

800# 4874
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
Nov 21 39
87 DEC -3 AM 9:01

Rogers & Wells
Two Hundred Park Avenue
New York, N.Y. 10166

1737 M STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 331-7760
TELECOPIER (202) 331-0463
TELEX 248439 WASHUR

201 NORTH FIGUEROA STREET
LOS ANGELES, CA. 90012-2633
TELEPHONE (213) 880-1000
TELECOPIER (213) 880-1234
(213) 880-1070
TELEX 194758 RWLBA

TELEPHONE (212) 878-8000
TELECOPIER (212) 878-8160
(212) 878-8375
TELEX 234493 RKWUR

47, AVENUE HOCHÉ
75008-PARIS, FRANCE
TELEPHONE 47-83-11-00
TELECOPIER 33-1-4267-5061
TELEX 280617 EURLAW

58 COLEMAN STREET
LONDON EC2R 5BE, ENGLAND
TELEPHONE 01.628.0101
TELECOPIER 441-638-2008
TELEX 854964 USLAW

November 30, 1987

Charles W. Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Dorothy Pitman Hughes

Dear Mr. Snyder:

I am returning herewith the signed and notarized transcript of the deposition of Dorothy Pitman Hughes which was taken on October 8, 1987. As you will see, Ms. Hughes has made several corrections in the text of the transcript.

Sincerely,

Margaret Blair Soyster

Margaret Blair Soyster

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 DEC -3 AM 10:14

89040760464

60044874

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ea1

1

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER

OF

DOROTHY PITMAN HUGHES.

ORIGINAL

MUR 2139

DEPOSITION OF DOROTHY PITMAN HUGHES, taken
by the Commission, pursuant to notice
at the office of the United States
Attorney for the Southern District of
New York, One Saint Andrew's Plaza,
New York, N.Y . 10007, on October 8, 1987
at 1:40 p.m., before Eugene A. Levine,
a Certified Shorthand Reporter and Notary
Public of the State of New York.

89040760465

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

2

A P P E A R A N C E S:

CHARLES W. SNYDER,
Office of General Counsel,
Federal Election Commission
999 E. Street,
Washington, D.C. 20463

ROGERS & WELLS,
Attorneys for Witness
200 Park Avenue,
New York, N.Y. 10166

MARGARET BLAIR SOYSTER,
of Counsel.

oOo

DOROTHY PITMAN HUGHES, was called
as a witness, and having been duly sworn, testified as
follows:

BY MR. SNYDER:

Q. Mrs. Hughes, what is your home address?

A. 609 West 138th Street, New York City.

Q. What is your business address?

A. Business address is 16 West 125th Street,
New York City.

Q. What is your business?

A. It's copy and printing service.

Q. What is your function in that business?

A. To do everything. Operating, making copies,

89040760466

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

3

and just in general run the business.

Q. What is the name of this copying and printing service?

A. Harlem Copy Center.

Q. How long have you been in this in this business?

A. I know two years. Exactly how long after the two years, I don't know the month I started.

Q. In the period from November, 1983 through April, 1984, what business were you in then?

A. In '83, I was working in day care, doing a demonstration day care program.

Q. Through April, 1984?

A. Through April, 1984, I was doing that still.

Q. Then you began the copy printing business in 1985, is that correct?

A. Late 1985.

Q. What is your marital status?

A. Married.

Q. What is your husband's name?

A. Clarence Hughes.

Q. What is his address?

A. His home address is 609 West 138th Street.

Q. What is his business?

8904070467

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

4

A. He right now is in school.

Q. Mrs. Hughes, are you familiar with an organization called the Woman's Network for Political and Economic Parity?

A. I am.

Q. Is that organization known as NWPEP?

A. It is.

Q. What is that organization?

A. It is an organization that was a community organization set up to deal with parity, economic and political parity of women both in the community and otherwise, nationally.

Q. When was it formed?

A. Exactly, I don't know. But it was formed around the time of the last -- not too far -- not too -- when was the last large election?

Q. You mean the last Presidential election in 1984?

A. Yes, in 1984. It was started in '84. I don't know exactly what month.

Q. How many members does this organization have?

MS. SOYSTER: Do you want to ask if it still exists?

Q. Does it still exist?

8904070468

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

5

A. Not as an organization. And how many members did it have?

Q. Let's take the period around April, 1984, then. How many members did it have?

A. It had about six or seven members. It was not the kind of organization that required a written membership. It was like any woman who wanted to work on parity could do so.

Q. What type of work for parity did it do?

A. Well, it was intended to be a political organization to work for parity, to advocate for parity, to go out in the community, to educate parity.

One of the things that had been the intentions of the organization was to do something that we had done without having the need as an organization, which would be to -- one of the things that we did was to look at the cost of food from the first 3 days of the month, and then from the 16th to the 19th of the month, and to go around to stores and see why they raised their prices, those two times of the month. Which we did.

So it was that kind of organization, to bring out the differences of what was happening to them in certain communities, and especially where there was

8904070469

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

6

a large population of women heads of households.

Q. What was your position in the WNPEP

A. One of the founders and treasurer.

Q. How long did you hold that position of treasurer?

A. It wasn't long. Until the FEC said that I had done something wrong, probably did something wrong using that position. So I mean, to me it was just a position of making sure that everything, the accounting for whatever we did, because we had filed for a federal election PAC.

Q. You are now referring to the Women's Network for Political Parity Political Action Committee?

A. Yes.

Q. Are those two organizations, that is, WNPEP and WNPEP-PAC, are those separate organizations or do you consider them one organization?

A. I consider it one organization. It was like an organization, the name of the organization, and then then once we applied for a PAC, then it was the same. I thought it was. I'm not sure if it constitutes being the same.

Q. When did the WNPEP-PAC cease to exist?

A. Whenever -- I think there was a letter

8904070470

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

written to you saying that we had had a meeting and everybody on the committee decided that it was too complicated for us. And I don't know when the date of that letter was.

Q. But when did WNPEP-PAC terminate as a registered committee, when WNPEP itself ceased to exist, is that correct?

A. Yes.

Q. As of January, 1984 had you any prior experience in raising money for political candidates?

A. Not in the sense -- well, not for political candidates. I have had fund raising parties before.

Q. For what causes did you raise funds?

A. For whichever one that would come through. Like if somebody was running for district leader or somebody was running for something, I would also be involved baking cakes or something. I would always support things. So myself personally, I have been helping to raise funds for years.

Q. When you say you raised funds for District leaders, you are speaking of political candidates, is that correct?

A. Well, is a district leader a political candidate? I mean, you have to tell me now because I

8904070471

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

8

don't know the difference between a political candidate district leader or a person who runs for the school board, and I have been involved in raising funds a long time for anything that is a social need to help raise funds for in the community. I have done it. So that's my experience.

Q. When you say district leader, do you mean for a governmental position, or is this a district leader of a private organization?

A. The only kind of District leader I know is one where it would be for the community, a public official.

Q. About how many years would you say you were involved in fund raising

MS. SOYSTER: Of any type?

Q. Of any type?

A. I would say that when I was in school I was helping to raise funds for -- I don't know if that makes any sense to you, but I have always helped to do whatever -- I am not classified as a fund raiser, but I have always done something, whatever anybody needed that I could do, about anything that had to do with civil rights or social things. I have done that. So I guess since I was 10 years old I have been involved in

8904070472

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

9

community activities.

Q. Are you familiar with the Jesse Jackson for President Committee?

MS. SOYSTER: You do you mean does she know if there is or was such an entity?

Q. Yes.

A. Jesse Jackson for President Committee?

Q. Yes?

A. Do you mean the Stars Committee or the Jesse Jackson for President Committee?

Q. At this point I am asking to the principal authorized campaign committee for Jesse Jackson's candidacy for President in 1984.

A. Am I familiar with them.

Q. Are you familiar with them?

A. I am familiar with there being an office or committee, the fact that there was a committee.

Q. Are you familiar with an organization called New Yorkers for Jesse Jackson?

A. New Yorkers for Jesse Jackson, I don't know if that's one of the 15 groups that gave a party for Jackson, then that would be.

Q. All I am asking of your own knowledge, have you heard of that before?

8904070473

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

10

MS. SOYSTER: Just tell him what you know.

A. New Yorkers for Jesse Jackson, no.

Q. Are you familiar with a fund raiser that was held for Jesse Jackson's fund raiser campaign on April second, 1984 at the Tavern on the Green Restaurant?

A. Yes.

Q. When did you first learn of a proposal to hold such a fund raiser?

A. During the latter part of the months before, before the April party.

Q. Are you saying that you first heard of the idea for it in March of 1984?

A. Well, maybe the month before that. I heard about it. I heard that there was going to be a WestSide group giving the party. I got involved. So I had heard about it before March, the last part of -- first part of March, the last couple of weeks before then.

Q. In February, 1984?

A. Maybe in February.

Q. Do you know who originated the idea for holding this fund raiser?

A. I think that it was a group called the WestSiders for Jackson.

8904070474

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

11

Q. From whom did you learn of it?

A. From Bill Pitman, who was my ex-husband, who was one of the WestSiders for Jackson.

Q. To your knowledge, who contacted the Jesse Jackson campaign, that is to say, the national campaign itself about holding such a fund raiser?

MS. SOYSTER: Who from the WestSiders?

MR. SNYDER: Whoever was involved in organizing and holding that fund raiser contacted Jesse Jackson's campaign?

A. I don't know who from the WestSiders.

Q. Could I then assume that a contact had already been made with the Jesse Jackson campaign to assure that Jesse Jackson would appear at this fund raiser, by the time you first became involved with this?

A. Well, I don't know.

MS. SOYSTER: Just answer what you know.

Q. What was your role in planning or holding, organizing this fund raiser?

A. My role was to see if I could get Tavern on the Green to allow \$1,000 deposit that had been paid to them to stand, although the time had elapsed, and to see if we could revise the party at Tavern, and my role was just to make sure that if we did, that I would be

89040760475

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

12

responsible for making sure that Tavern was -- would be taken care of for that process.

Q. When Mr. Pitman first told you about this fund raiser, \$1,000 deposit had already been made, is that correct?

A. That is what I was told.

Q. Did you help to publicize the fund raiser?

A. Not any more than -- you mean doing ads and stuff?

Q. Adding any form of help?

A. No. Just talk about it.

Q. You spoke to other people personally about it?

A. To buy tickets

MR. SNYDER: Would you mark this please.

(Copy of letter dated 18 November 1983 marked Commission's Exhibit 1 for identification)

Q. I am going to hand you through your attorney a document that has been marked as Commission's Exhibit number 1 for identification. Can you identify it for us?

MS. SOYSTER: Can you identify it?

A. Yes.

Q. What is it, please?

8904070476

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

13

A. This is a letter that I wrote to Mario, who was the scheduling officer for Jesse Jackson for President Committee, asking them to make Jesse available for a party at Tavern on the Green.

Q. Did you prepare this letter?

A. I didn't prepare. Somebody else prepared it, but I certainly approved it and signed it.

Q. Who prepared it?

A. Probably one of the ladies that work on the committee.

Q. Do you know who?

A. Her name would be on here somewhere and I probably could find it. What does it say, M G C -- I think that would be -- somebody, this says M G C.

Q. What is the date, just for the record, of the letter?

A. November, '83.

Q. Also for the record, could you just read the first sentence, after the comma?

A. "We are formally requesting a date in January or February, 1984 for Rev. Jackson to appear at a fund raising event at Tavern on the Green located in Central Park."

Q. Was a fund raiser held in January or

8904070477

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

14

February, 1984 at Tavern on the Green for Rev. Jackson?

A. No.

Q. Was there a reference to the fund raiser that was later held at Tavern on the Green in April, 1984?

A. It probably was, because I had wanted to hold a fund raiser for Jackson, and gave up the idea of doing it. After writing this letter, I didn't hear from them, or something. Actually, my mother got sick, or something. And the next time I was involved or knew of the party for Jackson was after Bill -- I mentioned it to Bill that I wanted to do it, so they had a WestSide Committee and they were going to do it.

Q. Do you know who rescheduled the dinner for April

MS. SOYSTER: I don't think there's ever been any testimony that it had been scheduled for any other time.

MR. SNYDER: The letter states that they request a date in January or February.

MS. SOYSTER: So there was never anything scheduled, is my point. I think She has suggested that there are two separates kinds of things. One she was planning to do and gave up on and then apparently what

8904070478

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

15

ultimately occurred. I'm not sure it's one event.

MR. SNYDER: Let me clarify that.

Q. Was this letter sent before Mr. Pitman spoke to you and asked you to participate in the fund raiser that was to be held by WestSide committee?

A. This letter was sent a long time before. Pitman asked -- I am trying to think of when was the National Women's Day. That was the day that I decided to get involved in the Tavern event, Tavern on the Green event. That was in March. So this letter was sent, it must have been sent the 18 of November in '83.

Q. For the record, could you read the rest of that first paragraph that you began? You left off at Central Park.

A. "New York City, sponsored by the WestSide Committee to Elect Rev. Jackson. Jesse Jackson and the Women's Network for political and Economic Parity. Total proceeds will benefit the Jackson campaign. The WestSide Committee is made up of 15 WestSide organizations and several individuals representing the Coalition of men and women, black, white, Jews, Asians and Latinos. The committee wishes to complete the arrangements at Tavern on the by 10-15 December '83. We look forward to hearing from you soon. Sincerely,

8904070479

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Dorothy Pitman Hughes, founder and president for Women's Network for political and Economic Parity."

Q. This letter seems to indicate that the WestSide Committee was involved in planning this fund raiser with the Women's Network, is that correct?

MS. SOYSTER: What the letter says what it says.

A. It says that it was to do that. But the Women's Network did not get involved, stay involved at that time.

Q. Let me ask you, who was Mario Cooper, that the letter is addressed to?

A. It says that he was the scheduling person, it says scheduling, Jesse Jackson for President Committee.

Q. Are you personally acquainted or were you personally acquainted with him?

A. No.

Q. Why did you address it to Mario Cooper?

A. Because somebody told me that that's who you would write a letter to having called Jackson's office in Washington.

Q. Was there a version of this letter that was actually sent out to Mario Cooper?

8904070480

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

17

A. I don't know. I thought maybe that one was.

Q. What I am asking is, we have a draft of a letter, we have a copy of a letter, to your knowledge was this letter actually mailed?

A. I don't really know. I know I sent it to you, because I was asked for everything that -- my whole file, and I sent it to you.

Q. But you do not recall actually mailing this letter?

A. I don't.

Q. Do you recall if you signed this letter?

A. I don't remember if I signed it, because I don't remember if it was sent.

Q. For the record, this letter has your name typed on it, and there is no signature. You don't recall if you did sign it or not?

A. I don't remember.

Q. Did you later send the Jesse Jackson for President Committee another letter concerning the scheduling of the fund raiser that was actually held?

A. Yes. I sent a letter to whoever the person was in charge then; to make sure that we got something back in writing that Mr. Jackson would be there, because we were actually having people come based on

8904070481

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

the fact that he was going to be there.

Q. Do you recall when you sent that letter?

A. I don't.

Q. Do you have a copy of it?

A. I probably do. Do you have one?

Q. No, I don't.

A. I probably do. I know that I was in contact with Arnold Pinkney. This is another letter that I wrote to Arnold Pinkney -- oh, yes, that is the same time.

MS. SOYSTER: Look for the letter he is asking about, though.

(Pause)?

A. I don't know if I then sent a letter, but I was told that he would be there

MS. SOYSTER: You are not sure you sent a second letter?

THE WITNESS: No, but I know that generally I would not go based on -- if it was my responsibility, I wouldn't go do a fund raiser telling somebody that Jesse was going to be somewhere without having some assurance that he was going to be there. But I might not have sent a letter at all because when I got back involved, I was told that he was going to be there. So

8904070482

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

the only two letters I really remember was to Arnold Pinkney and to Cooper, and to maybe a lady. But I don't know if it was about that.

Q. Who was Arnold Pinkney?

A. Somebody in the Jackson campaign. National campaign director.

Q. Do you have that letter to Mr. Pinkney now?

A. Yes. It's the same letter as to Cooper

MR. SNYDER: Can we put that on the record?

MS. SOYSTER: Yes, but I don't know, I think this may be the only copy would have. I just don't want to lose it. I don't have any problem with showing it to you.

(Pause)

MR. SNYDER: If you can make a copy and send this to us, that would be all right.

MS. SOYSTER: Sure.

THE WITNESS: I'm surprised that you don't have it.

Q. You have referred to the WestSide Committee to elect Rev. Jesse Jackson and it's also mentioned in this letter that is Exhibit 1. Are you familiar with the WestSide Committee for Jackson?

A. Well, yes.

8904070483

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

20

Q. What was that organization?

A. The WestSide Committee for Jesse Jackson was a committee that was set up by my ex-husband, who lived in 80th Street and there was a group of people who were people, his friends and all, that they wanted to do something for Jackson, so they just called themselves the WestSide Committee for Jackson.

Q. Apart from Mr. Pitman, who else was involved in the WestSide Committee?

A. I don't know the people's names because they were mostly his friends, or people that he got. So I really don't know. They probably can tell you.

Q. You were no longer married to Mr. Pitman at this time, is that correct?

A. No. But we are good friends.

Q. He is still living?

A. Yes.

Q. You were not then, as I understand it, you were not yourself a member of the WestSide Committee, is that correct?

A. No.

Q. Do you know how many members WestSide had?

MS. SOYSTER: At what time?

Q. At the time.

8904070484

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MS. SOYSTER: 1984?

Q. Does the WestSide Committee for Jackson still exist?

A. I don't think so. That was all around that election.

Q. That was extant for the 1984 election. Apart from the WestSide Committee for Jackson and the Women's Network for Political and Economic Parity were any other groups or individuals active in putting together the fund raiser that we discussed earlier?

A. Yes.

Q. Who?

A. That was a group called VAC-PAC

Q. Do you know what the VAC stood for, if anything?

A. No.

Q. Do you know why they had that name?

A. No. But it's like -- it's VAC-PAC. I really don't know know. I probably should, but I don't know what it means. Never thought of it.

Q. That was headed by Flo Kennedy?

A. Flo Kennedy Kennedy. And the stars for Jackson, which was like, I think Susan Taylor, Roberta

8904070485

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

22

Flack, Lou Gossett.

I don't know, some other coalitions or something. There was a lawyers group, a professional business group. The lawyers group and the person who like chaired the meetings and in whose office we met all the time, was like Joe Barnes. He was an attorney.

Q. Do you know what his address was?

A. 110 Columbus Circle, or 10 Columbus Circle. It's 10 Columbus Circle.

Q. What organization was Mr. Barnes affiliated with?

A. I don't know which organizations he was affiliated with, but he was one of the people who were somewhere, I don't know whether he was the WestSide group, the stars group, the VAC-PAC or whatever.

Q. Do you remember the name of the lawyers organization you referred to earlier?

A. When I say there was a lawyers organization I don't know it was a lawyers organization. I know there was 4 lawyers there as part of the group.

Q. Was Mr. Barnes one of these lawyers?

A. Yes.

Q. At his office you attended meetings with other people involved in organizing the fund raiser?

8904070486

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

23

A. That's where the Stars for Jackson Committee met.

Q. Who, to your knowledge, solicited contributions for the Jackson campaign in connection with this fund raiser?

A. To my knowledge, all the people on that list; on the Stars for Jackson list were to get people to buy tickets.

Q. Did you solicit any funds on behalf of the Jackson campaign?

A. I don't think I sold a ticket.

Q. How much money did the Women's Network for Political and Economic Parity receive on behalf of this fund raiser for Jackson?

A. I would have to look at the paper that I sent to you, because that would be the only time that-- whatever we reported to the FEC was what went into the account.

Q. We'll be discussing that later. I will get back to that.

Did you have a contact at the Jackson campaign concerning the money that was raised by the Women's Network in connection with the fund raiser?

A. Yes.

8904070487

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

24

Q. Who was that?

A. Whoever the person -- I can't think of one lady's name, but there was a lady who was the treasurer who was out of Philadelphia.

Q. Are you familiar with someone named Emma Chappell?

A. That is who it was.

Q. What contacts did you have with her concerning the fund raiser?

A. She was the person I called to make sure that somebody was going to be there from the Jackson campaign --

Q. Excuse me. When you say there--

A. Be at the Tavern on the Green. To make sure that there was going to be whatever I needed to do to get people to sign papers and stuff; to get the money --

Q. When you say to sign papers, you mean--

A. Well, the papers that I sent to you that said individual contributions and stuff, that's what she said to do, is have people write down the name of the person and the company that they work for and the amount the ticket was, and whatever.

Q. You kept these fund raising records in accordance with the advice Mrs. Chappell gave you, is

8904070488

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

that correct?

A. I kept them on the basis of what I understood her to be saying that I needed to do, which was to make sure that I wrote down the name of the person and what their occupation was. And also I was in touch with her to make sure that somebody was going to be there to take over the party.

Q. By the way, did WNPEP solicit any contributions for Jackson other than what was involved in this Tavern on the Green fund raiser?

A. At any other party?

Q. At any other time?

A. I don't know. Solicit, meaning what?

Q. Ask for money for the Jackson candidacy?

A. I don't know. Probably. If there were any other fund raisers, then we were somewhere.

MS. SOYSTER: Don't speculate. Just tell him what you remember and what you know.

A. Well, I have been to a lot of fund raising parties for Jesse.

Q. The Women's Network as an organization there were involved in raising funds let's say after the fund raiser at Tavern on the Green was held?

A. I don't think so. Because we reported to

8904070489

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

26

you and you told us we did something wrong, so we killed it. I mean, the organization was dissolved after, so we never raised any money.

MR. SNYDER: You already have mentioned about a list. Would you mark this please

(Copy of list marked Commission's Exhibit 2 for identification)

Q. I will now show you what has been marked as Commission's exhibit number 2 through your attorney, and ask you if you can identify it.

(Pause)

A. Yes.

Q. What is it?

A. This is the list on the scroll for the Stars for Jackson Committee for President, for the Tavern on the Green party Monday, April second, 1984.

Q. The people who are listed on this exhibit are all members of the Stars for Jesse Jackson for President Committee, is that correct?

A. This is what this list was to be: People who were listed as members of that committee.

Q. What was the purpose of the Stars for Jesse Jackson Committee?

A. As I understood it, it was to raise funds

8904070490

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

27

and to bring about an entertaining, star studied evening before the election in New York.

Q. What connection did you have with the Stars Committee?

A. My connection was as a member of the committee. That was it. Just a member of the committee to help with the party at Tavern on the Green.

Q. Did all the people listed here contribute to the Jackson campaign at the fund raiser?

A. I do not know

MS. SOYSTER: You mean by my or--.

Q. Contribute by money?

A. I don't know.

Q. One would be listed her as a member and not contribute to the campaign?

A. I don't know. I didn't follow that part of the committee.

Q. You are listed here as a member?

A. I am listed here.

Q. After the fund raiser was held on April second, what did the Stars Committee do subsequently?

A. I don't know.

Q. Did it continue to exist?

A. No. Not that I know of. I have not attended

8904070491

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

28

any meetings of the Stars Committee, and I don't know that there is any address or any phone number or anything.

Q. Who was the head of the Stars Committee, if there was someone who was in charge?

A. I don't know that either. I know that I attended the Stars Committee meetings, and the person who chaired the meeting, the couple of times that I was there, was Joe Barnes.

Q. Did he have a title in the committee?

A. No. I have heard no one referred to buy title on the committee.

Q. Was the Stars Committee set up purely for the purpose of holding, sponsoring and holding a fund raiser at Tavern on the Green?

A. I don't know.

Q. Do you know when it was first set up?

A. I don't.

Q. When did you become a member?

A. I don't know when. I became a member at the first meeting that I went to go, to help with the party.

Q. Do you recall when that was?

A. Again, it was like the week after the National Women's Day. I don't know when that was.

8904070492

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

29

MS. SOYSTER: Do you know what month?

THE WITNESS: It was in March. I mean -- no --

Q. March?

A. Yes, it was in March.

Q. March, 1984?

A. Okay. March, 1984.

MR. SNYDER: Would you mark this please

(Copy of booklet marked Commission's Exhibit

3 for identification)

Q. I am going to show you what has been marked as economist exhibit number three for identification and hand it to you through your attorney. It's a document of 4 pages. Can you tell me what it is?

A. It's a copy of the invitation that was done for the Tavern on the Green party for Rev. Jesse Jackson. It says it's a Stars for Jackson Committee invitation.

Q. Who prepared it?

MS. SOYSTER: If you know?

A. I don't know.

Q. Do you know who paid for it?

A. I don't -- unless the money came out of the whole thing.

MS. SOYSTER: Only what you know.

8904070493

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

30

A. I don't remember who paid for it.

Q. Do you know who printed it?

A. I don't.

Q. To whom was this invitation sent?

A. I don't know. To the general public, I guess.

Q. Do you know if there was a list of invitees that was prepared from some other list?

A. No. I don't know -- if you want to know what I know --

Q. Yes.

A. I will tell you. I just know each of the people who were to make up the list of the committee was supposed to get invitations and send them out to their own people or whatever.

Q. People they knew?

A. Yes.

Q. Do you know when that was distributed to the members for their distribution?

A. No.

Q. Did you receive one to send out?

A. I'm sure I did.

Q. Do you recall when that was?

A. No.

8904070494

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Did you in fact send it out to other people that you knew?

A. I'm sure I didn't because I didn't have time to. I mean, I really don't have a great list. All the people that I knew was probably --

Q. Were probably what?

A. Welfare mothers. I work with day care.

Q. I just wanted you to hold on to 2 for a moment, just to compare the two.

It appears that the list of the stars on Exhibit 2 is considerably longer than the list on Exhibit 3. Can you explain why that is?

MS. SOYSTER: If you know. He is saying this list looks bigger than this list, do you know why?

THE WITNESS: I don't know, because I didn't do either one of these.

Q. To your knowledge was this solicitation approved by the Jesse Jackson for President Committee, Exhibit 3?

A. I don't know.

Q. On the second page of this exhibit, could you read the line below where it says, it says a telephone number, that next line below. Beginning with "sponsor."

89040760495

1
2 A. Sponsors, \$1,000; patrons, \$200. supporters,
3 \$1."

4 Q. Is it \$1 or--

5 A. I mean \$100.

6 Q. Do you know who received the money that
7 would have been sent in in response to this invitation
8 over these categories?

9 A. I don't know who received it.

10 Q. On the third page of this exhibit it gives
11 an address. Would you read that address for the record?

12 A. This address says Stars for Jesse Jackson
13 Committee, 394 Broadway, 6th floor, New York, New York
14 10013.

15 Q. Whose address is that, do you know?

16 A. I don't know 394 Broadway --

17 Q. Would it possibly be Mr. Barnes's address?

18 A. Mr. Barnes's address that I went to was 10
19 Columbus Circle. But -- wait a minute. 394 Broadway
20 is another law firm, right?

21 Q. I am asking you.

22 A. I think it is.

23 Q. Do you know whose law firm it is?

24 A. This looks like one of the other lawyer that
25 was part of that group, Regina Darby. And the reason I

1
2 feel that is when I received your letter the other day,
3 I got an address to send Barnes and Darby, and all the
4 folks on this committee a copy of it. And that is is
5 address that I used, to send it to Regina.

6 Q. Turn to the last page. There is a form
7 there for the recipient to fill out his name and
8 address. Would you read the line below that?

9 A. "Please make checks payable to the Jesse
10 Jackson president for committee " --

11 Q. That is enough. To your knowledge, were
12 checks received in response to these invitations or
13 solicitations made out to the Jesse Jackson for
14 President Committee?

15 A. The checks, there were checks made out to
16 the Jesse Jackson Committee, yes. To my knowledge of
17 their going to that address, I don't know.

18 MR. SNYDER: Mark this for identification,
19 please.

20 (Copy of group of checks marked
21 Commission's Exhibit 4 for identification)

22 Q. I am going to hand you a document which I
23 believe is 15 pages long which has been marked
24 Commission Exhibit 4, and I will hand it to you through
25 your attorney, and ask if you can identify it.

89040760497

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(Pause)

A. Yes, this looks like the list -- this is a list of copies of checks made out to the Women's Network that I sent to the FEC. It's part of a report.

Q. We have copies of checks and also on the sixth page and the seventh page there is a list. Can you tell us what that is?

A. This is a list of people, and I'm not sure if this is a list of the people whose checks there are, but probably was the intent of this. So I can check it and see.

MS. SOYSTER: He can do that.

Q. In other words, the names that are written on this pages 6 and 7 are, in your recollection, the names of people who contributed checks to the Women's Network, is that correct?

A. Whose checks were -- I am just going to answer something because I don't know what you mean. If we are being sort of technical, I want to be straight for me --

Q. That's fine.

A. These are people whose checks were made out to the Women's Network for the purpose of paying for the party.

8904070498

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Is that correct?

A. Yes.

Q. Let me just mention, if you could just take one, we are not going to do all of these. Could you take the fourth one from the top on page 6. Could you just read across, for the record?

A. Denise Lamaute of 41 Hamilton Terrace, New York, 10031. Amount of check, \$100. Committee sponsor, Joe Barnes.

Q. What does the committee sponsor mean here, as used here?

A. It means that it was to identify each person that got somebody else to come in to make a contribution or whatever, where the person -- that's whose contact it was. They got the person to come on the committee; it was just a way of knowing who you got to help.

Q. What committee is referred to when it says committee sponsor? What committee are we talking about?

A. The Stars for Jackson Committee.

Q. What address is printed near the middle of the page at the top?

MS. SOYSTER: What does it says, or whose address is it.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. First, what is the address?

A. 609 west 138 street, New York, 10031. And phone number 862-6047.

Q. Whose address and telephone number is that?

A. That one is ^{my} night address.

Q. Why would your address be on here?

A. Because I was the one that was given these checks for -- I think they were women network collection made out to Women's Network. And everything that I took, I took the responsibility for, Tavern on the Green with these. That was ^{Why} what they were given to me. That is the only reason I know that it would be there.

Q. You recall earlier we discussed exhibit 3, which is a solicitation or invitation to the fund raiser, and it asked people to make their checks payable to the Jesse Jackson for President Committee, so I will ask you, why did people make out their checks to the Women's Network for Political and Economic Parity in connection with the fund raiser?

MS. SOYSTER: She can't tell you why other people did things.

MR. SNYDER: If she knows.

A. ^{The} For why these people made these checks out

89040760500

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

to the Women's Network ~~was~~ because ~~the committee~~ at the committee meeting, it was decided that in order to pay for the Tavern on the Green, that they would make the checks out because the Women's Network had an account and --

Q. A bank account?

A. A bank account. And Tavern on the Green had to be paid immediately, ~~and~~ Tavern wasn't waiting, and they were -- the committee, I guess it was decided that the process of getting it through the Jackson campaign might have been too long or something. But anyway Joe Barnes and ~~them~~ all said since the Women's Network has an account, we'll all make a certain amount of checks out to the Women's Network and Dorothy can pay Tavern on the Green from that. And after that was done, the other checks ~~were~~ would be made out to Jesse, to the Jackson campaign.

Q. When you say this occurred at the meeting of the committee, what committee are you referring to?

A. To the Stars for Jackson Committee.

Q. That meeting was held in Mr. Barnes's office, is that correct?

A. Mr. Barnes's office. That is why I am startled as to what's wrong. There were four lawyers

8904070501

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

there. That is what they said to do.

Q. And the checks that are in this exhibit are checks that were made out to the Women's Network as a result, is that correct?

A. Yes. These are the checks that was made out, so that it would be toward making a payment on Tavern on the Green, to answer that required amount that they were requiring.

Q. Were the people who made these checks to Women's Network, were they asked or solicited to make contributions to the Jackson campaign or to the Women's Network?

A. Well, actually, however everybody told them, whatever each committee might be who got them to do it, seems they must have told them that it was directly towards helping the Jackson campaign, because they had it on here. They have it on their checks. Says Jesse Jackson contribution, Jesse Jackson campaign, 1984.

If you look at the bottom of the check where you have note or purpose or something, they also directly targeted it for the Jackson thing. *Party*

Q. Let me refer you to the first page of this, to the third check from the top, which appears to be a check from a group called the Famous Organization,

8904070502

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

39

Limited. For the record could you just state what the amount of the check is and too to whom it's made?

A. \$100 to the Women's Political Network.

Q. Is there any indication that this check was intended for the Jackson campaign?

A. Not on this check it doesn't indicate it. But then whoever did it, all the rest of them was. I don't know who brought this in this way. Specifically, whoever this is, the Famous Organization, whatever, if asked, I'm sure that they would know or have on record that's what they were doing with it.

Q. Did anyone tell you orally, either in person or on the telephone that they intended a check that they made out to the Women's Network to be a contribution in fact to the Jesse Jackson campaign?

A. No, I never talked with anybody about it. Did anyone ever tell me?

Q. Yes?

A. Not that I know of.

Q. Were you told that other people with soliciting money for the Jackson campaign and that the solicitors were telling the people they were soliciting, to make the checks out to the Women's Network? In other words, were you told that money was being raised

8904070503

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

40

for Jackson by checks made out to the Women's Network?

A. I was told in the meeting that that's what they were going to do.

Q. You were told that, then?

A. I mean, that's what they decided to do, in order to pay for the party, they said, everybody will pay, those people that they will get to pay for their ticket up front -- these were for tickets. It wasn't like a contribution other than for the ticket. They were paying for their ticket to the Jackson affair at Tavern on the Green to the Women's Network but for that purpose. I mean, I don't know how crazy that sounds.

Q. I understand.

You mentioned Mr. Barnes was present and you mentioned he is an attorney?

A. Yes.

Q. You said there were four attorneys present. Who were the other 3?

A. Regina Darby is an attorney; Paul Williams is an attorney; I think he and Mr. Barnes were partners, or they both were in the same office. And there was another attorney whose office they were in. I don't know his name.

Q. Just to be absolutely certain, you did not

8904070504

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

actually solicit any funds yourself for the Women's Network in connection with this fund raiser?

A. No. I mean, I don't know of anybody that I asked to buy a ticket.

Q. Where were these checks deposited?

MS. SOYSTER: These checks, these copies?

Q. Yes?

A. They were deposited in Freedom National Bank on 125th Street.

Q. In whose account?

A. In the Women's Network PAC.

Q. What did Women's Network PAC do with those funds?

A. We paid Tavern on the Green and whatever went to that party, which was whatever we reported out, and I don't know, I'm not looking at it.

Q. A check was drawn on that amount to Tavern on the Green?

A. Several. It was in pieces because whenever the check cleared, we put the check in and it had to clear first, and then we'd pay Tavern on the Green.

Q. Who signed the checks to Tavern on the Green?

A. Myself and -- I don't know, did you have a copy of the check I sent?

8904070505

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

42

Q. I don't have a copy.

MS. SOYSTER: Were they checks on your account or were they cashier's checks?

THE WITNESS: They were cashier's checks. They ~~w~~e would not accept a committee check.

Q. Tavern on the Green would not.

To your knowledge was the Jesse Jackson for President Committee given a list of the people who made these contributions to the Women's Network?

MS. SOYSTER: These that are here.

Q. This exhibit is a sample, would you agree, of checks that were paid, this is not all the checks, is that right?

A. That's right.

Q. I'm here referring to checks that were made out to the Women's Network that were made out to Women's Network consequent to the meeting that you described earlier with Mr. Barnes where you described to make the checks out to the Women's Network.

In that respect, did the Women's Network or anyone else, to your knowledge, give a list of their names to the Jesse Jackson for President Committee?

MS. SOYSTER: At any time.

Q. At any time?

89040760506

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. Anything that had to do with this party, a list was given to the Jackson campaign and a list was given to the FEC.

Q. Specifically, if you could answer the question a little more specifically: The names of people who made out these checks, let's say as we have it on this exhibit that we are talking about, was a list of their names given to the Jesse Jackson for President Committee?

A. Not as a list, because I didn't make -- you mean like this?

Q. In any form.

MS. SOYSTER: Would you count a copy of a check as a list?

A. A copy of a check is a list?

Q. In any form. I'm not asking about the formats. Were the names provided to the Jesse Jackson committee?

A. A copy of these names on these checks were provided to the committee.

Q. To the committee, meaning which committee?

A. To the Jackson Campaign Committee.

Q. The National Campaign Committee in

Philadelphia, is that correct? *? I think this should be in Washington, D.C. Hughes.*

8904070507

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

44

A. Yes.

Q. In what form was that information provided?
was it in the form of copies of checks --

MS. SOYSTER: I think she said copies of
checks and names. So it would be like this.

A. Just like this.

Q. Did you provide any supplemental information
about the people who made out the checks?

A. I didn't have any information.

Q. Apart from the notations which occur in many
of these checks, such as: memo: Jackson fund raiser,
memo: Jackson campaign, did you receive any written
instructions that the checks were intended for the
Jackson campaign?

A. No.

Q. Did you report to any government body for
official the identity of these contributors and the
candidates for which the contribution was intended?

A. Would you consider that list with the
identification, a report? That I reported to the FEC?

Q. Your report to the Federal Election
Commission?

A. Federal Election Commission.

Q. We'll discuss that in a moment.

89040760508

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

45

Did you, apart from the FEC, did you report these contributions, and again I am speaking of those who made checks to the Women's Network on behalf of the Jackson committee, did you report these contributions to anybody else besides the FEC and the government?

MS. SOYSTER: And the Jackson campaign.

Q. Anyone else in the government besides the SEC?

A. No.

Q. Specifically, did you report it to the Clerk of the House of Representatives?

A. No.

Q. Did you report it to the Secretary of the Senate?

A. No.

Q. You spoke earlier about the fact that the Women's Network registered as a political committee with the FEC. Why did you decide to register as a political committee?

A. Because we heard that there was not a PAC in New York, one that was a women's one or a black women's one. And also because everybody was talking about PACs being able to raise money. And I also heard that the PAC that was for the other presidential candidates had

8904070509

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

46

raised millions of dollars. And I thought there was something magical about the PAC, so we decided to make it a PAC. So we decided to see if we could do it. And we wrote to the FEC and said we wanted to be a PAC, whatever. And that's why we did it, because we thought it was going to help.

MR. SNYDER: Let's go to the next exhibit.

(Copy of list marked Commission's Exhibit 5 for identification)

Q. Let me show you what's been marked as Commission's Exhibit number 5. I will hand it to you through your attorney and ask you if you can identify it.

(Pause)

A. This is another list of people that was given to me, that were people involved in the collection of people's monies for tickets. This is a ticket sheet. This is what they were using, a sheet to know who was paying for tickets and it was a checklist sheet.

Q. When you say they were using, to whom are you referring?

A. I mean, who was was collecting. Each committee person would be after their own and they

8904070510

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

47

were using ~~to~~ this to make sure they had a record of who ~~we~~ were getting money from and who was getting a ticket. I also think it was used at the door to show they would know that the person who came to the door had paid to get into the party.

Q. Let me clarify. These names are people who paid in advance to go to the fund raiser and then when they wished to gain admission, they could say, my name is on this list and they checked, and if so, they could go in, is that correct?

A. Yes, it could be. This was a process of making sure that we knew what people had paid.

Q. Would you read the name of the organizations in the upper left hand corner?

A. Stars for Jesse Jackson Committee.

Q. Is there any difference between this list of names and amounts paid and addresses which has the name Stars for Jesse Jackson Committee at the top, and the similar list we had looked at earlier which had your address printed at the top, was there any difference between -- that would account for why different organizations would issue these different lists?

MS. SOYSTER: Other than the different names?

Q. Obviously there are different individuals,

8904070511

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

48

but what I am asking is, did these people contribute to a different organization than the people on the other list?

MS. SOYSTER: Why was this form used instead of the other form?

