$ 42,698	\$ 42,698
	\$ -0-	
	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-573-4068

Robert B. Campbell

Type or Print Name of Treasurer

Robert B. Campbell
SIGNATURE OF TREASURER

July 30, 1985

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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Committee (in Full)

**Footwear Distributors Political Action
Committee**

Report Covering Period

From: _____ To: _____

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees.	-0-	91,783	11(a)
(Memo Entry Unitemized \$ _____)			
(b) Political Party Committees.			11(b)
(c) Other Political Committees.			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	-0-	91,783	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED.			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	-0-	4,250	16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	96,033	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES.	-0-	2,727	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND	2,500	65,600	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES.			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE.			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees.			26(a)
(b) Political Party Committees.			26(b)
(c) Other Political Committees.			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2,500	68,327	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	91,783	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	91,783	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	2,727	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-	2,727	34

Name of Committee (in Full)

**Footwear Distributors Political Action
Committee**

Report Covering the Period:

From:

To:

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 200)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO: Refund excess
contribution

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 20 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

96040571827

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	200	91,983
	200	91,983
	-0-	4,250
	63,152	96,233
	255	2,982
	250	65,850
	3,334	3,334
	3,839	72,166
	200	91,983
	3,334	3,334
	(3,134)	88,649
	255	2,982
	255	2,982

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)

Footwear Distributors Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Leahy for Senate Committee P.O. Box 53 Burlington, Virginia	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/14/84	250
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Saloutore Salibello 100 Prospect Street Stanford, Conn.	Refund of excess contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/3/84	3,334
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,584

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

85 JUL 1 A 9: 09

HAND DELIVERED

1. Name of Committee (in Full)
Footwear Distributors Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO N.Y. N.Y. 10166

Check if address is different than previously reported.

2. FEC Identification Number
C00121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

85 JUL 1 10 09

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 1/1/85 Through 6/30/85		
6. (a) Cash on Hand January 1, 19_____		\$ 39,059
(b) Cash on Hand at Beginning of Reporting Period	\$ 39,059	
(c) Total Receipts (from Line 18)	\$ -0-	\$ -0-
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 39,059	\$ 39,059
7. Total Disbursements (from Line 28)	\$ 15,977	\$ 15,977
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 23,082	\$ 23,082
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Robert B. Campbell

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Type or Print Name of Treasurer

Robert B. Campbell

July 30, 1985

SIGNATURE OF TREASURER

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3-80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursement
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)
Footwear Distributors Political Action Committee

Report Covering the Period:
From: **1/1/85** To: **6/30/85**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(Memo Entry Unitemized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	-0-	-0-
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	477	477
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,500	15,500
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	15,977	15,977
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	-0-	-0-
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	477	477

86040371330

SCHEDULE B

ITEMIZED DISBURSEMENTS

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)

Footwear Distributors Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Cec Heftel 300 Ala Moana Blvd. Honolulu, Ha. 96850	Contribution	7/2/85	500
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code Wyden for Congress P.O. Box 2206 Main Station Wash. D.C. 20013	Purpose of Disbursement " "	7/2/85	250
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code Reelect Campbell to Congress P.O. Box 533 Greenville, S.C.	Purpose of Disbursement Contribution	7/2/85	250
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Bill Thomas Campaign Comm. P.O. Box 395 Bakersfield, Cal. 93302	Purpose of Disbursement Contribution	7/2/85	1000
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code Friends of Neal Smith RR 3, Altoona, Ia. 50009	Purpose of Disbursement Contribution	7/2/85	250
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code Henson Moore Elec. Comm. P.O. Box 6 Baton Rouge, Ala.	Purpose of Disbursement Contribution	7/2/85	1000
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code Citizens for Madigan P.O. Box 3305 Bloomington, Ill.	Purpose of Disbursement Contribution	7/2/85	500
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code Reelect Senator Mark Armstrong c/o John Sharman, Ste. 3600 11200 Smith St., Houston, TX	Purpose of Disbursement Contribution	7/2/85	1000
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code Senator Slade Gorton Comm. 500 Wall St. Seattle, Wash 98211	Purpose of Disbursement Contribution	7/2/85	1000
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

(see instructions)

Bar Distributors Political Action Committee

Report covering the

From:

To:

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees.	-0-	26,131	11(a)
(Memo Entry Unitemized \$ _____)			
(b) Political Party Committees.			11(b)
(c) Other Political Committees.			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	-0-	26,131	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED.			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES			16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	26,131	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES.	-0-	608	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND	15,000	32,350	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES.			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE.			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees.			26(a)
(b) Political Party Committees.			26(b)
(c) Other Political Committees.			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	15,000	32,958	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	26,131	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	26,131	31
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	608	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		608	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	-0-		34

RECEIVED
OFFICE OF THE
COMMISSIONER

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

SENSITIVE

35 JUN 28 AM : 21 **FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF
TRANSMITTAL BY OGC
TO THE COMMISSION:

RAD REFERRAL NO. 85L-16
STAFF MEMBER: Stephen Levin

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

RESPONDENT'S NAME: Footwear Distributors Political Action
Committee
Robert Campbell, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)
2 U.S.C. § 434(b)(5)(A)

INTERNAL REPORTS
CHECKED:

Committee Reports

GENERATION OF MATTER

This matter arose from a referral from the Reports Analysis
Division (hereinafter "RAD") to the Office of General Counsel,

Political Action Committee and Robert Campbell, as treasurer
("Footwear PAC" or "Respondent"), an unauthorized political
committee, violated 2 U.S.C. § 434(a)(4)(B) by failing to file
five reports in a timely manner and by failing to file another
report during the 1983-1984 election cycle. Further, the
referral states that Respondent violated 2 U.S.C. § 434(b)(5)(A)
by failing to itemize administrative expenses for four reports
during the 1983-1984 election cycle.

FACTUAL AND LEGAL ANALYSIS

All political committees, other than authorized committees,
are required to file quarterly or monthly reports, a pre-election

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report and a post-general election report in a year in which an election is held and a mid-year report and a year-end report or monthly reports in a year in which an election is not held. The quarterly reports, the mid-year and year-end reports are required in lieu of the committee filing monthly reports, if it so chooses. In the matter at hand, Respondent chose to file monthly reports. The monthly reports must be filed no later than the 20th day after the last day of the month except that, in a year in which a regularly scheduled general election is held, in lieu of filing the reports otherwise due in November and December, a pre-general election report, a post-general election report, and a year end report must be filed. The pre-general election report must be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. The post-general election report must be filed no later than the 30th day after the general election and the year end report must be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(B).

In this matter, Respondent did make contributions to candidates in 1984 elections. Therefore, it was required to file a pre-election report in 1984, in addition to the post-general election report, year-end report and ten monthly reports for that year and monthly reports throughout 1983. Respondent failed to

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file its 1983 February monthly report and filed five 1984 reports late, with the delinquency period ranging from 50 to 116 days.