Q. Right.

A. If I had knew about the period of time --

MS. SOYSTER: Don't speculate. Just tell him what you know.

A. I don't know, I think this had to do with the individual who was collecting it. Again, remember the committee was buying their tickets up front, they were paying to the Women's Network. The other checks which might -- don't speculate -- the other checks probably are -- I know, don't speculate -- these checks were probably made out to the Jackson campaign. I don't know if it was or not. I don't know.

Q. Do you know by whom these contributions, the ones that are on here, do you know by whom they were solicited?

A. No, because it doesn't have the committee.

Q. Do you know by whom they were received? In other words, were these sent to the Women's Network, do you know, or--

8904070512

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. I don't know because I haven't looked at the check and the name.

MR. SNYDER: Would you mark this as another exhibit, please.

(Copy of group of documents marked Commission's Exhibit 6 for identification)

Q. I am going to show you what has been marked Commission's Exhibit 6 for identification and I am going to hand it to you through your attorney and ask you if you can identify it.

A. I can identify it.

Q. What is it, please?

A. It's another one of the documents that was to say who the contributor was. The first thing is, this was Alice --

Q. Who?

A. Alice Nelson, Elyse Nelson. I mean, it looks as if, because they put their name on it if there was their group, whoever.

And it looks as if it's just whoever bought tickets and how many tickets they bought.

MS. SOYSTER: What about this list?

Q. The last two pages are in a different format?

A. These are people that she -- I see something

8904070513

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

50

here that says these people are paid, these people at door. They probably paid at the door. I mean --

MS. SOYSTER: These are still more payments, though?

THE WITNESS: These are still tickets.

Q. And the others were presumably paid in advance, is that correct, the ones in the front?

A. They might have picked up their ticket at the door. The they might have called in and say that they would buy it at the door, but reserve it, because there was a lot of people.

Q. You said that was Alice Nelson's group. Who is Alice Nelson?

A. Alice Nelson, her name is at the top. She is one of the people on the committee from the WestSide group.

Q. She was a member of the WestSide Committee?

A. Yes.

Q. Is it your understanding, then, that the people who are listed on this exhibit were people who had been solicited by Ms. Nelson to contribute to the fund raiser?

A. These are people that she might have gone to pick up he ticket. The committee did everything. They

8904070514

8904070515

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

went out and picked up the checks, trying to get it all in by the afternoon. So I don't know whether she solicited them or somebody else had solicited them and she went to pick up, deliver the check, the ticket or whatever.

Q. The people who said let's pay at the door, to whom, if you know, did they make out their check?

A. Only at that time they would be making them out to the Jackson campaign.

Q. Do you know what was done with those checks?

A. They were given to the Jackson treasurer. .

Q. Specifically, do you know to what individual they were given, these checks that were collected?

A. I do. To the -- specifically, to the national treasurer.

Q. Mr. Chappell?

A. ^{Emmett} Emmett Chappell.

Q. Were any checks of the fund raiser at any time, either at the door or earlier, were any checks made out to the Stars for Jesse Jackson?

A. No. That I know about, I don't know.

Q. To your knowledge, were any made out to the WestSide Committee?

A. Not that I know of.

89040760516

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. The New Yorkers for Jesse Jackson, were any made at the outset to them?

A. I don't know.

Q. Were any made out to the Jesse Jackson for President Committee?

A. Yes.

Q. Including some that were paid in advance?

A. Yes.

Q. Do you know of any checks that were ^{paid} played out to anyone other than the Women's Network or the Jesse Jackson's for president committee?

A. I don't know of any other. Just those two. I don't know of any other.

MR. SNYDER: Mark this as an exhibit, please.

(Copy of report of receipts and disbursements marked Commission's Exhibit 7 marked for identification.

Q. I am now going to show you what's been marked for identification as Commission's Exhibit 7 and hand it to you through your attorney and ask you if you can identify it.

(Pause)

A. I can.

Q. What is it?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

53

A. It is the report that I made out and sent to the FEC. I obviously made it out wrong. This is it.

Q. This is an accurate copy of what you filed?

A. Yes.

MS. SOYSTER: Is that everything?

THE WITNESS: I don't know. It's been so long.

Q. According to this report, how much did the Women's Network pay to Tavern on the Green on behalf of the Jesse Jackson for President campaign

MS. SOYSTER: Presumably the report shows that.

MR. SNYDER: Yes. I'd like to verify it for the record.

MS. SOYSTER: You want her to read something for you?

Q. Yes. Refer to the third page of this exhibit, please.

MS. SOYSTER: He wants you to read, I think, the column that says amount of disbursement.

Q. Yes.

A. Excuse me. The amount of disbursement was \$25,360.

Q. That amount was disbursed to whom?

8904070517

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

54

A. Tavern on the Green.

Q. For that purpose?

A. For the food and -- the party. Whatever it cost.

Q. The fund raising party for Jesse Jackson?

A. Right.

Q. Is that report accurate in terms of what actually happened, to your knowledge?

MS. SOYSTER: Were these funds actually disbursed, is that what you are asking, to Tavern on the Green?

Q. Is that substantially correct, in your recollection?

A. Yes, except \$100 or something. This is it.

MS. SOYSTER: This is correct?

THE WITNESS: Yes.

Q. Could you refer to the last page of the exhibit, please.

A. Yes.

Q. Let me something ask you something else, first. Going back to the front page, the amount received by the Women's Network for Political and Economic Parity was the total receipts, would you read that amount for the year to the date that this was

8904070518

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

55

filed.

MS. SOYSTER: This is not a very good copy.
We are having trouble. Is that line C, total receipts?

MR. SNYDER: Yes.

MS. SOYSTER: You can tell him what it says
there.

THE WITNESS: Total receipts is \$25,360.

Q. What was the amount disbursed?

A. That is \$25,360.

Q. And cash on hand at the end of the reporting
period was how much?

A. Was nothing.

Q. If you would refer back to the last page, could you
tell me specifically what that document is?

A. This is a bill from Tavern on the Green.

Q. It's a bill for how much, in what amount?

A. The bill was for \$25,000.

Q. What is the date of this bill?

A. April third, 1984.

Q. How much had been paid on deposit towards
that bill as of the date of this document?

MS. SOYSTER: As of April third?

Q. Correct?

A. I don't really know.

8904070519

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

56

Q. It's stated on here?

A. Where?

Q. If that is correct.

MS. SOYSTER: This was the day after the party.

A. Okay. Then --

MS. SOYSTER: The party was April second, is that right?

A. The outstanding \$100 balance was paid -- we paid \$24,900.

Q. Do you recall when that was paid, since it had been paid prior to this date?

A. Yes. It had been paid, all of it, that amount was paid the night of the party, the total -- I mean, considering what we had paid before, to reach that amount, was paid.

Q. In other words, the \$24,900 had been paid over a period of time?

A. Culminating that night.

Q. The bill you were presented with on April third was for how much?

A. Well, the \$100, we knew that that had to be paid that night.

Q. When was the hundred dollars paid, do you

8904070520

8904070521

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

57

recall?

A. I think I paid it the next day or something.

MS. SOYSTER: It says here was paid during the week of April second. Is that correct, as far as you recall?

THE WITNESS: Whenever it was. Walter would know that. I paid it. I ^{Sent} went in affidavit and I paid it.

Q. Who would know?

A. The banquet person at Tavern on the Green.

Q. His name was what?

A. Walter Rauscher.

Q. Could you spell that for the record?

A. I don't know.

MS. SOYSTER: I can spell Walter.

A. Walter Rauscher, R A S H-- something.

Q. It refers here to a \$360 payment. Could you tell us what that was?

A. That was in gratuities or whatever you give to the people who were helping out at the party from Tavern on the Green. The waiters and all that stuff.

Q. So the \$25,000 Bill, the \$360 gratuity accounts for the entire budget of Women's Network, is that correct?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

58

A. Yes, that is correct.

Q. Did Women's Network raise any funds other than the \$25,360 referred to?

A. Well, the Women's Network didn't raise all of that money either, I don't think. We didn't have any money. We were over drawn. That is why we had to take the hundred dollar later. We didn't have any money.

Q. Was all the -- was the entire cost of the Tavern on the Green fund raiser, that is the bill of Tavern on the Green restaurant, was that paid from the account, the bank account you referred to earlier, of Women's Network?

A. It was paid from the bank account and whatever in checks that I gave out was paid from the bank account. The other -- the national treasurer for the Jackson campaign and Joe Barnes and Regina Darby, and I don't know who else from any other committee, handled paying Tavern on the Green the remaining amount of the \$24,900 that night from the door, from the money that came on the door.

Q. How much?

A. I'm not sure how much it was in cash they paid them that night, but this was the balance of it.

8904070522

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Because my responsibility was only to make sure that they were paid. So the national treasurer, when they took the money from the door, that's where it went into, Walter Rauscher's office, to make sure that they got ^{paid} fade.

Q. How much did Tavern on the Green want to have to permit the fund raiser to go ahead? How much did they require to be put down before they actually permitted the funder to be held?

MS. SOYSTER: At what point because it changed from time to time?

A. From me they had said just go ahead and do it. I think that the first amount was ~~like~~ \$1,200 or something that I gave them. Another one was \$25,000 or so.

Q. Do you recall, let's take the day before the fund raiser, which would have been April first; do you recall how much through April first, had been paid to Tavern on the Green?

A. I don't.

Q. But of the \$25,360 that Women's Network reported paying to Tavern on the Green, some of that was paid by other people, is that correct?

A. That was paid to Tavern on the Green. The

8904070523

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

60

Women's Network was responsible for that in the sense that in that personally I worked for Warner LeRoy before --

Q. For who?

A. For the owner of Tavern on the Green and that is why I was involved, to get the place. I don't know how, I have really no idea exactly how much was paid at what time. I would have to look at something, whatever.

Q. You mean Mr. Pitman asked you to participate in the funds raiser in terms of dealing with Tavern on the Green because you had worked for Tavern to the Green before?

A. Well, Mr. Pitman didn't ask me in that behalf. Mr. Pitman had lost the money that their committee had put together.

Q. I'm sorry?

A. They were trying to have it at Tavern to the Green and were not going to be able to do it, ^{full} full it off in time. So Mr. Pitman and the other committee members said they wanted to do it and because I had worked for -- not for Tavern on the Green but for Warner LeRoy, who was the owner, I consented to go there and ask them if we could have it, and that, you

8904070524

R 9 0 4 0 7 0 5 2 5

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

61

know, we would make sure that they were paid.

Q. When did you work for him?

A. Years and years ago. Before it was the Tavern on the Green.

Q. In what capacity did you work for him?

A. I worked, I kept their house and took care of his wife, who was sick.

Q. Do you have an approximate year or time period when you worked for him?

A. Gosh, years ago.

Q. Prior to 1960?

A. Prior to -- in 1960 probably. 1960-something.

Q. When Women's Network reported paying \$25,360 to Tavern on the Green, was that figure chosen because that was the total amount that was paid to Tavern on the Green by anyone connected with the fund raiser?

A. That was because that was the money that went to them that I was -- I considered myself seeing to them being paid. So I just reported that that's what they were paid because that's what they were paid.

Q. Some of these payments derived from the checks made out to Women's Network that we took a look at before?

A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. And some came from other sources, some was cash received at the door?

A. Right.

Q. And some came from Mr. Chappell?

A. No.

Q. The Jesse Jackson for President Committee?

A. No, the Jesse Jackson for President Committee from Washington didn't put any money in. ~~Mr.~~MS
Chappell was there and because they came in, when they came in, I figure that everything was to be turned over to them to take care of everything after that. Except that I wanted to make sure that Tavern was paid, not leaving me with the bill, so when the money was taken at the door, Miss Chappell was asked with Joe Barnes and Regina Darby and others who were on the committee to go into the room and make sure that he was paid, Tavern was paid.

Q. The committee you are referring to that they were on, that was the Stars Committee, is that right?

A. Yes.

Q. You don't recall how much was actually paid on the night of the fund raiser to Tavern on the Green?

A. Because once in that room and I knew he was getting paid, I went off to go into the other room. We

8904070526

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

63

were having a problem with too many people were there,
and I went off to try to do something about that.

Q. Too many people for what?

A. At the party. Central Park was full of
people. And like people were getting scared there were
going to be riots or so, so I went off to deal with
that.

Q. Do you know how many people were there at
the party?

A. I don't know.

Q. You mean there were people outside of Tavern
on the Green?

A. The whole park was full of people. Tavern
on the Green is in the park, in Central Park, and it
was really quite scary.

Q. Referring back to the last page of this
exhibit, is it correct to read this to mean that by the
end of the fund raising party itself, that is to say
the next day, April third, the entire bill had been
paid except \$100, is that right?

A. Yes.

Q. And that was paid soon afterwards?

A. That was paid on the third, actually.
Because that's when I got that in my hand. It was

8904070527

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

completed, he circled it.

Q. Was there any other source for money that went to Tavern on the Green besides the checks that we discussed earlier that were made out to the Women's Network and receipts at the gate at Tavern on the Green?

A. Not that I know of.

Q. Apart from the money that actually went to Tavern, which is \$25,360, correct--

A. Yes.

Q. How much money did the Jackson campaign realize from the fund raiser, if you know?

A. I don't know how much they realized.

Q. Do you know how much was hoped for, expected to be raised?

MS. SOYSTER: By whom?

Q. By yourself?

A. No, I didn't have any expectations.

Q. In your opinion, from what you knew at the time, was the event considered a financial success?

MS. SOYSTER: By whom?

Q. By one that that had been involved, that you spoke to?

A. I thought it was pretty good. I thought it was a neat party.

89040760528

1
2 Q. As far as the report that we looked at
3 earlier concerning the \$25,360 that you reported to the
4 Federal Election Commission, was it your understanding
5 that this was a contribution from the Women's Network
6 for Political and Economic Parity or from someone else?

7 A. It was my understanding that it was a
8 collective body of people and that it was -- I never
9 even understood it to be a contribution. I understood
10 it to be the money that the people buying their tickets
11 up front, the whole committee was buying their tickets
12 up front in order to pay Tavern on the Green to have
13 the party.

14 Q. The whole committee being the stars?

15 A. The Stars for Jesse Jackson. Women's
16 Network didn't have any money, so I didn't consider it
17 the Women's Network paying for Tavern on the Green.
18 But I thought since it went into the Women's Network
19 and since I was the one dealing with the thing, that I
20 had to report that.

21 Q. Did the Women's Network receive any
22 contributions from anyone apart from those people who
23 contributed in order to contribute to the Jackson
24 funn- led raiser?

25 A. No.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. SNYDER: One more exhibit.

(Copy of letter on the letterhead of West-Side Committee for Jesse Jackson marked Commission's Exhibit 8 for identification)

Q. Let me show you what's been marked as Commission's Exhibit No. 8 for identification; I hand it to you through your attorney and ask you if you can identify it.

MS. SOYSTER: Have you seen this before?

THE WITNESS: Not really. Not to know it, you know. Did I submit it to you?

Q. Have you ever seen it before?

A. I don't know that I have seen it, but I know everybody here and I know what it says.

Q. Let's me ask you: Did you write this, did you draft this?

A. No.

Q. Do you know who did?

A. No.

Q. Do you know who printed it?

A. No.

Q. Do you know to whom it was sent?

A. No.

Q. Were you sent a copy of this?

8904070530

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

67

A. I might have been. If I sent it to you, I was sent a copy of it. I don't know.

Q. Could you just read for the record the name and address at the top?

A. WestSide Committee for Jesse Jackson, 150 West 80th Street, New York, New York 10024.

Q. Do you know whose address that is?

A. Bill Pitman's.

Q. Do you know what his connection with WestSide Committee for Jackson was?

A. He was the founder.

Q. Did he have a title?

A. No. Founder.

Q. About a quarter of the way down the page it refers to the fund raiser we have been talking about. Would you just read that section which is in bold print, for the record

MS. SOYSTER: What are you looking at?

Q. It begins with "the stars."

MS. SOYSTER: I'm not sure this is the same thing because it's a different date.

MR. SNYDER: That is what I want to find out.

MS. SOYSTER: You said it refers to the one we have been talking about?

8904070531

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

68

Q. I'm sorry, it's reference to the fund raiser?

A. "The stars salute to Jesse Jackson, Tavern on the Green in Central Park, Friday, March 30, 1984, 6 p.m. to midnight."

Q. To your knowledge was a salute to Jesse Jackson held at Tavern on the Green on March 30, 1984?

A. No. I mean, not to my knowledge.

Q. To your knowledge was the fund raiser you were involved with, the one we have been discussing, was it ever scheduled for March 30th, 1984?

A. No. Not the one that -- I don't know if it was scheduled for that or not.

Q. Do you know when it was first scheduled for April second, 1984?

A. When -- I don't know when it was scheduled for that date.

Q. Were you involved, yourself, in the scheduling?

MS. SOYSTER: In selecting the date?

Q. Yes?

A. In selecting the date, I don't know if it was at the meeting, I was in a meeting, I don't know if it was at that time that the date was selected.

Q. You testified that one of your roles was to

8904070532

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

69

talk to the man at the Tavern, Mr. LeRoy--

A. Walter Rauscher and Mr. LeRoy.

Q. Did you discuss scheduling the event, that is to say to decide what date would be held, with them?

A. I discussed the date that I was told that they wanted, which was the second.

Q. Of?

A. Of -- when was it -- April second.

Q. Do you know why, turning to the middle part, could you just read for the record, there is a solicitation at the middle?

A. "Your contribution" --

Q. The next part?

A. "Make your check out today to Women's Network PAC care of the WestSide Committee for Jesse Jackson, 150 west 80th Street, New York, New York, 10024".

Q. Were you told that checks were being solicited for the Women's Network PAC by WestSide Committee?

A. No, I think this is Bill Pitman's suggestion that he was making out what out to be done, what he wanted to be done. I'm not sure that was ever completed in anything but a draft. Because when I know

89040760533

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

70

it, somebody else was even dealing with it. Bill had turned the chairmanship over to the lawyer.

Q. To whom?

A. To Barnes, where we were meeting.

Q. Did Mr. Pitman ever bring you any checks made out to Women's Network?

A. Not unless he is on one of those lists.

Q. Did he personally deliver other people's checks to you?

A. Not --

Q. Made out to Women's Network?

A. No.

Q. Did anyone else?

A. Not unless it was on the list. Everybody who gave me collection were the committee members. He is on the committee.

Q. Who gave you checks made out to Women's Network?

A. I don't know. We we have them listed -- Whoever was part of the stars who solicited and got people to buy tickets up front was the ones who gave it. This \$250 thing is something that I think the first committee was trying to put together. That's what they thought the tickets ought to have been or something. I

8904070534

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

71

don't really think this is --

Q. How much were the tickets in fact?

A. \$200 and \$100, I think.

Q. About two thirds of the way down it lists 3 individuals on here. Would you read them for the record, please?

A. Contact number is --

Q. You don't have to read the phone numbers?

A. Bill Pitman chairman, Flo Kennedy Kennedy chairman, Carole Conover, director of media and entertainment.

Q. Of what organization was Mr. Pitman chairman, if you know?

A. I don't know.

MS. SOYSTER: Don't guess.

A. I don't know.

Q. Do you know what organization Flo Kennedy Kennedy was chairman of?

MS. SOYSTER: Only if you know.

A. Bill is supposed to be chairman of the WestSide group. Flo Kennedy Kennedy is chairperson of the PAC -- VAC-PAC group.

Q. I see?

A. Right. That's how I know them.

8904070535

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. To your knowledge was Flo Kennedy Kennedy a member of the WestSide Committee for Jesse Jackson?

A. I don't know about the WestSide Committe.

Q. You don't know?

A. She was a member of VAC-PAC.

Q. Was she a member of the Stars?

A. She was a member of Stars. Flo Kennedy also was one of the founders of the WestSide group, yes. She was with the first grove that was going to be giving a party.

Q. Which was called what?

A. The WestSide Committe for Jackson.

Q. And it describes Carole Conover as director of media and entertainment. Do you know for whom she was director of media and entertainment?

A. I don't know. I guess --

MS. SOYSTER: Don't guess.

A. I don't know. I don't know Carole Conover that well.

Q. Could you read the notation right at the very bottom, there are two small lines at the bottom of the page, for the record?

A. It says "authorized by the Jesse Jackson for president committee, Samuel Voggie, treasurer.

89040760536

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

73

Q. Are you familiar with, down at a Mr. Voggie?

A. No.

Q. Have you ever seen his named before?

A. I don't remember.

Q. You never had any dealings with him?

A. I just say I don't remember. That --

MS. SOYSTER: Did you ever have any dealings with him?

A. I don't know that name. I might have had dealings with him, if I could identify a person. I don't know who this is.

Q. Is the name misspelled?

A. I don't know.

Q. Do you know a Samuel Foggie, F O G G I E?

A. Where is Samuel Foggie from?

Q. I just asked if you know him?

A. No, I don't know that I know this person at all.

I thought Chappell was the treasurer.

Q. In your familiarity with the Jesse Jackson for President Committee was anybody else besides Emmett Chappell treasurer?

A. Not that I know of.

Q. Do you know who paid for this solicitation?

8904070537

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. No.

Q. Was Flo Kennedy Kennedy a member of the Women's Network for Political and Economic Parity?

A. No.

Q. Do you know would role she played in the fund raiser?

A. For the Stars Committee?

Q. Yes?

A. In this fund raiser?

Q. Yes, in this funder raiser.

A. She was a committee member and she gave direction, helped to plan, whatever that was. She talked; and I'm sure she got some people to come.

Q. Do you know what role Carole Conover played in the fund raiser?

A. She was on the committee. I don't know what each other person's role was. I only saw these people once. The only time I would see them is in the committee meeting; I don't know what they were doing other than that.

Q. I am just confused about the origins of this.

A. The origins of this whole thing, Bill Pitman heard me saying that I would like to do it, and

8904070538

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

75

I couldn't do it, so Bill Pitman decided to do a Tavern on the Green party. And he got his committee together.

Q. Was the idea of holding a fund raiser on the Tavern on the Green originally yours?

A. It was a thing I'd like to do. Bill Pitman was a builder and then I met him at Warner Leroy's house, and afterwards he became my husband. This is my book you are getting to.

MS. SOYSTER: Just the first chapter.

A. And Bill Pitman is the one that did the interior, much of the interior for Tavern on the Green and Maxwell's Plum. So I said it would be great to do a party at Tavern on the Green and I really couldn't get it together. So Bill decided he wants to do it.

Q. When did you tell him that you wished to do this?

A. Probably at the beginning of when everybody understood that Jesse going to run.

Q. Do you recall what month that was?

A. No. I don't even know when Jesse decided to run. It's been so long ago to me.

Q. What initial efforts did you make to put together this fund raiser?

A. None.

8904070539

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. It was just an idea?

A. Just an idea. I didn't have time.

Q. Was the Women's Network for political and Economic Parity in existence at that time?

A. No -- well, yes. That is what I was just just doing is organizing the Women's Network.

Q. Did the Women's Network have a purpose aside from and separate from the fund raiser for Jesse Jackson?

A. The purpose of the Women's Network was going to be to change our community, to have some parity and to deal with in a real sense what went into your cupboards, not buying from people who were discriminating against us, not buying from people who were not giving good education -- you know, all of that kind of stuff. It's more local.

Q. If you have these local concerns, why did the Women's Network cease to exist at the end of the Jackson fund raiser?

A. Because if I did something so wrong that you guys tell me that these big old penalties and all these laws -- I don't know what law I am breaking by being a PAC and I wanted a PAC because it was supposed to help. I think that's what my letter said. If I am going to

8904070540

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

help myself, for all of these years I have been able to help myself without having a PAC, and I didn't get in trouble.

The minute we get something supposed to help us, it looks like I have broken every law in the book, and I have never broken a federal law before or know anything about it. And nobody told me what went with it. How many times I asked you, well, what is going to happen to me? What kind of law did I break? How come -- so I didn't know. And you never told me what could happen to me. So I just said well, oh, no, I don't need that. I can do, I can feed some children without having a PAC.

That is what I am doing all those years, I take kids off the streets and feed them and help old people and carry on the way I have been carrying on. I didn't have no signs of trouble, and I have fed lots of children since then. Nobody has said anything about it.

Q. Let me go back. You mentioned you had an initial conversation with Mr. Pitman in which you said you thought you'd like to have a fund raising for Jesse Jackson at Tavern on the Green. How long after that did you decide you couldn't do it's?

A. I couldn't do it because right after then my

8904070541

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

78

mom got sick, and I had children and things to do in the day care and all that stuff. So I just couldn't do it. It wasn't something that I could pull together.

Q. Was the letter we just he had earlier, the Exhibit 1 to Mario Cooper, we can show it to you again, was that sent to him during this initial phase when you were considering doing this on your own?

A. I don't know. But I'm almost sure if that letter was sent at all -- I doubt if that letter was sent. But I'd like to know who the M G is, is that the O'Connor -- I don't know, somebody probably suggested that you can't do it, but we'll do it in your name, we'll help. It's probably from the WestSide Committee. That's probably how they were involving me to help out, you know.

Q. You don't know who M G or M C was?

A. I don't even know who that is. Usually that is the person who types the letter, right?

Q. Sometimes. Not usually capitalized, though.

A. Like, I'm sure that that is a suggestion that Bill Pitman was making, that the Women's Network, the receiver, just as Joe Barnes made it and that's why we did it, but because I didn't know there was nothing wrong with it.

8904070542

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. After you had this conversation with Mr. Pitman where you suggested having a fund raiser and you later found that for whatever reason you couldn't continue, who next suggested everything a fund raiser, to you, that you were involved with?

A. The fund raising event was, for the WestSide was being planned already. I was at some kind of function where it was announced that the fund raiser was -- by Flo Kennedy -- that the fund raiser was being called off because they couldn't get it off the ground and they were losing the money they had all contributed or was going to pay for their tickets early. That's where that concept I guess came from, of paying for the tickets early.

Q. When was this meeting?

A. I don't know, like sometime in March at a Dag Hammarskjold Plaza rally, where this was said. And when it was said, that is when I know that Susan Taylor from Essence Magazine and myself and Roberta Flack got involved. We got involved from that particular announcement that it was off, and we thought it was a good idea to have it. And then we just decided to go there and help. We said, will you help, yes, I will help; I know Warner LeRoy, I will go to him and see if

8904070543

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

he can save the money, and that's what we did.

Q. The first thing was that you mentioned to Bill Pitman that you thought it would be a good idea to have it. And the second phase was that the WestSide Committee and VAC-PAC were planning to conduct a fund raiser, and they paid money to Tavern on the Green, is that correct?

A. Whoever the committee was. But please don't make it like I told Bill that it was a good idea. I'm sure that in our conversations about things to do, that it was -- we discussed -- I'm not sure whose idea it was. I'm not going to take credit for the idea of having it at Tavern, but it came up that it would be a good thing to do.

Q. You were no longer married to him?

A. I haven't been married to Bill Pitman in a lot of years. A lot of of years. But we are good friends.

Q. There was a period, then, that you know of when VAC-PAC, Flo Kennedy Kennedy, WestSide Committee --

A. And Stars, by that time there was already Stars for Jesse Jackson because when I went to my first meeting, it was after the 8 of March. When I went to the first meeting it was at Joe Barnes's office. So

8904070544

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

there seemed to be a round table and there seemed to be a number of people who were already involved and had plans. So, you know.

Q. Why was it called the Stars for Jackson?

MS. SOYSTER: If you know?

A. I guess because there was going to be a lot of stars.

Q. But the people who were members of the Stars Committee were not all celebrities, were they?

A. No. But a lot of them were. What you do is, you get your best foot out there first because that's what's going to sell.

Q. You were at a meeting on March 8 with Mr. Barnes --

MS. SOYSTER: No, after March first?

A. And March 8, that's when the nationality women's thing was at Hammarskjold Plaza. And that's when I heard that this thing was in trouble.

Q. Was it on March 8 that Flo Kennedy made a statement that the fund raiser was off?

A. Somebody made a statement at that meeting, that the party at Tavern on the Green was not going to be happening, that it was in trouble, you know, they were losing their money.

8904070545

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Had money already been paid to Tavern on the Green, to your knowledge?

A. I think so.

Q. Do you know how much?

A. I think they said \$1,000.

Q. Was that--

A. To hold the place.

Q. Was that a ^{Non-}now refundable deposit?
_{Non-Re}

A. Yes.

Q. To your knowledge was the \$1,000 that was paid up to that time including included in the \$25,360 ever paid to Tavern on the Green?

A. I don't know what happened before. Say that again.

Q. Do you know if the thousand dollar deposit that had been put down was included in the \$25,000 that was eventually paid or was that separate?

A. No, that was separate. I'm sure that from the time -- Tavern on the Green must have given us a lot more than that, because they got everything that we needed. The lighting, wiring, piano and all that stuff. So they probably just let us resolve some of that through just giving us a lesser bill. \$25,000 for 600 and some people.

8904070546

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

83

Q. How much do you think that the fund raiser actually cost Tavern on the Green

MS. SOYSTER: If you know?

A. I don't know. I was surprised when you said to me that \$26,000 was too much to pay.

Q. Do you recall who said that the fund raiser was off?

A. No.

Q. I thought it was at the rally that you heard this.

A. That is where I heard it. I couldn't tell you who said it. It was part of a statement. I don't know if Flo Kennedy said it or not, but she was there. And I know that I discussed it with her.

Q. To your knowledge did the Stars for Jesse Jackson group exist as of March 8, 1984?

A. I don't know.

Q. When was the first time you heard of that organization?

A. When I went to the meeting.

Q. Approximately how much later was that?

A. Maybe a week or 3 days.

Q. So that meeting was held in Mr. Barnes's office?

8904070547

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

84

A. Yes.

Q. That was held approximately March 11 to March 15, 1984, is that correct?

A. Yes.

Q. Who else was at the meeting besides yourself and Mr. Barnes?

A. Susan Taylor, Roberta Flack, Bill Pitman, the other name that I recognize, Alice somebody --

MS. SOYSTER: Nelson.

A. Nelson, and her daughter, and Joe Barnes, Regina Darby, Paul Williams -- I said Susan Taylor -- and I don't know who else. Maybe a few more people that I didn't know, that I wouldn't particularly remember their names.

Q. Was this the meeting at which you were asked to contact the owner of the Tavern on the Green?

A. Yes, This was the meeting where I consented to do that. I volunteered to do it because I knew that I was trying to go and talk with them and they would hopefully trust me to help pull it off.

Q. Was it at this meeting when it was decided that contributions for the fund raiser were to be made out, that is to say, checks were to be made out to the Women's Network for Political and Economic Parity?

8904070548

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. It was at this meeting that it was decided that enough checks to pay Tavern on the Green would be made out to the Women's Network for political and Economic Parity, because I wasn't going to go to them and ask them to do something that I didn't know was going to be covered; you know. Because I have to feed my children.

I couldn't think of paying Tavern on the Green, working for Tavern on the Green to pay them off for a party for Jesse.

Q. Do you know if the Women's Network had formed its political action committee at that time?

A. I thought we had. We had applied and we had -- we had gotten a letter from the FEC saying that we were a PAC.

Q. So you were already a PAC before this completing?

A. That week. About that week. The week that I went to those meetings. And that's why I thought I was so powerful, that I was going to be able to pull this thing together because we were now a PAC.

Q. What I am trying to find out is if you decided to become a PAC as a result of this meeting if you had already decided.

8904070549

8904070550

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EL

Hughes

86

A. No, we had already applied to be a PAC. But we had just gotten our little credentials.

Q. Did you have any other meetings with Mr. Barnes between this meeting and the holding of the fund raiser at Tavern on the Green?

A. I went to all the meetings there.

Q. How many meetings were there?

A. Must have been like every week till we did it, and two or three times.

Q. What was the purpose of those meetings?

A. To organize, to get people down, to see what was done. You know, just to organize this thing, keep it coordinated.

MR. SNYDER: That's all I have. Do you have any questions?

MS. SOYSTER: No.

MF. SNYDER: Thank you very much.

(Time noted: 2:50 p.m.)

Hector Pitman Hughes

Subscribed and sworn to before me this 24th day of November 1987.

AURA M. GARCIA
Notary Public, State of New York
No. 60-4520573
Qualified in Westchester County
Commission Expires Feb. 28, 1989

Aura M Garcia

for identification
PAGE 12 LINE 17

16 (Copy of letter dated 18 November 1983
17 marked Commission's Exhibit 1 for identification)

PAGE 26 LINE 7

6 (Copy of list marked Commission's Exhibit 2
7 for identification)

PAGE 29 LINE 9

8 (Copy of booklet marked Commission's Exhibit
9 3 for identification)

PAGE 33 LINE 20

19 (Copy of group of checks marked
20 Commission's Exhibit 4 for identification)

PAGE 46 LINE 9

8 (Copy of list marked Commission's Exhibit 5
9 for identification)

PAGE 49 LINE 6

5 (Copy of group of documents marked
6 Commission's Exhibit 6 for identification)

PAGE 52 LINE 16

15 (Copy of report of receipts and

8904070552

16 disbursements marked Commission's Exhibit 7 marked for
17 identification.

====>
PAGE 66 LINE 4

2 (Copy of letter on the letterhead of West-
3 Side Committee for Jesse Jackson marked Commission's
4 Exhibit 8 for identification)

8
9
0
4
0
7
0
5
5
3

back

cover

Comm. Et 3- id
10/4/67
EAL

Stars for Jackson Committee

Dr. Theodos Adams
 Roberto Adams
 William Adkins
 Florence Anthony
 Nola Ashford
 John Atkinson
 Travis Bell
 Felicia Bennett
 Pam Bennett
 Deborah Brown
 Maguette Brown
 Dr. Houston Brown
 Tony Casellas
 Kathryn Cheneath
 Bill Cherry
 Michelle Clark
 Michael J. Clark, M.D.
 Kellie I. Clark, M.D., J.D.
 Carol Connor
 Hans Cooley
 Philip C. Cox
 Fancher Cozler
 Dr. Mary Cozler
 Norma Jean Darden
 Andrea Darnell
 Harold Dean
 Bill Deaton
 George Deaton
 Kok Decker
 Jon Deibel
 Johnson Gibson
 Martin Goodman
 Sam Goodman
 James Gossett, Jr.

Kevin C. Greenidge, M.D.
 Candy Hamilton
 Joan Hamilton
 Michael J. Hanch
 Jennifer Harris, M.D.
 Joyce Hartsfield, Esq.
 Jessica Hankins-Greenidge
 Linda Hayes
 Theola Palmer Head
 Eddie Heath
 L. Anna Henry
 Patricia M. Hines
 Sandra Hutchinson
 Patricia L. Hyatt, Esq.
 Donald Johnson
 Dr. Holly E. Jones
 Steven E. Jones
 Jack M. Jordan
 DuKennedy
 Joe Kennedy
 Vincent Kenyon
 Tom King
 Bill Koussouza
 Yoni Koussouza
 Pam LaBelle
 Denise LaMotte
 Kathleen West Lane
 C. Ann Lancaster III, Esq.
 Ruth Sanchez Lavetta
 Bob Lee
 Bl Lewis
 Ed Lloyd
 Ralph Mc Donald
 Dr. Tom Mahon

Dr. Rufus Mahone
 Vernon C. Manley
 Lena Tipton Meyers
 Kendall Minter
 J. R. Mitchell
 Harriet Morgan
 Muma
 Marlene Paige
 Dr. Al Pinkney
 Patricia Poman
 Joseph Plasket
 Lloyd Price
 Jonelle Proulx
 Del Robinson
 Manuel Rodriguez, Esq.
 Dr. Luther Sealbrook
 Michele Shay
 Valerie Simpson
 Donald Smart
 Raymond Sussman, Esq.
 M. A. Terry
 T. C. Thompson
 Valhal Pugh
 Roy Vaughn
 Corinne Waters
 Jim Walker
 Lee Wallace
 Ruby Weston
 Rev. H. J. Whipple, Jr.
 Gladys Williams
 Terrie M. Williams
 Ron Wolfe
 Peter Worr, M.D.
 Peter Zuber, Esq.

★ ★ ★
 The Stars
 Come Out
 For
 Jesse Jackson
 ★ ★ ★

inside:
left and right flap.

EVENING'S FEATURED GUESTS

MASTER OF CEREMONIES

Howard E. Rollins, Jr.

Roberta Flack

IN A SPECIAL PERFORMANCE

"DREAMGIRL"

Sheryl Lee Ralph

"TAP DANCE KING" STARS

Alfonso Ribeiro

Hinton Battle

Marilyn Goodman,

**AUTHOR OF I.T. ROBERT GIBBMAN,
W.H.J. '90 TRIBUTE TO REV. JACKSON**

OPEN BAR AND BUFFET DINNER

**YOU ARE CORDIALLY INVITED TO MEET REV. JESSE JACKSON
AT A FUNDRAISER ON THE EVE OF THE NEW YORK DEMOCRATIC
PRESIDENTIAL PRIMARY**

MONDAY, APRIL 2, 1984

5:30 TO 8:30 P.M.

AT

**TAVERN ON THE GREEN
CENTRAL PARK WEST AT 67TH STREET**

**BILL COSBY
HONORARY CHAIRPERSON**

**ROBERTA FLACK SUSAN L. TAYLOR
CO-CHAIRPERSON CO-CHAIRPERSON**

DRESS: BLACK TIE (OPTIONAL)

**PLEASE RSVP BY MARCH 28:
862-6647**

SPONSOR • \$1,000 PATRON • \$200 SUPPORTER \$100

***INCLUDES PRIVATE PARTY HOSTED BY ROBERTA FLACK, 9 P.M.**

**PLEASE MAKE CHECKS PAYABLE TO
JESSE JACKSON FOR PRESIDENT COMMITTEE**

9 5 5 0 9 2 0 1 9 8 8 TAKE YOUR SEAT AT THE DOOR

envelope for response card

89040760556



"Stars For Jesse Jackson Committee"
394 Broadway-6th Floor
New York, New York 10013



emphasis
added by
me.

response card

**The Stars For Jesse Jackson Committee
Gala Celebration and Fundraiser
Monday, April 2, 1984**

I CANNOT ATTEND BUT ENCLOSE MY CONTRIBUTION OF \$ _____

NAME _____ TELEPHONE _____

ADDRESS _____

PLEASE MAKE CHECKS PAYABLE TO: JESSE JACKSON FOR PRESIDENT COMMITTEE
394 BROADWAY—6TH FLOOR NEW YORK, NEW YORK 10013

PLEASE CONFIRM RESERVATIONS BY PHONE: (212) 862-6047

8
9
0
4
0
7
6
0
5
4

7



W.N.P.E.P

Women's Network for Political and Economic Parity

Comm ex 1-10
10/18/87
EAL

609 West 138th Street
New York, NY 10031
(212) 862-6047

18 November 1983

Mario Cooper
Scheduling
Jesse Jackson for President Committee
2100 M Street N.W.
Suite 316
Washington, D.C. 20036

Dear Mr. Cooper:

We are formally requesting a date in January or February 1984 for Rev. Jackson to appear at a fundraising event at Tavern on the Green, located in Central Park, New York City, sponsored by the WestSide Committee to Elect Rev. Jesse Jackson and the Women's Network for Political and Economic Parity (WNPEP). Total proceeds will benefit the Jackson Campaign.

The WestSide Committee is made up of fifteen (15) West Side organizations and several individuals, representing a Rainbow Coalition of men and women, Blacks, Whites, Jews, Asians and Latinos.

The Committee wishes to complete the arrangements with Tavern on the Green by the 10th December 1983.

We look forward to hearing from you soon.

Sincerely,

Dorothy P. Hughes, Founder and President
(for) Women's Network for Political and Economic Parity

DPH/MG-C

89040760558

EAL

"Our time has come" —Rev. Jesse L. Jackson

Stars for Jesse L. Jackson for President Committee

9 2 0 4 0 7 6 0 5 5 9

Dr. Thelma Adair
 Bange Adell
 Roberts Adorno
 William Aiken
 Florence Anthony
 Nick Ashford
 John Atchison
 Phyllis Atchison
 Tony A. Badillo
 Lawrence R. Bailey Jr., Esq.
 Lillian Baker
 Jesse Banks
 Joy Banks
 Joe Barnes, Esq.
 Mr. & Mrs. James Barrett
 Hinson Battle
 Bernard Beal
 Robin V. Bell
 Travis Bell
 Felicia Bentine
 Canute C. Bernard, M.D.
 Ernest Booker
 Jesse Boseman
 Pam Breanan
 Trevor Brooks, Esq.
 Delethia Brown
 Marguerite Brown
 Dr. Houston Brummit
 Stephen Brusch, Esq.
 W. Haywood Burns
 Helen Burrell, D.D.S.
 Rev. Calvin Butts
 Vivian Campbell
 Tony Casellas
 Colette Charles
 Kathryn Chenault
 Bill Cherry
 Bill Cheng
 Michelle Clark, M.D.
 Ruth Clark
 Kildare I. Clarke, M.D.
 Johannie Colson
 Carol Conover
 Harry Cooley
 Philip C. Cox
 Frankie Crocker
 Jimmy Cumming
 Regina Darby, Esq.
 Norma Jean Darden
 Andrea Darnon
 David Davis
 Gene Davis

Renee Davis
 Harold Dow
 Alan Eason
 William Eason
 Audrey Edwards
 Cheryl Evesette
 George Falson
 Kirk Fancher
 Joy Farrell
 Jackie Krygar Fisher
 Roberta Flack
 James Forrythe
 Adriane Gaines
 Colleen Goldberg
 Johnnie Golson
 Marilyn Goodman
 Martin Goodman
 Susan Gordon
 Louis Gossett, Jr.
 Gregory Gray
 Jessica Hawkins-Greenidge
 Kevin C. Greenidge, M.D.
 Derry Grubb
 Ellis Haizlip
 Dudley A. Hall
 Candis Hamilton
 Joan Hamilton
 Michael J. Handy
 Joyce Hartsfield, Esq.
 Linda Haynes
 Theda Palmer Head
 Eddie Heath
 Joan Logue Henry
 LaQuita Henry
 Patricia M. Hinds
 Sheldon Tatt Hinton
 Sandra Hochman
 Leon Hubbard
 Dorothy Pitman Hughes
 Patricia L. Irvin, Esq.
 Howard Johnson
 Wallace Johnston
 Dr. Billy E. Jones
 Jack M. Jordan
 Flo Kennedy
 Joe Kennedy
 Vincent Kenyon
 Don King
 Bill Kochivama
 Yun Kochivama
 Patti LaBelle
 Denise LaMaute

C. Knox Laffner III, Esq.
 Ellen LaVer
 Valerie Lancaster
 Kathleen Wyr Lane
 Ruth Sanchez Levisra
 Bob Law
 Edward Lewis
 Ida Lewis
 Jackie Lewis
 Michele Shay Lewis
 Ed Lloyd
 Ralph MacDonald
 Dr. Jim Malone
 Dr. Rubie Malone
 Vernon C. Manley
 Pat Martin
 Sam Mattingly
 Kim Mayner
 Leonard Mays
 Marcia McBroome
 Gil McGriff
 Lena Tipton Meyers
 Kendall Minter
 J.R. Mitchell
 Harriet Morgan
 Peck Morrison
 Antisia Music
 Mtrume
 Lanny D. Myers
 Santiago Negrone
 Jeanne Marie Neilson
 Alice deLoache Nelson
 Leslie Ann Nelson
 Melbourne Nunes
 Rev. Calvin Owens
 Maxine Paige
 Linda Peng
 Alphonso Pinkney
 Dr. Al Pinkney
 Bill Pitman
 Patrice Pitman
 Joseph Plaskett
 Robert J. Policastro
 Teddy Powell
 Lloyd Price
 Jonelle Procope
 Sheryl Lee Ralph
 Pat Ramsay
 Walter C. Rauscher
 La Grande Reed
 Judith Reed, Esq.
 Rosemarie Rhodes, Esq.

Alfonso Ribeiro
 Del Robinson
 Dinah Robinson
 Manuel Rodriguez, Esq.
 Howard E. Rollins, Jr.
 Joyce Sanders
 Vince Sanders
 Joan Sandler
 Kenneth L. Scott
 Tad Schnugg
 Dr. Luther W. Seabrook
 Marianne R. Seabrook
 Norma Shirley
 Valerie Simpson
 Meredith Sirmans, M.D.
 Vernon Slaughter
 Clarence O. Smith
 Jack E. Smith
 Willi Smith
 Dr. Lodema Stephens
 Raymond Susman, Esq.
 Percy Sutton
 Evon Taylor
 Susan L. Taylor
 Dino Terrell
 M.A. Terry
 T.C. Thompkins
 Rev. Nathaniel Tyler-Lloyd
 Damon Upshaw
 Roy Vaughn
 William Velcz
 Connie Walters
 Jim Walker
 Cora Walker, Esq.
 Fred Wallace
 Lee Wallace
 Fay Washington
 Fave Wattleton
 Ruby Weston
 Rev. B.J. Whipper, Jr.
 Greta White
 Gladys Williams
 Terrie M. Williams
 Jack L. Willis
 Mary P. Willis
 Annie Wolinsky
 Melvin Wolinsky
 Peter Wong, M.D.
 Gail Wright, Esq.
 P. W. Yuen, Esq.
 Peter Zeiler, Esq.

Tavern on the Green, Monday, April 2, 1984

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

Com'n 66 F. 10 THE FEC
10/1/87 EAL
85 JUNE 11 10:00

(Summary Page)

ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)

**WOMEN'S NETWORK FOR
POLITICAL AND ECONOMIC
PARITY**

Address (Number and Street)

**609 West 138th Street
New York, New York 10031**

City, State and ZIP Code

New York, New York 10031

Check here if address is different than previously reported

2 FEC Identification Number

C00175216

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 July 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

This committee qualified as a multicandidate committee during the Reporting Period on _____ (Date)

SUMMARY

5 Covering Period 2/16/84 through 4/3/84

6 (a) Cash on hand January 1, 19 84

(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 Line 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) Cash on hand January 1, 19 84		\$ 00.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 00.00	
(c) Total Receipts (from Line 18)	\$ 25,360.00	\$ 25,360.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 25,360.00	\$ 25,360.00
7 Total Disbursements (from Line 28)	\$ 25,360.00	\$ 25,360.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 00.00	\$ 00.00
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 00.00	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 00.00	

I certify that I have examined this Report and to the best of my knowledge and belief the figures are true and complete.

DOROTHY PITMAN HUGHES

Secretary

For further information contact

Federal Election Commission

Washington, D.C. 20543

Phone (202) 426-4000

15 June 1985
Date

SIGNATURE OF TREASURER

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

Name of Committee (in Full)		Report Covering the Period		
WOMEN'S NETWORK FOR POLITICAL AND ECONOMIC PARTY		2/16/84	To 4/3/84	
		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	\$ 25,360.00	\$ 25,360.00	11(a)
(Memo Entry Unitemized \$ 25,360 _____)				
(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))	25,360.00	25,360.00	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)	\$ 25,360.00	\$ 25,360.00	18
II. DISBURSEMENTS				
19 OPERATING EXPENDITURES			19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	\$ 25,360.00	\$ 25,360.00	21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 USC § 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)	\$ 25,360.00	\$ 25,360.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	\$ 25,360.00	\$ 25,360.00	29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	25,360.00	25,360.00	31
32 TOTAL OPERATING EXPENDITURES from Line 19			32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15			33

89040760561

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 21
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)			
WOMEN'S NETWORK FOR POLITICAL AND ECONOMIC PARITY (W N P E P)			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tavern on the Green Central Park at W. 67th St. New York, New York 10023	PTD \$25,360 Fundraising party J. Jackson Pres. Camp. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/2/84	\$ 25,360.00
B. 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):		
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 (Enter on page 1 of this page)			\$ 25,360.00
TOTAL (Total - Print - Use page this line number only)			\$ 25,360.00

89040760562

TAVERN ON THE GREEN

CENTRAL PARK AT WEST 87TH STREET
NEW YORK N.Y. 10023 • (212) 873-4111

April 3, 1984

Mrs. Dorothy Pittman Hughes
609 West 138th Street
New York, New York 10028

RE: THE STARS SALUTE JESSEE JACKSON
RECEPTION
MONDAY, APRIL 2, 1984

625 Guests Guaranteed at \$40.00 per person \$25,000.00

"THIS IS INCLUSIVE OF SALES TAX AND SERVICE CHARGE"

TOTAL BILL \$25,000.00

LESS DEPOSIT -24,900.00

TOTAL AMOUNT DUE \$ 100.00

15 June 1985

NOTE:

The outstanding \$100.00 balance was paid the week of April 2nd, 1984. An additional \$360.00 was paid out in cash the evening of 2 April 1984 to assisting employees of Tavern on the Green as gratuities for service.

DPH

1035761425

COMM EX 3-10
10/8/87
EAL

WESTSIDE COMMITTEE FOR JESSE JACKSON
150 West 80th Street
New York, NY 10024

The Westside Committee for Jesse Jackson for President, invites you and members of your firm to support Jesse Jackson's candidacy by becoming a patron for:

THE STARS SALUTE TO JESSE JACKSON
TAVERN ON THE GREEN
in Central Park
FRIDAY, MARCH 30, 1984
.. 6:00 P.M. to Midnight ..

Your contribution of \$250.00 entitles you to cocktails, buffet dinner, dancing and entertainment by some of New York's finest stars and celebrities. If you wish, your name will be included on the list of Patrons for the dinner which will be printed for the Benefit Program.

Make your check out today to:

WOMEN'S NETWORK, P.A.C.
c/o The Westside Committee for Jesse Jackson
150 West 80th Street
New York, New York 10024

.. Single tickets available at \$100.00 ..

Jesse Jackson not only represents the legitimate aspirations of millions of minority Americans but he is also a viable candidate. Your support is needed to make THE STARS SALUTE TO JESSE JACKSON a gala fundraiser.

Thank you.

Contact Numbers: 787-5241 [Bill Pitman, Chairman]
759-3223 [Flo Kennedy, Chairman]
534-7415 [Carole Conover, Director of Media & Entertainment]

Please include the name and address of where you wish the tickets to be sent. Also note whether or not you want your names(s) included on the printed program. If you cannot attend the event but wish to be a Patron, please advise us. ...

AUTHORIZED BY JESSE JACKSON for PRESIDENT COMMITTEE
Samuel Voggie, Treasurer

89040760564

89040760565

Make all checks payable to:
Women's Network P.A.C.

will attend

Enclosed is \$_____ for _____ tickets

not attend but

Enclosed is my contribution

of \$ _____

AUTHORIZED BY JESSE JACKSON for PRESIDENT COMMITTEE
Samuel Voggio, Treasurer

STARS SALUTE TO JESSE JACKSON

includes:

"DREAM GIRLS"

"TAP DANCE KID"

SANDMAN SIMS

FIRE AND ICE

KEN PRYMUS

YAHEE

ROY AYRES

J.R. MITCHELL &
MARCELLUS GREEN in a
Tribute to THELONIOUS MONK

and more to follow...

The Westside Committee
150 West 80th Street
New York, N.Y. 10024

GRACE NELSON
LESLIE NELSON

Comm. 6-10-
10/10 SAL No. 4-5

Name of Contributor ^{\$100} FRANK - Alfred ✓
Address 261 West 131 St. N.Y. Zip Code
Occupation S.I.P. - Employed
Business/Employer
Business Address

INDIVIDUAL CONTRIBUTOR'S CARD

No. 345

Name of Contributor ^{\$100} LYNES - Leonard ✓
Address 120-22 Dreiser Loop B.N.Y. Zip Code 10475
Occupation Insurance - Self Employed
Business/Employer
Business Address Same Address

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 343
Spencer Council

Name of Contributor ^{P \$100} NELSON - Alice ✓
Address 123 Brown Place S.N.Y. Zip Code 10475
Occupation Actress - Teacher
Business/Employer St. of Education
Business Address 110 Livingston St. 3rd Fl. N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 30857 - Committee Member

SEE TERRY AT DOOR

Name of Contributor ^{P \$100} NELSON - Leslie ✓
Address 123 Brown Place S.N.Y. Zip Code 10475
Occupation Production Assistant
Business/Employer WNEW-TV Channel 5
Business Address 205 East 67th St. N.Y. 10021

INDIVIDUAL CONTRIBUTOR'S CARD

No. 327
328

\$100 ✓ MRS ✓

89040760566

No. _____

Name of Contributor 1100 [unclear] [unclear]

Address 27 Clarendon Ave. NYC Zip Code 10022

Occupation Supervisor - [unclear]

Business/Employer [unclear]

Business Address [unclear]

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 224

Name of Contributor 1100 Fischer Hope

Address 110 West End Ave NYC Zip Code 10022

Occupation Secretary

Business/Employer Fashion Institute of Technology

Business Address 227 West 27th St NYC Zip Code 10001

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 324

Name of Contributor 1100 DITTO [unclear]

Address 750 Park Ave NYC Zip Code _____

Occupation Music Publisher

Business/Employer _____

Business Address Same address

INDIVIDUAL CONTRIBUTOR'S CARD

No. 413

Name of Contributor 1100 Young Andrew

Address 140 West End Ave NYC Zip Code 10023

Occupation Scientist - Self-employed

Business/Employer Ms. [unclear]

Business Address 575 5th Ave NYC

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 34

39040760567

#100
 Name of Contributor Disanto John ✓
(last) (first) (initial)
 Address 1-2 Columbia St NYC Zip Code _____
 Occupation Firefighter
 Business/Employer Fire Dept
 Business Address 100 5th St

INDIVIDUAL CONTRIBUTOR'S CARD

#100
 Name of Contributor Morton John ✓
(last) (first) (initial)
 Address 39 Hampton Blvd New Rochelle Zip Code 10805
 Occupation Asst. Buyer
 Business/Employer Hammingsdale's
 Business Address 1000 3rd Ave NYC

INDIVIDUAL CONTRIBUTOR'S CARD

#100
 Name of Contributor Williams Jeff ✓
(last) (first) (initial)
 Address 3426 Barker Ave Brooklyn Zip Code _____
 Occupation Pharmacist
 Business/Employer W.D.A.S.S. - Williams Pharmacy
 Business Address 143rd St 7th Ave NYC

INDIVIDUAL CONTRIBUTOR'S CARD

#100
 Name of Contributor delrache William ✓
(last) (first) (initial)
 Address 10-47 Kichman Plaza Brooklyn Zip Code 10453
 Occupation Retired
 Business/Employer _____
 Business Address _____

INDIVIDUAL CONTRIBUTOR'S CARD

89040760568

No. 33

Name of Contributor Dist APPOINT (last) (first) (initial)

Address 313 WEST 111 STREET Zip Code 10014

Occupation LEGAL HEALTH PLAN TRUST

Business/Employer LEGAL HEALTH PLAN TRUST

Business Address 313 WEST 111 STREET

INDIVIDUAL CONTRIBUTOR'S CARD

No. 337

Name of Contributor Van ANSON GEORGE (last) (first) (initial)

Address 230 WEST 76th St. #9D Zip Code 10023
NEW YORK, N.Y.

Occupation INVESTMENT BANKER

Business/Employer GOLDMAN SACHS & CO.

Business Address 85 BROAD ST NEW YORK, N.Y. 10004

INDIVIDUAL CONTRIBUTOR'S CARD

No. 332

Bin CHEN, LORI ✓

Name of Contributor Hall ✓ John (last) (first) (initial)

Address 424 Rimsen Avenue Bklyn, NY Zip Code 11212

Occupation Engineer

Business/Employer Turner Construction Co.

Business Address 133 3rd Ave. N.Y.C.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 331

DITTO ✓

Name of Contributor Marin (last) (first) (initial)

Address 530 1st St Zip Code 10011

Occupation Lawyer

Business/Employer

Business Address

INDIVIDUAL CONTRIBUTOR'S CARD

No. 330

8 9 0 4 0 7 6 0 5 6

3/30

Paik

For

John W. Hall	\$200	2 - \$100
George L. VanAnsen	\$100	1 - \$100
Sigurd Larson	\$100	1 - \$100
Luth E. Boatwright	\$200	2 - \$100
Opheia Dismuke	\$100	1 - \$100
Doris Gochon	\$100	1 - \$100
Jeff Williams	\$100	1 - \$100
Roberta Norton	\$100	1 - \$100
Alfred L. Francis	\$100	1 - \$100
Rec # 5247 - Reverend Nathaniel Lloyd - CASH	\$200	2 - \$100
Rec # 5248 - Mr. Andrew Young - CASH	\$100	1 - \$100
William deLochi	\$100	1 - \$100

At Door - 4/2

Yvonne Young	\$200	2 - \$100
Hoye Fisher	\$100	1 - \$100
Rec # 5245 - Len Jones - CASH	\$100	1 - \$100

pd in - 3/27

Marion Rodgers	\$200	2 - \$100
Anthony Nelson	\$100	1 - \$100

\$7200 total

9040760570

~~Account~~

3/30

3/30

Debit

For

332	✓ John W. Hall	\$200	2 - \$100
333			
337	✓ George L. VanAmeyn	\$100	1 - \$100
336	✓ Sigurd Larson	\$100	1 - \$100
329	✓ Fred E. Boatwright	\$200	2 - \$100
330			
403	✓ Ophelia Dismuke	\$100	1 - \$100
346	✓ Doris E. Johnson	\$100	1 - \$100
402	✓ Jeff Williams	\$100	1 - \$100
401	✓ Roberta Norton	\$100	1 - \$100
400	✓ Alfred L. Francis	\$100	1 - \$100
327	✓ Reverend Nathaniel Boyd	\$200	2 - \$100
328			
410	✓ Mr. Andrew Young	\$100	1 - \$100
334	✓ William de Bondi	\$100	1 - \$100

760571

3/30

At Door - 4/2

339	Yvonne Young	\$200	2 - \$100
340			
338	Hope Fisher	\$100	1 - \$100
345	Len Jones	\$100	1 - \$100

3/27

331	Marion Rodgers	\$200	2 - \$100
335			
344	Anthony Klein	\$100	1 - \$100

\$2200 total

8 9 0 4 0 7 6 0 5 7 2

Comm. Et 5-19.

10/8/87

EAL

MATCHING FUNDS CASH VOUCHER SHEETStars For Jesse Jackson Committee

<u>NAME</u> (PLEASE PRINT)	<u>CASH AMOUNT</u>	<u>COMMITTEE MEMBER SPONSOR</u>	<u>SIGNATURE</u>
<u>Firsythe, James</u>	<u>\$ 100</u>	<u>246 W 12th St, NY 10014</u>	
<u>Robinson, Dinah</u>	<u>200</u>	<u>210 W 12th St, NY 10014</u>	
<u>Head, Theda Palmer</u>	<u>200</u>	<u>44 W 62nd St NY 10023</u>	
<u>Johnson, Howard</u>	<u>200</u>	<u>2301 Fifth Ave #488 NY 10037</u>	
<u>Clark, Ruth</u>	<u>200</u>	<u>392 Central Park West NY 10025</u>	
<u>Lewis, Jackie</u>	<u>200</u>	<u>425 E 58th St NY 10022</u>	
<u>Fisher, Jacqueline</u>	<u>200</u>	<u>264 Washington Ave, NY 10025</u>	
<u>Atchinson, Phyllis</u>	<u>200</u>	<u>50 Hamilton Terrace, NY 10031</u>	
<u>Wallace, Fred</u>	<u>200</u>	<u>44 W 55th St, NY 10019</u>	
<u>Lane, Kathleen</u>	<u>200</u>	<u>1270 Fifth Ave #5E, NY 10029</u>	
<u>Velez, William</u>	<u>20</u>	<u>110 Riverside Dr. NY 10024</u>	
<u>Clark, Michele</u>	<u>200</u>	<u>887 River Road, Teaneck, NJ 07666</u>	
<u>Mays, Leonard</u>	<u>100</u>	<u>792 Columbus Ave #3R NY 10025</u>	
<u>Antisia Music</u>	<u>200</u>	<u>130-24 236th St. Laurelton 11422</u>	
<u>Eaton, William</u>	<u>200</u>	<u>1650 B'way, Suite 1001, NY 10019</u>	
<u>Fancher, Kirk</u>	<u>120</u>	<u>1674 B'way, Suite 200, NY 10019</u>	

Comm Ex 4-10
10/8/87
SAL

U.S. DOLLAR ACCOUNT

THE ROYAL BANK OF CANADA
GEORGE TOWN, GRAND CAYMAN ISLANDS, W.I.



APRIL 2 1984

PAY TO THE ORDER OF

Women's Network PAC U.S. \$ 300.00
Three hundred ⁰⁰/₁₀₀

PAYABLE BY DEMAND DRAFT ON NEW YORK

U.S. DOLLARS

Paul Fisher - V.P.
Guy Ballard Treas.

ACCOUNT NO.

24751

PRUDENTIAL FINANCIAL
SPECIAL - POLITICAL CONT.

BLACK RETAIL ACTION GROUP INC.
ROCKEFELLER CENTER STATION P.O.
P.O. BOX 1182
NEW YORK, NY 10188

1227

PAY TO THE ORDER OF

Women's Network PAC
Four hundred ⁰⁰/₁₀₀ \$ 400.00
DOLLARS

April 19 2 1-482
280



Republic National Bank of New York
1185 AVENUE OF THE AMERICAS
NEW YORK, N.Y. 10020

Taylor fundamen Margaret Kuster
⑆026004828⑆ 260046802⑆ 1227

THE FAMOUS ORGANIZATION LTD.

192

April 2 1984

WOMEN'S POLITICAL NETWORK

\$ 100.00

ONE HUNDRED**



FREEDOM NATIONAL BANK
OF NEW YORK
20 WEST 125th STREET, NEW YORK, N.Y. 10020

Memo

⑆000192⑆ ⑆026004149⑆ 130 001⑆

sf [signature]

LE GRAND BREED

376

PAY TO THE ORDER OF

Women's Network PAC U.S. \$ 300.00
Three hundred ⁰⁰/₁₀₀ DOLLARS

4-2 1984 1-12/210

CHEQUE

ON THE BANK OF CANADA

FOR THE ACCOUNT OF

⑆010001281⑆ 194-2190 0376

AUTHENTICITY

[Signature]

89040760574

89040760575

✓ CHARLES CHILDS
34 HORATIO ST.
NEW YORK, NY 10014

2549

March 24, 1964

PAY TO THE ORDER OF

John Sandler

3200.00

Two thousand

DOLLARS



MANUFACTURERS HANOVER
TRUST COMPANY

49th Street & Madison Avenue, New York, N.Y. 10017

Signature
John Sandler

Charles Childs

⑆52 59⑆042255076⑆11⑆9⑆000120⑆

MARTIN P. CARTER
ELAINE D. CARTER
100 WEST END AVENUE
NEW YORK, NY 10024

March 19 84 2950

Pay to the order of The Women's Network \$ 200.00
Two Hundred and 00/100 Dollars

CHEMICAL BANK
400 Park Avenue South
New York, N.Y. 10018

Martin P. Carter

Memo: ⑆021000128⑆ 030-221714⑆ 2950

EDWARD G. LLOYD
CAROLE DARDEN-LLOYD
130-13 RIVERSIDE DRIVE
NEW YORK, NY 10022

102

3-28 84 1-00/100

Pay to the order of Women's Network - P.E.P. \$ 200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
177 Second Avenue, New York, N.Y. 10028

Jesse Jackson (cashier) *Edward G. Lloyd*

⑆021000206⑆ 11450614169⑆ 65 0102

KEVIN C. GREENIDGE, M.D.
153 EAST 32ND ST., NO. 1C
NEW YORK, NY 10016

107

3/30 19 84 1-00/100

Pay to the order of Women's Network \$ 200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
230 Second Avenue, New York, N.Y. 10028

Jesse Jackson *Kevin C. Greenidge*

⑆021000306⑆ 10630620389⑆ 65 0107

89040760576

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 7398871

March 30 19 84

Pay to the Order of Women's Network PAC \$ 200.00

Address Jesse Jackson for President Signature Darryl E. Greene

⑆7398871⑆ ⑆021000128⑆ 000-??7048⑆

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

No. 6150884

3/30 19 84

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL 105 BANK **1000000**

Address Woodhull Hosp.

Signature Johnnie Chandler

⑆6150884⑆ ⑆021000128⑆ 000⑉777048⑆

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

No. 6150883

3/30 19 84

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL 105 BANK **1000000**

Address Woodhull Hosp.

Signature Jewel Porter

⑆6150883⑆ ⑆021000128⑆ 000⑉777048⑆

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

No. 6150885

3/30 19 84

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL 105 BANK **1000000**

Address 362 65th St. Bklyn, N.Y. 11220

Signature Betty McNeill

⑆6150885⑆ ⑆021000128⑆ 000⑉777048⑆

VERNON C. MANLEY
207 W. 108TH STREET
NEW YORK, NY 10025

9/30 19 84 141

Pay to the order of Womens' Network PAC

\$ 200.00

Two Hundred and 00/100

1.111111

EMIGRANT
EMIGRANT SAVINGS BANK
8 EAST 42ND STREET, NEW YORK, N.Y. 10017

Home Office Vernon C. Manley

Vernon C. Manley

⑆225770403⑆ ⑆15039221⑆ 5⑆ 0141

89040760577

MARTIN P. CARTER
ELAINE D. CARTER
220 WEST 84th AVENUE
NEW YORK, NY 10024

March 24 1984 2950

Pay to the Order of The Women's Network \$ 200.00
Two Hundred and 00/100 Dollars

CHEMICAL BANK
420 Park Avenue South
New York, N.Y. 10018

Martin P. Carter

MEMO: 021000128: 030-226744 2950

EDWARD G. LLOYD
CAROLE DARDEN-LLOYD
126-18 RIVERSIDE DRIVE
NEW YORK, NY 10022

102

3-28 1984 1-08/210

Pay to the Order of Women's Network - P.E.P. \$ 200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
170 Second Avenue, New York, N.Y. 10022

Jesse Jackson (Cash) *Edward G. Lloyd*

021000006: 1145061416965 0102

KEVIN C. GREENIDGE, M.D.
153 EAST 32ND ST., NO. 1C
NEW YORK, NY 10016

107

3/30 1984 1-30/210

Pay to the Order of Women's Network \$ 200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
220 Second Avenue, New York, N.Y. 10022

Jesse Jackson (Cash) *Kevin C. Greenidge*

0210000306: 1063062038965 0107

89040760578

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 7398871

March 30 1984

Pay to the Order of Women's Network PAC \$ 200.00

Address Jesse Jackson, President Signature Darryl E. Greene

7398871 021000128: 000-777048

NAME
(PLEASE PRINT)

ADDRESS

609 West 130th Street
New York, NY 10031
(212) 862-6047

AMOUNT OF CHECK

COMMITTEE SPONSOR

✓ Vaughn, Roy O. ✓	322 W. 57 th St #28K N.Y. 10021	200	
Davis, Gene A.	23 W. 68 th St. N.Y. 10023	200	
✓ Gregory, Theodore M. ✓	250 George Rd. #260, Cliffside, N.J. 07010	200	
✓ Lamante, Denise ✓	48 Hamilton Terrace, N.Y. 10031	100	Joe Barnes
✓ Maillard, Lucille ✓		100	
✓ Lewis, Michele Shay ✓	40 W. 86 th St. N.Y. 10024	100	
✓ Durden, Marjorie ✓		100	
✓ Greene, Cheryl Y. ✓	260 Convent Ave #93 N.Y. 10031	40	
✓ Shirley, Norma Elise ✓	155 W. 68 th St. #415 N.Y. 10023	100	
✓ Burrell, Helen Dr. ✓	120 West 58 th St, NY 10019	100	Alice D. Nelson
✓ Lopez, Georgette Adrienne ✓	95 W. 95 th St. N.Y. 10025	300	
✓ Hart, Shellie H. Jr. ✓		100	
✓ Chenault, Kathryn C. ✓	475 Esplanade, Pelham Manor 10963	200	
✓ Hamilton, Charles ✓	28 Cadman Plaza West #70 NY 11221	200	
✓ Henry, Laquita ✓		100	Joe Barnes

2140
300
1840

2140
+300
2440

1840

840

2140

NAME
(PLEASE PRINT)

ADDRESS

600 West 138th Street
New York, NY 10031
(212) 862-8047

COMMITTEE SPONSOR

Marianne Camille Spraggins, Esq.	444 C.P.W., NY 10025	200
Colleen T. Goldberg	50 E. 89 th St, NY 10028	200
Clarence O. Smith	5900 Arlington Ave, Bronx 10471	200
Jill Nelson	49 Clinton Ave, Dobbs Ferry NY 10522	200
Ruby Weston	652 Eastern Pkwy, Bklyn 11210	100
Wanda D. Kemp	233 West 138 th St #1A, NY 10030	100
Delores Cann		100
Houston Brumont, MD	145 E. 49 th St, NY 10017	100 + 100
Anis Barghouti	747 Third Ave - 25 th Fl, NY 10017	100
Jonelle Procope	325 E. 41 st St. #504, NY 10017	100
Herbert Brown, Jr.	120-2 Alcott Place, Bronx 10475	100
William R. Brown, PC	76 Madison Ave, NY 10016	100
Sharon Hope	Actor's Federal Credit Union, 165 W. 46 th St, NY 10036	100
Ellin La Var	Harold Melvin Salon, 137 W. 72 nd St, NY	100
Roberto Adorno	724 DeKalb Ave, Bklyn	100

2000
~~1000~~
~~1000~~

10
1000
2000

MARIANNE GEMELLE SPRAGONS, ESQ.
444 CENTRAL PARK WEST
NEW YORK, N.Y. 10028

791

March 22 19 84

PAY TO THE ORDER OF

John's
for Harold and 100

\$ 200.00

DOLLARS



The Chase Manhattan Bank, N.A.
1 New York Plaza, New York, N.Y. 10021

[Signature]

⑆021000021⑆ 017 1 077456 0798

DAVID C. GOLDBERG, M.D.
COLLEEN T. GOLDBERG
50 E. 89TH ST.
NEW YORK, NY 10028

1713

28 March 19 84

PAY TO THE ORDER OF

Women's Network PAC

\$ 200.00

DOLLARS

Two hundred & 00/100

Citibank, N.A.
371 St. of Madison Ave.
New York, N.Y.



check

non-deductible contribution

Colleen T. Goldberg

⑆021000089⑆ 027 50450759 1713

Merrill Lynch Cash Management Account*

CLARENCE O. SMITH
ELAINE SMITH
5900 ARLINGTON AVE.
BRONX, NY 10471

222

3/27 19 84

Pay to the order of

Women's Network PAC

\$ 200.00

Dollars

Two Hundred

BANK ONE.

BANK ONE OF COLUMBUS, N.A.
Columbus, Ohio 43215

Elaine Smith

⑆044000804⑆ 3012593370 0222

JILL NELSON
GREGORY T. RICKS
49 CLINTON AVE.
DOBBS FERRY, NY 10522

206

3/28 19 84

PAY TO THE ORDER OF

The Women's Network PAC

\$ 200.00

DOLLARS

Two Hundred



COUNTY TRUST REGION
15 ACHARD AVENUE, DOBBS FERRY, N.Y. 10522

Jill Nelson

⑆021902352⑆ 067-494415 0206

89040760581

HOUSTON BRUMMIT, M.D.
145 E. 48TH ST.
NEW YORK, NY 10017

3467

28 Mar 1984

1-10/78

PAY TO THE ORDER OF WOMEN'S NETWORK P.A.C. \$ 100.00

One Hundred DOLLARS

European American Bank
A TRUST COMPANY
700 Park Ave., New York, N.Y. 10022

Ms. Susan Jackson / Houston Brummit

⑆021001486⑆ 030⑆ 10170 3⑆ 3467

ANIS BARGHOUTI
747 THIRD AVENUE, 28TH FLOOR
NEW YORK, N.Y. 10017

2325

4/11 1984

1-07/78

PAY TO THE ORDER OF Women Network \$ 100.00

Only One Hundred DOLLARS

The Merchants Bank of New York
757 THIRD AVENUE NEW YORK, N. Y. 10017

Anis Barghouti

⑆026006790⑆ #4 213839⑆

JONELLE PROCOPE
325 EAST 41ST ST., APT. 904
NEW YORK, N.Y. 10017

730

3/28 1984

1-30/78

PAY TO THE ORDER OF Women's Network P.E.P. \$ 100.00

Just Hundred Dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
1185 Avenue of the Americas, New York, N.Y. 10020

Jonelle Procope

⑆021000306⑆ 11570609543⑆ 85 0730

HERBERT BROWN, JR.
126-2 ALCOTT PL.
BRONX, NY 10475

101

March 28, 1984

1-30/78

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00

One Hundred and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
60 West 126th Street, New York, N.Y. 10028

Ms. Susan Jackson Presidential Campaign / Herbert Brown Jr.

⑆021000306⑆ 1296009543⑆ 85 0101

89040760582

89040760583

65 Eastern Pkwy
RUBY WESTON

3/30 1984 1152

Pay to the order of Women's Net-work, PAC \$ 100.00
One hundred dollars

INDEPENDENCE SAVINGS BANK
120 COLONY STREET
ROCKWELL, NEW YORK 10880

INSTRUMENT NO. Ruby Weston

⑆226071211⑆ 9 602221146⑆ 1152

WANDA D. KEMP
233 WEST 136TH STREET NO. 1A
NEW YORK, NY 10030

March 31, 1984 692

Pay to the order of Women's Net-work PAC \$ 100.00
one hundred and 00/100 Dollars

Citibank, N.A.
100 Irving Pl. nr. 14th St.
New York, N.Y. **CITIBANK**

For Jackie Campaign Wanda D Kemp

⑆021000089⑆ 067 58804773⑆ 0692

HOUSTON BRUMMIT, M.D.
148 E. 48TH ST.
NEW YORK, NY 10017

28 Mar 1984 3465

Pay to the order of WOMEN'S NETWORK-PAC \$ 100.00
DOLLARS

EAB European American Bank
A TRUST COMPANY
700 2ND AVE. NEW YORK, NY 10022

for personal use Houston Brummit

⑆021001186⑆ 030-10170 3⑆ 3465

⑆226070319⑆ 831 0385563⑆ 0547

Memo

Women's Net-work PAC \$ 100.00

DOLLAR SAVINGS BANK OF NEW YORK
The better way

Pay to the order of Women's Network - PAC \$ 100.00

17921
54

89040760584

WILLIAM E. BROWN, P.C.
76 MADISON AVE.
NEW YORK, NY 10016

0893

1-2810

March 16 1984

PAY TO THE ORDER OF Women's Network Pac \$ 100 -
The Funded - - - - - 001 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
1400 Broadway, New York, N.Y. 10018

William E. Brown

⑆000893⑆ ⑆021000306⑆ ⑆11290633562⑆65

drawn upon account of SHAKON Hape

ACTORS FEDERAL CREDIT UNION
141 WEST 4TH STREET
NEW YORK, N.Y. 10036

NEW YORK

NO 042413
3/27 1984 1-12 210

PAY TO THE ORDER OF Women Political Network - PAC \$100.00

THE SUM OF 100 DOLLARS DOLLARS

CHEMICAL BANK
1501 BROADWAY
NEW YORK, N.Y. 10036

from Jackson Campaign 1984

⑆042413⑆ ⑆021000128⑆ 004-003667⑆

Ed O'Leary
TREASURER OR ASSISTANT TREASURER

CITIBANK

187723258

⑆33084 6.1.01. 041-15-103-01 C+++++100.00+1.23

DATE 03-30-84

BANK N.A. NEW YORK N.Y.

PAY TO THE ORDER OF The Women's Network PAC \$100.00***

***ONE HUNDRED DOLLARS 00/100

NOT GOOD FOR MORE THAN \$1,000.00

Ellen Egan Van
DRAWER

James Jackson Contribution
ADDRESS Harold Wilson Bldg, 131 West 22 St

⑆0223-1042⑆ 8⑆790410 187723258

THIS DOCUMENT CONTAINS AN ERASURE SENSITIVE FACE. ATTEMPTED ALTERATIONS WILL APPEAR WHITE.

AMERICAN EXPRESS MONEY ORDER

45-121,522,579

THE SUM OF 100 DOLLARS THE SUM OF 100.00 *
NOT GOOD OVER \$300. AC=1 0000*

3/30 84

PAY TO THE ORDER OF Women's Network P.A.C. direct

Roberto Abarno - 724 DeKalb Ave. B'klyn
DRAWER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

⑆121522579⑆

JACK E. SMITH
FORDHAM HILL APTS.
2201 WEBB AVE., APT. 17B
BRONX, NY 10468

913

3-10 1984
Pay to the order of Women's Network P.A.C. For Jesse Jackson \$ 100.00
ONE - Hundred Dollars Dollars



The Chase Manhattan Bank, N.A.
67 Park Avenue, New York, N.Y. 10022

Campaign Contribution

⑆021000021⑆ 240 0 071870⑆ 0913

Jack E. Smith

LUTHER W. SEABROOK
MARIANNE R. SEABROOK

673

7/26 1984
Pay to the order of Women's Network P.A.C. \$ 200.00
two hundred + 00/100 DOLLARS



The Chase Manhattan Bank, N.A.
2218 Fifth Avenue & 126th Street
New York, N.Y. 10027

Donation

Luther W Seabrook

⑆021000021⑆ 078 1 048699⑆ 0673

89040760585

89040760586

REGINA L. DARBY
300 MADWAY 6TH FL.
ROCKY HAVEN, NY 10813

667

19 07 1-708/1288

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200 00
Two hundred xx 00 DOLLARS

AMERICAN SAVINGS BANK
100 WALL ST. NEW YORK, N.Y. 10038

Jesse Jackson for Pres. Regina L. Darby

⑆ 226070623⑆ 003841643 7⑈ 0⑆0

JONNIE M. GOLSON 2648

1-2/10

Mar 20 1984

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200 00
Two hundred - and 00/100 DOLLARS

MANUFACTURERS TRUST COMPANY
30 West 60th Street, New York, N.Y. 10020

FOR J. Jackson Jonnie M. Golson

⑆ 028000306⑆ 10640563777065 2648

W. HAYWOOD BURNS 386

343 E. 7TH ST.
NEW YORK, NY 10003

1-12/10

March 21 1984

PAY TO THE ORDER OF Women's Network for Political-Economic Party \$ 100 00
One Hundred and 00/100 DOLLARS

Chemical Bank
125th St & Convent Ave. New York, N.Y. 10030

Political Contribution W. Haywood Burns

⑆ 028000128⑆ 056-202490⑈ 0386

RENEE DAVIS 114

205-27 104th Ave
Holts, N.Y. 11742

3/22/84 1-7071/2260

PAY TO THE ORDER OF The Women's Network PAC \$ 100 00
One hundred dollars & 00/100 DOLLARS

The Manhattan Savings Bank
165 MADISON AVE. NEW YORK, NY 10017

MANHATTAN INSURED MONEY MARKET ACCOUNT

Contribution Jesse Jackson Campaign Renee Davis

⑆ 2260707⑆ 0⑆⑆⑆03⑆26 4⑈ 0⑆⑆⑆

878

VIVIAN CAMPBELL
49-09 37 STREET 7U
SUNNYVALE, NY 11104

3/21/84

PAY TO THE ORDER OF Women's Network - PAC \$ 100 00
One hundred DOLLARS

Jesse Jackson

The Chase Manhattan Bank, N.A.
3001 Grand Central Avenue
Long Island City, N.Y. 11104

⑆ 2260707⑆ 0⑆⑆⑆03⑆26 4⑈ 0⑆⑆⑆

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

88 JAN 11 PM 4:18

MUR 2139

EXECUTIVE SESSION
JAN 20 1988
SENSITIVE

In the Matter of)
)
Jesse Jackson for President Committee)
and Emma Chappell, as treasurer)
Women's Network for Political and)
Economic Parity, and Dorothy Pitman)
Hughes, as treasurer, et al.)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 30, 1986, the Commission found reason to believe that the Jesse Jackson for President Committee (hereinafter "JJPC") and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441(f). The basis for this finding was that JJPC had accepted an excessive contribution from the Women's Network for Political and Economic Parity ("WNPEP") and Dorothy Pitman Hughes, as treasurer. At the same time, the Commission also found reason to believe that WNPEP and Mrs. Hughes, as treasurer, violated 2 U.S.C. § 441a(a)(1).