Footwear PAC's 1983 February monthly report was due February 20, 1983. Respondent was notified of that fact by RAD on January 7, 1983. On October 19, 1984, a non-filer notice was sent to Footwear PAC for failing to file that report. However, the 1983 February monthly report has not been filed.

On June 21, 1984, Respondent was notified by RAD that the 1984 August and September monthly reports were due on August 20, 1984 and September 20, 1984, respectively. On October 19, 1984, a non-filer notice was sent to Footwear PAC for failing to file those two reports. The 1984 August and September monthly reports both were filed on December 14, 1984, 116 and 85 days late, respectively.

On September 21, 1984, Footwear PAC was notified by RAD that the 1984 October monthly report was due October 20, 1984. On November 9, 1984, RAD sent a non-filer notice to Respondent for failing to file the 1984 October monthly report. The report was filed on December 14, 1984, 55 days late.

Footwear PAC was notified by RAD on October 1, 1984 that the 1984 12 day pre-general and 30 day post general reports were due October 25, 1984 and December 6, 1984, respectively. On November 16, 1984, RAD sent Respondent a non-filer notice for failing to file the 1984 12 day pre-general report. That report was filed on December 14, 1984, 50 days late. On December 28,

In addition, Footwear PAC failed to itemize administrative expenses for four monthly reports (1983 October and 1984 June, July and October). Such reports require the inclusion of the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within that calendar year is made by the reporting committee to meet its operating expenses, together with the dates, amounts, and purposes of such operating expenses. 2 U.S.C. § 434(b)(5)(A).

A Request for Additional Information ("RFAI"), which explained the requirement for itemizing administrative expenses, were sent by RAD to Footwear PAC on November 7, 1984 regarding the 1983 October monthly report, the 1984 June monthly report and the 1984 July monthly report. RAD sent Respondent a second notice on November 29, 1984 for failing to respond to the RFAIs. On January 11, 1985, an RFAI requesting information on administrative expenses was sent by RAD to Footwear PAC regarding the 1984 October monthly report. RAD sent respondent a second notice on January 31, 1985 for failing to respond to the RFAI.

Throughout the course of much of this matter, RAD attempted to directly contact Respondent's treasurer but was unable to do so. In the course of analyzing Respondent's reports, RAD noted disbursements made to Douglas R. Stevens, Esquire, in Washington, D.C. RAD contacted Stevens and inquired as to whether he was counsel for Footwear PAC. Stevens replied affirmatively, requested that RAD direct correspondence to him relative to this

matter, and assured RAD that he would prepare the appropriate responses.

On April 1, 1985, RAD received a response from Stevens to its requests for information regarding Respondent's administrative expenses. Stevens stated that Footwear PAC bears all of its own administrative expenses. The response included an amendment to the 1984 October monthly report which itemized \$1,870 in "legal fees" and stated that the "remaining expenditures were for postage and for stationery below the reportable limit." The amended report did not, however, itemize any other operating expenses. In addition, Footwear PAC did not amend any of the other reports in question to include its itemized operating expenses. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe that the Footwear Distributors Political Action Committee and Rorbert Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Find reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).
4. Approve the General Counsel's Factual and Legal Analysis.

5. Approve and send the attached letter.

Charles N. Steele
General Counsel

Nov 20, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

- RAD Referral
- Letter to Respondent
- General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE FOOTWEAR DISTRIBUTORS POLITICAL
ACTION COMMITTEE

This is a referral of the Footwear Distributors Political Action Committee ("Footwear PAC"). Footwear PAC failed to file the 1983 February Monthly, 1984 August Monthly, 1984 September Monthly, 1984 October Monthly and the 1984 12 Day Pre-General Reports as of Election Day, November 6, 1984. To date, the 1983 February Monthly Report has not been received by the Commission. In addition, Footwear PAC failed to file the 1984 30 Day Post-General Report within thirty (30) calendar days from the date of the Non-Filer Notice.

Footwear PAC also failed to itemize operating expenses for four (4) \$10,000.

If you have any questions on this matter, please contact J. Hunter Bryan at 523-4048.

Attachment

85047371341

A R E M I N D E R F O R Q U A R T E R L F I L E R S

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election which have not previously been reported must file a pre-election report.

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

BQ-7

OCT 19 1984

Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313
General Post Office
New York, NY 10166

Identification Number: C00121947

Reference: 1983 February Monthly (1/1/83-1/31/83), 1984 August
Monthly (7/1/84-7/31/84) and 1984 September
Monthly (8/1/84-8/31/84) Reports

Dear Mr. Campbell:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Reports of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file these reports may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact J. Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

94033121273



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 21, 1984

OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by October 15, 1984. (See Monthly Filers below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through September 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,* through September 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by October 20, 1984, and disclose all financial activity of their committee from September 1 through September 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

FB

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

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A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election, which have not previously been reported, must file a pre-election report.

**FOR INFORMATION CALL: Office of Public Communications
800/424-9530 or 202/523-4068**

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

EQ-7

November 9, 1984

Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/General Post Office
New York, NY 10116

Identification Number: C00121947

Reference: OCTOBER MONTHLY REPORT (9/1/84-9/30/84)

Dear Mr. Campbell:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

9403305418

Late October through Mid-November 1984

MEMORANDUM TO THE FILE

FROM : MICHAEL B. FILLER
COMMITTEE : FOOTWEAR PAC
SUBJECT : NON-FILING AND OTHER MATTERS

Hunter Bryan, the analyst assigned to Footwear PAC, had made several unsuccessful attempts to contact the treasurer in late October and early November. After reviewing the file, I noticed that Footwear PAC had paid Douglas Stevens for legal services. Since Mr. Stevens was located in Washington, D.C., I called him to find out if the committee were a client of his.

Mr. Stevens acknowledged that he was handling certain matters for Footwear PAC. I informed him that we had attempted to contact the treasurer concerning a number of problems, but we had not been successful.

I told Mr. Stevens that the committee had not filed a number of reports. He responded that he had the documents in his in-box. I advised him to file them as soon as possible. In addition, I informed Mr. Stevens that the committee had filed a number of reports late, and had not responded to several notices concerning the lack of itemized administrative expenses.

Mr. Stevens requested copies of the notices, so that he could prepare the appropriate responses. I advised Mr. Stevens to call Hunter Bryan if he had any questions after receiving the notices.

Copies of the notices were sent to Mr. Stevens on December 3, 1985.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 1, 1984

**GENERAL ELECTION FILING NOTICE
FOR UNAUTHORIZED COMMITTEES**

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

* * * * *

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC form 3X, for details.

QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

*Or from date of registration, or the close of books of the last report filed, whichever is later.

**Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

* * *

MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications
800/424-9530 or 202/523-4068

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

November 16, 1984

Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/General Post Office
New York, NY 10116

Identification Number: C00121947

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear Mr. Campbell:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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RECEIVED BY THE FEC

84 DEC 14 11:42

In Office
Douglas R. Stevens
2550 M Street, N. W., Suite 405
Washington, D. C. 20037
202-775-6600

17 Lincoln Street
Montreal, New York 11000
202-775-6600

1000 Freedom Drive
Bethesda, Maryland 20814
202-775-6600

December 7, 1984

Mr. J. Hunter Bryan
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Bryan:

This will respond to the Commission's letters to the Footwear Distributors Political Action Committee of October 19, 1984, November 2, 1984, November 7, 1984, November 9, 1984, and November 16, 1984.

As promised over the phone, I am enclosing the reports of the Committee for July, August, and September, as well as the Pre-General Election report.

In regard to the October 19, 1984 letter, signed by Michael D. Filler, please be assured that the Committee will do everything possible to insure that future reports are timely filed.

With regard to the letter of October 19, 1984, from John D. Gibson, I am enclosing the 1984 August and September monthly reports, and will try to locate another copy of the 1983 February monthly report.

With regard to the November 2, 1984 letter from you, we will file an amended report as requested.

In addition, with regard to administrative expenses, please be advised that the Committee does not have a connected organization and has been bearing all of its own administrative expenses.

With regard to the November 7, 1984 letter from you, we will file the amended reports you requested in the near future.

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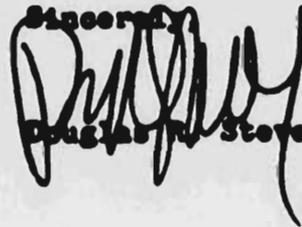
- 2 -

With regard to the November 9, 1984 letter from John D. Gibson, the October 1984 monthly report is enclosed.

With regard to the November 16, 1984 letter from John D. Gibson, the 12 day Pre-General Election report is enclosed.

I will forward the above referenced documents to you in the very near future.

Please let me know if there is anything else you require.

Sincerely,

Douglas W. Stevens

DRS/bt

84033570184

REPORT OF RECEIPTS AND DISBURSEMENTS THE FEC
For a Political Committee Other Than an Authorized Committee

(Summary Page)

84 DEC 14 11:42

1. Name of Committee (in Full)
**Footwear Distributors
Political Action Committee**
Address (Number and Street)
P.O. Box 2313
City, State and ZIP Code
GPO N.Y., N.Y. 10116
 Check if address is different than previously reported.

2. FEC Identification Number
CO0121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for **July, 1984**
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

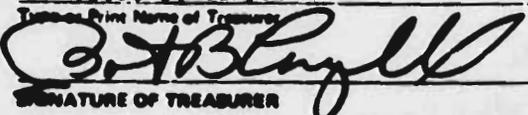
840335701385

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	July 1, 1984 Through July 31, 1984		
6. (a) Cash on Hand January 1, 19__			\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period		\$ 6,181	
(c) Total Receipts (from Line 18)		\$ -0-	\$ 41,847
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 6,181	\$ 66,489
7. Total Disbursements (from Line 28)		\$ -0-	\$ 60,308
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 6,181	\$ 6,181
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-573-4088

Robert B. Campbell
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

August 17, 1984
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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RECEIVED BY THE FEC

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

84 DEC 14 All: 42

(Summary Page)

<p>1. Name of Committee (in Full)</p> <p>Footwear Distributors Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p>P.O. Box 2313</p> <hr/> <p>City, State and ZIP Code</p> <p>GPO NY New York 10116</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)</p> <p><input checked="" type="checkbox"/> Monthly Report for <u>August, 1984</u></p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p>COO</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	

R 4 0 3 3 7 0 1 9 8

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
6. Covering Period August 1, 1984 through August 31, 1984			
6(a) Cash on Hand January 1, 1984			\$ 24,642
6(b) Cash on Hand at Beginning of Reporting Period	\$ 6,181		
6(c) Total Receipts (from Line 18)	\$ -0-		\$ 41,847
6(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 6,181		\$ 66,489
7. Total Disbursements (from Line 28)	\$ 3,540		\$ 63,848
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 2,641		\$ 2,641
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-573-4068

Robert B. Campbell
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

Sept. 17, 1984
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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RECEIVED AT THE FEC

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Campaign Committee

ALL: 48

(Summary Page)

<p>1. Name of Committee (in Full)</p> <p>Footwear Distributors Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p>P.O. Box 2313</p> <hr/> <p>City, State and ZIP Code</p> <p>GPO N.Y., N.Y. 10116</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>SEPT., 1984</u> <input type="checkbox"/> Twelfth day report preceding _____ <small>(Type of Election)</small> election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p>000121947</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ <small>(Date)</small></p>	

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>Sept. 1, 1984</u> through <u>Sept. 30, 1984</u>		
6. (a) Cash on Hand January 1, 19____		\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,641	
(c) Total Receipts (from Line 18)	\$ 63,152	\$ 104,999
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 65,793	\$ 129,641
7. Total Disbursements (from Line 28)	\$ 26,759	\$ 90,607
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 39,034	\$ 39,034
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact

Federal Election Commission
Toll Free 800-424-9630
Local 302-573-4000

Robert B. Campbell

Type or Print Name of Treasurer
Robert B. Campbell
SIGNATURE OF TREASURER

October 17, 1984

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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R 4 0 3 3 3 7 0 1 9 2

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Footwear Distributors Political Action Comm.

Report Covering the Period

From _____ To _____

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unitemized \$ 400)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

63,152

104,999

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

63,152

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

1,989

3,597

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

24,770

86,910

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES

(2 U.S.C. § 441 old) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

26,759

90,467

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

63,152

104,999

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

63,152

104,999

32. TOTAL OPERATING EXPENDITURES from Line 19

1,989

3,597

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

1,989

3,597

8403370193

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

<p>1. Name of Committee (in Full) Footwear Distributors Political Action Committee</p> <hr/> <p>Address (Number and Street) P.O. Box 2313</p> <hr/> <p>City, State and ZIP Code GPO NY New York 10116</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number 00121947</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input checked="" type="checkbox"/> Twelfth day report preceding <u>General</u> election on <u>11/6/84</u> in the State of _____ <small>(Type of Election)</small> <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
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8403370200

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>10/1/84</u> Through <u>10/17/84</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period	\$ 39,034	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 104,999
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 39,034	\$ 129,641
7. Total Disbursements (from Line 28)	\$ 9,090	\$ 99,697
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 29,944	\$ 29,944
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 888-434-6530
Local 202-637-4908

Type or Print Name of Treasurer

October 17, 1984

SIGNATURE OF TREASURER

Date

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

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

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**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, PFC FORM 3X)**

Name of Committee or Fund Footwear Distributors Political Action Committee	Report Covering the Period		
	From	To	
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	-0-	104,999	11(a)
(Also See Unitized 8 _____)			
(b) Political Party Committees			11(b)
(c) Other Political Committees	-0-	104,999	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))			11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	104,999	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	90	3,687	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	9,000	95,910	21
22. INDEPENDENT EXPENDITURES (see Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 et al) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUND (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	9,090	99,597	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	-0-	104,999	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	-0-	104,999	31
32. TOTAL OPERATING EXPENDITURES from Line 19	90	3,687	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	90	3,687	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)			34

97033302



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80-7

December 28, 1984

**Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313
General Post Office
New York, NY 10116**

Identification Number: C00121947

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Campbell:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact J. Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

**John D. Gibson
Assistant Staff Director
Reports Analysis Division**

R 4 0 3 3 5 7 4 9 4 0

TELECON

ANALYST Bryan
initiated call? xx

TELECON WITH: Douglas R. Stevens
initiated call? _____

-
=

Candidate/Committee: Footwear Distributors PAC

DATE: 1-22-85

SUBJECT(S): Non-Filing of 30G

I informed Mr. Stevens that it would be to the committees' advantage to file the 30-Day post-general report ASAP.