Subsequently, on January 29, 1987, the Commission found reason to believe that WNPEP violated 2 U.S.C. § 441d. On the same date, the Commission also found reason to believe that the Westside Committee for Jackson and the Stars for Jesse L. Jackson ("Stars") violated 2 U.S.C. § 441d, and authorized the Office of General Counsel to take the deposition of Dorothy Pitman Hughes, if such were deemed necessary on the grounds that the responses to the Commission's findings by the aforesaid respondent committees proved inadequate.

This Office subsequently identified Florence Kennedy as Chairman of the Westside Committee for Jackson, and sent the

89040760589

appropriate notification letter to her. (See Comprehensive Investigative Report #1, signed April 24, 1987.) Mrs. Kennedy responded by telephone but unfortunately provided no substantive information. The notification letter for the Stars elicited no response. On October 8, 1987, this Office deposed Dorothy Pitman Hughes, who stated that Joseph Barnes, Esquire, of New York chaired meetings of the Stars. Accordingly, a reason to believe notification was sent to Mr. Barnes for the Stars on October 23, 1987.

Mrs. Hughes testified in essence that WNPEP agreed to deposit checks in its account that were solicited to pay for the fundraiser held for Jesse Jackson at Tavern on the Green restaurant on April 27, 1984. The Stars solicited these contributions expressly for the Jackson fundraiser. WNPEP then deposited such funds in its account and used them to pay Tavern on the Green by cashier's check for the dinner. Mrs. Hughes testified that JJPC was given a list of those who contributed to the fundraiser through WNPEP.

The response previously received from JJPC to the reason to believe finding confirms that the individuals who made their checks payable to WNPEP did so with the understanding that they were in fact contributing to JJPC, with WNPEP acting as a conduit. Such funds were, in effect, earmarked for JJPC. It further appears that some of the same individuals also contributed directly to JJPC, which raises the question whether

39040760590

their aggregate contributions exceeded the \$1,000 limit established at 2 U.S.C. § 441a. As counsel for JJPC stated in their response to the Commission:

Our initial sampling of contacts with these donors [to WNPEP] has confirmed that each individual intended their [sic] contribution to benefit the Jackson Campaign, and not the WNPEP organization. At a minimum, we would be pleased to amend our FEC reports reflecting these contributions and expenditure [sic] and attempt to contact the others that supported this event to supply FEC officials with written confirmation that an unlawful in-kind contribution to our Committee did not take place. We also plan to aggregate each donor's contribution and make refunds, if necessary.

Response of JJPC, March 11, 1986.

To date, JJPC has not advised this Office of any refunds it has made, or of any reports it has amended, pursuant to this inquiry. There is evidence, however, that even if JJPC did not accept a contribution from WNPEP in excess of the limits of 2 U.S.C. § 441a, it may have nonetheless violated 2 U.S.C. § 441a(f) by accepting excessive contributions from individuals, whose aggregate contributions to JJPC, both direct and through WNPEP as a conduit, exceeded \$1,000. For example, a preliminary review by this Office of JJPC reports shows that an individual named LeGrand Reed contributed \$1,000 to JJPC on April 10, 1984. WNPEP records show that LeGrand Reed contributed \$300 to WNPEP on April 2, 1984. Based on Mrs. Hughes' testimony, the check made

89040760591

out to WNPEP was intended as a contribution to JJPC. From this evidence, it appears that JJPC violated 2 U.S.C. § 441a(f) by accepting an aggregate of \$1,300 from an individual contributor in connection with the 1984 Presidential Primary election campaign.

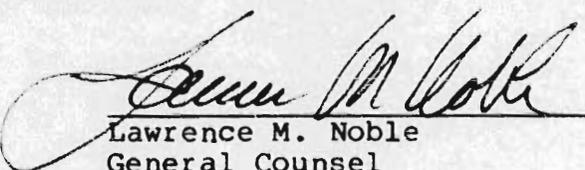
In the view of this Office, interrogatories should now be sent to JJPC in order to determine how many individuals made contributions to JJPC, both directly and through WNPEP, that aggregated in excess of \$1,000. Only in this way will it be possible to determine the extent of the alleged violation, and whether JJPC should make refunds and file amended reports. Finally, further questions should be asked to clarify JJPC's role in organizing the fundraiser that gave rise to this matter.

III. RECOMMENDATIONS

Approve the attached interrogatories and requests for production of documents and letter to the Jesse Jackson for President Committee and Emma Chappell, as treasurer.

Date

1/11/80


Lawrence M. Noble
General Counsel

Attachment
Interrogatories and Requests
for Production and letter

89040760592



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: JANUARY 14, 1988

SUBJECT: OBJECTIONS TO MUR 2139 - General Counsel's Report
Signed January 11, 1988

The above-captioned document was circulated to the Commission on Tuesday, January 12, 1988 at 11:00 A.M.

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

Commissioner Aikens	<u> X </u>
Commissioner Elliott	<u> X </u>
Commissioner Josefiak	<u> X </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u> X </u>

This matter will be placed on the Executive Session agenda for January 20, 1988.

Please notify us who will represent your Division before the Commission on this matter.

89040760593

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Jesse Jackson for President Committee)	
and Emma Chappell, as treasurer)	
Women's Network for Political and)	MUR 2139
Economic Parity, and Dorothy Pitman)	
Hughes, as treasurer, <u>et al.</u>)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 20, 1988, do hereby certify that the Commission decided by a vote of 6-0 to approve the interrogatories and requests for production of documents and letter to the Jesse Jackson for President Committee and Emma Chappell, as treasurer, as recommended in the General Counsel's report dated January 11, 1988, subject to amendment of the interrogatories as agreed upon in the meeting.

Attest:

Jan. 21, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040760594



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

James Hewitt, Esquire
Coaxum & Hewitt
100 Erieview Plaza
Suite 3400
Cleveland, Ohio 44114

RE: MUR 2139
Jesse Jackson for
President Committee
and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

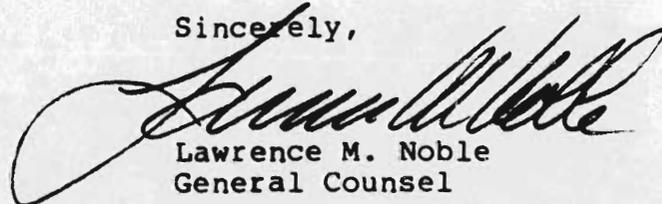
On February 4, 1986, your clients, the Jesse Jackson for President Committee and Emma Chappell, as treasurer, were notified that the Federal Election Commission had found reason to believe they violated 2 U.S.C. §§ 434 and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached interrogatories and requests for production of documents, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

It is required that you submit all answers to questions under oath and that you do so within 15 days of your receipt of these interrogatories and requests for production of documents.

If you have any questions, please direct them to Charles Snyder, the attorney handling this matter at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and Requests
for Production

89040760595

plm

HAND DELIVERED
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

COX-113

88 MAR -7 AM 9:41

Coaxum & Hewitt
Attorneys and Counsellors at Law
Galleries and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824
(216) 696-2022

Edward C. Coaxum, Jr.
James H. Hewitt, III

Of Counsel:
Donald D. Aron
Donald C. Haley
Earle C. Horton

March 5, 1988

VIA FEDERAL EXPRESS

Charles Snyder, Esq.
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2139

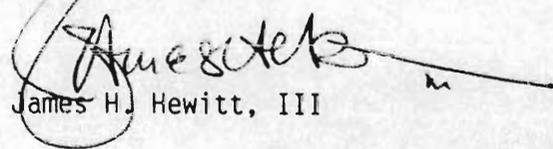
Dear Mr. Snyder:

As you are aware, this office serves as legal counsel for Jesse Jackson for President Committee, Inc., the principal campaign committee for Reverend Jesse L. Jackson, for the 1984 Democratic Party Presidential Primary election.

Enclosed herein are the Answers to Interrogatories and Request for Production of Documents to Emma Chappell, Treasurer, Jesse Jackson for President Committee, Inc.

If you have any questions or requests for additional information, please direct any inquiry to our attention at the address noted above. Thank you.

Very truly yours,


James H. Hewitt, III

JHH:ai
Enclosure
cc: Emma Chappell
Edward C. Coaxum, Jr., Esq.

890609704068

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 MAR -7 PM 12:25

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
MUR 2139

)
) ANSWERS TO INTERROGATORIES AND
) REQUESTS FOR PRODUCTION OF
) DOCUMENTS TO EMMA CHAPPELL,
) TREASURER, JESSE JACKSON FOR
) PRESIDENT COMMITTEE, INC.
)

Emma Chappell, Treasurer for Jesse Jackson for President
Committee, Inc. for her Answers to Interrogatories and Requests for
Production of Documents states as follows:

Preliminary Statement

Counsel for Jesse L. Jackson for President Committee, Inc., the
principal Campaign Committee for Rev. Jesse L. Jackson ("the Jackson
Campaign") previously supplied the Commission by letter March 17, 1986, our
official response to MUR 2139. Within that official reply, we explained the
circumstances known at that time, concerning the involvement of the Jackson
Campaign in a certain fundraiser held on April 2, 1984 at the Tavern
Restaurant in New York, New York. As you might be aware, the Jackson
Campaign has cooperated with every informal inquiry which has been raised
from as early as July, 1985 by Commission Audit Staff concerning this event.
The information previously supplied and Answers supplied below and/or
documents identified resulted from interviews with Ms. Dorothy Pittman
Hughes during July - August, 1985 -- approximately 15 months after the event
at the Tavern on the Green Restaurant took place. Again, for purposes of
clarity the Jackson Campaign was not aware of the efforts of Ms. Hughes

89040760597

and/or the Women's Network for Political & Economic Parity (WNPEP) in the planning of the April 4, 1984 fundraiser until certain inquiries were raised by the Commission Audit Staff. However, in an effort to be thorough and responsive, the Jackson Campaign will respond to these Interrogatories with the information obtained from our own independent investigation during July, 1985, unless otherwise stated. Further, the Jackson Campaign attaches those documents as identified relative to this fundraiser which were obtained from Ms. Hughes during July-August, 1985. Efforts to locate additional documents continue and this reply will be supplemented if more documents are discovered.

1. State whether the Jesse Jackson for President Committee accepted any contribution or contributions from the Women's Network for Political and Economic Parity in connection with the 1984 Presidential election. If so, state the date and amount of such contribution or contributions.

Answer: In August, 1985, after contacting Ms. Dorothy Pittman Hughes, Ms. Hughes supplied the National Campaign office with copies of certain checks that were apparently deposited into checking accounts controlled by WNPEP or Ms. Hughes in January through April, 1984; some of these checks were made payable to her organization, WNPEP, and other checks made payable to the Jackson Campaign. Copies of both categories of checks are attached. Through discussions with Ms. Hughes, the National Campaign office learned that these contributions were intended by the individual donors to benefit the Jackson Campaign.

2. Did the Jesse Jackson for President Committee receive any list or lists of persons who gave money to the Women's Network for Political and Economic Parity, or to Dorothy Pittman Hughes, for the purpose of paying for a fundraising dinner held for Jesse Jackson's 1984 Presidential campaign at the Tavern on the Green Restaurant in New York in April, 1984? If so, attach a copy of such list or lists.

Answer: In August, 1985 after Commission Auditors initiated informal inquiries about this fundraiser, the Jackson Campaign investigated and received copies of checks from Ms. Hughes in connection with the fundraising event. The lists of persons making contributions may be derived from the copies of the

89040760598

checks turned over to the Jackson Campaign by Ms. Hughes, referred to in our Answer to Interrogatory No. 1, above.

3. State whether the Jesse Jackson for President Committee reported to the Federal Election Commission the receipt of contributions raised by the Women's Network for Political and Economic Parity or that had been deposited in the bank account of the Women's Network for Political and Economic Parity.

Answer: At the time these contributions were generated by Ms. Hughes and/or WNPEP, the Jackson Campaign did not report the receipt of these donations to the Commission. In the event it is determined that these donations may not have been appropriately reported, the Jackson Campaign may remedy this inadvertence through an amended filing.

4. (a) State whether the Jesse Jackson for President Committee paid for any solicitations, through direct mail, newspapers, magazines, or any other type of general public political advertising, for contributions in connection with the fundraising dinner held for Jesse Jackson's Presidential campaign at the Tavern on the Green Restaurant in April, 1984, including solicitations for funds to pay for the aforesaid fundraising dinner. Attach copies of all such solicitations that appeared in writing.

Answer: No.

- (b) State whether the Jesse Jackson for President Committee authorized any solicitation, through direct mail, newspapers, magazines, or any other type of general public political advertising, for contributions in connection with a fundraising dinner held for Jesse Jackson at the Tavern on the Green Restaurant in April, 1984, including any solicitations to pay for the aforesaid dinner. Attach copies of all such solicitations that appeared in writing.

Answer: This Interrogatory is identical as 4(a) above; thus, the answer is no.

- (c) Identify all persons who paid for any of the aforesaid solicitations that were authorized by the Jesse Jackson for President Committee.

Answer: The reply herein is not applicable as no solicitations were authorized by the Jackson Campaign.

- (d) Refer to the attached Exhibits A, B, and C. State whether the Jesse Jackson for President Committee paid

89040760599

for or authorized the solicitations that appear in the aforesaid exhibits.

Answer: Exhibits A, B and C were not paid for and authorized solicitations by any member of the National Campaign Office for the Jesse Jackson for President Committee. Exhibit B, while containing the statement "Authorized By Jesse Jackson for President Committee, Samuel Foggie Treasurer", was prepared without knowledge and/or direction of the National Campaign Staff.

5. (a) State whether the Jesse Jackson for President Committee authorized the holding of a fundraising dinner for Jesse Jackson's Presidential campaign at the Tavern on the Green Restaurant in April, 1984.

Answer: No.

(b) Who first proposed the holding of the aforesaid fundraising dinner?

Answer: While we cannot be certain who first approached Rev. Jackson and/or the New Yorkers for Jackson Committee, it would appear that Ms. Dorothy Pittman Hughes indicated that she desired to coordinate this event for the candidate.

(c) Who was in charge of raising funds to pay the start up costs, including paying the Tavern on the Green Restaurant for the use of its facilities, in connection with the aforesaid fundraising dinner?

Answer: To the best of our knowledge, based on discussions with Ms. Hughes, a select number of committed individuals under her supervision coordinated this event.

(d) Who arranged for the Rev. Jesse Jackson to be present at the aforesaid fundraising dinner? When was this event included in the Rev. Jackson's schedule?

Answer: During the few days before the New York Democratic Party Presidential Primary, it was suggested to Rev. Jackson upon his arrival to New York City that he make an appearance at this fundraiser. We understand the decision to attend was spontaneous once it was learned of the individuals, some of whom were known personally to Rev. Jackson, that desired to publicly meet in support of his candidacy.

(e) Who coordinated planning for the aforesaid fundraising dinner on behalf of the Jesse Jackson for President Committee?

89040760600

Answer: The National Jackson Campaign Staff had no role in coordinating and/or planning this fundraiser.

(f) With what other groups or individuals did the Jesse Jackson for President Committee plan, coordinate, and organize the aforesaid fundraiser at Tavern on the Green Restaurant?

Answer: The National Campaign office did not have any contact with any other group to organize this fundraiser at the Tavern on the Green Restaurant.

6. Identify the following persons and explain the role of each in planning, organizing, and coordinating the fundraising dinner held for Jesse Jackson at Tavern on the Green Restaurant in April, 1984.

(a) Mario Cooper

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to this individual's role and this fundraiser.

(b) Samuel Foggie

Answer: From approximately November, 1983 (the beginning of the Campaign) until February 1, 1984, Mr. Foggie served as National Treasurer for the Jackson Campaign. From February 1, 1984 until the present, Emma C. Chappell serves as National Treasurer for the Jackson Campaign. During Mr. Foggie's tenure he had no knowledge of the April, 1984 fundraiser. It is believed that individuals unfamiliar with technical Commission requirements, used this authorization on their literature. The Jackson Campaign had no advance knowledge of the preparation or use of Mr. Foggie's name in connection with any publication.

(c) Dorothy Pittman Hughes

Answer: As reported in our official reply to MUR 2139, Ms. Hughes served as the principal coordinator of this fundraising event.

(d) Bill Pittman

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to this individual's role and this fundraiser.

89040760601

89040760602

(e) Roberta Flack

Answer: As you may know, Ms. Flack is a professional entertainer and long-time personal friend of Rev. Jackson. It is our belief that her name was used by organizers to lend credibility to this fundraising effort.

(f) Susan Taylor

Answer: In April, 1984, Ms. Taylor was Editor-in-Chief of Essence Magazine. It is our belief that Ms. Taylor's name was used by organizers to lend credibility to this fundraising effort.

(g) Joe Barnes

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to this individual's role and this fundraiser.

(h) Regina Darby

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to this individual's role and this fundraiser.

(i) Flo Kennedy

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to the above-named individual's role and this fundraiser.

(j) Warner LeRoy

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to the above-named individual's role and this fundraiser.

(k) Carol Conover

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to the above-named individual's role and this fundraiser.

(l) Stars for Jesse Jackson for President Committee

Answer: In August, 1985, the Jackson Campaign obtained the flyer attached to these Interrogatories as Exhibit C. We were informed at that time that the designated individuals were the organizers for this fundraiser.

(m) Westside Committee to Elect Rev. Jesse Jackson

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to the above-named organization's role and this fundraiser.

(n) Women's Network for Political and Economic Parity

Answer: Until April, 1984, the Jackson Campaign was not aware of this organization. At that point, it was not known that the group was a registered and an organized political action committee. It was our understanding that Ms. Hughes was the principal coordinator of this group.

(o) VAC-PAC

Answer: After making a reasonable inquiry, the Jackson Campaign has no knowledge and/or information relative to this organization's role and this fundraiser.

7. State whether the Rev. Jesse Jackson authorized the Stars for Jesse L. Jackson for President Committee or the Westside Committee to Elect Jesse L. Jackson to use his name in the names of their respective organizations. Attach copies of all correspondence between the Rev. Jackson or his agents with the two aforesaid organizations concerning their use of his name.

Answer: The National Campaign office did not authorize the use of its name in connection with the organization of this fundraiser. Copies of these solicitations were brought to the attention of the National Office in August, 1985. Accordingly, there exists no correspondence between the organizations noted herein and the National Campaign office.

89040760603

STATE OF PENNSYLVANIA)
)
COUNTY OF MONTGOMERY)

VERIFICATION

Emma Chappell, after first being duly sworn avers and states that:

1. I am the Treasurer of the Jesse Jackson for President Committee; and
2. I have read the foregoing Answers to Interrogatories and Production of Documents relative to MUR 2139 and state that they are true as I verily believe.

Emma C. Chappell
Emma Chappell

SWORN TO AND SUBSCRIBED in my presence this 4th day of March, 1988.

Alice Maxwell
Notary Public

ALICE MAXWELL, NOTARY PUBLIC
MONTGOMERY CO.
MY COMMISSION EXPIRES JUNE 19, 1988

89040760604

RONALD H. WILLIAMS
2190 MADISON AVE.,
NEW YORK, NY 10028
TELEPHONE NO. 590-1200

413
1-28-84

PAY TO THE ORDER OF JACKSON FOR PRESIDENT \$ 6.00
SIX DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
670 Street & Madison Avenue, N.Y., N.Y. 10017

NO. 4024000306419902244065 0413

Deliv

BERNARD HYMAN
28 CLIFTON AVE., 01613
NEWARK, NJ 07104
Date: Jan 16 84
Pay to the order of Jesse Jackson for President \$ 60.00
Sixty DOLLARS
American National Bank
American National Bank
Morristown, NJ 07960
Member Federal Reserve
SIGNED: Bernard Hyman
MICR: 0212023370213 666 238 6# 1061

ASSET DIRECTOR
THOMSON MCKINNON SECURITIES INC
230
CLAUDE R. HOYTE
SUSAN R. HOYTE
137 38TH 226 ST.
LAURELTON, NY 11413
Date: Jan 8 1984
Pay to the order of Jesse Jackson for President \$ 65.00
Sixty five and no/100 DOLLARS
BANK ONE
SIGNED: Claude R. Hoyte
FOR: CHECK HERE IF TAX DEDUCTIBLE
MICR: 0440008041449031792# 0230

C. J. RICHARDSON
28 CADMAN PLAZA, WEST 78
BROOKLYN, NY 11201
Date: 1-15 1984
Pay to the order of Jesse Jackson for President \$ 63.00
Sixty three DOLLARS
CHEMICAL BANK
SIGNED: C. J. Richardson
MICR: 0212023370213 666 238 6# 1061

JANICE KYDD
249 JEFFERSON AVENUE
BROOKLYN, NY 11216
Date: Jan 15 1984
Pay to the order of Jesse Jackson for President \$ 27.00
Twenty seven DOLLARS
DIME THE DIME SAVINGS BANK OF NEW YORK
FULTON ST & DEKALB AVE.
BROOKLYN, N.Y. 11201
SIGNED: Janice C. Kydd
MICR: 02260702961071 025367 5# 0447

THE REACH
301 EAST 47TH STREET
NEW YORK, NY 10017
Date: Jan 17 1984
Pay to the order of Jesse Jackson for Pres \$ 500.00
Five hundred DOLLARS
Bankers Trust Company
SIGNED: V. J. Jorgensen
MICR: 001494# 0210010331 46 424905

89040760605

JAMES TYRRE
828 EAST 222ND ST
BRONX, NY 10467

1131

PAY TO THE ORDER OF Jackson for President Committee 35.00
Thirty Five DOLLARS

CHEMICAL BANK
150 West 14th Street
New York, N.Y. 10011

Jan 15 1984
James Tyrre

⑆021000128⑆ 028 218272 1131

SANDRA B. ELLIS
128 E. 291ST ST.
BRONX, NY 10468

125

PAY TO THE ORDER OF Jackson for Pres. Comm. 15.00
Fifteen DOLLARS

CITIBANK
150 West 14th Street
New York, N.Y. 10011

1/15 1984
Sandra B. Ellis

⑆021000089⑆ 050 90916425 0125

FLORA WILLIAMS
1345 ST. NICHOLAS AVENUE
NEW YORK, NY 10033

898

PAY TO THE ORDER OF Jackson for President Committee 8.00
Eight Dollars

CHEMICAL BANK
150 West 14th Street
New York, N.Y. 10011

1/15 1984
Flora Williams

Memo
⑆021000128⑆ 046 617752 0898

CLETIS E. EDWARDS

518

PAY TO THE ORDER OF Jackson for President Committee 15.00
Fifteen Dollars

CHEMICAL BANK
44TH STREET AND 1ST AVENUE
NEW YORK, N.Y. 10017

1/15 1984
Cletis E. Edwards

⑆021000128⑆ 152 506209 0518

MARTZA E. MYERS

860

PAY TO THE ORDER OF Jesse Jackson for President 15.00
Fifteen DOLLARS

CITIBANK
150 West 14th Street
New York, N.Y. 10011

Jan 15 1984
Martza E. Myers

⑆021000089⑆ 001 53115115 0860

RONALD H. WILLIAMS
2186 MADISON AVE., 4-D
NEW YORK, NY 10027
TELEPHONE NO. 692-4194

11/15 1984

PAY TO THE ORDER OF Jesse Jackson for President 5.00
Five DOLLARS

MANUFACTURERS TRUST COMPANY
270 Broadway, New York, N.Y. 10012

Ronald H. Williams

JONA L. PETERS
JACQUELINE P. CANNON

412

PAY TO THE ORDER OF Jesse Jackson for President 35.00
Thirty Five DOLLARS

BANK OF COMMERCE
2280 9th Ave. New York, N.Y. 10036

1/15 1984
Jona L. Peters

89040760606

DALE R. WRIGHT
888 GRAND CONCOURSE
BRONX, NY 10451

266

JAN 8 1984 1-131/78

PAY TO THE ORDER OF JACKSON FOR PRESIDENT CAMPAIGN \$ 40.00

40 FORTY DOLLAR ONLY DOLLARS

MEMO: Wesley

⑆021000322⑆ 7119 72 88101 026⑆

1058

RICHARD E. WESLEY
221 MONTCLAIR AVE.
UPPER MONTCLAIR, NJ 07043

3 JAN. 1984 55-1 312

PAY TO THE ORDER OF NEW YORKERS FOR JESSE JACKSON \$ 40.00

FORTY AND 00/100 DOLLARS

MIDLANTIC
Midlantic National Bank
Bank Church Office, East Orange, N.J. 07018

MEMO: Richard Wesley

⑆021200012⑆ 10613 22558 1058

2740

RUNETT H. COOK
419 EAST 76TH ST.
NEW YORK, NY 10021

1/8 1984 1-316/78

PAY TO THE ORDER OF Jessie Jackson Pres. \$ 40.00

Forty DOLLARS

WOMEN'S BANK
111 EAST 57TH ST. NEW YORK, N.Y. 10022

MEMO: Contribution Runett H. Cook

⑆026003104⑆ 0111164219 2740

1553

GERRI FLETCHER
PH. 201-872-7334
ROCKAWAY, NJ 07866

1/8 1984 55-231 212

PAY TO THE ORDER OF N.Y. for Jessie Jackson \$ 40.00

Forty only DOLLARS

HERITAGE BANK
ROCKAWAY, N.J. 07866

MEMO: Gerri Fletcher

⑆021202311⑆ 2001457470 1553

697

CAROLYN CORNELL
32 W. 31ST ST., STUDIO 5
NEW YORK, NY 10001

JAN 15 1984 1-711/78

PAY TO THE ORDER OF New Yorkers for Jesse Jackson \$ 50.00

Five DOLLARS

THE BOWERY.
THE BOWERY SAVINGS BANK
FIFTH AVENUE AT 14TH STREET NEW YORK, N.Y. 10001

MEMO: Carolyn Cornell

⑆226070115⑆ 038 308303 70 0647

139

MARVA SANDMAN
225 CONVENT SQUARE
MONTROSE, NY 11404

1/8 1984 1-127/8

PAY TO THE ORDER OF Jessie Jackson for President's 400

Forty DOLLARS

CITIBANK
111 W. 40th St. New York, N.Y. 10018

MEMO: Marva Sandman

118

ROBERT S. GIBBS, M.D.
111 W. 40th St. New York, N.Y. 10018

1/8 1984 1-104/78

PAY TO THE ORDER OF Jessie Jackson Campaign \$40.00

Forty DOLLARS

FREEDOM NATIONAL BANK
111 W. 40th St. New York, N.Y. 10018

MEMO: Robert S. Gibbs

89040760607

CAROLYN A. PENNA EASTERN WhisperDraft 349
 9 MYATIG AVE. NEWARK, N. J. 07102 JAN 15 84
 PAY TO THE ORDER OF JACKSON FOR PRESIDENT \$40.00
 FOR 7/100
 EASTERN AIRLINES EMPLOYER FEDERAL CREDIT UNION
 Payable through First Bank (N.A.), New York, N.Y.
 PURPOSE FIND PAPER Carol A. Penna
 ⑆09190148045030026879005⑆ 0349

EARL S. BIGGETT JAN 15 1984 896
 PAY TO THE ORDER OF Jesse Jackson for President \$20 9/10
 Twenty 7/100
 THE NEW YORK BANK FOR SAVINGS
 1230 AVE. OF THE AMERICAS
 NEW YORK, N. Y. 10020
 MEMO Jackson's Nomination Carl S. Biggett
 ⑆1226070076⑆ 000 1526276⑆ 0846

SARAH E. WRIGHT No. 273
 799 WEST END AVE., 1-D
 NEW YORK, N. Y. 10025
 PAY TO THE ORDER OF Jackson for President 1/5 1984 1-12 210
 Twenty 40/100 \$40.00
 CHEMICAL BANK
 261 BROADWAY
 NEW YORK, N. Y. 10025
 FOR Sarah E. Wright
 ⑆10210⑆0012⑆ ⑆073⑆529206⑆ 0273

MICHAEL ARMSTRONG 385
 140-25 EINSTEIN
 BRONX, NY 10475
 PAY TO THE ORDER OF Jessie Jackson Camp Jan. 9, 1984 1-1011/288
 Forty 1/100 \$40.00
 THE BOWERY.
 THE BOWERY SAVINGS BANK
 SEVENTH AVENUE AT 80TH STREET, NEW YORK, N.Y. 10019
 MEMO Jessie Jackson Michael Armstrong
 ⑆1226070115⑆ 048 413818 5⑆ 0385

O. P. SHERWOOD 3767
 RUBY B. SHERWOOD
 6 GLEN ROAD
 LARCHMONT, NY 10638
 PAY TO THE ORDER OF Julie Jackson Campaign 1/6 1983 1-2/210/251
 Forty 10/100 \$40.00
 CHASE
 The Chase Manhattan Bank, N.A.
 2771 Broadway Avenue
 Brooklyn, New York 11210
 MEMO O.P. Sherwood
 ⑆1021000021⑆ 251 1 022531⑆ 3767

BEATRICE T. NIVENS
 447 CENTRAL PARK W., 15B
 NEW YORK, NY 10020
 PAY TO THE ORDER OF THE Jackson for President
 Twenty 00/100
 \$20.00
 1-2/18/84
 433
 Budget Finance

DR. JAMES A. MOSS
 222 EAST 90TH STREET
 NEW YORK, NY 10021
 CHEMICAL BANK
 401 E. 75TH STREET, NEW YORK, N.Y. 10021
 PAY TO THE ORDER OF
 \$55.30
 1/12/1984

809097040608

WILMANETTE M. SOMERY
 1175
 38 WILLOUGHBY AVENUE
 BROOKLYN, NY 11225

1-289

Pay to the order of Jesse Jackson for President \$ 100.00
One Hundred 00/100 Dollars

CITIBANK
 CHICAGO, ILL. 60601
 430 MYRTLE AVENUE
 BROOKLYN, N.Y. 11225

Man *Wilmanette M. Somery*

⑆021000089⑆ 053 51379794⑆ 1615

THE CHASE BANKING BANK, N.A.
 100 N. ST. ST. 1000

JAMES FRY
 MARIE FRY
 448 CLAREBORN ROAD
 BROOKLYN, NY 11225

1/15 1984
 1210
 13

504

Jesse Jackson for President
One Hundred 00/100

1/15 1984
1210
13

ROBERT T. WILLIAMS, JR.
 348 MC LEAN PL.
 HILLSIDE, NJ 07036

1495
 1/15 1984
 112

PAY TO THE ORDER OF Jesse Jackson for President \$ 100.00
one hundred and 00/100 DOLLARS

FIDELITY UNION BANK
 100 CLAYTON AVE
 DIVISION, NY 10004

Calvin J. Petty

⑆021200096⑆ 407 100230 1⑆ 1495

CALVIN J. PETTEY
 40 W. 135 ST
 New York, N.Y. 10027

361
 1-30/20
 Jan 12 1984

PAY TO THE ORDER OF Jesse Jackson for President \$ 100.00
One Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 LaGuardia Airport, Flushing, New York 11371

Calvin J. Petty

⑆021000306⑆ 10680504598⑆ 65 0361

EDWARD G. LLOYD
 CAROLE DARDEN LLOYD
 152-18 RIVERSIDE DRIVE WEST
 NEW YORK, NY 10032

1271
 1-100/200
 1/19 1984

PAY TO THE ORDER OF Jackson for President \$ 100.00
One Hundred 00/100 DOLLARS

ISSUING OFFICE
 MARINE MIDLAND BANK, N.A.
 ISSUING NEW YORK 10022

Carol Warden Lloyd

⑆028001081⑆ 483702978⑆ 1271

Lorraine E. Hale, Ph.D.
 320 Sprain Rd.
 Catsdale, NY 10583

499
 1-40/200
 Jan 8 1984

Pay To The Order Of Jesse Jackson for President \$ 40.00
Forty and 00/100 Dollars

FREEDOM NATIONAL BANK OF NEW YORK
 39 WEST 107TH STREET, NEW YORK, N.Y.

Lorraine E. Hale

⑆026004349⑆ 121 9839⑆ 0499

JEFF PERRY
 PO Box N-74
 H-6-0609 NY 07030

326
 201 433 2945

THE TRUST COMPANY OF NEW JERSEY
 JERSEY CITY, N.J. 07308

1-100/200
 Jan 19 1984
 212

Jesse Jackson for President \$ 100.00
One Hundred Dollars & no cents DOLLARS

ON 7

89040760609

51-575-149-9
THEODORE WILLIAM ALLEN
 97 BROOKLYN AVE
 BKLYN, NY 11216

15 Jan 1984 551

Pay to the order of Jesse Jackson for President \$ 20.00
Twenty and 00/100 Dollars

The Greater
 NEW YORK CREDIT BANK
 Through Avenue and 42nd Street, Brooklyn, N.Y. 11218

Memo for TWA & Air Day

Theodore William Allen

⑆2226070539⑆ 853 0701492⑆ 0551

Jan 15 1984 91

Pay to the order of Jesse Jackson for President \$ 20.00
Twenty Dollars and 00/100 Dollars

AMERICAN SAVINGS BANK
 251 WEST 97TH STREET
 NEW YORK, N.Y. 10019

And Yetter

⑆226070432⑆ 041104068 6⑆ 0091

MICHELE P. RAWLINS 2452

Jan 15, 1984

Pay to the order of Jesse Jackson for President Committee \$ 10.00
Ten Dollars and 00/100 Dollars

CITIBANK
 Citibank, N.A.
 Park Ave. at 46th St.
 New York, N.Y. 10018

Michele P. Rawlins

⑆021000089⑆ 049 5692068 2⑆ 2452

EULA C. JOHNSON 189

1333 FTELEY AVE. 1ST FL.
 BRONX, NY 10472

Jan 1984

PAY TO THE ORDER OF Jessie Jackson Campaign \$ 40.00
Forty Dollars DOLLARS

The Chase Manhattan Bank, N.A.
 CHASE
 26 San 2nd Street, New York, N.Y. 10010

FOR DONATION *Eula C. Johnson*

⑆021000021⑆ 002 1 318829⑆ 0189

GREGORY O. PAGE, D.M.D. 291

10 W. 135TH STREET NO. 1-B
 NEW YORK, NY 10037

1/8 1984 1-2/210/878

PAY TO THE ORDER OF JACKSON for President Committee \$ 100.00
One hundred dollars and 00/100 DOLLARS

The Chase Manhattan Bank, N.A.
 CHASE
 2215 FIFTH AVENUE & 135th Street
 New York, N.Y. 10037

Gregory O. Page, D.M.D.

⑆021000021⑆ 078 1 021875 0⑆ 0291

EVERALD J. WALSH 808

1-102/710

Pay to the order of Committee for Jesse Jackson \$ 10.00
Ten Dollars Dollars

Bankers Trust Company
 200 Broadway, N. York, N.Y. 10038

Jan 19 84

08 Jan 84

IRVING BURGIE 1838

190-02 111TH AVE.
 JHOLLIS, NY 11412

1-102/710

Pay to the order of Jesse Jackson for President \$ 40.00
Forty Dollars DOLLARS

MANUFACTURERS TRUST COMPANY
 200-19 Middle Avenue, Jamaica, N.Y. 11420

Jan 6 1985

08

89040760610

YVETTE DURAN
392 CENTRAL PARKWAY
NEW YORK, NY 10025

204-1183 188

APR 8 1983

PAY TO THE ORDER OF Jackson For President \$40.00
Forty ~~and~~ DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
200 Fifth Avenue, New York, N.Y. 10010

FOR Yvette Duran
⑆021000306⑆10230643957⑆650188

CAROLYN YOHANNES
27 GRAY STREET
POUGHKEEPSIE, NY 12603

1-20 1984 370

PAY TO THE ORDER OF Jackson For President Campaign \$10.00
Ten and 00/100 DOLLARS

CHEMICAL BANK
100 WALL STREET, NEW YORK, N.Y. 10038

MEMO Primary Campaign Carolyn Yohannes
⑆028000146⑆10282⑆231544⑆0370

M VELMANETTE MONTGOMERY
195 WILLOUGHBY AVENUE
BROOKLYN, NY 11285

1/8 1984 1596

PAY TO THE ORDER OF Jackson For President \$40.00
Forty 00/100 DOLLARS

CITIBANK
430 Myrtle Avenue
Brooklyn, N.Y. 11238

MEMO Velmanette Montgomery
⑆021000089⑆05351379794⑆1596

RANDRETA WARD-EVANS
2170 MADISON AVE.
NEW YORK, NY 10037

Jan 15 1983 191

PAY TO THE ORDER OF Jesse Jackson For President \$10.00
Ten 00/100 DOLLARS

BANK OF COMMERCE
1140 Avenue of the Americas, New York, N.Y. 10036

MEMO Randreta Ward Evans
⑆026007508⑆15⑆021092⑆

THOMAS C. LOVE
65 WEST 96TH ST., APT. 21D
NEW YORK, N.Y. 10025

118 1984 711

PAY TO THE ORDER OF NEW YORKERS FOR JESSE JACKSON \$10.00
TEN DOLLARS

CITIBANK
430 Myrtle Avenue
Brooklyn, N.Y. 11238

MEMO FUNDRAISER Thomas C. Love
⑆021000089⑆05351379794⑆1596

DOROTHY J. JOHNSON
214 LIVINGSTON RD.
NEW ROCHELLE, N.Y. 10884

Jan 3 1984 861

PAY TO THE ORDER OF Mrs. Jackson For Jesse Jackson \$10.00
Ten 00/100 DOLLARS

CHEMICAL BANK
100 HUDSON STREET
NEW ROCHELLE, N.Y. 10884

SANDRA O. SMALL
Jan 15 1984 154

PAY TO THE ORDER OF Jesse Jackson Campaign Fund \$10.00
TEN DOLLARS

CHEMICAL BANK
100 West 125th Street
New York, N.Y. 10027

1199407606118

DAVID VICKER
130 SUSSEX ST.
JERSEY CITY, NJ 07310

JAN 6th 1984

168

PAY TO THE ORDER OF NEW YORKERS FOR JESSE JACKSON'S 50th
FIATY DOLLARS

Commercial Trust
Commercial Trust Company of New Jersey
400 0702
19 WALL ST. 2ND FL. N.Y. N.Y. 10038

Hand Vicker

⑆021200410⑆ ⑆0303⑆23874⑆ 0168

WILLIAM H. MICHAEL
SANDRA MICHAEL
27 WEST 84TH STREET
NEW YORK, NY 10024

1/9 1984

386

PAY TO THE ORDER OF New Yorkers for Jesse Jackson \$ 50.00
Fifty DOLLARS

CITIBANK
Citibank, N.A.
Madison Ave. at 65th St.
New York, N.Y. 10021

William H. Michael

⑆0210000089⑆ 095 12130873⑆ 0386

IRENE MYERS
105 E. 87TH ST., 12A
NEW YORK, NY 10029

1-8 1984

253

PAY TO THE ORDER OF Jesse Jackson Campaign \$ 10.00
Ten DOLLARS

CHEMICAL BANK
126 E. 60th STREET, NEW YORK, N.Y. 10020

Irene Myers

⑆021000128⑆ 034⑆ 241485⑆ 0253

JESSE JACKSON CAMPAIGN FUND

1/8 1984

40.00

PAY TO THE ORDER OF Trusty DOLLARS

AMALGAMATED BANK OF NEW YORK
124 11-15 Union Square, New York, NY 10003

M.A. TERRY
FOR TWO PERSONS: VIVIAN CAMPBELL

⑆026003379⑆ 09557957⑆

M.A. Terry

HATTIE WINSTON
ACCOUNT # 2
280 EAST END AVE.
NEW YORK, N.Y. 10023

1-21-84

1540

PAY TO THE ORDER OF New Yorkers for Jesse Jackson \$ 50.00
Fifty and no/100 DOLLARS

Hattie Winston

The Chase Manhattan Bank, N.A.
One Chase Plaza, New York, N.Y. 10017

CHECK IS IN PAYMENT OF FOLLOWING ITEMS

DATE	AMOUNT
12-31-83	10.00

REF: 10/1/84

CORRECT ENDORSEMENT IS RECEIPT

ANNIVETTE STUDIO
99 POWELL STREET
BROOKLYN, NY 11212

12-31 1983

1035

PAY TO THE ORDER OF New Yorkers for Jesse Jackson \$ 10.00
Ten dollars DOLLARS

CHEMICAL BANK
248 FIFTH AVE.
NEW YORK, NY 10018

⑆001035⑆ ⑆021000128⑆ 182⑆ 18487⑆

89040760612

39040760613

MELBABA ENTERPRISES, INC.
231 WEST 58TH STREET
NEW YORK, NY 10019

5886

1/13 1984

PAY TO THE ORDER OF Rev Jesse Jackson Campaign \$ 50.⁰⁰

fifty 00 DOLLARS

FOR Campaign

The Chase Manhattan Bank, N.A.
230 West 57th Street, New York, N.Y. 10019

James J. Thomas

⑆005886⑆ ⑆021000021⑆ 018 1 084757⑆

ALICE M. DEAR
400 W. 148TH ST.
NEW YORK, NY 10031

1169

Dec. 31 1983

Pay to the order of Jackson for President \$ 50.⁰⁰

Fifty and 00/100 DOLLARS

Irving Trust

Irving Trust Company
One Wall Street, New York, NY 10038

political contribution

Alice M. Dear

⑆021000678⑆ ⑆148 0138216⑆ 1169

WILLIE WASHINGTON

1/15 1984 76

Pay to the order of Josie Jackson Campaign \$ 5.⁰⁰

Five & 00/100 DOLLARS

EMIGRANT
EMIGRANT SAVINGS BANK
12 EAST 42ND STREET, NEW YORK, N.Y. 10017

Memo Domestic

Willie Washington

⑆226070403⑆ 760403062 2⑆ 0741

L

GLORIA DIANE LOWERY-TYRRELL
156-68 169 AVENUE
JAMAICA, NY 11433

Jan 8 1984 160

Pay to the order of Jackson for Pres \$ 45.⁰⁰

Forty-five dollars & 00/100 DOLLARS

EVER FEDERAL SAVINGS
Savings and Loan Association
100 WEST 119TH STREET, NEW YORK, N.Y. 10027

John J. Kelly

⑆021000000⑆ ⑆506 040001⑆ 170000⑆

89040760614

WALA SAI'AM SHAH
 311 E. MONROUE PARKWAY
 BRIDGE, NY 10818

THE CHASE Manhattan Bank, N.A.
 677 Grand Street
 New York, N.Y. 10017

1-15-1984 1-12/28
 50.00
 DOLLARS

Wala Sa...

MUNTU DOGGETT
 17-85 - 215TH ST., 17P
 BAYSIDE, NY 11360
 PH. 462-8070

319

1-15-84 1-12/28
 50.00
 DOLLARS

THE BOWERY.
 THE BOWERY SAVINGS BANK
 FIFTH AVENUE AT BOW STREET, NEW YORK, N.Y. 10003

Muntu Doggett

⑆226070115⑆ 038 311382 6 0319

AIDA M. RICHARDSON

133

January 15, 1984 1-12/28
 50.00
 DOLLARS

CHEMICAL BANK
 124 WEST 120TH STREET NEW YORK, N.Y. 10027

Aida M. Richardson

⑆021000128⑆ 094 227608 0133

WILLIAM F. CARTER
 2225 FIFTH AVE.
 NEW YORK, NY 10037

1374

JAN 15 1984 1-07/210
 50.00
 DOLLARS

Irving Trust
 Irving Trust Company
 Madison Avenue at 11th Street, New York, NY 10022

William F. Carter

⑆021000678⑆ 115 00186721 1374

MARINE MIDLAND BANK, N.A.

MARINE MIDLAND MONEY ORDER

3732396
 DATE OF ISSUE January 15, 1984 1-08/210

PAY TO THE ORDER OF *Jackson for President Con...*

50.00
 DOLLARS

William F. Carter

828 E. 222 STR. BRONX, N.Y. 10467

MONEY ORDER VOID AFTER ONE YEAR FROM DATE OF ISSUE
 NOT VALID OVER \$1000.00

⑆899400⑆ ⑆021001088⑆ 001190049⑆ 8

8 9 0 4 0 7 6 0 6 1 6

ANGELA E. SMITH
 NO. 200
 1-15-84 19
 1-17/210
 PAY TO THE ORDER OF
 New Yorkers for Jessie Jackson's 95th
 Twenty - Five
 Chemical Bank
 60 Wall Street
 New York, N.Y. 10038
 Dollars

JACLYN K. DURANT
 150 ADELPHI ST.
 BROOKLYN, NY 11205
 1-15-84
 1-17/210
 PAY TO THE ORDER OF
 Jackson for President Comtee 25.00
 Twenty - Five
 Chemical Bank
 120 Wall Street
 New York, N.Y. 10038
 Dollars

WANDA ANNE McCLURE
 475 JERSEY AVE. APT. 5
 JERSEY CITY, NJ 07310
 1-17/210
 PAY TO THE ORDER OF
 JESSE Jackson
 25⁰⁰ 00
 TWENTY-FIVE
 Chemical Bank
 60 Wall Street, New York, N.Y. 10038
 Memo: *Wanda A. McClure*
 ⑆021200410⑆ ⑆0342⑆ 17319⑆ 0130

VERA S. BLOCH
 106 WILLOUGHBY AVE., APT. 516
 BROOKLYN, NY 11205
 January 15, 1984
 1-17/210
 PAY TO THE ORDER OF
 Joe Jackson for President
 Twenty - five 00/100
 Irving Trust
 Irving Trust Company
 One Wall Street, New York, NY 10038
 Memo: *Vera Bloch*
 ⑆021000678⑆ ⑆101 7764922⑆ 1370

JANIE WILLIAMS
 146-16 ELGAR PLACE APT. 16L
 BRONX, NY 10475
 Jan 15 1984
 1-9770 Branch 45
 PAY TO THE ORDER OF
 Jackson for President Comtee 25.00
 Twenty Five
 Citibank, N.A.
 111 Eighth Avenue
 New York, N.Y.
 10011
 CITIBANK
 FOR: *Janie Williams*
 ⑆021000089⑆ 045 90910998⑆ 0495

LAURA JONES
 345 LEFFERTS AVENUE
 BROOKLYN, NY 11225
 Jan. 15, 1984
 1-32 210
 Pay to the order of
 Jackson for President Com. 25.00
 Twenty five 00/100
 Manufacturers Hanover Trust Company
 1308 Fulton Street
 Brooklyn, N.Y. 11216
 Memo: *Laura Jones*
 ⑆021000306⑆ 10880107952⑆ 55 1741

JOAN M. EASTMOND
 342 MACON STREET
 BROOKLYN, NY 11233
 15 JAN 10 84
 1-12/210
 Pay to the order of
 JACKSON FOR PRESIDENT COM. 25.00
 TWENTY-FIVE
 Chemical Bank
 1300 Fulton Street
 Brooklyn, N.Y. 11219
 Memo: *Joan M. Eastmond*
 ⑆021000128⑆ 139⑆ 5351336⑆ 0619

ELMANETTE MCGOWEN
WILLOUGHBY AVENUE
BROOKLYN, NY 11228

1-15-84

Pay to the order of Jessie Jackson for President \$ 25.00
Twenty Five 00/100 Dollars

CITIBANK
CITIBANK, N.A.
200 MYRTLE AVENUE
BROOKLYN, N.Y. 11222

Memo Manila Elmanette McGowen

⑆021000089⑆ 053 51379794⑆ 1614

JOYCE S. WALKERSON
4511 FINE ST., #101
PHILADELPHIA, PA. 19133

124

Jan. 15, 1984

Pay to the order of Jessie Jackson for Presidency Campaign \$ 25.00
Twenty Five 00/100 Dollars

CHEMICAL BANK
UNITED NATIONS BLDG. (COR. N.Y. 2011)

Ann S. Walker

MRS. WILLIE BELK
MARSE PRY

251

1-15-84

Pay to the order of Jessie Jackson for President Campaign \$ 25.00
Twenty Five 00/100 Dollars

CITIBANK
CITIBANK, N.A.
248 ROCKAWAY PARKWAY
BRONX, N.Y. 11228

Memo Manila Willie Belk

⑆021000089⑆ 191 19317315⑆ 0251

JEAN SHARON JONES
2429 SEDGWICK AVENUE
BRONX, NY 10468

4/5 1984 562

Pay to the order of Jessie Jackson for President \$ 25.00
Twenty Five 00/100 Dollars

CITIBANK
CITIBANK, N.A.
2481 CRENSHAW AVE.
BRONX, N.Y. 10468

Memo Manila Jean Sharon Jones

⑆021000089⑆ 102 55661797⑆ 0562

JAMES L. THOMAS, JR.
DELORIS L. THOMAS
2330 FIFTH AVE.
NEW YORK, N.Y. 10037

January 15, 1984 316

PAY TO THE ORDER OF Jessie Jackson for President \$ 25.00
Twenty Five & 00/100 DOLLARS

MARINE MIDLAND BANK, N.A.
32ND STREET OFFICE
NEW YORK, NEW YORK 10103

FOR James L. Thomas Jr.

⑆021001088⑆ 11303379⑆ 0316

JACQUELINE P. CANNON
5906 ARLINGTON AVENUE
RIVERDALE, NY 10471

1-15-84 2142

Pay to the order of Jessie Jackson for President \$ 25.00
Twenty - five & 00/100 Dollars

The Amalgamated Bank of New York
11-11 UNION SQUARE
NEW YORK, N. Y. 10003

Jacqueline P. Cannon

⑆02600337⑆ 101191969⑆

GUY LEMARCHANDS

1353

Jan 15 1984

PAY TO THE ORDER OF New York for for Jessie Jackson \$ 25.00
Twenty Five 00 cents DOLLAR

CHEMICAL BANK
UNITED NATIONS BLDG. (COR. N.Y. 2011)

[Signature]

21909704068

8904070618

CHEMICAL BANK
 200 West Street
 New York, N.Y. 10038

James D. Walker
 18 JAN 1984 3303
 1-12/78

James D. Walker
 18 JAN 1984 3303
 1-12/78

James D. Walker
 18 JAN 1984 3303
 1-12/78

CTIBANK
 680 St. at Madison Ave.
 New York, N.Y. 10022

A. M. McAllister
 118 JAN 1984 1294
 1-8/77

A. M. McAllister
 118 JAN 1984 1294
 1-8/77

RICHARD WALUGEMER
 401 E 89th St
 N.Y. N.Y. 10027

156
 9 JAN 1984 1-10/78

PAY TO THE ORDER OF NEW YORKERS FOR JOSE JACKSON \$ 25
TWENTY-FIVE DOLLARS DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 6th Street & Madison Avenue, N.Y., N.Y. 10017

FOR Richard Walugemer
 ⑆021000308⑆11340636821⑆65 0156

LAWRENCE R. BANKS, JR.
 285 W. 180TH ST.
 NEW YORK, NY 10030

973
 JANUARY 4, 1983 1-9/81

Pay to the order of NEW YORKERS FOR JESSIE JACKSON-- \$ 25.00
TWENTY FIVE AND NO/100---- Dollars

Irving Trust
 Irving Trust Company
 Madison Avenue at 57th Street, New York, NY 10022

Benefit Lawrence R. Banks Jr.
 ⑆021000678⑆1115 6338474⑆ 0973

JOSEPH W. JOHNSON
 862 EAST 237TH STREET
 BRONX, NY 10466

482
 JAN 8 1984 1-3/216/875

PAY TO THE ORDER OF JACKSON FOR PRESIDENT \$ 25.00
TWENTY-FIVE DOLLARS

The Chase Manhattan Bank, N.A.
 728 East 233rd Street
 Bronx, N.Y. 10466

FOR Joseph W. Johnson
 ⑆021000021⑆ 075 1 076043⑆ 0482

ANDREA C. SKINNER
 316 WEST 22ND ST.
 NEW YORK, N.Y. 10011

646
 JAN 8 1984 1-2/110 28

PAY TO THE ORDER OF Jackson for President \$ 25.00
Twenty-five and 00/100 DOLLARS

The Chase Manhattan Bank, N.A.
 300 N. 6th Ave., N.Y., N.Y. 10011

FOR Andrea Skinner
 ⑆021000021⑆ 220 1 024557⑆ 0646

JOSEPH BAIER
 110th Street
 BROOKLYN, NY 11235

1-12/78
 1/9 1984 657

Jose Jackson \$ 25.00
 Dollars

8 9 0 4 0 7 6 0 6 1 9

CHARLYNE BROOKS
26 PARK AVENUE
NEW ROCHELLE, NY 10804

1-2/28/417 1674

PAY TO THE ORDER OF
Submits five 00/100
Jackson for President \$ 25.00
DOLLARS

Jan 8 1984

Debra P. Brooks

AMANDA ANDERSON Jan 8 1984 927

Pay to the order of Jackson for President \$ 25.00
Twenty-five Dollars

THE NEW YORK BANK FOR SAVINGS
1280 AVE. OF THE AMERICAS
NEW YORK, N. Y. 10020

Memo Amanda Anderson

⑆226070076⑆ 000 1236124⑆ 0927

DEE EDMONS EDELSTEIN Jan 8 1984 910

Pay to the order of Jackson for President \$ 25.00
Twenty-five Dollars

THE NEW YORK BANK FOR SAVINGS
1280 AVE. OF THE AMERICAS
NEW YORK, N. Y. 10020

Memo Dee Edmons Edelstein

⑆226070076⑆ 000 1531011⑆ 0910

JOSEPH T. McMILLAN, JR. Jan 19 84 1069
218 W. 85TH STREET APT. 2B
NEW YORK, NY 10024

Pay to the order of New Yorkers for Jesse Jackson \$ 25.00
Twenty-five and 00/100 Dollars

THE NEW YORK BANK FOR SAVINGS
DIVISION OF BUFFALO SAVINGS BANK
1280 AVE. OF THE AMERICAS
NEW YORK, N. Y. 10020

Memo J. T. McMillan Jr.

⑆226070076⑆ 000 1818970⑆ 1069

IRMA STRAUGHN 1279

1-8 1984 1-28/210

PAY TO THE ORDER OF Jackson for President \$ 25.00
Twenty-five and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
77 Eighth Avenue, New York, N.Y. 10014

FOR Irma V. Straughn

⑆021000306⑆ 10570605481⑆ 65 1279

CLEO BANKS January 8 1984 582
178-12 POCH BLVD.
JAMAICA, NY 11434

Pay to the order of New Yorkers for Jesse Jackson \$ 25.00
Twenty-five Dollars

CHEMICAL BANK
234 West Fourth Street
New York, N.Y. 10014

Memo Cleo Banks

⑆021000128⑆ 043⑆ 507913⑆ 0582

GERALDINE L. WILSON 217
120 RIVERSIDE DRIVE, APT. 5A
NEW YORK, NY 10012

1-8 1983 1-28/210

PAY TO THE ORDER OF
Submits five 00/100
Jackson for President \$ 25.00
DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
230 West Fourth Street, New York, N.Y. 10014

Geraldine Wilson

8 9 0 9 7 0 0 6 2 0

JANE M. HORNBUCHER Jan. 12 19 84 1367

Pay to the order of Jessie Jackson \$ 25.00

Twenty-five Dollars

DollarDryDock

Memo Jessie Jackson

⑆226070319⑆ 831042025 5# 1367

GLENN A. COUTRIER Jan 8 19 84 153

Pay to the order of New York Committee for Jesse Jackson \$ 25.00

Twenty Five and 00/100 Dollars

THE NEW YORK BANK FOR SAVINGS
DIVISION OF BUFFALO SAVINGS BANK
1280 AVE. OF THE AMERICAS
NEW YORK, N. Y. 10020

Memo Glenn A. Coutrier

⑆226070076⑆ 000 2276681 0153

DR. PAMELA D. STRAKER 1/7 84 481

Pay to the order of Jesse Jackson for President \$ 25.00

Twenty five and 00/100 Dollars

CHEMICAL BANK
600 Fifth Avenue
New York, N. Y. 10017

Memo Dr. Pamela D. Straker

⑆021000128⑆ 124 50590 0481

MIRIAM L. SNEED 1/8 19 84 224

Pay to the order of New Yorkers for Jesse Jackson \$ 25.00

Twenty five and 00/100 Dollars

THE NEW YORK BANK FOR SAVINGS
1230 AVE. OF THE AMERICAS
NEW YORK, N. Y. 10020

Memo Miriam L. Sneed

⑆226070076⑆ 000 1879220 0224

JOANNE WILLIAMS 1985

Pay to the order of Jesse Jackson Campaign \$ 25.00

Twenty-five Dollars

National Bank of New York

Memo Joanne Williams

⑆021000128⑆ 124 50590 0481

GRACE BLAKE January 3, 19 84

Pay to the order of Jesse Jackson Campaign \$ 25.00

Twenty Five and 00/100 Dollars

The Chase Manhattan Bank, N.A.
410 Park Avenue, New York, N.Y. 10022

Memo Grace Blake

⑆226070319⑆ 831042025 5# 1367

NORMA J. GARDEN Jan 8 19 84 266

Pay to the order of Jesse Jackson Campaign \$ 25.00

Twenty five and 00/100 Dollars

CITIBANK
City Branch, N.Y.C.

Memo Norma J. Garden

⑆226070319⑆ 831042025 5# 1367

EARLEAN KNOX
810 RIVERSIDE DR., 65
NEW YORK, NY 10025

314

Jan. 8 1984

PAY TO THE ORDER OF

Jackson for President \$ 25.00
Twenty five and 00/100

DOLLARS

CHEMICAL BANK
120 WEST 125TH STREET, NEW YORK, N.Y. 10027

Earlean Knox

⑆021000128⑆ 094-210764-0314

BARBARA C. SMITH

1659

Jan 8 1984

PAY TO THE ORDER OF

Jackson for President \$ 25.00
Twenty Five and 00/100

DOLLARS

Citibank, N.A.
605 La Guardia Place
New York, N.Y.
10018

CITIBANK

Barbara Smith

⑆021000089⑆ 122 72033629# 1659

CAROLYN F. GRAM
P.O. BOX 315
WEST HEMPSTEAD, NY 11552

549

1/8 84

PAY TO THE ORDER OF

Jackson for President \$ 25.00
Twenty-five and 00/100

DOLLARS



Republic National Bank of New York
7485 18TH AVENUE
BROOKLYN, NEW YORK 11228

Carolyn Gram

⑆026004828⑆ 601074581# 0549



OLLIE M. DAVIS
2408 HUDSON TERR.
FORT LEE, NJ 07024

2247

January 8 84

PAY TO THE ORDER OF

New York for Jesse Jackson \$ 25.00
Twenty five and 00/100

DOLLARS

United Jersey Bank
201 Main Street
Fort Lee, N. J. 07024

Ollie M. Davis

⑆021202162⑆ 226-651921# 2247

VALERIE SIECZKOWSKI

411

NO.

1/9 84

1-12/218

PAY TO THE ORDER OF

Jackson for President \$ 25.00
Twenty-five and 00/100

DOLLARS

CHEMICAL BANK

45 Park Avenue
New York, N.Y. 10022

Valerie Sieczkowski

⑆021000128⑆ 010-252008# 0411

DOMI MICHELSON
75 CANADIAN CRESCENT
WHITE PLAINS, NY 10603
4087
Jan. 8 84
\$ 25.00
Twenty five and 00/100
DOLLARS
Scribble National
Domi Michelson

LUCIA CLARE
135 OCEAN PARKWAY
BROOKLYN, NY 11218
3203
Jan 8 1984
\$ 25.00
Twenty-five
DOLLARS
The Chase Manhattan Bank, N.A.
25 Broad Street, New York, N.Y. 10018
Lucia Clare

129097606218904007606218

89040760625

CARRIE E. HAYNES
 2888-3 VALENTINE AVENUE
 BRONX, N. Y. 10467

669

Pay to the order of Jesse Jackson for President \$ 75.00
Jan 15 1984

Seventy-Five Dollars

Citibank, N.A.
 2100 Grand Concourse
 Bronx, N.Y. 10467

CITIBANK

Memo Contribution Carrie E. Haynes

• 021000089 • 181 67917278 # 0669

NORMA GREEN *Jan 7 1984* 1772

1700/200

Pay to the order of New-Yorkers for Jesse Jackson \$ 25.00
Twenty-Five Dollars Dollars

Roosevelt Savings Bank
 ADMINISTRATIVE HEADQUARTERS, BARREN CITY, N. Y. 10000

Memo Contribution Norma Green

• 226071091 • 020002653 2# 1772

UNITED STATES OF AMERICA POSTAL MONEY ORDER ⁴⁸

32122124368A40329 200271 200*00

<small>SERIAL NUMBER</small>	<small>YEAR MONTH DAY</small>	<small>POST OFFICE</small>	<small>DOLLARS AND CENTS</small>
<small>PAY TO</small> Women National P.A.C.		<small>FROM</small> Franklin R. Collins	
<small>STREET</small> 609 W 138 th Street		<small>STREET</small> 5 Eastern Parkway	
<small>CITY</small> New York, N.Y. 10036		<small>CITY</small> Brooklyn, N.Y. 11238	
MONEY ORDER		<small>POST OFFICE</small> New Jersey Jackson Lanes	

⑆000008002⑆

32122124368*

89040760624

TAD SCHNUGG
LONG RIDGE RD.
DANBURY, CT 06810

3-22 1984 1-12/210

PAY TO THE ORDER OF WOMEN'S NETWORK PAC \$ 200.00
TWO HUNDRED AND 00/100 DOLLARS

CHEMICAL BANK

PER JACKSON DUKE
⑆021000128⑆ 074 239414 0281

Tad Schnugg

MELVIN WOLINSKY
ATTY.-AT-LAW
18-34 COLLEGE POINT BLVD.
COLLEGE POINT, N.Y. 11356

1081

3/23/84

1-32/210

PAY TO THE ORDER OF Women's Network Pac \$ 400.00
Four Hundred DOLLARS

National Bank of North America
14-15 College Point Blvd., College Point, N.Y. 11356 123

MELVIN WOLINSKY

Melvin Wolinsky

FOR

⑆001081⑆ ⑆021000322⑆ 2123 40 8686⑆

89040760625

AUDREY EDWARDS
45 PLAZA ST.
BROOKLYN, NY 11217

2533

March 19 84

1-8 210

PAY TO THE ORDER OF The Women's Network PAC \$ 200.00
Two hundred and 00/100 DOLLARS

Citibank, N.A.
Park Ave. at 46th St.
New York, N.Y.
10159

CITIBANK

Audrey M. Edwards

⑆021000089⑆ 049 50833588⑆ 2533

JOSEPH LLOYD SERLING
ATTORNEY AT LAW

10708

3/18 19 84

1-12 210

PAY TO THE ORDER OF Women's Network PAC \$ 200.00
two hundred DOLLARS

CHEMICAL BANK

11 West 51st Street
New York, N.Y. 10019

Joseph Lloyd Serling

CHEMICAL BANK

55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 7309871

March 31 1984

Pay to the Order of

WOMENS NETWORK FOR Political & Economic Parity

CHEMICAL BANK
117 BANK ST
200 AND 00 CTS

Address

Signature

Carol Sprung

⑈7309871⑈ ⑆021000128⑆ 000⑈777048⑈

⑆021000306⑆ 00002 04038⑈

F. Coleman

MANUFACTURERS HANOVER TRUST COMPANY
MEMPHIS, NEW YORK 1301

DR R Coleman

Pay to the order of Women PAC

DR R Coleman

5 100 00

100 Dollars

1-30/210

3/30 19 84 101

DR R COLEMAN
5217 9840 0943 6471

890407606



BERNARD R. THOMAS
KAREN THOMAS
859 WALNUT STREET
ROSELLE, NJ 07203

Mar 30 1984 209

55-7001
2212

Pay to the order of Womens Network PAC \$ 50.00

Fifty and 00/100 Dollars

CITY FEDERAL SAVINGS
One of America's Largest Financial Services Companies

Memo Jackson Diner Karen Thomas

⑆221270017⑆ 085362334604⑈ 0209

MARGARET E. CALHOUN
819 RIVERSIDE DRIVE
NEW YORK, N.Y. 10032

380

3/30 1984 Branch 41

Pay to the order of Women's Network PAC \$ 50.00

Fifty & 00/100 DOLLARS

Citibank N.A.
Broadway at 40th Street
New York, N.Y. 10011
CITIBANK

for Jackson's Presidential Campaign Margaret E. Calhoun

⑆021800089⑆ 04162411585⑈ 0380

ELAINE RAY
664 WEST 163RD ST.
NEW YORK, NY 10032

0819

Mar 30 1984

1-30/218

PAY TO THE ORDER OF Women's Network PAC \$ 50.00

Fifty dollars and 00/100 DOLLARS

 **MANUFACTURERS HANOVER TRUST COMPANY**
844 Third Avenue, New York, N.Y. 10022

FOR Jane Jackson Diner Elaine C. Ray

⑆021000306⑆ 11100608156⑈ 65 0819

KENDALL A. MINTER, ESQ.
221 WEST 57TH STREET
NEW YORK, NY 10019

1422

1-4/210/200

March 27, 1984

PAY TO THE ORDER OF Womens Network PEP \$ 200.00

Two Hundred and _____ DOLLARS

Citibank, N.A.
Citicorp Center
163 E. 53rd St.
New York, N.Y.
10043

Private
Banking
Division

CITIBANK

MEMO Jesse Jackson Contribution

Kendall Minter

⑆02⑆000089⑆ 400 37⑆32824⑆ 1422

Joe Ben
! check
49200
✓

ALICE D. NELSON

No. _____

3/28 1984 1-327/200

PAY TO THE ORDER OF Women's Network - PAC \$ 100.00

One hundred _____ DOLLARS



AMALGAMATED BANK OF NEW YORK
124 207 BARTON AVENUE BRONX, NEW YORK 10476

Anthony Nelson

Alice d. Nelson

⑆02600⑆379⑆ 28⑆68670⑆ 0273

✓

39040760629

2121

PETER SHELLEY ZEILER
ATTORNEY AT LAW

3/27 1984 1-479/200

PAY TO THE ORDER OF Women's Network, P.C. \$ 200.00

Two hundred and _____ DOLLARS

The Merchants Bank of New York
484 BROADWAY, NEW YORK, N.Y. 10013

OR Political Contribution - business

Peter Shelley Zeiler

⑆026006790⑆ ⑆⑆047089⑆

SANTIAGO P. NEGRONI
183-85 THOMPSON STREET
NEW YORK, N.Y. 10012

1433

3/27/1984

1-8/210
Branch 122

PAY TO THE ORDER OF Women's Network, P.A.C. \$ 100.00
one hundred and 00/100 DOLLARS

Citibank, N.A.
535 La Guardia Place
New York, N.Y.
10012

CITIBANK

FOR P.A.C. Santiago P. Negroni
⑆021000089⑆ 122 72079088⑈ 1433

L. PRISCILLA HALL
20 SOUTH PORTLAND AVENUE
BROOKLYN, NY 11217

3/27 1984 1096

1-7840/2260

Pay to the order of Women's Network \$ 200.00
two hundred dollar and 00/100 Dollars

EMIGRANT
EMIGRANT SAVINGS BANK
8 EAST 42ND STREET, NEW YORK, N.Y. 10017

Memorize Jordan Campaign L. Priscilla Hall
⑆226070403⑆ 760108968 8⑈ 1096

89040760620



WNPEP

Women's Network for Political and Economic Party

NAME (PLEASE PRINT)	ADDRESS	AMOUNT OF CHECK	COMMITTEE SPO
✓ FAUCHER, KIRK ✓	1674 B'WAY, SUITE N.Y.C. 10019 200	\$ 120.00	<i>Cobinda Flack</i>
✓ DARBY, REGINA ✓	394 BROADWAY N.Y.C. 10013		
✓ GOHSON, JOHNNIE ✓			
✓ BURNS, W. HAYWOOD ✓ (Attorney)	243 EAST 7th ST. N.Y.C. 10009	\$ 100.00	M.A. TERRY
✓ DAVIS, RENEE ✓ (Computer Oper.)	205-27 104 ST. HOLLIS, N.Y. 11412	\$ 100.00	M.A. TERRY
✓ CAMPBELL, VIVIAN ✓ (Dr.)	48-50 57th ST. #7U SUNNYSIDE, NY 11101	\$ 100.00	
✓ BRUNNIT, HOUSTON, M.D. ✓	14 EAST 49th ST NYC 10017	\$ 200.00	M.A. TERRY
✓ HANDY, MICHAEL ✓	111 HICK ST. BRX, NY, 11201	\$ 200.00	
✓ C. KNOX ADISTE III ✓	870 6th Av NYC 10001	\$ 200.00	REGINA DARBY
✓ JACK H. WILLIS (Publisher)	354 West End Av. NYC 10024	\$ 250.00	BILL FITMAN
✓ MARY P. WILLIS			"
✓ JACK E. SMITH ✓	2391 Webb Ave. #1B BRONX, 10468	\$ 100.00	"
✓ LUTHER W. SEABROOK (DR. SPT IN)	BRONX	\$ 200.00	"
✓ WALLACE A. SEABROOK (NARCIS)	363 7th AVE. N.Y.C. 10001	\$ 200.00	"
✓ WALLACE JOHNSTON CONSULTING ENGINEERS			

1770
250
1520

1770
1250
520

1520
520 (177)

8 9 0 4 0 7 6 0 6 3 2



WNPEP
Women's Network for Political and Economic Party

600 West 130th Street
New York, NY 10031
(212) 862-8047

<u>NAME</u> (PLEASE PRINT)	<u>ADDRESS</u>	<u>AMOUNT OF CHECK</u>	<u>COMMITTEE SPONSOR</u>
Minter, Kendall	221 W. 11th St, NY 10013	200	C. Buerger
Nelson, Alice		100	
Zickler, Peter		200	NLD
Schwartz, Tami (Tee-Georgia Faison)	Long Ridge Rd. Danbury CT 06810	200	
Edwards, Annice	45 Plaza St. Oklyn 11217	200	
Zelinsky, Melva (Betty)	18-34 College Pt. Blvd, NY 11356	200	
Wagner, Barbara E.	150 35 Thompson St, NY 10012	100	NLD
Hall, Patricia	20 So. 10th Ave. Oklyn 11217	200	
Collins, Frederick W.	25 Eastern Pkwy. Oklyn 11230	200	DPH
Smith, Everett	323 Glenwood Ave. East Orange, N.J. 07027	100	Eileen Frank
Stroman, Robert Jr.	25 W. 32nd St. NYC, NY	100	Felicia Dantine
Spivack, Carol		200	Eileen Frank
Ward, Tom	907 Union St. Wallkill, NY 12590	50	Terie M. Williams
Wagner, E. Ann	300 Riverside Dr.	50	
Elmer, Kay	644 West 113th St. NY 10020	50	

2350
400
1950

2350
11800
550

1950

550

2350

Jackson EVERETT SMITH 1112
 225 GLENWOOD AVE.
 EAST ORANGE, NJ 07017
 3/30 19 84 1-2010
 TO THE ORDER OF Women's Network for Political Action 100.00
 One hundred and 00/100 DOLLARS
 Citibank, N.A.
 77 William St. at John St. CITIBANK
 New York, N.Y. 10038
 Love & Peace Everett Smith
 ⑆021000089⑆ 035 0408190⑆ 1112

PATRICE MILES 159
 66 STERLING PLACE
 BROOKLYN, NEW YORK 11217
 March 30, 1984 1-2010
 TO THE ORDER OF Women's Network PAC \$ 100.00
 One hundred 00/100 DOLLARS
 The Chase Manhattan Bank, N.A.
 60 Wall Street at Church Street, New York, N.Y. 10013
 Patricia Miles
 ⑆021000021⑆ 022 1 094501⑆ 0159

AMERICAN EXPRESS COMPANY
 American Express Company
 Payable to the Order of MORRIS HIGHLAND
 ONE HUNDRED DOLLARS
 Cashier
 ⑆8000008⑆ 921970727⑆ 0915000008⑆

HILL STREET BROWNIES, INC. 1214
 182 CENTRAL PARK WEST
 NEW YORK, NY 10025
 4/2 19 84 1-2010
 DAY TO THE ORDER OF Women's Network PAC \$ 100.00
 One hundred 00/100 DOLLARS
 MANUFACTURERS HANOVER TRUST COMPANY
 60 Wall Street, New York, N.Y. 10013
 For Cash
 ⑆001214⑆ ⑆021000306⑆ ⑆0640613519⑆ 065

89040760633

REGINA L. DARBY
394 BROADWAY 6TH FL
NEW YORK, NY 10013

64
19 84 1-7062/2200

PAY TO THE ORDER OF

Women's Network P.A.C. \$ 200.00

Two hundred ^{xx}/₁₀₀ DOLLARS

AMERICAN SAVINGS BANK
335 BROADWAY
NEW YORK, NY 10013

Jesse Jackson for Pres. Campaign

Regina L. Darby

⑆ 226070623⑆ 003841643 7⑈ 0⑆ 0

JOHNNIE M. GOLSON

2648

Mar 20 1984 138210

PAY TO THE ORDER OF

Women's Network P.A.C. \$ 200.00

Two hundred and ⁰⁰/₁₀₀ DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
60 New 9th Street, New York, N.Y. 10023

J. Jackson

Johnnie M. Golson

⑆ 021000306⑆ 10640563777065 2648

W. HAYWOOD BURNS
243 E. 7TH ST.
NEW YORK, NY 10009

March 21 1984 386 1-12/210

PAY TO THE ORDER OF

Women's Network for Political-Economic Parity \$ 100.00

One Hundred and ^{xx}/₁₀₀ DOLLARS

CHEMICAL BANK
130TH ST & CONVENT AVE. NEW YORK, N.Y. 10031

W. Haywood Burns

Political Contribution
Jesse Jackson campaign
⑆ 021000128⑆ 05600202490⑈ 0386

RENEE DAVIS

114

205-2710474
Helix, N.Y. 11412

3/22 1984 1-7071/2260

Pay to the order of The Women's Network PAC \$ 100.00

One hundred dollars & ⁰⁰/₁₀₀ DOLLARS

The Manhattan Savings Bank

385 MADISON AVE. NEW YORK, NY 10017

MANHATTAN INSURED MONEY MARKET ACCOUNT

Contribution in Jesse Jackson Campaign Renee Davis

⑆ 226070717⑆ 011103126 4⑈ 0114

878

1-2/210/24

3/21 1984

VIVIAN CAMPBELL
48-50 37 STREET 7U
SUNNYSIDE, NY 11101

PAY TO THE ORDER OF Women's Network - PAC \$ 100.00

One hundred ⁰⁰/₁₀₀ DOLLARS



The Chase Manhattan Bank, N.A.
48-01 Greenpoint Avenue
Long Island City, N.Y. 11104

For Contribution to Jesse Jackson Campaign

Vivian Campbell

JACK E. SMITH
FORDHAM HILL APTS.
2391 WEBB AVE., APT. 17B
BRONX, NY 10468

913

1-2/210
268

3-10 1984

% The Westside Committee
For Jesse \$ 100.00

Pay to the
order of JACKSON

Women's Network, P.A.C.

ONE-Hundred Dollars

Dollars



The Chase Manhattan Bank, N.A.
67 York Avenue, New York, N.Y. 10019

no Campaign Contribution

⑆021000021⑆ 240 0 071870⑈ 0913

Jack E. Smith

LUTHER W. SEABROOK
MARIANNE R. SEABROOK

673

7/26 1984

1-2/210/078

PAY TO THE
ORDER OF

Women's Network P.A.C. \$ 200

two hundred + 00/100

DOLLARS



The Chase Manhattan Bank, N.A.
2218 Fifth Avenue & 135th Street
New York, N.Y. 10037

MEMO

Donation

Luther W Seabrook

⑆021000021⑆ 078 1 048699⑈ 0673

MICHAEL J. HANDY
111 HICKS ST.
BKLYN NY 11201

454

No.