He said he had been working on the others but would stop to file the report by Fri., the 25th.

25040371351

(Summary Page)

83 OCT 24 AM: 28

<p>1. Name of Committee (in Full) Footwear Distributors Political Action Committee</p> <p>Address (Number and Street) P.O. Box 2313</p> <p>City, State and ZIP Code GPO NY New York 10166</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number 000 121947</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>September, 1983</u> <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
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SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>September 1, 1983</u> through <u>September 30, 1983</u>		
6. (a) Cash on Hand January 1, 19____		\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period	\$ 35,582	
(c) Total Receipts (from Line 18)	\$ 100	\$ 16,700
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 35,682	\$ 41,342
7. Total Disbursements (from Line 28)	\$ 18,750	\$ 24,410
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 16,932	\$ 16,932
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4088

Robert B. Campbell
 Type or Print Name of Treasurer


 SIGNATURE OF TREASURER

October 17, 1983

Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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03032951949

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM SX)**

Name of Committee (in Full)	Report Covering the Period:	
	From 9/1/83	To 9/30/83
	COLUMN A Total This Period	COLUMN B Subtotal - prior Dates
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	100	16,700
(Memo Entry Underlined \$ 100)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	100	16,700
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add Lines 11d, 12, 13, 14, 15, 16 and 17)	100	16,700
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-0-	770
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	18,750	23,500
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §414(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS	-0-	140
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	18,750	24,410
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	100	16,700
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	100	16,700
32. TOTAL OPERATING EXPENDITURES from Line 19	-0-	770
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	-0-	770

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0:032951949

RECEIVED AT THE FEB 2

REPORT OF RECEIPTS AND DISBURSEMENTS Attachment 19
For a Political Campaign Other Than an Authorized Candidate

FEB 2 4 08:30

(Summary Page)

Page 1 of 2

1. Name of Committee (in Full)
**Footwear Distributors
Political Action Committee**

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
GPO N.Y., N.Y. 10166

Check if address is different than previously reported.

2. FEC Identification Number
000121947

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for May, 1984
 Twelfth day report preceding _____
(Type of Standard election on _____ in the State of _____)
 Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>May 1</u> Through <u>May 31, 1984</u>		
6. (a) Cash on Hand January 1, 1984		\$ 24,642
(b) Cash on Hand at Beginning of Reporting Period	\$ 15,767	
(c) Total Receipts (from Line 10)	\$ 20,847	\$ 41,847
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 36,614	\$ 66,489
7. Total Disbursements (from Line 20)	\$ 15,433	\$ 45,308
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 21,181	\$ 21,181
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ - 0 -	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 302-623-4888

Robert B. Campbell

Signature of Treasurer
Robert B. Campbell
SIGNATURE OF TREASURER

June 11, 1984
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

84033104433

**CONTRIBUTOR PRIMARY PAGE
of Receipts and Disbursements
(Part 2, FEC FORM 3X)**

Name of Committee or Fund	Report Covering the Period		
	From	To	
	COLUMN A Total This Period	COLUMN B Calendar Year - 2-Date	
L. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	20,847	41,847	11(a)
Illness Entry Unitemized \$ <u>1,447</u>)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	20,847	41,847	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	20,847	41,847	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	333	1,568	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,100	43,600	21
22. INDEPENDENT EXPENDITURES (see Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 et al) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS		140	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	15,433	45,308	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	20,847	41,847	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	20,847	41,847	31
32. TOTAL OPERATING EXPENDITURES from Line 19	333	1,568	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	333	1,568	34

84033184432

Summary Page

1. Name of Committee (in Full)
Footwear Distributors
Political Action Committee

Address (Number and Street)
P.O. Box 2313

City, State and ZIP Code
CFO N.Y., N.Y. 10166

2. FEC Identification Number
C00121947

3. This committee qualified as a noncandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for June, 1984
 Twelfth day report preceding _____ (Type of election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	June 1, 1984 Through June 30, 1984		
6. (a)	Cash on Hand January 1, 1984		\$ 24,642
(b)	Cash on Hand at Beginning of Reporting Period	\$ 21,181	
(c)	Total Receipts (from Line 10)	\$ -0-	\$ 41,867
(d)	Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 21,181	\$ 66,489
7.	Total Disbursements (from Line 20)	\$ 15,000	\$ 60,308
8.	Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 6,181	\$ 6,181
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

Robert B. Campbell

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-633-4888

Type or Print Name of Treasurer
Robert B. Campbell
SIGNATURE OF TREASURER

July 17, 1984
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 43.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

80-2

NOV 7 1984

Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313
General Post Office
New York, NY 10166

Identification Number: C00121947

Reference: October Monthly (9/1/83-9/30/83), Year End (12/1/83-
12/31/83) and February Monthly (1/1/84-1/31/84)
Reports

Dear Mr. Campbell:

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

-On Schedule A supporting Line 11a of the Detailed Summary Page, your February Monthly report disclosed contributions from individuals which omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR 104.3(a)(4)(i).

-Column B figures should be cumulative for a single calendar year. Please amend Column B totals for the Summary and Detailed Summary Pages of the February Monthly Report to show 1984 activity only.

In addition, please amend the coverage dates for the February Monthly Report, which should be January 1, 1984 through January 31, 1984.