March 22 19 84

1-8/210
Branch 93

PAY TO THE
ORDER OF

Women's Network PAC

\$ 200 ~~xx~~

Two hundred

DOLLARS

Citibank, N.A.
68 Duane St. at Elk St.
New York, N.Y.
10007

CITIBANK

OR

L Jackson Contribute

Michael J. Handy

⑆021000089⑆ 093 74072437⑈ 0454

Company Contribution
 Jess Jackson
 FROM RICK FANCHER
 RICK HOFFMAN

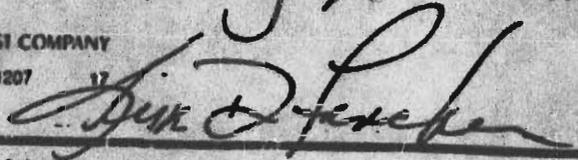
TOTAL OF CHECKS	
LESS _____ & DISCOUNT	
LESS _____	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	


WMI
 CONSULTING

446
 7-41/330
 March 21 19 84

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00
One Hundred and Twenty ~~00~~ DOLLARS


 MERCANTILE SAFE DEPOSIT & TRUST COMPANY
 7000 SECURITY BLVD
 BALTIMORE, MARYLAND 21207



⑆00000446⑆ • ⑆052000618⑆ ⑆614872⑆ ⑆


C. KNOX LASISTER III
 870 AVENUE OF THE AMERICAS
 NEW YORK, NY 10001
 602

24 March 84 1-148/210

PAY TO THE ORDER OF Women's Network PAC \$ 200.00
Two Hundred Dollars — ~~00~~ DOLLARS

EAB European American Bank
 A TRUST COMPANY
 179-55 Hillside Ave., Jamaica, N.Y. 11432

MEMO Women's Network Contribution 

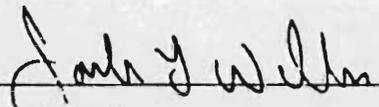
⑆00000446⑆ 050⑆ 11248 ⑆ 0602

JACK L. WILLIS
MARY P. WILLIS
 354 WEST END AVENUE
 NEW YORK, NY 10024
 1868

2/16 19 84 1-124/210

PAY TO THE ORDER OF Womens Network P.A.C. \$ 250.00
Two hundred fifty DOLLARS

CHEMICAL BANK
 1501 BROADWAY, NEW YORK, N. Y. 10036

MEMO Westside Chem Bank 

⑆021000128⑆ 004⑆ 217802⑆ 1868

89040760630

NAME
 (PLEASE PRINT)

ADDRESS

 547 West 138th Street
 New York, NY 10031
 (212) 667-8047

AMOUNT OF CHECK

COMMITTEE SPONSOR

✓ Vaughn, Roy O. ✓	322 W. 57 th St #28K N.Y. 10021	200	
Davis, Gene A.	23 W. 68 th St. N.Y. 10023	200	
✓ Gregory, Theodore M. ✓	250 Gorge Rd. #26D, Cliffside, N.J. 07010	200	
✓ Lamonte, Denise ✓	41 Hamilton Terrace, N.Y. 10031	100	Joe Barnes
✓ Maillard, Lucille ✓		100	
✓ Lewis, Michele Shay ✓	40 W. 86 th St. N.Y. 10024	100	
✓ Durden, Marjorie ✓		100	
✓ Greene, Cheryl Y. ✓	260 Convent Ave #93 N.Y. 10031	40	
✓ Shirley, Norma Elise ✓	155 W. 68 th St. #415 N.Y. 10023	100	
✓ Burrell, Helen Dr. ✓	120 West 58 th St N.Y. 10019	100	Alice D. Nelson
✓ Lopez, Georgette Adrienne ✓	95 W. 95 th St. N.Y. 10025	300	
✓ Hart, Shellie H. Jr. ✓		100	
✓ Chenault, Kathryn C. ✓	475 Esplanade, Pelham Manor 10963	200	
✓ Hamilton, Charles ✓	28 Cadman Plaza West #7D NY 11201	200	
✓ Henry, Laguita ✓		100	Joe Barnes

$$\begin{array}{r} 2140 \\ 300 \\ \hline 1840 \end{array}$$

$$\begin{array}{r} 2140 \\ +300 \\ \hline 2440 \end{array}$$

1840

840

2140

NAME
 (PLEASE PRINT)

ADDRESS

699 West 120th Street
 New York, NY 10033
 (212) 862 6047

AMOUNT OF CHECK

COMMITTEE SPONSOR

Dr. Daniel E. McMurres		50	
Kenneth K. Evans	175 West 42 nd St NY 10015	100	
Constance Jackson Collins	135 Eastern Pkwy #2c Bklyn 11238	200	
Carol C. Gould	101 W. 172 nd St. Bklyn. Boro NY 10032	400	
Richard Greene		200	
Just C. Nichols	736 Eastern Pkwy Bklyn 11213	200	
Janet S. Street	141-18 Morningside Ave St Albans NY 11412	200	
W. Harrisfield Esq		200	
Dudley F. Hall		200	
Stanley J. Gerson	147 10 th Ave NY 10011	200	
June C. Keenan		100	
Emile A. Milne		100	
Lana Neal	141-125 W. 47 th St NY 10039	100	
Alvin E. Johnson	36 E 50 th St NY 10022	200	
Paul Frederick Martin	300 E 75 th St NY 10021	200	

2650
 400

 2250

2650
 2200

 450

2250
 450

 1800

2650

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 7398870

March 29, 84

Pay to the Order of Women's Network PAC

CHEMICAL BANK 20000000

Address Joe Jackson for President Signature Richard Meene

⑈ 7398870⑈ ⑆ 021000128 ⑆ 000⑈ 777048⑈

PERSONAL
MONEY ORDER

DATE 3/30 19 84

1-12
210

No. 3451259

PAY TO THE ORDER OF Women's Network

NATIONAL WESTMINSTER BANK USA 1220000000

National Westminster Bank USA
NEW YORK, N.Y.
NOT VALID OVER \$1,000.00

Signature Janet C. Nichols
ADDRESS 1736 Eastern Parkway
CITY Brooklyn, N.Y. STATE 11213

2 tickets for 4/2/84

⑈ 3451259⑈ ⑆ 021000322 ⑆ 001 7 0002 5⑈

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 6632509

March 30 1984

Pay to the Order of Women's Network PAC

CHEMICAL BANK 20000000

Address 191-18 Horlock Ave St Albans NY 11412 Signature Sandra Sneed

⑈ 6632509⑈ ⑆ 021000128 ⑆ 000⑈ 777048⑈

89040760639

89040760640

April 3, 1984 2312

Pay to the order of Women's Network P.A.C. \$ 50.00

Fifty and 00/100 Dollars

DollarDryDock
 Jasse Jackson
 Memo Campaign

Rosal McFarlane

⑆226070319⑆ 831033273 ⑆ 2312

RONALD R. EVANS 520
 175 WEST 92ND ST.
 NEW YORK, NY 10025

4/11 1984 13870

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00

One hundred dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 30 West 45th Street, New York, N.Y. 10036

Jesse Jackson's Campaign Rosal McFarlane

⑆021000306⑆ 10640521075⑆ 65 0520

CONSTANCE JACKSON COLLINS 612
 GREGORY L. COLLINS
 135 EASTERN PARKWAY, APT. 7C
 BROOKLYN, NY 11238

2 April 1984 1-1022

PAY TO THE ORDER OF Women's Network \$ 200.00

Two hundred and 00/100 DOLLARS

Citibank, N.A.
 399 Park Avenue
 New York, N.Y. 10022

CITIBANK

Donation Constance Jackson Collins

⑆0210000089⑆ 022 27915606⑆ 0612

LOMIC CONTRACTING 138
 CONSULTANTS, ASSOCIATES
 112 WEST 120 STREET
 NEW YORK, NY 10027

Apr 2 1984 51-110/211

PAY TO THE ORDER OF Women's Network \$ 400.00

Four Hundred Dollars and 00/100 DOLLARS

Union Trust Company
 UNION TRUST COMPANY
 GREENWICH OFFICE
 GREENWICH CONNECTICUT 06030

Donation L. Collins

⑆021101101⑆ 1 249 723⑆ 0138

LUCILLE MAILLARD

1783

26 March 1984

1-30/210

The Women's Network \$ 100.00
one hundred and 00/100 DOLLARS



MANUFACTURERS HANOVER
TRUST COMPANY
481 Eighth Avenue, New York, N.Y. 10001

347 Denise Lamaute
1:02100003061:100402809431651783

DENISE LAMAUTE, ESQ.
41 HAMILTON TERR.
NEW YORK, NY 10031

429

3-27-1984

1-334
21034

PAY TO THE
ORDER OF

Women's Network \$ 100.00

One hundred and 00/100 DOLLARS

Citibank, N.A.
Third Ave. at 46th St.
New York, N.Y.
10017

CITIBANK

Denise Lamaute

1:0210000891:034 086606951 0429

89040760641

ROY O. VAUGHN, JR.
322 W. 87TH ST., APT. 28K
NEW YORK, NY 10021

225

3-27 1984-1/210/72

PAY
TO THE
ORDER OF

WOMENS NETWORK PAC \$ 200.00

Two hundred and 00/100 DOLLARS

THE BANK OF NEW YORK

708 MADISON AVENUE, NEW YORK, N.Y. 10021

Roy O. Vaughn Jr.

1:0210000181: 53 50951 0225

NORMA ELISE SHIRLEY
155 W. 68TH ST., 415
NEW YORK, NY 10023

3/27/84 1-12/210

PAY TO THE ORDER OF

Women's Network PAC \$ 100 ⁰⁰/₁₀₀

One hundred ~~xx~~ ~~xx~~

DOLLARS

CHEMICAL BANK
200 COLUMBUS AVENUE, NEW YORK, N.Y. 10019

Norma Shirley

MEMO
⑆021000128⑆ 085⑈568953⑈ 1469

MICHELE SHAY LEWIS
40 W. 66TH STREET
NEW YORK, NY 10024

March 23, 1984 181

1-12/210

Part of the order of Women's Network PAC \$ 100.00
One hundred dollars

CHEMICAL BANK
1350 Avenue of the Americas 135
New York, N.Y. 10019

Memo Jesse Jackson Foundation
⑆021000128⑆ 135⑈290651⑈ 0181

890407600642

MARJORIE E DURDEN
85785416

1-8/210
3/22/84

253

PAY TO THE ORDER OF Women's Network PAC \$ 100
ONE HUNDRED

DOLLARS

CITIBANK NA
162 AMSTERDAM AVE. AT 67TH ST.
NEW YORK, N.Y. 10023

Jessie Jackson Marjorie Durden

⑆021000089⑆ 096 85785416⑈ 0353

CHERYLL Y. GREENE
200 CONVENT AVE., 93
NEW YORK, NY 10031

27 March 1984 669
1-7043/2260

PAY TO THE ORDER OF

Women's Network PAC \$ 40.00

Forty and 00/100

DOLLARS

AMERICAN SAVINGS BANK
2852 BROADWAY
NEW YORK, N.Y. 10028

Chyll Greene

MEMO
⑆226070432⑆ 032842843 8⑈ 0669

SHELLIE H. [REDACTED] JR. 474
 March 19 84 1-8/210/282
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 100.00
 100 DOLLARS
 Citibank, N.A. Private Banking Division
 399 Park Avenue New York, N.Y. 10043
 CITIBANK
 SHELLIE H. [REDACTED] JR.
 @021000089: 400 37394226# 0474

✓ Chenault
 1 ticket at
 \$100
 ticket # 310

DR. HELEN BURRELL 175
 March 19 84 1-8/210/121
 PAY TO THE ORDER OF Women Network P.E.P. \$ 100.00
One hundred DOLLARS
 Citibank, N.A.
 40 West 57th St.
 New York, N.Y. 10019
 CITIBANK
 Helen Burrell, M.D.
 @021000089: 121 71140617# 0175

1-2006
 +45
 74.5

EDWARD R. DUDLEY, JR.
 GEORGETTE ADRIENNE LOPEZ 229
 96 WEST 96TH ST.
 NEW YORK, NY 10025
 27 Mar 19 84 1-8/210/128
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 300.00
Three Hundred & no/100 DOLLARS
 Citibank, N.A.
 700 Columbus Avenue
 New York, N.Y. 10025
 CITIBANK
 donation Gene Jackson
 @021000089: 126 19870727# 0229

Chenault
 3 tickets
 at \$100
 ticket #s
 306, 307 & 303

KENNETH I. CHENAULT
 KATHRYN C. CHENAULT 2879
 476 ESPLANADE
 PELHAM MANOR, NY 10803
 March 27 19 84 1-8/210/282
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 200.00
Two Hundred DOLLARS
 Citibank, N.A. Private Banking Division
 Citicorp Center
 153 E. 53rd St.
 New York, N.Y. 10043
 CITIBANK
 Kenneth I. Chenault
 Kathryn C. Chenault

Chenault
 2 tickets.
 @200 & sale
 of \$2,000
 ticket # 66+6

89040760643

CHARLES J. HAMILTON, JR.
25 CADMAN PLAZA WEST, 7-0
BROOKLYN HEIGHTS, NY 11201

March 27, 1984

671

PAY TO THE ORDER OF

Women's Network P.E.P.

\$ 200.00

Two hundred and

no/100 DOLLARS

Citibank, N.A.
Park Ave. at 40th St.
New York, N.Y.
10169

CITIBANK

[Signature]

⑆021000089⑆ 049 05407192⑆ 0071

Deposit of
1 check of
\$200
check # 65

THEODORE M. GREGORY
266 GORGE ROAD NO. 26D
CLIFFSIDE PARK, NJ 07010

1663

3/27/1984

1-2/210
17

Pay to the order of Women's Network PAC

\$ 200.00

Two hundred exactly

Dollar



The Chase Manhattan Bank, N.A.
1 New York Place, N.Y., N.Y. 10001

Contribution
for Gene Jackson Campaign Theodore M Gregory

⑆021000021⑆ 017 1051329⑆ 1663

89040760644

LAQUITA HENRY

928

3/19/84

1-899
21099

PAY TO THE ORDER OF

Women's Network Inc \$ 100.00

One Hundred DOLLARS

Citibank, N.A.
Vanderbilt Ave. at 44th St.
New York, N.Y.
10017

CITIBANK

[Signature]

⑆021000089⑆ 099 60874533⑆ 0928

check at 100.00

NANA NEAL
101-125 W. 147TH ST.
NEW YORK, NY 10038

177

April 1, 1984

1-7011/288

PAY TO THE ORDER OF

Women's Network P.A.C. \$ 100⁰⁰/₁₀₀

One Hundred ⁰⁰/₁₀₀ DOLLARS

THE BOWERY.

THE BOWERY SAVINGS BANK
140 WEST STREET AT 57th STREET, NEW YORK, NY 10011

MEMO: Jesse Jackson Campaign

[Signature]

⑆226070⑆⑆5⑆058 50⑆240 4⑆0⑆??

Sponsor: J. R. Mitchell

CALVIN E. JOHNSON
136 E. 55TH ST.
NEW YORK, NY 10022

579

3/30 1984

1-279/280

Pay to the order of

WOMEN'S NETWORK \$ 200.00

Two Hundred and ⁰⁰/₁₀₀ DOLLARS

Bank Leumi
TRUST COMPANY OF NEW YORK
1900 Broadway New York, N.Y. 10023

MEMO: JESSIE JACKSON Campaign

[Signature]

⑆025002794⑆2⑆006482⑆06 0519

JOEL PRENDERGAST MARTIN
300 EAST 75TH STREET
NEW YORK, NY 10021

3-28 1984 2307

1-12/210

Pay to the order of

Women's Network P.A.C. \$ 200⁰⁰

Two Hundred ⁰⁰/₁₀₀ Dollars

CHEMICAL BANK

100 Park Avenue
New York, N.Y. 10017

MEMO: 2 tickets

[Signature]

⑆02⑆000⑆28⑆0⑆19⑆570686⑆2307

JUNE C. LENNON

NUMBER
825

March 31 1984

1-001
280

PAY TO THE
ORDER OF

Women's Network Political Action Comm \$100.00

One Hundred ⁰⁰/₁₀₀ DOLLARS



CENTRAL NATIONAL BANK
OF NEW YORK
70 NASSAU STREET, BROOKLYN, N.Y. 10011

June Lennon

⑆026008510⑆ 52ⁿⁿ 55107ⁿⁿ 0825

EMILE A. MILNE

No. 213

Mar. 30 84

1-2/210
228

PAY TO THE
ORDER OF

Women's Veterans PAC \$100.00

One hundred and ⁰⁰/₁₀₀ DOLLARS



The Chase Manhattan Bank, N.A.
300 3rd Ave., N.Y., N.Y. 10016

Emile A. Milne

⑆021000021⑆ 229 0 028311⑆ 0213

89040760647



89040760648

Sharon Salcedo
233 W 83 St.
New York, NY. 10024
Apt. 5A
Telep. 877-3524

8 9 0 4 0 7 6 0 6 4 9



WNPEP

Women's Network for Political and Economic Power

609 West 138th Street
New York, NY 10031
(212) 862 0047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHECK

COMMITTEE SPONSOR

Marianne Camille Spraggins, Esq	444 C.P.U. NY 10025	200	
Colleen Goldberg	50 E. 89 th St NY 10028	200	
Clarence D. Smith	5906 Arlington Ave, Bronx 10471	200	
Jill Nelson	49 Clinton Ave, Dobbs Ferry NY 10522	200	
Kathy Weston	652 Eastern Pkwy, Bklyn 11226	100	
Wanda A. Kemp	233 West 138 th St #1A NY 10030	100	
Delores Cann		100	
Harrison Brummet, MD	145 E 49 th St, NY 10017	100 + 100	
Aris Bughauti	747 Third Ave - 25 th Fl, NY 10017	100	
Luella Procope	335 E. 41 st St #504 NY 10017	100	
Herbert Brown, Jr	120-2 Alcott Place, Bronx 10475	100	
William R. Brown, PC	70 Madison Ave, NY 10016	100	
Sharon Kope	Haterys Federal Credit Union, 165 W. 44 th St, NY 10036	100	
Ellen La Van	Harold Melnic Salon 137 W. 112 th St, NY	100	
Roberto Adorno	701 DeKalb Ave, Bklyn	100	

2000
+ 1000
+ 1000

10

1000

2000

89040760650

MARIANNE CAMILLE SPRAGGINS, ESQ.
444 CENTRAL PARK WEST
NEW YORK, N.Y. 10020

791

March 27 1984

PAY TO THE ORDER OF Woman's Network PAC \$ 200.00

Two hundred and 00/100 DOLLARS

The Chase Manhattan Bank, N.A.
1 New York Plaza, New York, N.Y. 10007

104
⑆021000021⑆ 017 6 077456⑈ 0791

DAVID C. GOLDBERG, M.D.
COLLEEN T. GOLDBERG
50 E. 90TH ST.
NEW YORK, NY 10020

1713

28 March 1984

PAY TO THE ORDER OF Woman's Network PAC \$ 200.00

Two hundred and 00/100 DOLLARS

CITIBANK

Class tax deductible contribution

Colleen J. Goldberg

⑆021000089⑆ 027 60450759⑈ 1713

Merrill Lynch Cash Management Account

CLARENCE O. SMITH
ELAINE SMITH
5900 ARLINGTON AVE.
BRONX, NY 10471

222

3/27 1984

Pay to the order of Women's Network PAC \$ 200.00

Two Hundred Dollars

BANK ONE

BANK ONE OF COLUMBUS, N.A.
Columbus, Ohio 43215

Memo Elaine Smith

⑆1044000804⑆ 3012593370⑈ 0222

JILL NELSON
GREGORY T. RICKS
49 CLINTON AVE.
DOBBS FERRY, NY 10522

206

3/28 1984

PAY TO THE ORDER OF The Women's Network PAC \$ 200.00

Two Hundred DOLLARS

FIRST BANK OF NEW YORK

COUNTY TRUST REGION
12 ASHFORD AVENUE DOBBS FERRY, NY 10522

Handwritten: Handwritten - 2/TIX Jill Nelson

⑆021902352⑆ ⑈57⑈494465⑈ 0206

89040760651

HOUSTON BRUMMIT, M.D.
145 E. 40TH ST.
NEW YORK, NY 10017

3467

38 Mar 1984 1-148/210

PAY TO THE ORDER OF WOMEN'S NETWORK P.A.C. \$ 100.00
One Hundred DOLLARS

EAB European American Bank
725 Park Ave. New York, NY 10022

Two P.O. Boxes Houston Branch
⑆021001486⑆ 030⑆ 10170 3⑆ 3467

ANIS BARGHOUTI
747 THIRD AVENUE, 23TH FLOOR
NEW YORK, N.Y. 10017

2325

4/11 1984 1-479/280

PAY TO THE ORDER OF Women Network \$ 100.00
Only One Hundred & 00/100 DOLLARS
The Merchants Bank of New York
757 THIRD AVENUE NEW YORK, N. Y. 10017

⑆026006790⑆ ⑆L 213839⑆ Anis Barghouti

JONELLE FROCOPE
325 EAST 41ST ST., APT. 504
NEW YORK, N.Y. 10017

730

3/28 1984 1-20/210

PAY TO THE ORDER OF Women's Network P.E.P. \$ 100.00
Just Hundred Dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
1185 Avenue of the Americas, New York, N.Y. 10036

⑆021000306⑆ 11570609543⑆ 650730 Jonelle Frocope

HERBERT BROWN, JR.
120-2 ALCOTT PL.
BRONX, NY 10475

101

March 28, 84 1-30/210

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00
One Hundred and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
55 West 125th Street, New York, N.Y. 10027

⑆02100306⑆ 11570609543⑆ 650730 Herbert Brown Jr.

89040760652

653 Eastern Pkwy
Adm II box
RUBY WESTON

3/30 1984 1152

1-7181

Pay to the order of Women's Net-Work, POC \$ 100.00
One hundred dollars Dollars

INDEPENDENCE SAVINGS BANK
150 COURT STREET
BROOKLYN, NEW YORK 11201

Memo Ruby Weston

⑆226071211⑆ 9 602221146⑆ 1152

WANDA D. KEMP
233 WEST 138TH STREET NO. 1A
NEW YORK, NY 10030

March 31, 1984 692

1-8718
Branch 17

Pay to the order of WOMEN'S NETWORK POC \$ 100.00
one hundred and 00/100 Dollars

Citibank, N.A.
100 Irving Pl. at 14th St.
New York, N.Y. 10003

CITIBANK

of Jackie Campaign Wanda D Kemp

⑆0210000089⑆ 067 58804773⑆ 0692

HOUSTON BRUMMIT, M.D.
145 E 49TH ST.
NEW YORK, NY 10017

28 Nov 1984 3465

1-148/210

Pay to the order of WOMEN'S NETWORK-POC \$ 100.00
DOLLARS

EAB European American Bank
A TRUST COMPANY
181 Park Ave. New York, N.Y. 10022

of Houston Brummit

⑆021001486⑆ 030110170 31⑆ 3465

⑆2260703191⑆ 831 0385563⑆ 0547

Memo

Deborah Ann

DOLLAR SAVINGS BANK OF NEW YORK
The Dollar Way

Pay to the order of Women's Network-POC \$ 100.00
one hundred dollars Dollars

1726
Z26C

54 March 31, 1984

DOLORES CANN

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

88 MAY 31 PM 4: 23

In the Matter of)
Women's Network for Political)
and Economic Parity and Dorothy)
Pitman Hughes, as treasurer)
Jesse Jackson for President)
Committee and Emma Chappell,)
as treasurer)

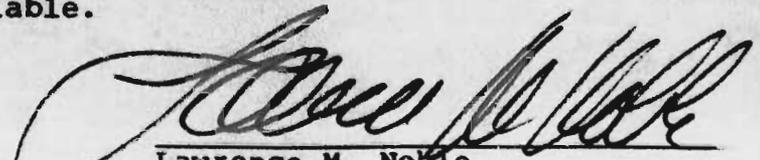
MUR 2139

SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, and the Jesse Jackson for President Committee and Emma Chappell, as treasurer, based on the assessment of the information presently available.

5/31/88
Date


Lawrence M. Noble
General Counsel

89040760654



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 1988

James H. Hewitt, III, Esquire
Coaxum & Hewitt
100 Erieview Plaza
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824

RE: MUR 2139
Jesse Jackson for President
Committee and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on January 30, 1986, found reason to believe that your clients, the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441a(f), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

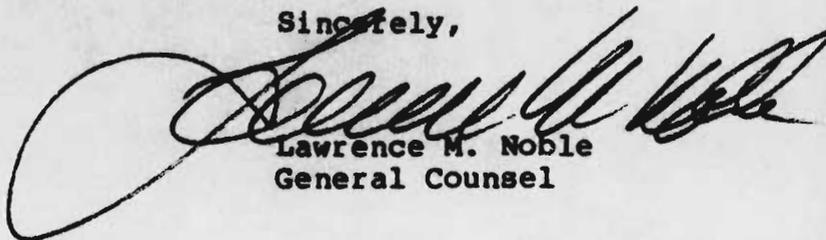
80040760655

Letter to James H. Hewitt, III., Esquire
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Charles Snyder, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

89040760656

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jesse Jackson for President) MUR 2139
Committee and Emma Chappell,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 30, 1986, the Commission found reason to believe that the Jesse Jackson for President Committee ("JJPC") and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441a(f). The principal basis for these findings was that the Women's Network for Political and Economic Parity ("WNPEP") had reported an in-kind contribution to JJPC in the form of a payment of \$25,360 to the Tavern on the Green restaurant in New York City for a fundraiser held for Jesse Jackson's 1984 presidential campaign at the aforesaid restaurant on April 2, 1984. It appeared, therefore, that JJPC had accepted a contribution in excess of the \$1,000 limitation set forth at 2 U.S.C. § 441a(a)(1), in violation of 2 U.S.C. § 441a(f).

In response to the Commission's finding of reason to believe, JJPC stated:

In early 1984, several professional entertainers from radio, television and theatre, became motivated, like others, to join the groundswell of popular support for Reverend [Jesse] Jackson's historic candidacy for the Democratic Party nomination for President. Thus, the idea was developed to sponsor a fundraiser at the Tavern on the Green Restaurant. The event was advertised as "Stars for Jesse L. Jackson for President Committee."

89040760657

JJPC response, March 11, 1986. Respondents further stated that various individuals made advance contributions to pay the initial costs associated with holding the fundraiser at Tavern on the Green.

The "stars" group designed a certain plan whereby they would each contribute approximately \$200 to raise the start-up costs for organizing this fundraiser. Approximately 100 individuals donated and the down payment for the Tavern on the Green fundraiser had been accomplished. We understand that the intent of all donors was to contribute to the Jackson campaign.

Id. The specific method agreed upon for making the down-payment required by Tavern on the Green was for each of the above-mentioned contributors (approximately 100 in number) to draft checks payable to WNPEP. Said checks were then deposited by WNPEP president/treasurer Dorothy Pitman Hughes into WNPEP's account. Next, according to JJPC,

Mrs. Hughes, having taken personal responsibility with the Tavern on the Green Restaurant for payment of expenses, prepared the check of WNPEP in the sum of \$25,360 to pay for the facility costs needed to sponsor this event.

Id.

JJPC stated that it raised approximately \$70,000 at the fundraiser, and that it properly reported all of those contributions. It acknowledged, however, that it did not report the \$25,360 worth of contributions collected to pay Tavern on the Green, despite the fact that the persons who contributed

89040760658

this money intended it as a contribution to JJPC, and regarded WNPEP as no more than a conduit for that purpose.^{1/} As JJPC put it in the aforementioned response,

Our initial sampling of contacts with these donors has confirmed that each individual intended their contribution to benefit the Jackson Campaign, and not the WNPEP organization. At a minimum, we would be pleased to amend our FEC reports reflecting these contributions and expenditures and attempt to contact the others that supported this event to supply FEC officials with written confirmation that an unlawful in-kind contribution to our Committee did not take place. We also plan to aggregate each donor's contribution and make refunds, if necessary.

Id. This statement confirms that the individuals who made out checks to WNPEP in connection with the Tavern on the Green fundraiser were in fact contributing to JJPC. Respondent's statement that it would amend its reports reflects the fact that it failed to report the aforesaid \$25,360 in contributions that it received. The final statement concerning aggregation refers to the fact that some of the persons who contributed to JJPC via

^{1/} According to JJPC's answer to interrogatories propounded by the Commission, some of the checks used to pay for the fundraiser were made payable to JJPC, or to its affiliated committee, New Yorkers for Jesse Jackson. JJPC does not explain how these checks were used; e.g. whether JJPC or New Yorkers for Jesse Jackson endorsed these checks over to WNPEP or whether the checks were cashed. In any event it does appear, based on JJPC's answer, that the funds evidenced by these checks were contributed in some form to the Jackson campaign, but not reported to the Commission.

89040760659

WNPEP also contributed directly to JJPC; respondents acknowledge that aggregating these contributions might result in a finding that the total contributions of certain of these individuals exceeded the limitations set forth at 2 U.S.C. § 441a of the Federal Election Campaign Act ("the Act"). (To date, no such amendments or refunds have been made.)

Dorothy Pitman Hughes of WNPEP has confirmed that the checks she deposited into WNPEP's account were earmarked for JJPC:

For why these people [the contributors] made these checks out to the Women's Network was because it was decided that in order to pay for the Tavern on the Green, that they would make the check out because the Women's Network had ... a bank account.... [The Stars for Jackson] decided that the process of getting it through the Jackson campaign might have been too long or something ... [so] we'll all make a certain amount of checks out to the Women's Network and Dorothy can pay Tavern on the Green from that. After that was done, the other checks ... would be made out to ... the Jackson campaign [T]hey [The Stars group] must have told them [i.e. the contributors] that it was directly towards helping the Jackson campaign, because they had it ... on their checks Says Jesse Jackson contribution, Jesse Jackson campaign, 1984.

Deposition of Dorothy Pitman Hughes, October 8, 1987, pp. 36-38.

In response to interrogatories issued by the Commission, JJPC acknowledged on March 5, 1988 that it had received from Ms. Hughes and WNPEP contributor information regarding the funds raised on behalf of JJPC in connection with the Tavern on the

89040760660

Green function. JJPC also admitted that it had failed to report this information to the Commission. JJPC attached to its response photocopies of checks made out to WNPEP, lists of such contributions, and other related contributor information.

A review of this contributor information resulted in findings supporting JJPC's previous acknowledgement that aggregation of contributions made to JJPC through WNPEP with contributions made directly to JJPC would result in total contributions in excess of the limits of the Act. It appears, specifically, that Clarence O. Smith contributed \$200 to JJPC via WNPEP, in addition to a \$1,000 contribution to JJPC on November 2, 1983; and Avis Barghouti contributed \$100 to JJPC via WNPEP, and \$1,000 to JJPC on March 22, 1984. The investigation conducted by this Office also found that LeGrand Reed contributed \$300 to JJPC via WNPEP, as well as \$1,000 to JJPC on April 10, 1984.

The materials submitted by JJPC also revealed the following corporate contributions:

<u>Corporation</u>	<u>Payee</u>	<u>Date</u>	<u>Amount</u>
Melbaba Enterprise, Inc.	JJPC	1/13/84	\$ 50
The New Music Group, Inc.	JJPC	1/13/84	\$ 50
JTRT Corp.	JJPC	1/15/84	\$ 50
Hill Street Brownies, Inc.	WNPEP	4/2/84	\$100

89040760661

Abraham & Hans Carl Construction Corp.	N/A	N/A	N/A
The Famous Organization, LTD.	WNPEP	4/2/84	\$100
Black Retail Action Group, Inc.	WNPEP	4/2/84	\$400

Accordingly, it appears that, either directly or through a conduit, JJPC accepted corporate contributions of at least \$750.

II. ANALYSIS

As stated in the preceding section of this brief, JJPC has denied that it accepted a \$25,360 contribution from WNPEP. It acknowledges the funds used by WNPEP to pay for a Jesse Jackson fundraiser at Tavern on the Green constituted contributions to JJPC, but respondents state that these contributions came from approximately 100 persons who earmarked the contribution for JJPC and used WNPEP solely as a conduit for that end.

Given this factual setting, JJPC and its treasurer had a clear obligation to comply with the Commission's regulations concerning earmarked contributions. Under these regulations,

(a) all contributions by a person made on behalf of or to a candidate, including contributions which are in any way earmarked or otherwise directed to the candidate through an intermediary or conduit, are contributions from the person to the candidate.

(b) For purposes of this section, earmarked means a designation, instruction, or encumbrance (including those which are direct or indirect, express or implied, oral or written) which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly

89040760662

identified candidate or a candidate's authorized committee.

11 C.F.R. § 110.6. Based on the evidence that the checks were earmarked for JJPC, as the term "earmarked" is used in the Commission's regulations, and respondents' own understanding that the contributions in question were earmarked for the Jackson campaign, it is clear that these contributions were in effect contributions from the drafters of the check to Jesse Jackson, 11 C.F.R. § 110.6(a), and therefore to JJPC. 11 C.F.R.

§ 102.7(d). (Many of the checks contained notations to the effect that they were intended for the Jackson Campaign, as Mrs. Hughes stated in her deposition.)

As the recipient of the contributions, JJPC was obliged to report them to the Commission. Under the Act, the treasurer of each political committee must file reports that include "the total amount of all receipts," 2 U.S.C. § 434(b)(2) and "the identification of each - (A) person (other than a political committee) who makes a contribution to the reporting committee during the reporting, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year...." 2 U.S.C. § 434(b)(3). Certain of the contributions made to JJPC through WNPEP exceeded \$200,^{2/} hence JJPC should

^{2/} Contributions to JJPC through WNPEP in excess of \$200 include the following: Georgette Adrenne Lopez, \$300; Greg Pollard, \$300; Margaret Vlaster, \$400; LeGrand Reed, \$300; Carter Community Health Ctr. Pharmacy, \$250. This list is not exhaustive. Other persons who contributed \$200 or less to JJPC via WNPEP may also have made an unitemized contribution directly to JJPC, with the aggregate contribution unreported - although in excess of \$200.

89040760663

have identified these contributors in its reports. In addition, because the earmarked contributions went through WNPEP as a conduit, JJPC was required to comply with the regulation that states: "The intended recipient [of an earmarked contribution] shall disclose on his next report each conduit through which the contribution passed." 11 C.F.R. § 110.6(c)(3).

In response to interrogatories, respondents have stated that, "At the time these contributions were generated by Ms. Hughes and/or WNPEP, the Jackson Campaign did not report the receipt of these donations to the Commission. In the event it is determined that these donations may not have been appropriately reported, the Jackson Campaign may remedy this inadvertence through an amended filing." More particularly, it appears that JJPC and its treasurer failed to report the amount of the contributions it received in the form of payments through WNPEP to Tavern on the Green, failed to report the identity of persons who made any of the aforesaid contributions in amounts exceeding \$200, and failed to report that it received earmarked contributions through WNPEP, acting as a conduit. Accordingly, there is probable cause to believe JJPC violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(c)(3).

As was stated above, aggregation of contributions made by certain individuals to JJPC through WNPEP, with other contributions made by the same individuals directly to JJPC,

89040760664

results in total contributions in excess of the limitations of the Act. Under the pertinent statutory provisions,

(1) No person shall make contributions -
(A) to any candidate and his authorized political committees with respect to any election for Federal office, which, in the aggregate, exceed \$1,000.

2 U.S.C. § 441a(a). The Act further provides that "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section." 2 U.S.C. § 441a(f). It appears that JJPC accepted contributions from several individuals that, in the aggregate, exceeded \$1,000; specifically, respondents accepted aggregate contributions of \$1,200 from Clarence O. Smith, \$1,100 from Anis Barghouti, and \$1,300 from LeGrand Reed. Because it appears that respondents accepted contributions in excess of the limitations of 2 U.S.C. § 441a(a)(1)(A), there is probable cause to believe respondents violated 2 U.S.C. § 441a(f).

Finally, evidence obtained during the investigation of this matter, as was noted above, established that JJPC and its treasurer knowingly accepted contributions from corporations. Under the Act,

It is unlawful for ... any corporation whatever ... to make any contribution or expenditure in connection with any [federal] election ..., or for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

89040760665

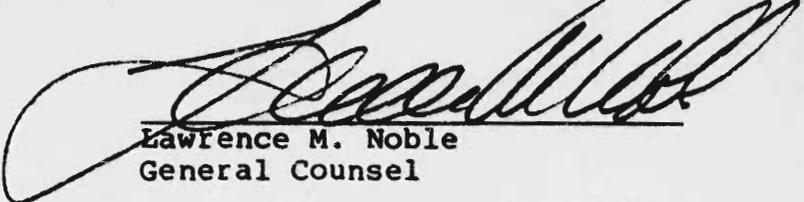
2 U.S.C. § 441b(a). In view of the evidence, including copies of cancelled checks and lists of contributors submitted by JJPC and WNPEP, it appears that JJPC and its treasurer knowingly accepted contributions from several corporations: specifically, Melbaba Enterprises, Inc., The New Music Group, Inc., JTRT Corp., Hill Street Brownies, Inc. Abraham & Hans Carl Construction Corp., The Famous Organization, Ltd., and Black Retail Action Group, Inc. Accordingly, there is probable cause to believe that JJPC and its treasurer violated 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a) and 11 C.F.R. § 110.6(c)(3).

Date

7/1/88


Lawrence M. Noble
General Counsel

89040760666



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 5, 1988

**Dorothy Pitman Hughes
609 West 138th Street
New York, New York 10031**

**RE: MUR 2139
Women's Network for Political
and Economic Parity and
Dorothy Pitman Hughes, as
treasurer**

Dear Ms. Hughes:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities and information supplied by you, the Federal Election Commission, on January 30, 1986, found reason to believe that the Women's Network for Political and Economic Parity and you, as treasurer, violated 2 U.S.C. § 441a(a)(1), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

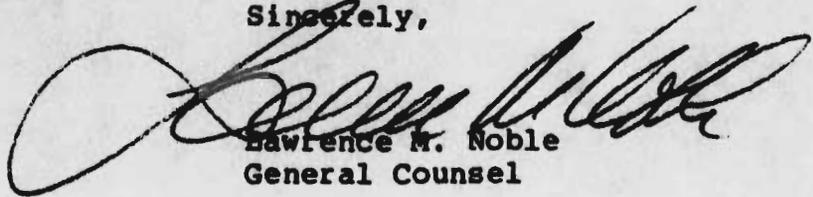
89040760667

Letter to Dorothy Pitman Hughes
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Charles Snyder, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

89040760668

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political) MUR 2139
and Economic Parity and Dorothy)
Pitman Hughes, as treasurer)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 30, 1986, the Commission found reason to believe that the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, (hereinafter "WNPEP") violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act (hereinafter "the Act"). On January 29, 1987, the Commission found reason to believe that WNPEP violated 2 U.S.C. § 441d. The basis for the finding relating to 2 U.S.C. § 441a(a)(1) was WNPEP's own report, filed with the Commission, that it made a contribution of \$25,360 to the Jesse Jackson for President Committee (hereinafter "JJPC") by paying for a fundraiser held at Tavern on the Green restaurant for the Reverend Jesse Jackson, in connection with the Reverend Jackson's 1984 campaign for President. The basis for the finding relating to 2 U.S.C. § 441d(a) was a letter soliciting contributions for the fundraiser that failed to include the disclaimer required by the aforesaid statutory provision.

According to Dorothy Pitman Hughes, her (and WNPEP's) involvement with a projected fundraiser for Jesse Jackson began as early as November, 1983. Deposition of Dorothy Pitman Hughes, October 8, 1987, 13. However, the original plans for holding the

89040760669

fundraiser had been abandoned (although a downpayment had been made to Tavern on the Green) and Ms. Hughes had no further involvement with the project until March, 1984. At that time, a group of individuals calling themselves the Stars for Jesse Jackson ("the Stars") revived the idea of holding the fundraiser. Ms. Hughes attended some meetings of the Stars in March, 1984 in connection with organizing the fundraiser. Id. 28-29.

Ms. Hughes described her role as follows:

My role was to see if I could get Tavern on the Green to allow \$1000 deposit that has been paid to them to stand, although the time had elapsed, and to see if we could revise the party at Tavern, and my role was just to make sure that if we did, that I would be responsible for making sure that Tavern was - would be taken care of for that process.

Id. 11-12. In short, her job was to see to it that Tavern on the Green was paid. Id. 61. The reason she was chosen for this particular role was that she knew Warner LeRoy, the owner of Tavern on the Green, since the 1960's, when she worked for him as a housekeeper. Id. 60-61.

It was agreed at the Stars' meeting that each individual who made a contribution in order to pay Tavern on the Green the costs required to hold the fundraiser at that restaurant would make his or her check payable to WNPEP. Ms. Hughes explained this procedure as follows:

For why these people made these checks out to the Women's Network was because the committee at the committee meeting, it was decided that in order to pay for

89040760670

the Tavern on the Green, that they would make the checks out because the Women's Network had ... a bank account. And Tavern on the Green had to be paid immediately, and Tavern wasn't waiting, and ... it was decided that the process of getting it through the Jackson campaign might have been too long ... [so] we'll all make a certain amount of checks out to the Women's Network and Dorothy can pay Tavern on the Green from that.

Id. 36-37.

It was nonetheless clearly understood by all who drew checks to WNPEP that the purpose of the contributions was to benefit Jesse Jackson. Those Stars who solicited contributions told the contributors to make their checks payable to WNPEP, and that the contributions were "directly towards helping the Jackson campaign" Id. 38. Many contributors made notations on their checks that the money was intended for Jesse Jackson's campaign. Id.

Ultimately, Ms. Hughes and WNPEP paid Tavern on the Green \$25,360, the final payment being made on April 3, 1984, the day after the fundraiser was held. ID. 57-63. The \$25,360 represented all the funds received and all the funds disbursed by WNPEP. Id. Some of the funds paid Tavern on the Green were raised the night of the fundraiser, under the supervision of officials of JJPC. Id. 62.