-Your reports disclose no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been

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incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

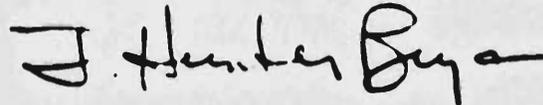
If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

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

Sincerely,



J. Hunter Bryan
Reports Analyst
Reports Analysis Division

86040571339
8403310497

JHB



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

NOV 7 1984 RO-2

**Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313
General Post Office
New York, NY 10166**

Identification Number: C00121947

**Reference: March Monthly (2/1/84-2/29/84), April Monthly
(3/1/84-3/31/84), May Monthly (4/1/84-4/30/84), June
Monthly (5/1/84-5/31/84), and July Monthly (6/1/84-
6/30/84) Reports**

Dear Mr. Campbell:

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

-Please amend the calendar year-to-date totals of the Summary and Detailed Summary Pages to reflect only 1984 totals for the following reports:

1984 March Monthly Report (2/1/84-2/29/84)
1984 April Monthly Report (3/1/84-3/31/84)
1984 May Monthly Report (4/1/84-4/30/84)
1984 June Monthly Report (5/1/84-5/31/84)
1984 July Monthly Report (6/1/84-6/30/84)

-Your April, June and July Monthly reports disclose no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

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If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b. JB

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

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

Sincerely,

J. Hunter Bryan

J. Hunter Bryan
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BQ-3

November 29, 1984

Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313
General Post Office
New York, NY 10166

Identification Number: C00121947

Reference: July Monthly (6/1/83-6/30/83), August Monthly
(7/1/83-7/31/83), October Monthly (9/1/83-9/30/83),
Year-End (12/1/83-12/31/83), February Monthly (1/1/84-
1/31/84), March Monthly (2/1/84-2/29/84), April
Monthly (3/1/84-3/31/84), May Monthly (4/1/84-
4/30/84), June Monthly (5/1/84-5/31/84), and July
Monthly (6/1/84-6/30/84) Reports

Dear Mr. Campbell:

This letter is to inform you that as of November 28, 1984,
the Commission has not received your response to our requests for
additional information, dated November 7, 1984. Those notices
requested information essential to full public disclosure of your
Federal election financial activity and to ensure compliance with
provisions of the Federal Election Campaign Act (the Act).
Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the
date of this notice, the Commission may choose to initiate audit
or legal enforcement action.

If you should have any questions related to this matter,
please contact Hunter Bryan on our toll-free number (800) 424-
9530 or our local number (202) 523-4048.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

DEC 26 1984

RG-2

Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313, General Post Office
New York, NY 10116

Identification Number: C00121947

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Campbell:

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:

-Your report discloses \$1,989 in operating expenses but failed to include a Schedule B itemizing each expenditure. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RG-3

January 31, 1985

**Robert B. Campbell, Treasurer
Footwear Distributors Political
Action Committee
c/o Douglas R. Stevens
2550 M Street, N.W., Suite 405
Washington, DC 20037**

Identification Number: C00121947

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Campbell:

On January 11, 1985 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your 1984 Year-End Report which discloses the refund of \$3,334 to Saloutore Salibello on December 3, 1984. Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your refund of the excessive amount will be taken into consideration. The following information is still required, however, for your response to be considered adequate.

-Your report discloses \$1,989 in operating expenses but failed to include a Schedule B itemizing each expenditure. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from

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that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §6441a and 441b.

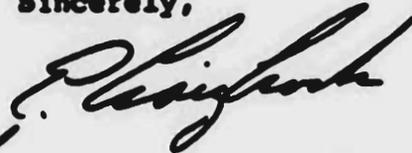
Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

-Line 21 of the Detailed Summary Page of your report discloses a total of \$12,250 in contributions to Federal candidates and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$24,770. Please amend your report to clarify the discrepancy.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Hunter Bryan on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

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In re: Footwear Political Action Committee

RECEIVED

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Attachment 26

In Reply
Douglas R. Stevens
2550 M Street, N. W., Suite 405
Washington, D. C. 20037

17 Lincoln Road
Mountaintop, New York 10990
212 262 2000

202 775 0000

5000 Woodburn Drive
Southland, Maryland 20680
301 775 0000

February 11, 1985

Mr. J. Hunter Bryan
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Bryan:

Thank you for your letter of January 31, 1985 regarding the October monthly report and the June monthly report.

This letter is to ask for an extension of ten days to answer these questions. During this time I will also attempt to provide information previously requested.

Thank you for your attention to this matter.

Sincerely,

Douglas R. Stevens
Douglas R. Stevens

DRS/bt

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Law Office

Douglas R. Stevens
2550 M Street, N. W., Suite 405
Washington, D. C. 20037

57 Linden Street
Manhattan, New York 10030
516.262.2400

202.775.0500

5601 Western Drive
Luttwal, Maryland 20023
202.775.0500

March 26, 1985

Mr. J. Hunter Bryant
Reports Analyst
Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Bryant:

This letter and its attachments will supplement my previous response to communications from you regarding the reports of the Footwear Distributors Political Action Committee.

I am attaching an amended report for the June 1984 monthly report including the aggregate year-to-date total for supporting Line 11(a) of the Detailed Summary Page.

I am also enclosing an amended copy of the October monthly report showing \$1,870.00 in itemized disbursements. The remaining expenditures were for postage and for stationery below the reportable limit. As indicated in my previous letter, all administrative expenses of the Committee are borne by the Committee. The discrepancy you noted on Line 21 of the Detailed Summary Page has been corrected. The receipt of a contribution in excess of \$5,000 was rectified and was reported in our subsequent report. In addition, I am enclosing an amended monthly report showing the proper coverage dates.

With regard to the July monthly and August monthly reports, amended reports are enclosed showing the Line 7 amount to be \$5,160.00, as you indicated.

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- 2 -

The coverage dates are also amended in these reports.

Please also note that the aggregated year-to-date totals are now included on supporting Line 11(a) of the Detailed Summary Page in the October monthly report.

The October monthly report has also been corrected to show the proper coverage dates for calendar year 1984 activity only. The coverage dates have also been corrected.

Amended reports reflecting 1984 totals are also enclosed as requested.

I hope that these amended reports satisfy the issues you raised. Please do not hesitate to contact me if there is any further information or activity that is required.

Sincerely,

Douglas R. Stevens

DRS/bt

936040571879
93033641955

Name of Candidate (Do Not Print)

Report Covering the Period

Footwear Distributors Political Action Comm. From _____ To _____

1984 October Monthly Amendment

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unitemized \$ 400)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES

AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND

OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

From _____ To _____		COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		63,152	104,999	11(a)
(b) Political Party Committees				11(b)
(c) Other Political Committees				11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))		63,152	104,999	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES				12
13. ALL LOANS RECEIVED				13
14. LOAN REPAYMENTS RECEIVED				14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES				16
17. OTHER RECEIPTS (Dividends, Interest, etc.)				17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		63,152		18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		1,989	3,597	19
20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES				20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		24,770	56,910	21
22. INDEPENDENT EXPENDITURES (Use Schedule E)				22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)				23
24. LOAN REPAYMENTS MADE				24
25. LOANS MADE				25
26. REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))				26(d)
27. OTHER DISBURSEMENTS				27
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		26,759	60,467	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		63,152	104,999	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)				30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		63,152	104,999	31
32. TOTAL OPERATING EXPENDITURES from Line 19		1,989	3,597	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15				33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		1,989		34

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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)

Footwear Distributors Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<p>Douglas R. Stevens 2550 M St. N.W. Washington, D.C. 20037</p>	<p>Legal fees- Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>9/7/84</p>	<p>1,870</p>
<p>B. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>C. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>H. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

1,870

95033591976



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 18, 1985

Robert Campbell, Treasurer
Footwear Distributors
Political Action Committee
P.O. Box 2313
General Post Office
New York, New York 10116

RE: MUR 2056

Dear Mr. Campbell:

On July 3, 1985, the Federal Election Commission determined that there is reason to believe the Footwear Distributors Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and § 434(b)(5)(A), provisions 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 findings, 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.