WNPEP maintained records of those who had paid it money for the Jackson fundraiser, in the form of contributor lists and

89040760671

cancelled checks. The records were not provided to the Commission until September 16, 1986, when they were obtained through discovery in the course of the present Matter Under Review. The records were not sent to JJPC until August, 1985. JJPC Response, March 5, 1988.

With respect to the finding that WNPEP may have violated 2 U.S.C. § 441d by making a solicitation that failed to include an appropriate disclaimer, it should be noted that Ms. Hughes has testified that she did not prepare or mail the solicitation that gave rise to that finding. Id. 29-31. She did not formally solicit funds for the fundraiser for Jesse Jackson, Deposition of Dorothy Pitman Hughes, 41, although she talked to people about the fundraiser and suggested they buy tickets. Id. 12. She also stated that she did not recognize another solicitation letter obtained by this Office, and denied that she had written it. Id. 66.

89040760672

II. ANALYSIS

WNPEP and its treasurer reported to the Commission a \$25,360 in-kind contribution to JJPC. Respondents now state that that report was inaccurate, that the \$25,360 represented the sum of approximately 100 separate contributions from various persons who intended to contribute to Jesse Jackson's 1984 Presidential campaign by paying the start-up costs for a fundraiser on behalf of the Reverend Jackson's candidacy. In effect, the contributions involved were all earmarked for the Jackson

campaign, and WNPEP served only as a conduit for receiving these funds, and disbursing them, as instructed, on behalf of JJPC.

Under the Commission's regulations, earmarking involves any "designation, instruction, or encumbrance," which results in "all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate"

11 C.F.R. § 110.6(b) (emphasis added). An earmarked contribution is deemed made by the contributor to the candidate. 11 C.F.R. § 110.6(a). The Regulations further provide that

(c) the intermediary or conduit of the earmarked contribution shall report the original source and intended recipient of the contribution to the Commission ... and to the intended recipient.

(1) The report to the Commission ... shall be included in the conduit or intermediary's next due quarterly, pre-or post-election, or annual report ..., and shall-

(i) If the contribution passed through the conduit's account, disclose each contribution, regardless of amount, on schedules of itemized receipts and expenditures

(2) The report to the intended recipient shall be made when the contribution is passed on to the intended recipient.

11 C.F.R. § 110.6. Respondents in this case failed to include on their next due report to the Commission the original source and intended recipient of the contributions they handled, based on their own version of events, as a conduit. Accordingly, they also failed to comply with the requirement that, where (as here) such contributions pass through the conduit's account, they include in their report schedules of itemized receipts and

39040760673

expenditures. Finally, WNPEP failed to notify JJPC of these transactions at the time the expenditures were made on behalf of JJPC, as required by the regulations. Over sixteen months elapsed from the time of the fundraiser and the payments to Tavern on the Green before WNPEP sent contributor information to JJPC. Accordingly, there is probable cause to believe that WNPEP violated 11 C.F.R. § 110.6(c)(1) and 110.6(c)(2).

The regulations also set forth the contents required for the aforementioned conduit reports. 11 C.F.R. § 110.6(c)(4).

Specifically, the report must include

- (i) The name and mailing address of the contributor and if the contribution exceeds \$200, the contributor's occupation and the name of his or her employer.
- (ii) The amount of the contribution, the date received by the conduit, and the intended recipient as designated by the contributor.
- (iii) The date the contribution was passed on to the intended recipient and whether the contribution was passed on in cash, by the contributor's check, or by the conduit's check.

Id. Respondents failed to report any of this information in a timely manner. Certain information was belatedly provided when subpoenaed by this Office. Other information, such as the date some of the checks were received by WNPEP and the employer and occupation of some contributors, has never been reported. Accordingly, this Office recommends that the Commission find probable cause to believe WNPEP and its treasurer violated 11 C.F.R. § 110.6(c)(4).

89040760674

As previously noted, respondents inaccurately reported making a \$25,360 disbursement on behalf of JJPC. In view of respondents' obligation to report disbursements accurately, 2 U.S.C. § 434(b)(4), the erroneous report constitutes a violation of that statutory provision. This Office therefore recommends that the Commission find probable cause to believe respondents violated 2 U.S.C. § 434(b)(4).

On the other hand, the evidence indicates that respondents did not pay for or disseminate any solicitations that failed to include appropriate disclaimers. While one such solicitation did ask for checks to be made out to WNPEP, this request apparently reflected the decision by the Stars to use WNPEP as a conduit for handling certain contributions to JJPC and payments to Tavern on the Green. Since WNPEP and its treasurer actually made no solicitations, this Office recommends that the Commission find no probable cause to believe respondents violated 2 U.S.C. § 441d(a).

Finally, based on the evidence that WNPEP itself made no contributions to JJPC, but merely acted as a conduit for handling the contributions of others, it appears that WNPEP did not make an excessive contribution to JJPC. Accordingly, this Office recommends that the Commission find no probable cause to believe WNPEP and its treasurer violated 2 U.S.C. § 441a(a)(1).

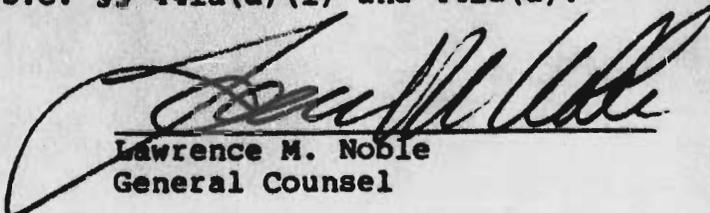
89040760675

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 434(b)(4) and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4).
2. Find no probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. §§ 441a(a)(1) and 441d(a).

Date

7/1/88


Lawrence M. Noble
General Counsel

89040760670

HAND DELIVERED
RECEIVED
FEDERAL ELECTION COMMISSION

9225

88 JUL -8 AM 10:08

Coaxum & Hewitt

Attorneys and Counsellors at Law

Galleria and Towers at Erieview

1301 East Ninth Street

Suite 3400

Cleveland, Ohio 44114-1824

(216) 696-2022

July 7, 1988

*Edward C. Coaxum, Jr.
James H. Hewitt, III*

*Of Counsel:
Donald D. Brown
Donald C. Haly
Earle C. Horton*

RECEIVED
FEDERAL ELECTION COMMISSION
88 JUL -8 PM 12:54

VIA AIRBORNE EXPRESS
AIRBILL NO. 261456672

Charles Snyder, Esq.
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MJR 2139 - Jesse Jackson for President
Committee and Emma Chappell as Treasurer

Dear Mr. Snyder:

On today's date we received a letter from Lawrence M. Noble, Esq., General Counsel of the Federal Election Commission, including a copy of the General Counsel's Brief setting forth the basis for the General Counsel's belief that the Jesse Jackson for President Committee and Emma Chappell, as Treasurer, violated during the 1984 Presidential election cycle, certain sections of the Federal Election Campaign Act.

The Jackson Campaign is most interested in availing itself to every opportunity to present to the Commission those reasons supporting why no finding of probable cause should occur.

However, as you may be aware, this law firm is involved with the current campaign of Reverend Jesse Jackson, seeking the 1988 Democratic Party nomination for the office of President. From July 13, through July 22, 1988, my partner Edward C. Coaxum, Jr. and I will be involved in activities relating to the 1988 Democratic National Convention in Atlanta, Georgia. Thus, we request an extension of time to submit reasons supporting our position for consideration by the Commission.

Thus, by this letter, we request an extension of time through and including August 11, 1988 by which we may supply your office and the Commission with our brief explaining why no finding of probable cause should issue.

As in the past, we request that you confirm this extension in writing to my attention and by telephone.

7
2
9
0
9
7
6
0
6
7
7

Coaxum & Hewitt

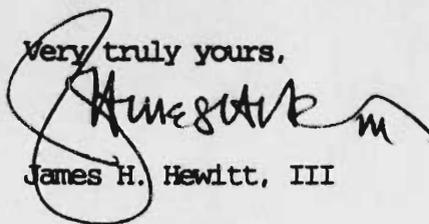
VIA AIRBORNE EXPRESS

Charles Snyder, Esq.
July 7, 1988
Page Two

In light of our planned commitment in Atlanta, Georgia beginning Wednesday, July 13, the courtesy of a prompt reply to this request is favored.

Thank you.

Very truly yours,



James H. Hewitt, III

JHH:al
cc: Edward C. Coaxum, Jr.

89040760678

EAGLE-A
Trojan Bond
25% COTTON FIBER

plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 13, 1988

James H. Hewitt, III, Esquire
Coaxum & Hewitt
Galleria and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824

RE: MUR 2139
Jesse Jackson for President
Committee and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

This is in response to your letter dated July 7, 1988, which we received on July 8, 1988, requesting an extension of 20 days until August 11, 1988 to respond to the General Counsel's brief. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 11, 1988.

If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

89040760679

CCC# 17

RECEIVED
FEDERAL ELECTION COMMISSION

88 AUG -5 AM 9:29

Rogers & Wells
Two Hundred Park Avenue
New York, N.Y. 10166

1737 H STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 331-7780
TELECOPIER (202) 331-0463
TELEX 248439 WASHUR

201 NORTH FIGUEROA STREET
LOS ANGELES, CA. 90012-2636
TELEPHONE (213) 580-1000
TELECOPIER (213) 580-1234
(213) 580-1070
TELEX 194758 RWLSA

TELEPHONE (212) 878-8000
TELECOPIER (212) 878-8180
(212) 878-8378
TELEX 234493 RKWUR

47, AVENUE HOCHE
75008-PARIS, FRANCE
TELEPHONE 47-63-11-00
TELECOPIER 33-1-4267-5081
TELEX 290617 EURLAW

88 COLEMAN STREET
LONDON EC2R 5BE, ENGLAND
TELEPHONE 01.628.0101
TELECOPIER 441-638-2008
TELEX 884964 USLAW

August 3, 1988

Charles Snyder, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2139
Women's Network for Political
and Economic Parity and Dorothy
Pitman Hughes, as Treasurer

Dear Mr. Snyder:

This will confirm our telephone conversation yesterday in which you agreed that Ms. Hughes has to and including August 16, 1988 to file a brief stating her position on the issues and replying to the brief of the General Counsel. As I explained to you, Ms. Hughes was out of the city for three weeks and did not receive the General Counsel's July 5, 1988 letter until August 1, 1988.

I appreciate your courtesy in this matter.

Very truly yours,

Blair Soyster

Margaret Blair Soyster

cc: Ms. Dorothy Pitman Hughes

89040760680

RECEIVED
FEDERAL ELECTION COMMISSION
88 AUG -5 PM 1:36

HAND DELIVERED 20789
RECEIVED
FEDERAL ELECTION COMMISSION

88 AUG 11 AM 10:17

Coaxum & Hewitt
Attorneys and Counsellors at Law
Galleria and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824
(216) 696-2022
Telex Number
(216) 244-2679
August 10, 1988

Of Counsel:
Donald D. Graves
Donald C. Holey
Earle C. Horner

Edward C. Coaxum, Jr.
James H. Hewitt, III

VIA FEDERAL EXPRESS

Secretary of the Commission
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

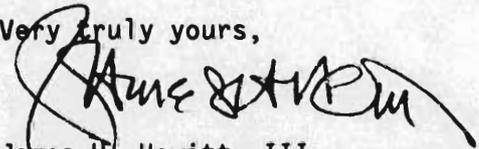
Re: MUR 2139 - Jesse Jackson for President
Committee and Emma Chappell, as Treasurer

Gentlemen:

Enclosed herein please find ten (10) copies of the Brief of Counsel for Jesse Jackson for President Committee, which are being submitted to you as our support that the Commission reject the recommendation of the General Counsel and find no probable cause to believe that a violation of the Act has occurred.

A copy of this letter is also being sent to Charles Snyder, Esq., the attorney assigned to handle this matter, together with three (3) copies of this Brief.

Should any questions arise regarding the receipt of these materials, we request that you direct them to my attention. Thank you.

Very truly yours,

James H. Hewitt, III

JHH:ldj
Enclosures
cc: Charles Snyder, Esq. ✓
Reverend Jesse L. Jackson
Ms. Emma Chappell
Howard Renzi, C.P.A.

18909760681

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF RECORDS & COMMUNICATIONS
88 AUG 11 PM 1:35

BEFORE THE FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

In The Matter Of:)
)
)
Jesse Jackson for President)
Committee and Emma Chappell,) Re: MUR 2139
as Treasurer)
)
)

BRIEF OF COUNSEL FOR JESSE JACKSON FOR PRESIDENT
COMMITTEE AND EMMA CHAPPELL, AS TREASURER

Through correspondence from Lawrence M. Noble, General Counsel, Federal Election Commission (the "Commission"), dated July 5, 1988, Legal Counsel for Jesse Jackson for President Committee ("JJPC") and Emma Chappell, as Treasurer, were informed that "the General Counsel is prepared to recommend that the Commission find probable cause to believe that" JJPC and Emma Chappell, as Treasurer, have violated certain provisions of the Federal Election Campaign Laws and certain regulations promulgated thereunder.

By letter dated July 7, 1988, the undersigned requested additional time to prepare our written reply, and by letter dated July 13, 1988, the Office of General Counsel advised that the requested extension had been granted to and including August 11, 1988.

The formal Brief of the General Counsel recommends that the Commission find probable cause to believe that the JJPC violated: 2 U.S.C. Section 441a(f), because of alleged acceptance of knowing excessive contributions; 2 U.S.C. Section 441b(a), because of alleged knowing acceptance of corporate contributions; 2 U.S.C. Section 434(b)(3) because of alleged failure to report contributions having an aggregate amount of \$200 within the calendar year; and 11 C.F.R. Section 110.6(c)(3), because of alleged failure to report the ultimate recipient of certain earmarked contributions, and 2 U.S.C. Section 434(b), because of certain alleged violations arising out of a fund-raising event held in April, 1984.

Based upon the following factual and legal discussion and all previous responses submitted to the Commission on this matter, it appears that no violation of Title 2 has occurred. In summary, first, the allegation involving acceptance of excessive contributions, as well as

89040760682

corporate contributions, is improper because 2 U.S.C. Sections 441a(f); 434(b)(3) require that acceptance be made with knowledge that the contribution is prohibited. The JJPC did not accept any contribution with knowledge that it was prohibited. Second, the allegations arising out of the fund-raising event and the allegations concerning failed reporting of earmarked contributions or contributions aggregating \$200 within a given year are improper because the JJPC exerted its best efforts to comply with all applicable accounting and report requirements.

Moreover, the recommendations of the General Counsel appear to lack substantive merit and are contrary to public interest in light of unavoidable and subsequently corrected realities attendant to the historic 1984 Campaign of Reverend Jesse Jackson.

STATEMENT OF FACTS

The General Counsel's factual brief alleges that the Women's Network for Political and Economic Parity (WNPEP) and Dorothy Pittman-Hughes, as Treasurer, reported disbursing \$25,360.00 on April 3, 1984 to the Tavern on the Green Restaurant for a fund-raising party for and authorized by the JJPC. The General Counsel argues that acceptance of such an in-kind contribution would constitute a violation of the Federal Election Act. It is further alleged that the JJPC did not report acceptance of this contribution. At the time WNPEP reported this payment to the Tavern on the Green Restaurant in New York City, JJPC received no supporting documentation. Moreover, the event was unauthorized. WNPEP reported the check as part of its accounting and report requirements to the Commission as an unitemized expenditure in July, 1984.

JJPC first learned about this matter after being contacted by the Commission Audit Staff. Thereafter, JJPC officials requested more complete information from WNPEP and Ms. Dorothy Pittman-Hughes. As a result, the JJPC received a skeleton summary of this event indicating that WNPEP reported the sum of \$4,611.00 had been disbursed in contributions to JJPC. Thereafter, the JJPC requested on several occasions information on further contributions that may have been received or reported. No response from WNPEP was received.

During July, 1985 the JJPC notified the Commission through its Audit Department of additional information. Thereafter, the JJPC continued its attempts to obtain information from WNPEP and Ms. Hughes concerning the fund-raising event. These efforts were suspended when the Auditors' stated their satisfaction with committee efforts.

However, receipt of this MUR revived the issue and the JJPC, again, attempted to obtain information. Eventually, information was received which disclosed that approximately \$70,000.00 was raised at the event and \$25,360.00 was recorded and paid for by the WNPEP organization. As a result of additional JJPC efforts, further information was obtained and this information was reported and disclosed in previous responses supplied and prepared by this office.

89040760683

Again, to assist your analysis, we believe it useful to supply a brief background obtained by JJPC during the course of this investigation about WNPEP and the fund-raiser organized in April, 1984 at the Tavern on the Green Restaurant.

In early, 1984, several professional entertainers (radio, television and theatre) became motivated, like others, to join the ground swell of popular support for Reverend Jackson's historic candidacy for the Democratic Party nomination for President. Thus, the idea was developed to sponsor a fund-raiser at the Tavern on the Green Restaurant. The event was advertised as "Stars for Jesse L. Jackson for President Committee." This group of professional entertainers being unfamiliar with organizing a fund-raiser in which Commission requirements were necessary, apparently approached Ms. Dorothy Pittman-Hughes, a local New York small businesswoman, with ties to an organization known as WNPEP, for assistance.

The April, 1984 reception fund-raiser was organized without the assistance of the JJPC National Campaign staff. Disclaimers were not included on fund-raising literature. Furthermore, unbeknown to JJPC officials, Ms. Hughes had taken the personal responsibility with the Tavern on the Green restaurant for payment of expenses. Ms. Hughes, independently, prepared the check of WNPEP in the sum of \$25,360.00 to pay for the facility costs needed to sponsor this event

Thereafter, in an attempt to comply with Federal Election reporting requirements, Ms. Hughes prepared a report of expenditures, without professional assistance, listing this disbursement on behalf of the JJPC. In a very real practical sense, the JJPC was unaware that Ms. Hughes or WNPEP made any payments to the Tavern on the Green Restaurant on its behalf until it was notified through the FEC Audit staff and later the Office of General Counsel's Legal and Factual Analysis.

ANALYSIS

1. The JJPC Did Not Knowingly Accept Contributions In Violation of 2 U.S.C. Sections 441a(f); 441b(a)

The General Counsel recommended a finding of probable cause to believe that the JJPC violated 2 U.S.C. Section 441a(f) by accepting excessive contributions, as well as improper corporate contributions. It continues to be the view of the General Counsel that the JJPC accepted excessive contributions from the moment they were tendered by the WNPEP organization.

2 U.S.C. Section 441a(f) states: "No candidate or political committee shall knowingly accept any contribution . . . in violation of the provisions of this section." (Emphasis added.) Without such facts to support the allegation, no violation of 2 U.S.C. Section 441a(f) can be found. In fact, the JJPC did not knowingly accept any excessive contribution, and, therefore, the JJPC did not violate 2 U.S.C. Section 441a(f).

Furthermore, 2 U.S.C. Section 441b(a) states in relevant part:

[no] political committee or other person [shall] knowingly accept or receive any contribution promoted by this Section.

For example, to establish a violation of 2 U.S.C. Sections 441a(f) and 441b(a), the General Counsel must establish that the JJPC: (1) accepted a contribution; (2) knowing the contribution to be in violation of 2 U.S.C. Sections 441a and 441b(a). Acceptance of a contribution usually occurs at the time the contribution is deposited. United States v. Chestnut, 533 F.2d 40 (2d Cir. 1976). Because the JJPC never directly received any funds from the WNPEP, it is the General Counsel's view that a "contribution from an individual or organization to a political committee arises at the time the individual makes payment for the goods or services, i.e., at the time cash or a check is tendered." Therefore, in the facts at issue, for the General Counsel to establish that the JJPC violated 2 U.S.C. Sections 441a(f) and 441b(a), the General Counsel must show that the JJPC knew at the time the contributions were made that the contributions violated 2 U.S.C. Sections 441a and 441b(a). Any knowledge gained by the JJPC after payment for the goods by the WNPEP is thus irrelevant to establishing a knowing acceptance. (1)

"Knowingly," as used in 2 U.S.C. Sections 441a(f) and 441b(a), is not defined by either the Act or the Presidential Election Campaign Fund Act (26 U.S.C. Section 9001 et seq.) (PECFA) or their implementing regulations. In general, case law finds a knowing violation when a person is shown to have knowledge of all of the facts which establish a violation. See, e.g., United States v. Keegan, 331 F.2d 257 (7th Cir.), cert. denied, 379 U.S. 828 (1964); Oregon-Washington R. & Nav. Co. v. United States, 205 F.2d 337 (9th Cir. 1913); United States v. Key Line Freight Line, Inc., 481 F. Supp. 91 (W.D. Mich. 1977), aff'd, 570 F.2d 97 (6th Cir. 1978).

Further support for this definition is found in Federal Election Commission v. California Medical Association, 502 F.Supp. 196 (N.D. Cal. 1980). In this case, the court found that the defendant political action committee knew all the facts (accepting in-kind contributions which it knew at the time of acceptance exceeded \$5,000 -- a limit found in 2 U.S.C. Section 441a(f) which rendered its conduct unlawful. The court found that "such knowledge is sufficient to create civil liability under 2 U.S.C. Section 441a(f)." Id. at 203.

In the facts at issue, the JJPC had no knowledge at the time of acceptance (payment for the goods or services) that the WNPEP's alleged contributions exceeded \$1,000 and, therefore, violated 2 U.S.C. Section 441a(f). The JJPC had no knowledge of the character or the amounts involved until the FEC audit staff so noted. Therefore, the JJPC did not accept any alleged contributions knowingly.

89040760685

Moreover, a knowing violation will not occur because of a failure through inadvertence or negligence to become aware of all the facts which establish a violation. See United States v. Jewell, 532 F.2d 697 (9th Cir.), cert. denied, 426 U.S. 951 (1976); United States v. Haney Chevrolet, Inc., 371 F. Supp. 381 (N.D. Fla. 1974). Thus, even if it is assumed that the JJPC through inadvertence or negligence failed to gain knowledge at the time of acceptance that the WNPEP organization had incurred expenses exceeding the \$1,000 limitation, a violation of 2 U.S.C. Sections 441a(f) or 441b(a) still cannot be found.

Therefore, unless the General Counsel can show that the JJPC had knowledge at the time of acceptance (the point in time which the WNPEP incurred the expenses) that the alleged contribution in fact exceeded \$1,000, or was obtained from a corporation, the JJPC cannot be found to have knowingly accepted an excessive or a corporate contribution. The General Counsel has not offered and cannot offer such evidence. Therefore, the JJPC cannot be found to have violated 2 U.S.C. Sections 441a(f) or 441b(a), and no further action should be taken on these issues.

2. The JJPC Used its Best Efforts to Account and Report the Contributions and Expenditures Related to the Tavern on the Green Fund-Raising Event

2 U.S.C. Section 432(i) and 11 C.F.R. Sections 102.9(d) and 104.7(a) provide that records maintained and reports submitted by a committee will be considered in compliance with the Act, if a committee used its best efforts to obtain, maintain and submit the documentation required. The JJPC contends that it used its best efforts to obtain and report information relating to the fundraiser and, therefore, did not violate the Act or its regulations. The FEC Auditors apparently agreed with the JJPC's position. See JJPC Answers to Interrogatories, paragraph 2; hereinafter JJPC Ans. Interr. Para. ____.)

The best efforts test was incorporated into the Act and its regulations to prevent political committees from being overburdened with administrative requirements. In Congress' view, such overburdening would defeat the purpose of the Act, *i.e.*, to achieve substantial voluntary compliance with the provisions of the Act. See H.R. Rep. 96-422, 96th Cong. 1st Sess. 14 (1979). In fact, Congress views this test as so important to the intent of the Act that the Commission has been criticized for its failure to incorporate this test into its procedures.

[T]he application of the best efforts test is essential to the enforcement of the recordkeeping and reporting provisions of the Act. It is the opinion of the JJPC that the Commission has not adequately incorporated the best efforts test into its administrative procedures, such as systematic review of reports.

89040760686

Id. The circumstances surrounding the accounting and reporting of information relating to the fundraiser, in the JJPC's view, require that the best efforts test be applied and the JJPCs be found to have used its best efforts.

Application of the best efforts test has been impeded because 2 U.S.C. Section 432(f) and 11 C.F.R. Sections 102.9(d) and 104.7(a) do not define what constitutes best efforts. Moreover, little administrative interpretation of "best efforts" is available. However, the legislative history of the 1979 amendments to the Act and PECFA and case law provide some guidance.

In discussing the best efforts test, Congress has stated:

One illustration of the application of this test is the current requirement for a committee to report the occupation and principal place of business of individual contributors who give in excess of \$100. If the committee does not report the occupation and principal place of business for each itemized individual contribution, the Commission's review and enforcement procedures must be geared to determining whether the committee exercised its best efforts to obtain the information. The best efforts test is crucial since contributor information is voluntarily supplied by persons who are not under the control of the committee.

In a situation such as this, the first question is what efforts did the committee take to obtain the information. Did the solicitation contain a clear request for the occupation and principal place of business? If the committee made an effort to obtain the information in the initial solicitation and the contributor ignored the request, the Commission should not require the committee to make the same request two, three, or four times. On the other hand, if the best efforts test is not met, the committee must be required to take corrective action, such as contacting the contributor and requesting the information.

H.R. Rep. 96-422, 96th Cong. 1st Sess. 14 (1979).

Applying this standard to the facts at issue, the JJPC clearly used its best efforts. The JJPC contacted WNPEP and Ms. Hughes officials on numerous occasions. (JJPC Ans. Interr. Paras. 1 and 2.) The event was

89040760687

89040760688

unauthorized. (JJPC Ans. Interr. Paras. 4a, 4b and 5a). Other individuals involved with the fundraiser were contacted. (JJPC Ans. Interr. Paras. 1, 2 and 3.) Despite these efforts, only limited information was obtained. (JJPC Ans. Interr. Paras. 1, 2 and 5(d)); 6 and 7.) Moreover, the JJPC indicated a willingness to account for and report the contributions received based upon the limited information made available. (JJPC Ans. Interr. Para. 3.) Therefore, as viewed by Congress, the JJPC clearly exercised its best efforts.

Case law shows that "[b]est efforts,' like 'reasonable care' is a term which necessarily takes its meaning from the circumstances." Perma Research and Development Company v. Singer Company, 308 F. Supp. 743, 748 (S.D.N.Y. 1970). What courts appear to look for in the circumstances is a reasonable or good faith effort by a party to do that which the party is capable of doing to fulfill its responsibilities. See Western Geophysical Company v. Bolt Associates, 584 F.2d 1164 (2d Cir. 1970); Bloor v. Falstaff Brewing Corp., 454 F. Supp. 258 (S.D.N.Y. 1978), aff'd, 601 F.2d 609 (2d Cir. 1979); U.C.C. Section 2-306(2), Official Comment 5.

The circumstances surrounding the April 4, 1984 fund-raising event clearly demonstrate that the JJPC exercised reasonable and good faith efforts in its attempt to obtain information necessary to fully account for and report the event. The facts show the following:

(1) the event was unauthorized and no disclaimer was noted on fund-raising literature (JJPC Ans. Interr. Paras. 4a, 4b, 4c and 4d);

(2) upon receipt of information disclosing that contributions received exceeded the amount initially provided to the JJPC, the JJPC requested on numerous occasions but did not receive, any further information (JJPC Ans. Interr. Paras 1, 2 and 3);

(3) the JJPC indicated a willingness to account for and report the contributions received in a manner appropriate to the circumstances (JJPC Ans. Interr. Para. 3);

(4) efforts to obtain additional information ceased when the auditors stated their satisfaction with JJPC efforts (JJPC Ans. Interr. Paras. 1 and 2);

(5) after receiving MUR 2139, the JJPC performed further investigations and determined that even more contributions were involved (JJPC Ans. Interr. Paras. 1, 2 and 3);

(6) through its own efforts, the JJPC examined bank statements and other reports to identify the amount and type of expenditures involved (JJPC Ans. Interr. Paras. 1 and 2);

(7) any copies of cancelled checks and/or lists of contributions submitted by JJPC were obtained directly from WNPEP. Further, the corporate contributions alleged to have been received were never supplied to JJPC by WNPEP until after investigation by JJPC and after receipt of MUR2139 (JJPC Ans. Interr. Paras. 1, 2 and 3); and

(8) upon proper identification and categorization of expenses, the JJPC indicated a willingness to promptly report the information (JJPC Ans. Interr. Para. 3).

These facts clearly show that the JJPC exercised its best efforts and did all that it reasonably could do to obtain information necessary to account for and report the results of the fund-raiser.

For this reason, the General Counsel's finding of probable cause relative to 2 U.S.C. Section 434(b)(3); 2 U.S.C. Section 434(b) and 11 C.F.R. Section 110.b(c)(3) should be withdrawn.

CONCLUSION

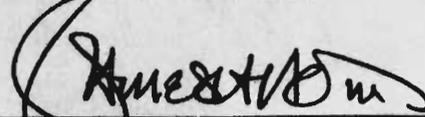
On behalf of our clients, we urge that the Commission reject the recommendation of the General Counsel to find probable cause to believe that (i) JJPC and its Treasurer violated 2 U.S.C. Sections 441a(b); 441b(a); 434(b); 434(b)(3); and 11 C.F.R. Section 110.6(c)(3).

We respectfully request that the Commission recognize the mitigating factors described herein, as well as in previous responses. We ask that the Commission acknowledge the absence of knowing, willful or deliberate violations of the Act. We request that the Commission acknowledge that any alleged violations should be deemed to be technical in nature. Further, should the Commission find that these violations are technical violations in nature, the JJPC as part of resolution or conciliation will appropriately correct our reports through amended or supplemental filings, upon the receipt of verified information. Finally, even if technical violations can be deemed to have occurred, the foregoing analysis establishes that our clients have exercised diligently their best efforts in full compliance with the requisites of 2 U.S.C. Section 432(i).

89040760689

Thus, the diligent and conscientious exercise of best efforts establishes full compliance with the reporting and recordkeeping provisions of the Act. If the Act has been complied with, then any finding of probable cause is not well-founded.

Respectfully submitted,



EDWARD C. COAXUM, JR.
JAMES H. HEWITT, III

COAXUM & HEWITT
Galleria and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114
Telephone: (216) 696-2022

Attorneys for Jesse L. Jackson
For President Committee and
Emma C. Chappell, as Treasurer

89040760690

FOOTNOTES

(1)

Closely analogous to the wording of 2 U.S.C. Sections 441a(f) and 441b(a) are laws prohibiting the receipt of stolen property. Cases interpreting receipt of stolen property statutes hold that to be guilty of receiving stolen property, an individual must know at the time of receipt of the property that the property was stolen. See United States v. Lambert, 436 F.2d 552 (7th Cir. 1972); United States v. Butler, 494 F.2d 1246 (10th Cir. 1974); McGee v. State, 65 P.2d 207, 60 Okl. C.R. 436 (1937). Knowledge gained later that the property was stolen may establish the crime of possession of stolen property, but it does not establish the crime of receiving stolen property. See, United States v. Koran, 453 F.2d 144 (10th Cir. 1972). These cases are of particular value because "receiving" and "accepting" are synonymous in meaning. Standard Oil v. United States, 164 F.2d 376 (7th Cir. 1908), cert. denied, 212 U.S. 579 (1909).

(2)

Recent proposed amendments to the Foreign Corrupt Practices Act of 1977 support the position that when a statute requires a civil penalty for a knowing violation, as does the Act, the word "knowingly" requires a showing of knowledge of all of the facts which establish a violation. The Committee on Banking, Housing and Urban Affairs stated:

The Committee believes that the purpose of the FCPA accounting provisions was to proscribe knowing conduct, not unknowing conduct. Accordingly, the Bill provides that violations occur where a person 'knowingly' violates Section 13(b)(2). In adopting the standard, the Committee intends to assure that the accounting provision, as modified, is the basis for enforcement action only in cases where a conscious awareness of wrongdoing is present, and not in situations where mere negligence or other conduct not reflecting such an awareness results in some imperfection in a company's internal accounting control system or in unintentional circumvention of that system.

H.R. Rep. 97-209, 97th Cong., 1st Sess. 14 (1981).
(Emphasis added).

8904076691

600#147

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 AUG 17 AM 10:13

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Women's Network for Political)	
and Economic Parity and)	MUR 2139
Dorothy Pitman Hughes, as)	
Treasurer)	

MEMORANDUM OF WOMEN'S NETWORK
FOR POLITICAL AND ECONOMIC PARITY
AND
DOROTHY PITMAN HUGHES

This memorandum is submitted on behalf of the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes (hereinafter collectively referred to as "WNPEP") to call the Commission's attention to certain facts overlooked or de-emphasized by the General Counsel in his brief.

At the outset, it should be noted that the General Counsel has concluded that the facts do not warrant a finding of probable cause to believe that WNPEP violated either 2 U.S.C. § 441a(a)(1) or 2 U.S.C. § 441d(a), the only two sections which the Commission ever found reason to believe had been violated by WNPEP. Specifically, the General Counsel has found, following investigation, that the evidence demonstrates that WNPEP did not make an excessive contribution to the Jesse Jackson for President Campaign and that it did not disseminate any improper solicitations for contributions.

Having exonerated WNPEP totally with respect to the alleged violations which were the sole subject of the Commission's reasonable cause determination, the General Counsel

8 2 0 4 0 7 6 9 2

88 AUG 17 PM 12:03
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

now, more than four years after the fact, improperly seeks to shift the focus of inquiry to a different alleged violation relating to reporting--an alleged violation which was never before the Commission for consideration pursuant to 2 U.S.C. § 437(g)(2). In any event, even this new purported violation does not justify further action by the Commission.

89040760695
There can be no question but that WNPEP was unsophisticated concerning the technical requirements of the Federal Election Law and that it was unaware of the potential obligations it was undertaking by playing even a minor part in the 1984 Jackson fundraising event at Tavern on the Green in New York. Its involvement resulted not from any decision to be a fundraiser or a custodian of funds for the Jackson Campaign, but rather from the simple fact that WNPEP had a bank account and thus appeared to be in a position to make the required prompt payment to Tavern on the Green more quickly than would have been possible by working directly through the Jackson Campaign (Deposition of Dorothy Pitman Hughes, pp. 36-37). To allow Ms. Hughes to fulfill her personal commitment of immediate payment to the owner of Tavern on the Green, the decision was made to have certain checks made payable to WNPEP and then disbursed by it directly to Tavern on the Green (Hughes Dep., pp. 11-12, 60-61).

It was never contemplated that the act of helping out in this small way would embroil WNPEP in the unfamiliar

intricacies of the Federal Election Law. Indeed, the arrangement was conceived of and recommended by lawyers involved in the Jackson Campaign, causing Ms. Hughes to this day to be "startled as to what's wrong" since "There were four lawyers. That is what they said to do" (Hughes Dep., pp. 38-39).

Under the circumstances, there are compelling mitigating circumstances which should be taken into account in assessing any possible technical violation of the Act. Certainly there was no willful or intentional effort to circumvent the requirements of the Federal Election Law. WNPEP has cooperated fully and to the best of its ability with every aspect of the investigation. We respectfully urge that a finding of no probable cause be made and that no further action be taken against WNPEP.

Respectfully submitted,

ROGERS & WELLS
Attorneys for Women's Network for
Political and Economic Parity
and Dorothy Pitman Hughes
200 Park Avenue
New York, New York 10166
(212) 878-8000

Dated: August 15, 1988
New York, New York

89040760694



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 1, 1988

Margaret Blair Soyster, Esquire
Rogers & Wells
200 Park Avenue
New York, New York 10166

RE: MUR 2139
Women's Network for
Political and Economic
Parity and Dorothy
Pitman Hughes, as treasurer

Dear Ms. Soyster:

This is in reference to the memorandum submitted by your office on behalf of respondents in the above-referenced matter.

You were advised by Charles Snyder of our staff when you appeared with Dorothy Pitman Hughes at a deposition held in New York on October 8, 1987, that, if you wished to represent Mrs. Dorothy Pitman Hughes and the Women's Network for Political and Economic Parity (WNPEP) in this matter, it was necessary for said respondents to submit a written statement designating you as their counsel. You stated that while you had agreed to appear with Mrs. Hughes at the deposition, it had not been decided whether you would actually represent Mrs. Hughes and WNPEP in this matter. As you recall, on August 2, 1988, Mr. Snyder again told you by telephone that it was necessary for you to submit a Designation of Counsel statement if you intended to represent the aforesaid respondents. You stated that it had not yet been decided whether you would submit a reply brief on behalf of Mrs. Hughes.

Since Mrs. Hughes and WNPEP have not designated you as their counsel, the memorandum you submitted on their behalf cannot be considered by the Commission at this time. If you wish the memorandum to be considered, you must have your client submit a written statement designating you as counsel in this matter. In the alternative, Mrs. Hughes may sign another copy of the memorandum and submit it on her own behalf.

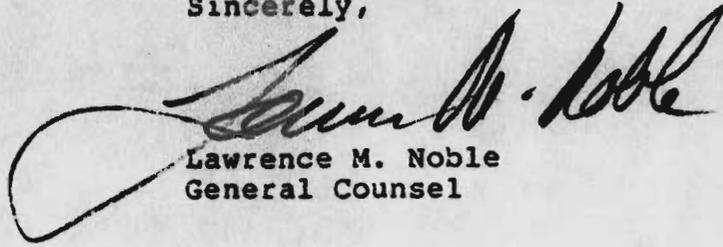
If the memorandum is to be considered, Mrs. Hughes must submit either a designation of counsel statement or a copy of the memorandum signed by her within seven days of your receipt of

89040760695

Margaret Blair Soyster, Esquire
Page 2

this letter. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble". The signature is written in dark ink and is positioned above the printed name and title.

Lawrence M. Noble
General Counsel

89040760696

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

88 SEP 26 AM 11:32

RECEIVED
FEDERAL ELECTION COMMISSION

88 SEP 19 PM 11:10

OGC
454

Rogers & Wells
Two Hundred Park Avenue
New York, N.Y. 10166

1737 H STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 331-7760
TELECOPIER (202) 331-0463
TELEX 248438 WASHUR

201 NORTH FIGUEROA STREET
LOS ANGELES, CA. 90012-2038
TELEPHONE (213) 580-1000
TELECOPIER (213) 580-1234
(213) 580-1070
TELEX 194758 RWLSA

TELEPHONE (212) 676-6000
TELECOPIER (212) 676-8160
(212) 676-6375
TELEX 234493 RKWUR

47, AVENUE HOCHÉ
75008-PARIS, FRANCE
TELEPHONE 47-63-11-00
TELECOPIER 33-1-4267-8081
TELEX 290617 EURLAW

58 COLEMAN STREET
LONDON EC2R 5BE, ENGLAND
TELEPHONE 01.628.0101
TELECOPIER 441-638-2005
TELEX 884984 USLAW

September 12, 1988

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2139 - Women's Network for
Political and Economic Parity and
Dorothy Pitman Hughes, as Treasurer

Dear Mr. Noble:

Enclosed is a Designation of Counsel submitted on behalf of the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as its Treasurer. I trust that the memorandum which I previously submitted on their behalf can now be considered by the Commission.

Please let me know if there is anything additional which is required.

Sincerely,

Margaret Blair Soyster

Margaret Blair Soyster

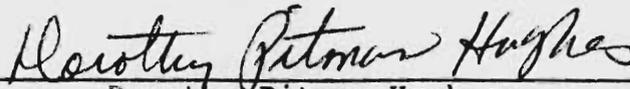
Enclosure

cc: Charles Snyder, Esq.

89040760697

DESIGNATION OF COUNSEL

The Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as Treasurer, hereby designate Rogers & Wells, 200 Park Avenue, New York, New York 10166 as their counsel in connection with MUR 2139 and request that future correspondence be directed to Margaret Blair Soyster at Rogers & Wells.