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Robert Campbell, Treasurer

Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Stephen Levin, the staff member assigned to this matter, at (202) 423-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

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

cc: Douglas R. Stevens, Esquire

350405/1833

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2056

STAFF MEMBER: Stephen Levin

RESPONDENT: Footwear Distributors Political Action Committee
Robert Campbell, 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

The Footwear Distributors Political Action Committee and Robert Campbell, as treasurer (hereinafter "Footwear PAC" or "Respondent"), allegedly violated 2 U.S.C. § 434(a)(4)(B) by failing to file one report and failing to file five reports in a timely manner during the 1983-84 election cycle. Further, Respondent allegedly violated 2 U.S.C. § 434(b)(5)(A) by failing to itemize administrative expenses in four reports during the 1983-84 election cycle.

FACTUAL AND LEGAL ANALYSIS

All political committees, other than authorized committees, are required to file quarterly or monthly reports, a pre-election report and a post-general election report in a year in which an election is held and a mid-year report and a year-end report or monthly reports in a year in which an election is not held. The quarterly reports, the mid-year and year-end reports are required in lieu of the committee filing monthly reports, if it so chooses. In the matter at hand, Respondent chose to file monthly reports. The monthly reports must be filed no later than the 20th day after the last day of the month except that, in a year

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in which a regularly scheduled general election is held, in lieu of filing the reports otherwise due in November and December, a pre-general election report, a post-general election report, and a year end report must be filed. The pre-general election report must be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. The post-general election report must be filed no later than the 30th day after the general election and the year end report must be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(B).

In this matter, Respondent did make contributions to candidates in 1984 elections. Therefore, it was required to file a pre-election report in 1984, in addition to the post-general election report, year-end report and ten monthly reports for that year and monthly reports throughout 1983. Respondent failed to file its 1983 February monthly report and filed five 1984 reports late, with the delinquency period ranging from 50 to 116 days.

Footwear PAC's 1983 February monthly report was due February 20, 1983. Respondent was notified of that fact by RAD on January 7, 1983. On October 19, 1984, a non-filer notice was sent to Footwear PAC for failing to file that report. However, the 1983 February monthly report has not been filed.

On June 21, 1984, Respondent was notified by RAD that the 1984 August and September monthly reports were due on August 20, 1984 and September 20, 1984, respectively. On October 19, 1984, a non-filer notice was sent to Footwear PAC for failing to file those two reports. The 1984 August and September monthly reports both were filed on December 14, 1984, 116 and 85 days late, respectively.

On September 21, 1984, Footwear PAC was notified by RAD that the 1984 October monthly report was due October 20, 1984. On November 9, 1984, RAD sent a non-filer notice to Respondent for failing to file the 1984 October monthly report. The report was filed on December 14, 1984, 55 days late.

Footwear PAC was notified by RAD on October 1, 1984 that the 1984 12 day pre-general and 30 day post general reports were due October 25, 1984 and December 6, 1984, respectively. On November 16, 1984, RAD sent Respondent a non-filer notice for failing to file the 1984 12 day pre-general report. That report was filed on December 14, 1984, 50 days late. On December 28, 1984, RAD sent Footwear PAC a non-filer notice for failing to file the 1984 30 day post-general report. That report was filed on January 29, 1985, 54 days late. See chart.

<u>Report</u>	<u>Period Covered</u>	<u>Date Due</u>	<u>Date Filed</u>	<u>Days Late</u>
1983 February monthly	1-1-83- 1-31-83	2-20-83	Not Filed	—

23040:71985

<u>Report</u>	<u>Period Covered</u>	<u>Date Due</u>	<u>Date Filed</u>	<u>Days Late</u>
1984 August monthly	7-1-84- 7-31-84	8-20-84	12-14-84	116
1984 September monthly	8-1-84- 8-31-84	9-20-84	12-14-84	85
1984 October monthly	9-1-84- 9-30-84	10-20-84	12-14-84	55
1984 12 day pre-general election	10-1-84- 10-17-84	10-25-84	12-14-84	50
1984 30 day post-general election	10-18-84- 11-26-84	12-6-84	1-29-85	54

Therefore, the Office of General Counsel recommends that the Commission open a Matter Under Review ("MUR") in this case. This Office further recommends that, as a result of Respondent not having filed one report and having filed five reports in an untimely manner, the Commission find reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

In addition, Footwear PAC failed to itemize administrative expenses for four monthly reports (1983 October and 1984 June, July and October). Such reports require the inclusion of the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within that calendar year is made by the reporting committee to meet its operating

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expenses, together with the dates, amounts, and purposes of such operating expenses. 2 U.S.C. § 434(b)(5)(A).

A Request for Additional Information ("RFAI"), which explained the requirement for itemizing administrative expenses, were sent by RAD to Footwear PAC on November 7, 1984 regarding the 1983 October monthly report, the 1984 June monthly report and the 1984 July monthly report. RAD sent Respondent a second notice on November 29, 1984 for failing to respond to the RFAIs. On January 11, 1985, an RFAI requesting information on administrative expenses was sent by RAD to Footwear PAC regarding the 1984 October monthly report. RAD sent respondent a second notice on January 31, 1985 for failing to respond to the RFAI.

Throughout the course of much of this matter, RAD attempted to directly contact Respondent's treasurer but was unable to do so. In the course of analyzing Respondent's reports, RAD noted disbursements made to Douglas R. Stevens, Esquire, in Washington, D.C. RAD contacted Stevens and inquired as to whether he was counsel for Footwear PAC. Stevens replied affirmatively, requested that RAD direct correspondence to him relative to this matter, and assured RAD that he would prepare the appropriate responses.

On April 1, 1985, RAD received a response from Stevens to its requests for information regarding Respondent's administrative expenses. Stevens stated that Footwear PAC bears all of its own administrative expenses. The response included an

860403/1338

amendment to the 1984 October monthly report which itemized \$1,870 in "legal fees" and stated that the "remaining expenditures were for postage and for stationery below the reportable limit." The amended report did not, however, itemize any other operating expenses. In addition, Footwear PAC did not amend any of the other reports in question to include its itemized operating expenses. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that the Footwear Distributors Political Action Committee and Robert Campbell, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

850405/1889

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 10, 1985ANALYST: J. Hunter Bryan

I. COMMITTEE: Footwear Distributors Political Action
Committee (C00121947)
Robert Campbell, Treasurer^{1/}
P.O. Box 2313, General Post Office
New York, NY 10116

II. RELEVANT STATUTE: A. 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)
B. 2 U.S.C. §434(b)(5)(A)
11 CFR 104.3(b)(1) and (3)

III. BACKGROUND:

A. Non-Filing and Failure to Timely File

The Footwear Distributors Political Action Committee ("Footwear PAC") has failed to file the 1983 February Monthly Report. Footwear PAC also failed to file the 1983 February Monthly, 1984 August Monthly, 1984 September Monthly, 1984 October Monthly, and 1984 12 Day Pre-General Reports as of Election Day, November 6, 1984. In addition, Footwear PAC failed to timely file the 1984 30 Day Post-General Report.

On January 7, 1983, Footwear PAC was notified that the 1983 February Monthly Report was due February 20, 1983 (Attachment 2). On June 21, 1984, Footwear PAC was notified that the 1984 August and September Monthly Reports were due August 20, 1984 and September 20, 1984, respectively (Attachment 3). On October 19, 1984, a Non-Filer Notice was sent to Footwear PAC for failure to file these three reports (Attachment 4).

^{1/} Although Robert Campbell is the treasurer of record, all contact with Footwear PAC has been through Douglas R. Stevens, counsel for Footwear PAC at 2550 M Street, NW, Suite 405, Washington, DC 20037.

FOOTWEAR DISTRIBUTORS POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On September 21, 1984, Footwear PAC was notified that the 1984 October Monthly Report was due October 20, 1984 (Attachment 5). On November 9, 1984, a Non-Filer Notice was sent to Footwear PAC for failing to file the 1984 October Monthly Report (Attachment 6).

The Reports Analysis Division ("RAD") attempted to contact the treasurer on several occasions, and succeeded in reaching the attorney, Mr. Douglas R. Stevens, in mid-November. After discussing the outstanding matters, Mr. Stevens requested that copies of the notices be sent to him (Attachment 7).

On October 1, 1984, Footwear PAC was notified that the 1984 12 Day Pre-General and 30 Day Post-General Reports were due October 25, 1984 and December 6, 1984, respectively (Attachment 8). On November 16, 1984, a Non-Filer Notice was sent to Footwear PAC for failing to file the 12 Day Pre-General Report (Attachment 9). This report, along with the 1984 August Monthly, September Monthly, and October Monthly Reports, was received by the Commission on December 14, 1984 (Attachments 10 through 14).

On December 28, 1984, a Non-Filer Notice was sent to Footwear PAC for failure to file the 30 Day Post-General Report (Attachment 15). On January 22, 1985, Mr. Stevens was called and informed it would be in Footwear PAC's best interests to file the 30 Day Post-General Report by January 25, 1985 (Attachment 16). The report was received by the Commission on January 29, 1985 (Attachment 17). To date, however, the 1983 February Monthly Report has not been received.

B. Failure to Itemize Administrative Expenses

Footwear PAC failed to itemize administrative expenses for four (4) reports, each disclosing disbursements in excess of \$10,000 (Attachments 13, 18, 19 and 20). Requests for Additional Information ("RFAs"), which explained the requirement for itemizing administrative expenses, were sent to Footwear PAC on November 7, 1984 for the 1983 October Monthly, 1984 June Monthly, and 1984 July Monthly Reports (Attachments 21 and 22).

In mid-November, Mr. Stevens was contacted and advised to respond to these requests (Attachment 7). A Second Notice was sent to Footwear PAC on November 29, 1984 for failure to respond to the RFAs (Attachment 23).

FOOTWEAR DISTRIBUTORS POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

On December 14, 1984, a response was received which stated that "the Committee does not have a connected organization and has been bearing all its own administrative expenses." The reports, however, were not amended to itemize Footwear PAC's operating expenditures (Attachment 10).

On January 11, 1985, an RFAI requesting information on administrative expenses was sent for the 1984 October Monthly Report (Attachment 24).^{2/} A Second Notice was sent on January 31, 1985 for failure to respond to the RFAI (Attachment 25). On February 13, 1985, a response from Mr. Stevens was received which asked "For an extension of ten days" to answer questions regarding the 1984 October Monthly Report. Mr. Stevens also stated that he would "attempt to provide information previously requested" (Attachment 26).

On April 1, 1985 a response was received from Mr. Stevens which stated that "all administrative expenditures of the Committee are borne by the Committee" (Attachment 27). The response included an amendment to the 1984 October Monthly report which itemized \$1,870 in "legal fees" and stated that the "remaining expenditures were for postage and for stationery below the reportable limit" (Attachment 28). The report, however, did not itemize any other operating expenditures. In addition, Footwear PAC did not itemize any operating expenditures for the other previously questioned reports.

To date, Footwear PAC has not provided an adequate response or amended its reports to itemize operating expenditures.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

^{2/} This RFAI was originally sent on December 26, 1984 to the New York address. The RFAI was returned to the Commission and remailed to Mr. Stevens.

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (43-84)

DATE PAGE#5
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATE	# OF PAGE#	MICROFILM LOCATION
FOOTWEAR DISTRIBUTORS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #000131947
1983	NOTICE OF FAILURE TO FILE			1JAN83 -31JAN83	1	84FEC/242/1273
	MARCH MONTHLY	0	0	1FEB83 -28FEB83	2	83FEC/269/0624
	APRIL MONTHLY	0	0	1MAR83 -31MAR83	2	83FEC/271/3558
	1 ST LETTER INFORMATIONAL NOTICE			1MAR83 -31MAR83	1	84FEC/248/0186
	MAY MONTHLY	5,500	3,189	1APR83 -30APR83	5	83FEC/272/2089
	1 ST LETTER INFORMATIONAL NOTICE			1APR83 -30APR83	2	84FEC/248/0188
	JUNE MONTHLY	0	0	1MAY83 -31MAY83	3	83FEC/278/2465
	JULY MONTHLY	0	2,020	1JUN83 -30JUN83	4	83FEC/279/2461
	JULY MONTHLY - AMENDMENT	0	2,020	1JUN82 -30JUN82	2	83FEC/369/1980
	REQUEST FOR ADDITIONAL INFORMATION			1JUN82 -30JUN82	2	84FEC/348/2492
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN83 -30JUN83	7	84FEC/349/5241
	AUGUST MONTHLY	0	0	1JUL83 -31JUL83	2	83FEC/282/3744
	AUGUST MONTHLY - AMENDMENT	0	0	1JUL83 -31JUL83	2	83FEC/369/1982
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31JUL83	1	84FEC/348/3173
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31JUL83	1	84FEC/350/3365
	SEPTEMBER MONTHLY	11,100	500	1AUG83 -31AUG83	5	83FEC/282/5311
	OCTOBER MONTHLY	100	18,750	1SEP83 -30SEP83	4	83FEC/295/4848
	REQUEST FOR ADDITIONAL INFORMATION			1SEP83 -30SEP83	2	84FEC/248/2696
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP83 -30SEP83	1	84FEC/350/3366
	NOVEMBER MONTHLY	1,000	190	1OCT83 -31OCT83	4	83FEC/288/6767
	DECEMBER MONTHLY	0	0	1NOV83 -30NOV83	3	84FEC/291/0428
	YEAR-END	0	2,750	1DEC83 -31DEC83	4	84FEC/291/0431
	REQUEST FOR ADDITIONAL INFORMATION			1DEC83 -31DEC83	1	84FEC/348/3174
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1DEC83 -31DEC83	1	84FEC/350/3367
1984	MISCELLANEOUS NOTICE FROM FEC			1984T84	2	84FEC/342/4573
	FEBRUARY MONTHLY	3,300	1,275	1JAN84 -31JAN84	5	84FEC/306/4801
	FEBRUARY MONTHLY - AMENDMENT	3,300	1,275	1JAN84 - 1JAN84	1	83FEC/369/1984
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31JAN84	1	84FEC/348/3175
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31JAN84	1	84FEC/350/3368
	MARCH MONTHLY	0	0	1FEB84 -29FEB84	3	84FEC/315/0579
	MARCH MONTHLY - AMENDMENT	0	0	1FEB84 -29FEB84	1	83FEC/369/1986
	1 ST LETTER INFORMATIONAL NOTICE			1FEB84 -29FEB84	1	84FEC/348/3179
	APRIL MONTHLY	0	1,250	1MAR84 -31MAR84	4	84FEC/315/0581
	APRIL MONTHLY - AMENDMENT	0	1,250	1MAR84 -31MAR84	3	83FEC/369/1978
	REQUEST FOR ADDITIONAL INFORMATION			1MAR84 -31MAR84	1	84FEC/348/3179
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR84 -31MAR84	1	84FEC/350/3370
	MAY MONTHLY	0	0	1APR84 -30APR84	3	84FEC/315/0585
	MAY MONTHLY - AMENDMENT	0	0	1APR84 -30APR84	2	83FEC/369/1988
	1 ST LETTER INFORMATIONAL NOTICE			1APR84 -30APR84	1	84FEC/348/3179
	JUNE MONTHLY	20,847	15,432	1MAY84 -31MAY84	7	84FEC/318/4155
	JUNE MONTHLY - AMENDMENT	20,847	15,432	1MAY84 -31MAY84	1	83FEC/369/1990
	REQUEST FOR ADDITIONAL INFORMATION			1MAY84 -31MAY84	1	84FEC/348/3177
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY84 -31MAY84	1	84FEC/350/3372
	REQUEST FOR ADDITIONAL INFORMATION			1MAY84 -31MAY84	1	84FEC/357/4113

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (93-84)

DATE 8APR85
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE/ COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	REQUEST FOR ADDITIONAL INFORMATION END			1MAY84 -31MAY84	3	85FEC/363/2248
	JULY MONTHLY	0	15,000	1JUN84 -30JUN84	4	84FEC/325/4219
	JULY MONTHLY - AMENDMENT	0	15,000	1JUN84 -30JUN84	4	85FEC/369/1965
	REQUEST FOR ADDITIONAL INFORMATION			1JUN84 -30JUN84	1	84FEC/348/3176
	REQUEST FOR ADDITIONAL INFORMATION END			1JUN84 -30JUN84	1	84FEC/350/3373
	AUGUST MONTHLY	0	0	1JUL84 -31JUL84	5	84FEC/357/0188
	NOTICE OF FAILURE TO FILE			1JUL84 -31JUL84	1	84FEC/343/0428
	SEPTEMBER MONTHLY	0	3,540	1AUG84 -31AUG84	4	84FEC/357/0188
	NOTICE OF FAILURE TO FILE			1AUG84 -31AUG84	1	84FEC/343/0429
	OCTOBER MONTHLY	63,152	26,759	1SEP84 -30SEP84	8	84FEC/357/0192
	OCTOBER MONTHLY - AMENDMENT	63,152	26,759	1SEP84 -30SEP84	9	85FEC/369/1963
	NOTICE OF FAILURE TO FILE			1SEP84 -30SEP84	1	84FEC/330/5418
	REQUEST FOR ADDITIONAL INFORMATION			1SEP84 -30SEP84	3	84FEC/357/4110
	REQUEST FOR ADDITIONAL INFORMATION END			1SEP84 -30SEP84	2	85FEC/363/2179
	PRE-GENERAL	0	9,090	1OCT84 -17OCT84	4	84FEC/357/0200
	PRE-GENERAL - AMENDMENT	0	9,090	1OCT84 -17OCT84	3	85FEC/362/1349
	PRE-GENERAL - AMENDMENT	0	9,090	1OCT84 -17OCT84	4	85FEC/362/1769
	NOTICE OF FAILURE TO FILE			1OCT84 -17OCT84	1	84FEC/349/0605
	POST-GENERAL	0	2,500	18OCT84 -26NOV84	4	85FEC/362/1779
	POST-GENERAL - AMENDMENT	0	2,500	18OCT84 -26NOV84	3	85FEC/362/1357
	NOTICE OF FAILURE TO FILE			18OCT84 -26NOV84	1	84FEC/357/4940
	YEAR-END	200	3,739	27NOV84 -31DEC84	3	85FEC/362/1353
1985	MISCELLANEOUS REPORT			13FEB85 TO FEC	2	85FEC/366/0016
	TOTAL	105,199	0 105,935	0	180	TOTAL PAGES

Cash on hand as of 12/31/84: \$23,905
 Debts owed to committee as of 12/31/84: \$0
 Debts owed by committee as of 12/31/84: \$0
 All reports have been reviewed.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FOOTWEAR DISTRIBUTORS POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID #C00121947
CONNECTED ORGANIZATION:	NONE					
	1985 FEBRUARY MONTHLY	0	0	1JAN85 -31JAN85	3	85FEC/367/1459
	TOTAL	0	0	0	3	TOTAL PAGES

No reports have been reviewed.

Cash on hand as of 1/31/85: \$23,905
 Debts owed to committee as of 1/31/85: \$0
 Debts owed by committee as of 1/31/85: \$0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 7, 1983

JANUARY 31 YEAR-END REPORT NOTICE**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1983.

WHAT MUST BE REPORTED

All political committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration, through December 31, 1982.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1983. Reports hand-delivered or mailed first class must be received no later than close of business January 31, 1983.

WHERE AND HOW TO FILE

Committees should consult the instructions on the form for details.

FAILURE TO FILE

According to a revised Commission policy, although political committees may no longer receive mailgram notification of their failure to file reports, they remain fully liable for failure to file any report required under the Act. Committees should be aware that the names of non-filers may be published by the Commission. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

1983 FILING REQUIREMENTS

See the January 1983 issue of the FEC Record for filing requirements during non-election year 1983.

FOR INFORMATION CALL:

Office of Public Communications
202/523-4068
800/424-9530

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,* through June 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

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JB



FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 2056

Date Filmed 3/13/86 Camera No. --- 2

Cameraman AS