Dorothy Pitman Hughes

Dated: New York, New York
September 8, 1988

8 9 0 4 0 7 6 0 6 9 8

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

88 NOV -8 AM 9:37

In the Matter of)
Jesse Jackson for President Committee)
and Emma Chappell, as treasurer)
Women's Network for Political and)
Economic Parity and Dorothy Pitman)
Hughes, as treasurer)

MUR 2139

EXECUTIVE SESSION

NOV 15 1988

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 30, 1986, the Commission found reason to believe that the Women's Network for Political and Economic Parity ("WNPEP") and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 441a(a)(1), and that the Jesse Jackson for President Committee ("JJPC") and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441a(f), provisions of the Federal Election Campaign Act ("the Act"). The basis for these findings was WNPEP's report that it had made an excessive contribution of \$25,360 to JJPC, which the latter accepted but failed to report to the Commission. An investigation was conducted. Based on the evidence this Office obtained, it appeared that WNPEP acted as a conduit for contributions made by various individuals and organizations. In the view of this Office, as set forth in the General Counsel's brief signed July 1, 1988, WNPEP served as a conduit for various contributions made to JJPC, but it failed to report the sources and recipients of earmarked contributions to the Commission, failed to notify JJPC of the transactions in a timely manner, and failed to report other relevant information concerning the contributions, in violation of 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4). On the other hand,

89040760699

WNPEP itself made no contribution to JJPC, and, therefore, did not in the view of this Office violate 2 U.S.C. § 441a(a)(1).

JJPC, under the facts that emerged during the investigation, failed to report the contributions it received through WNPEP, failed to report WNPEP's role as a conduit, and failed to itemize the contributions thus received, in violation of 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(c)(3). In addition, it appeared that JJPC accepted both corporate contributions and individual contributions that aggregated in excess of \$1,000; therefore, JJPC also violated 2 U.S.C. §§ 441b(a) and 441a(f).

Finally, on January 29, 1987, the Commission found reason to believe that WNPEP, the Westside Committee for Jackson, and Stars for Jesse L. Jackson for President, violated 2 U.S.C. § 441d. This finding was based on solicitation letters produced during the investigation, that failed to include an appropriate disclaimer stating who paid for them and whether they were authorized by a candidate or candidate's committee.

II. ANALYSIS

(See General Counsel's Briefs, signed July 5, 1988.) On August 11, 1988, this Office received a reply brief from JJPC and its treasurer. (See Attachment 1.) This brief argues in essence that JJPC did not violate 2 U.S.C. §§ 441a(f) and 441b(a) because respondents did not have knowledge that the contributions in question were illegal, and that JJPC did not violate 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(c)(3) on the grounds that it used its "best efforts" to comply with the reporting requirements of

89040760700

the Act and the Commission's regulations. The JJPC arguments will now be examined in more detail.

First, JJPC argues that it did not violate the Act by accepting illegal contributions because, according to JJPC, it did not know "at the time the contributions were made that the contributions violated 2 U.S.C. Sections 441a and 441b(a). Any knowledge gained by the JJPC after payment for the goods by the WNPEP is thus irrelevant to establishing a knowing acceptance." JJPC Brief, 4. Respondents cite Federal Election Commission v. California Medical Association, 502 F. Supp. 196 (N.D. Cal. 1980), in support of the proposition that a finding of acceptance of an illegal contribution can only be made where the recipient committee, at the time of the acceptance, "knew all the facts ... which rendered its conduct unlawful." Id. Even if the recipient negligently failed to ascertain the illegality of the contributions, respondents argue, an illegal acceptance does not occur, since actual knowledge is required. "Thus, even if it is assumed that the JJPC through inadvertence or negligence failed to gain knowledge at the time of acceptance that the WNPEP organization had incurred expenses exceeding the \$1,000 limitation, a violation of 2 U.S.C. Sections 441a(f) or 441b(a) still cannot be found." JJPC Brief, 5.

JJPC's argument betrays a failure to understand the nature of the violation. It is not a question of whether WNPEP incurred expenses in excess of \$1,000; the uncontroverted evidence in this case shows that WNPEP acted as a conduit for contributions by

89040760701

others to JJPC, and that some of the contributors were corporations, and some were individuals whose aggregate contributions to JJPC exceeded \$1,000. JJPC does not deny these facts, but rather seeks refuge in its purported ignorance of the contributions.

A brief review of the record reveals that JJPC and its treasurer did know that WNPEP received contributions from third parties on behalf of JJPC. In addition, JJPC and its treasurer knew that WNPEP expended these funds to pay for the Tavern on the Green fundraiser. As early as the Fall of 1983, WNPEP had contacts with JJPC concerning the Rev. Jesse Jackson's appearance at a fundraiser at Tavern on the Green restaurant in New York. Deposition of Dorothy Pitman Hughes (hereinafter "deposition"), 13. Once the fundraiser was scheduled, Mrs. Hughes was in direct contact with JJPC treasurer Emma Chappell, concerning the funds that were raised to pay Tavern on the Green and concerning the record-keeping requirements respecting these contributions. The following testimony was given by Mrs. Hughes:

Q. Did you have a contact at the Jackson campaign concerning the money that was raised by the Women's Network in connection with the fundraiser?

A. Yes.

Q. Who was that?

A. Whoever the person - I can't think of one lady's name, but there was a lady who was the treasurer who was out of Philadelphia.

Q. Are you familiar with someone named Emma Chappell?

A. That is who it was.

89040760702

Q. What contacts did you have with her concerning the fundraiser?

A. She was the person I called to make sure that somebody was going to be there from the Jackson campaign ... at the Tavern on the Green. To make sure that there was going to be whatever I needed to do to get people to sign papers and stuff; to get the money -

Q. When you say sign papers, you mean -

A. Well, the papers that I sent to you that said individual contributions and stuff, that's what she said to do, is have people write down the name of the person and the company that they work for and the amount of the ticket was, and whatever.

Deposition, 23-24. When the fundraiser actually was held, Mrs. Chappell and other representatives of JJPC attended.

Mrs. Hughes testified that

when they came in, I figured that everything was to be turned over to them to take care of everything after that. Except that I wanted to make sure that Tavern was paid, not leaving me with the bill, so when the money was taken at the door, Miss Chappell was asked with Joe Barnes and Regina Darby and others who were on the [Stars for Jackson] committee to go into the room and make sure that he was paid, Tavern was paid.

Deposition, 62. Thus, Emma Chappell knew from the very beginning that funds had been contributed by various persons to JJPC and its treasurer through WNPEP as a conduit, and used to pay Tavern on the Green for the use of its facilities for a fundraiser.

To be sure, WNPEP did not immediately send the necessary contributor information to JJPC. (Some sixteen months elapsed before WNPEP reported this information. This is the basis for

89040760703

the recommendation for a finding of probable cause to believe WNPEP violated 11 C.F.R. § 110.6(c)(2).) Nonetheless, the information was eventually passed along to JJPC. Deposition, 43. In previous communications to this Office, JJPC admitted knowledge of the illegality of certain of the contributions in question:

[I]t appears that Ms. Hughes was merely acting as an organizer for the "stars" group in setting up a fundraiser for the Jackson campaign Our initial sampling of contacts with these donors has confirmed that each individual intended their contribution to benefit the Jackson Campaign, and not the WNPEP organization. At a minimum, we would be pleased to amend our FEC reports reflecting these contributions and expenditures and attempt to contact the others that supported this event to supply FEC officials with written confirmation that an unlawful in-kind contribution [by WNPEP] to our Committee did not take place. We also plan to aggregate each donor's contribution and make refunds, if necessary.

Response of JJPC, March 11, 1986, emphasis added. It should be noted that, in the three years that have elapsed since WNPEP reported the earmarked contributions to JJPC, JJPC has neither reported these contributions to the Commission, nor has it, as promised in the above-quoted letter, refunded excessive contributions that resulted through aggregation of these contributions with others by the same contributors. Nor has JJPC refunded any of the corporate contributions (at least \$750 worth) that it received through WNPEP, despite the fact that the corporate character of these contributions appeared on the face of the instruments.

89040760704

JJPC argues nonetheless that it did not "knowingly" accept the contributions at the time they were made. In so arguing, respondents overlook the fact that they did know contributions were made to pay for the fundraiser, as evidenced by the fact that both JJPC treasurer, Emma Chappell, and the Rev. Jesse Jackson attended the fundraiser at Tavern on the Green. Mrs. Hughes testified that Mrs. Chappell was present when the arrangements for paying Tavern on the Green were discussed. Deposition, 62. Clearly JJPC was put on notice that contributions were made on its behalf to pay for the fundraiser. It did not suffice for JJPC then, in respondents' own terms, to have "through inadvertence or negligence failed to gain knowledge at the time of acceptance" that a violation occurred.^{1/} Respondents had an obligation to use their "best efforts" to obtain the contributor information. 11 C.F.R. § 104.7. By their own admission, JJPC and its treasurer made no inquiries of WNPEP concerning the contributions in question until

^{1/} Respondents cite, in support of the proposition that they had no affirmative duty to find the facts concerning the contributions, but could rely on the defense of ignorance, the case of United States v. Jewell, 532 F. 2d 697 (9th Cir. 1976). This is a criminal case, in which different standards apply than in a civil matter. Hence, the case would not be valid authority as against the requirement set forth at 11 C.F.R. § 104.7, that treasurers must use their best efforts to obtain necessary contributor information. It is noteworthy, nonetheless, that the holding in Jewell actually does not support JJPC's position. The Jewell Court held that "'knowingly' includes a mental state in which the defendant is aware that the fact is question is highly probable but consciously avoids enlightenment" Id. at 704.

89040760705

July or August, 1985, some 15-16 months after the fundraiser occurred. JJPC Response to Interrogatories, March 4, 1988.

In addition, when WNPEP did provide JJPC with contributor information, the latter neither reported it to the Commission, nor refunded the illegal contributions. Respondents claim they were not obliged to refund the contributions because they had not accepted them, based on their purported lack of knowledge. Aside from their constructive knowledge at the time (they knew someone had paid Tavern on the Green), they later had from WNPEP copies of the checks and lists of contributors. JJPC claims this subsequent knowledge does not count: "Any knowledge gained by JJPC after payment for the goods by WNPEP is thus irrelevant to establishing a knowing acceptance." JJPC brief, 4.

The Commission has made it clear that subsequent knowledge that an apparently legal contribution was in fact illegal creates an obligation to refund the contribution. In an advisory opinion, the Commission cited the requirement to refund illegal contributions, 11 C.F.R. § 103.3(b), and the requirement to use best efforts to determine the legality of contributions, and stated that:

The mandatory refund requirement of this regulation [11 C.F.R. § 103.3(b)], together with the duty to make "best efforts" to determine the legality of the contribution, reflect the Commission's view that as a general rule contributions prohibited by the Act shall be returned by the recipient once their unlawful nature is discovered ... While there are situations where contributions are accepted without

89040760706

knowledge, or reason to know, of the unlawful nature of the contribution at the time of receipt, it does not follow that when the recipient acquires later information revealing the unlawful nature of the contribution, he or she is excused from the duty to refund such a contribution.

AO 1984-52. See also 11 C.F.R. § 103.3(b)(2). Consequently, when JJPC found that some of those who contributed to it through WNPEP were corporations or persons whose aggregate contributions exceeded \$1,000, JJPC and its treasurer had an obligation to make refunds, and they have failed to do so.

It is important, moreover, to distinguish between the knowledge of the illegality of the contributions, and the "knowing" acceptance of the contributions. The obligation to make refunds arose when respondents acquired "later information revealing the unlawful nature of the contribution," AO 1984-52; but they "knowingly accepted" the contributions at the time of the Tavern on the Green fundraiser. They certainly knew that contributors had paid for the use of Tavern on the Green, Deposition, supra, and, there can be no doubt that the expenditures that paid for the fundraiser were coordinated with JJPC, as evidenced by the presence at Tavern on the Green that night of Jesse Jackson and Emma Chappell, among many other activists, supporters, and officials of the Jackson campaign. To establish a "knowing" acceptance, it is only necessary to show knowledge that a contribution was received, not knowledge that the contribution was illegal. "[A] 'knowing' standard ... does

89040760707

not require knowledge that one is violating a law, but merely requires an intent to act." Federal Election Commission v. John A. Dramesi for Congress, 640 F. Supp. 985, 987 (D. N.J. 1986).

In short, JJPC "knew the facts which rendered its conduct illegal," i.e., that it had accepted in-kind contributions for a Tavern on the Green fundraiser. See F.E.C. v. Cal. Medical Association, 502 F. Supp. at 203. It may be that JJPC believed these contributions were legal at the time (although it failed to use "best efforts" to find out); but, once WNPEP provided the contributor information establishing the illegality of certain of the contributions, JJPC had an obligation to make refunds. AO 1984-52. JJPC failed to do so; accordingly, there is probable cause to believe JJPC and its treasurer violated 2 U.S.C. § 441a(f) and 441b(a).

Similarly, JJPC and its treasurer failed to report these contributions, even after WNPEP provided them with the contributor information. In their brief, respondents argue as a defense that they used their "best efforts" to comply, and therefore their failure to report is excused. Under the Commission's regulations,

(a) When the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required by the Act for the political committee, any report of such committee shall be considered in compliance with the Act.

89040760708

(b) With regard to reporting the identification as defined at 11 C.F.R. § 100.12 of each person whose contribution(s) to the committee and its affiliated committees aggregate in excess of \$200 in a calendar year (pursuant to 11 C.F.R. § 104.3(a)(4)), 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 a written request or by an oral request documented in writing to obtain such information from the contributor.

11 C.F.R. § 104.7. Although, for reasons discussed above, JJPC and its treasurer knew in April, 1984 about the contributions that paid for the fundraiser, they made no effort to obtain any information about them until July or August, 1985. Once WNPEP provided the information, JJPC did not report it to the Commission. It is impossible to see how the "best efforts" provision relieved respondents of responsibility for their acts or omissions; indeed, it appears rather that JJPC and its treasurer clearly failed to use their best efforts to obtain and submit the information required by the Act. Accordingly, there is probable cause to believe JJPC and its treasurer violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(c)(3).

WNPEP and its treasurer submitted a reply brief on August 15, 1988.^{2/} This brief (Attachment 2) argued that "any

^{2/} When this brief was submitted, the attorneys who prepared it had not been designated as counsel for WNPEP and its treasurer. After this report was originally prepared, a designation of counsel, dated September 8, 1988, was received by this Office. (Attachment 3). Accordingly, this report was revised to include this information.

39040760709

possible technical violation of the Act" by WNPEP and its treasurer should be deemed mitigated by the fact that "WNPEP was unsophisticated concerning the technical requirements of the Federal Election Law" and "there was no willful or intentional effort" to violate the law. This Office would point out that there has been no allegation of a knowing and willful violation, and that ignorance of the law is not a defense. The considerations set forth by WNPEP and its treasurer can at best be considered as mitigating the violation, and not as a rebuttal of the grounds previously set forth for finding probable cause to believe these respondents violated the Act. For the reasons stated in the General Counsel's brief, therefore, the Commission should find probable cause to believe WNPEP and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 434(b)(4) and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2) and 110.6(c)(4), and no probable cause to believe they violated 2 U.S.C. §§ 441a(a)(1) and 441d(a).

Finally, we turn to the Commission's finding of reason to believe that the Westside Committee for Jackson and Stars for Jesse L. Jackson for President violated 2 U.S.C. § 441d. The investigation conducted by this Office did not determine who was responsible for the solicitations that gave rise to those findings. It cannot be said, therefore, whether the aforesaid respondents did or did not violate the Act. Due to the limited circulation of the solicitations, and the fact that the

89040760710

committees involved appear to be defunct, it is not worthwhile, in the view of this Office, to pursue the investigation of this aspect of the case any further. Accordingly, it is recommended that the Commission take no further action and close the file as to the Westside Committee for Jackson and Stars for Jesse L. Jackson.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

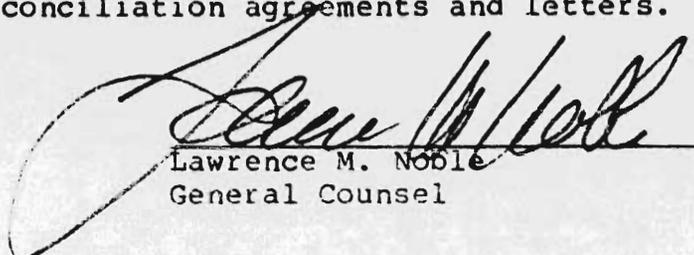
89040760711

IV. RECOMMENDATIONS

1. Find probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 434(b)(4) and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4).
2. Find no probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. §§ 441a(a)(1) and 441d(a).
3. Find probable cause to believe that the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a) and 11 C.F.R. § 110.6(c)(3).
4. Take no further action as to the Westside Committee for Jackson and Stars for Jesse L. Jackson and close the file as to these respondents.
5. Approve the attached conciliation agreements and letters.

Date

11/7/88


 Lawrence M. Noble
 General Counsel

Attachments

1. JJPC Brief
2. WNPEP Brief
3. Designation of Counsel
4. Conciliation Agreements (2)
5. Letters (4)

Staff Assigned: Charles Snyder

89040760712

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jesse Jackson for President Committee)
and Emma Chappell, as treasurer)
)
Women's Network for Political and) MUR 2139
Economic Parity and Dorothy Pitman)
Hughes, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 15, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2139:

1. Find probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 434(b)(4) and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4).
2. Find no probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. §§ 441a(a)(1) and 441d(a).
3. Find probable cause to believe that the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f), 441b(a) and 11 C.F.R. § 110.6(c)(3).

(Continued)

89040760713

4. Take no further action as to the Westside Committee for Jackson and Stars for Jesse L. Jackson and close the file as to these respondents.
5. Approve the conciliation agreements and letters attached to the General Counsel's report dated November 7, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

Nov. 14, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040760714



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 28, 1988

James H. Hewitt, III, Esquire
Coaxum & Hewitt
Galleria and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824

RE: MUR 2139
Jesse Jackson for
President Committee
and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

On November 15, 1988, the Federal Election Commission found that there is probable cause to believe your clients, the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f) and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.6(c)(3) of the Commission's regulations in connection with earmarked campaign contributions it accepted from various individuals and organizations through the Women's Network for Political and Economic Parity.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

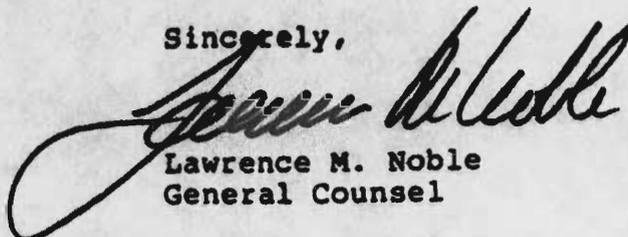
If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation

89040760715

James H. Hewitt, III, Esquire
Page 2

agreement, please contact Charles Snyder, the attorney assigned
to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

89040760716



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 28, 1988

Margaret Blair Soyster, Esquire
Rogers & Wells
200 Park Avenue
New York, N.Y. 10166

RE: MUR 2139
Women's Network for
Political and Economic
Parity and Dorothy
Pitman Hughes, as
treasurer

Dear Ms. Soyster:

On November 15, 1988, the Federal Election Commission found that there is probable cause to believe your clients, The Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4) of the Commission's regulations, in connection with the reporting of earmarked contributions received on behalf of the Jesse Jackson for President Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

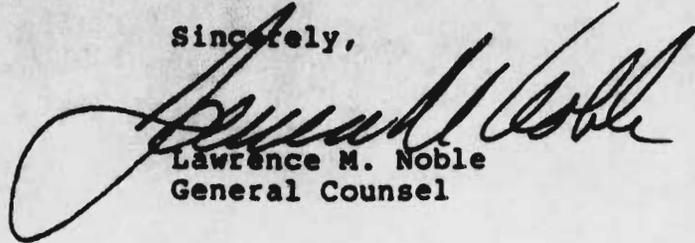
In addition, on November 15, 1988, the Commission found no probable cause to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. §§ 441a(a)(1) and 441d(a).

89040760717

Margaret Blair Soyster
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

89040760718

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 28, 1988

**Florence Kennedy
Westside Committee for Jackson
8 E. 48th Street
New York, N.Y.**

**RE: MUR 2139
The Westside Committee for
Jackson**

Dear Ms. Kennedy

On May 8, 1987, you were notified that the Federal Election Commission found reason to believe that The Westside Committee for Jackson violated 2 U.S.C. § 441d.

After considering the circumstances of the matter, the Commission determined on November 15, 1988, to take no further action against The Westside Committee for Jackson, and closed the file as it pertains to The Westside Committee for Jackson. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

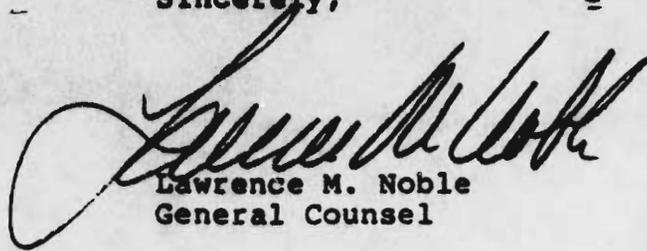
The Commission reminds you that soliciting contributions without stating who authorized and paid for the solicitation appears to be a violation of 2 U.S.C. § 441d. You should take immediate steps to insure that this activity does not occur in the future.

89040760719

Florence Kennedy
Page 2

If you have any questions, please contact Charles Snyder,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

89040760720



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 28, 1988

Joseph N. Barnes, Esquire
Barnes & Darby
11 Park Place
New York, N.Y. 10007

RE: MUR 2139
The Stars for Jesse Jackson
for President Committee

Dear Mr. Barnes:

On October 23, 1987, you were notified that the Federal Election Commission found reason to believe that The Stars for Jesse Jackson for President Committee violated 2 U.S.C. § 441d.

After considering the circumstances of the matter, the Commission determined on November 15, 1988, to take no further action against The Stars for Jesse Jackson for President Committee, and closed the file as it pertains to The Stars for Jesse Jackson for President Committee. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

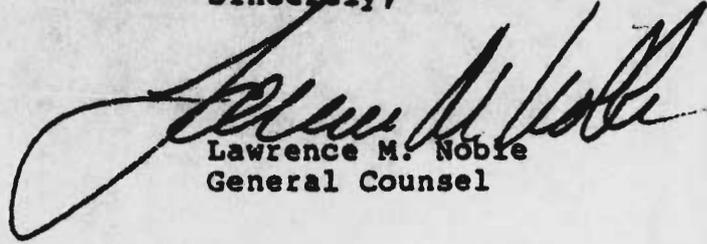
The Commission reminds you that soliciting contributions without stating who authorized and paid for the solicitation appears to be a violation of 2 U.S.C. § 441d. You should take immediate steps to insure that this activity does not occur in the future.

89040760721

Joseph N. Barnes, Esquire
Page 2

If you have any questions, please contact Charles Snyder,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

89040760722

89 MAR 15 AM 11:23

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Jesse Jackson for President)	
Committee and Emma Chappell,)	MUR 2139
as treasurer, <u>et al.</u>)	
)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Emma Chappell, treasurer of the Jesse Jackson for President Committee ("JJPC").

89040760723

89040760724

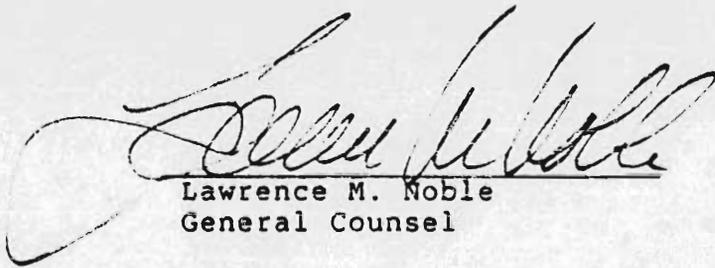
89040760725

89040760726

RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Jesse Jackson for President Committee and Emma Chappell, as treasurer.
2. Close the file as to the Jesse Jackson for President Committee and Emma Chappell, as treasurer.
3. Approve the attached letter.

3/15/89
 Date


 Lawrence M. Noble
 General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Charles Snyder

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Jesse Jackson for President)	MUR 2139
Committee and Emma Chappell,)	
as treasurer, <u>et al.</u>)	
)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 17, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2139:

1. Accept the conciliation agreement with the Jesse Jackson for President Committee and Emma Chappell, as treasurer, as recommended in the General Counsel's report signed March 15, 1989.
2. Close the file as to the Jesse Jackson for President Committee and Emma Chappell, as treasurer, as recommended in the General Counsel's report signed March 15, 1989.
3. Approve the letter, as recommended in the General Counsel's report signed March 15, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

March 17, 1989
Date

Valda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	3-15-89,	2:18
Circulated on 48 hour tally basis:	Wed.,	3-15-89,	4:00
Deadline for vote:	Fri.,	3-17-89,	4:00

89040760727



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1989

James H. Hewitt, III, Esquire
Coaxum & Hewitt
Galleria and Towers at Erieview
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824

RE: MUR 2139
Jesse Jackson for President
Committee and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

On March 17, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434(b), 441a(f), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.6(c)(3), a provision of the Commission's regulations. Accordingly, the file has been closed in this matter as it pertains to your clients. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

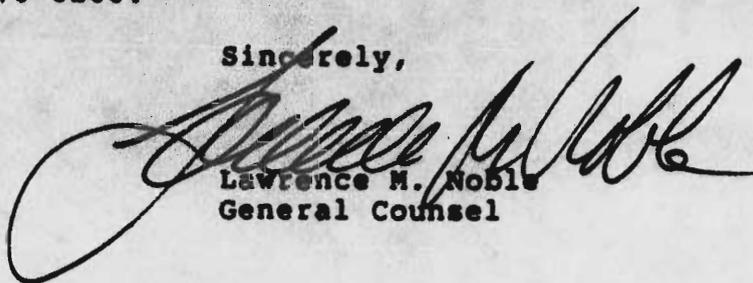
Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

89040760728

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

89040760729

OGC 2019

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Jesse Jackson for President) MUR 2139
 and Emma Chappell, as Treasurer)
)

RECEIVED
 FEDERAL ELECTION COMMISSION
 09 MAR -3 PM 3:48

89040760730

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Jesse Jackson for President Committee and Emma Chappell, as Treasurer ("Respondents") violated 2 U.S.C. Sections 434(b), 441a(f), 441b(a) and 11 C.F.R. Section 110.6(c)(3).

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation pursuant to 2 U.S.C. Section 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.
- II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondents enter voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 - 1. Respondent, the Jesse Jackson for President Committee, is a political committee within the meaning of 2 U.S.C. Section 431(4).

2. Respondent, Emma Chappell, is the Treasurer of said political committee.

3. Respondents participated in the holding of a fundraiser for Jesse Jackson's presidential campaign at the Tavern on the Green restaurant in April, 1984.

4. Contributions totaling \$25,360.00 were paid toward meeting the costs of holding said fundraiser by persons who intended their contributions to benefit Respondents.

5. Said contributions were paid to a registered political action committee, the Women's Network for Political and Economic Parity ("WNPEP") and Dorothy Pitman-Hughes, as Treasurer, which acted as an intermediary or conduit for said contributions, and expended them on behalf of respondents by paying for the aforesaid fundraiser. Respondents contend that although WNPEP and/or Ms. Dorothy Pitman-Hughes carried out the aforesaid efforts on their behalf, the fundraising methods or procedures instituted by WNPEP and/or Ms. Dorothy Pitman-Hughes were not reviewed or acknowledged in advance prior to this fundraiser.

6. WNPEP and Dorothy Pitman-Hughes reported to the Commission that it had satisfied the fundraising costs on behalf of the Respondents for the Tavern on the Green event. Respondents contend that this filing to the Commission, when reported by WNPEP, was not prepared or reviewed in advance by the Respondents.

7. Respondents received a list of the aforesaid contributions from WNPEP, during the course of a presidential campaign audit, during July, 1985, after WNPEP reported the payment of these fundraising costs to the Commission.

89040760731

8. Respondents failed to report that \$25,360.00 in earmarked contributions had been made and expended on their behalf.

9. Aggregation of contributions made by certain individuals to respondents through the conduit, WNPEP, resulted in contributions to Respondents in excess of the \$1,000 per individual limitation set forth at 2 U.S.C. Section 441a(1)(A).

10. Respondents accepted at least \$750.00 in contributions from corporations in connection with the aforementioned fundraiser.

V. 1. Respondents' failure to report to the Commission receipt of the earmarked contributions expended on their behalf was in violation of 2 U.S.C. Section 434(b) and 11 C.F.R. Section 110.6(c)(3).

2. Respondents' acceptance of contributions from individuals in excess of \$1,000 was in violation of 2 U.S.C. Section 441a(f).

3. Respondents' acceptance of contributions from corporations was in violation of 2 U.S.C. Section 441b(a).

4. Respondents contend that these violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Four Thousand Dollars (\$4,000.00), pursuant to 2 U.S.C. Section 437g(a)(5)(A).

VII. Respondents agree to amend their reports to identify correctly all the refunds, where addresses are available, made in this case; to report the aforesaid in-kind contribution; and to report those contributions obtained in excess of \$200.00.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. Section 437g(a)(1) concerning the matters at issue herein or

89040760734

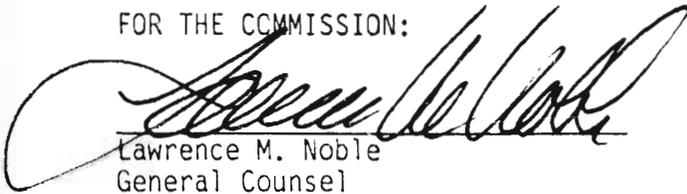
on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

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

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

3/21/89
Date

FOR THE RESPONDENTS:


Emma Chappell
Treasurer

February 28, 1989
Date

890407607335

06C 283D

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 MAY 22 AM 11:08

Rogers & Wells
Two Hundred Park Avenue
New York, N.Y. 10166

1737 H STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 331-7760
TELECOPIER (202) 331-0463
TELEX 248439 WASHUR

801 NORTH FIGUEROA STREET
LOS ANGELES, CA. 90012-2038
TELEPHONE (213) 880-1000
TELECOPIER (213) 880-1234
(213) 880-1070
TELEX 194758 RWLSA

TELEPHONE (212) 878-8000
TELECOPIER (212) 878-6180
(212) 878-8375
TELEX 234493 RKWUR

47, AVENUE HOCHE
78008-PARIS, FRANCE
TELEPHONE 47-63-11-00
TELECOPIER 33-1-4867-5081
TELEX 290617 EURLAW

88 COLEMAN STREET
LONDON EC2R 5BE, ENGLAND
TELEPHONE 01.628.0101
TELECOPIER 441-638-2008
TELEX 884964 USLAW

May 19, 1989

Charles Snyder, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: Women's Network for Political and
Economic Parity and Dorothy Pitman Hughes,
as Treasurer - MUR 2139

Dear Mr. Snyder:

As we discussed on the telephone earlier this week, I am enclosing herewith Ms. Hughes' check in the amount of \$900 payable to the Federal Election Commission and a signed copy of the proposed Conciliation Agreement. I would appreciate it if you would acknowledge receipt of the check and return to me a fully executed copy of the Conciliation Agreement.

I appreciate your courtesy and cooperation in working out the Conciliation Agreement and am pleased that we were able to resolve the matter without the necessity of further litigation.

Sincerely,

Blair Soyster

Margaret Blair Soyster

Enclosure

81040760734

09 MAY 24 PM 3:13

RECEIVED
FEDERAL ELECTION COMMISSION

In the Matter of)
Women's Network for Political)
and Economic Parity and Dorothy)
Pitman Hughes, as treasurer)
)

MUR 2139 89 JUN -8 PM 3:09

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Dorothy Pitman Hughes, the treasurer of the Women's Network for Political and Economic Parity.

The attached agreement contains no changes from the agreement approved by the Commission on March 28, 1989. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer.
2. Close the file.
3. Approve the attached letter.

6/8/89

Lawrence M. Noble (L.M.N.)
Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: Charles W. Snyder

CONFIDENTIAL

89040760735

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Women's Network for Political)	MUR 2139
and Economic Parity and Dorothy)	
Pitman Hughes, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 16, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2139:

1. Accept the conciliation agreement with the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, as recommended in the General Counsel's report signed June 8, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed June 8, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

June 16, 1989

Date

Hilda Arnold

for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	6-8-89,	3:09
Circulated on 48 hour tally basis:	Fri.,	6-9-89,	12:00
Deadline for vote:	Fri.,	6-16-89,	4:00

89040760736



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1989

James H. Hewitt, III, Esquire
Coaxum & Hewitt
Galleria and Towers at Erievue
1301 East Ninth Street
Suite 3400
Cleveland, Ohio 44114-1824

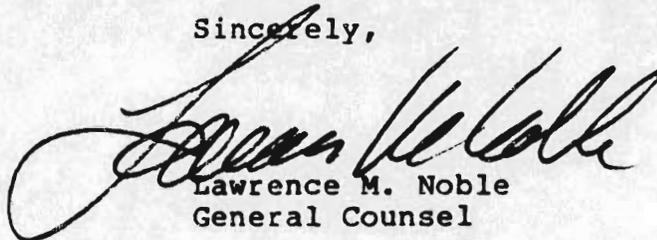
RE: MUR 2139
Jesse Jackson for
President Committee
and Emma Chappell,
as treasurer

Dear Mr. Hewitt:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Charles W. Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

cc: The Rev. Jesse L. Jackson

89040760737



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1989

Margaret Blair Soyster, Esquire
Rogers & Wells
200 Park Avenue
New York, N.Y. 10166

RE: MUR 2139
Women's Network for Political and
Economic Parity and Dorothy
Pitman Hughes, as treasurer

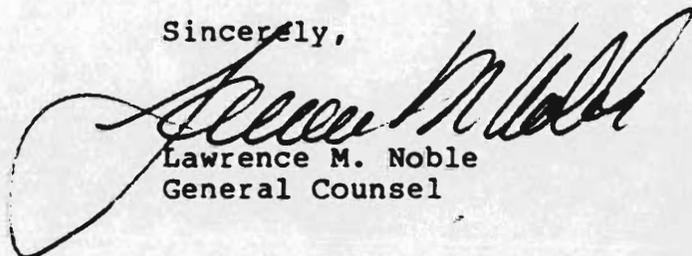
Dear Ms. Soyster:

On June 16, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(b)(4), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4) of the Commission's regulations. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

89040760738

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political)
and Economic Parity and Dorothy) MUR 2139
Pitman Hughes, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, ("Respondents") violated 2 U.S.C. § 434(b)(4) and 11 C.F.R. §§ 110.6(c)(1), 110.6(c)(2), and 110.6(c)(4).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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

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

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

1. At all times relevant to this proceeding, respondent, the Women's Network for Political and Economic Parity, was an organization that registered with the Federal Election Commission as a political committee.

2. At all times relevant to this proceeding, respondent, Dorothy Pitman Hughes, was the treasurer of the Women's Network for Political and Economic Parity.

89040760739

3. In connection with a fundraiser at Tavern on the Green restaurant in 1984, respondents served as an intermediary or conduit for contributions earmarked by various individuals, groups, and organizations for the Jesse Jackson for President Committee. Respondents contend that they served as an intermediary or conduit for the aforesaid contributions at the request of representatives of the Jesse Jackson for President campaign.

4. Respondents deposited the aforesaid contributions in the bank account of the Women's Network for Political and Economic Parity and subsequently remitted said funds to the Tavern on the Green restaurant to pay for the fundraising dinner which was held for the Rev. Jesse Jackson at said restaurant.

5. Respondents served as a conduit for the expenditure of \$25,360 in earmarked contributions on behalf of the Jesse Jackson for Presidential Committee.

6. Respondents filed a report with respect to the contributions with the Commission.

7. Respondents' report failed, however, to indicate the original source and intended recipient of the earmarked contributions.

8. Respondents' report also failed to include schedules of itemized receipts and expenditures.

9. Respondents failed to make the required report to the Jesse Jackson for President Committee, the intended recipient of the earmarked contributions, at the time the contributions were expended on behalf of the intended recipient.

89040760740

10. Respondents inaccurately reported that they made an in-kind contribution of \$25,360 to the Jesse Jackson for President Committee.

V. 1. Respondents' failure to report to the Commission in its next due report the original source and intended recipient of earmarked contributions that it received and expended as conduit was in violation of 11 C.F.R. § 110.6(c)(1).

2. Respondents' failure to report to the intended recipient the original source and intended recipient of the aforesaid earmarked contributions when the contributions were expended on behalf of the intended recipient was in violation of 11 C.F.R. § 110.6(c)(2).

3. Respondents' failure to report to the Commission and the intended recipient of the earmarked contributions, the name and mailing address of each contributor, the occupation and employer of each person who contributed in excess of \$200, the amount of each contribution, the date received by respondents as conduit, the intended recipient as designated by the contributor, and the date and form the contribution was passed on to the intended recipient was in violation of 11 C.F.R. § 110.6(c)(4).

4. Respondents' reporting inaccurately that they made an in-kind contribution of \$25,360 to the Jesse Jackson for President Committee was in violation of 2 U.S.C. § 434(b)(4).

VI. Respondents contend that the foregoing violations were not knowing and willful.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Nine Hundred Dollars (\$900.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

89040760741

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

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

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

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

FOR THE COMMISSION:

* Original signed

Lawrence M. Noble
General Counsel

Date

FOR THE RESPONDENTS:

+ Charlotte J. Hughes
(Name)
(Position) Treasurer

5/15/89
Date

890440760742



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2139

DATE FILMED 8-16-89 CAMERA NO. 2

CAMERAMAN AS

89040760743



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2139

DATE FILMED 8-16-89 CAMERA NO. 2

CAMERAMAN AS

89040760744

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 September 1985

ANALYST: Mike Tangney

I. COMMITTEE: Women's Network for Political and Economic Parity (C00175216)
Dorothy Pitman Hughes, Treasurer
609 West 138th Street
New York, NY 10031

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(1)(A)
11 CFR 110.1(a)(1)

III. BACKGROUND:

Excessive Contribution to a Political Committee

The 1984 July Quarterly Report filed by the Women's Network for Political and Economic Parity ("the Network") disclosed a disbursement of \$25,360 for fundraising (Attachment 2). A Request for Additional Information ("RFAI") was sent to the Network on April 16, 1985 seeking clarification as to whether any portion of the fundraising expenses were made on behalf of a specifically identified Federal candidate (Attachment 3). A Second Notice was mailed on May 9, 1985 for failure to respond to the initial RFAI (Attachment 4).

On May 30, 1985, the Reports Analysis Division ("RAD") analyst contacted the treasurer, Ms. Dorothy Hughes, to inquire as to why a response had not been sent to the Commission. Ms. Hughes indicated that she had been very busy. She stated that the fundraising activity had been held on behalf of the Jesse Jackson for President Campaign and that she would provide this information by amending the July Quarterly Report. In addition, Ms. Hughes stated that her committee was authorized by the Jesse Jackson for President Campaign to hold the fundraiser and that the committee had never before been active in Federal elections but is primarily concerned with school board elections and the involvement of women in politics (Attachment 5).

On June 20, 1985 the Network filed an amended July Quarterly Report which disclosed that the purpose of the disbursement was a fundraising party for the Jesse Jackson for President Campaign (Attachment 6).

89040760745

An additional RFAI was sent to the Network on July 10, 1985 (Attachment 7, page 1). The RFAI advised the Network that the Act precluded a committee, other than a multi-candidate committee, from making a contribution (including an in-kind contribution) to a candidate for Federal office in excess of \$1,000 per election. The Network was advised to notify the recipient and request a refund of the amount in excess of \$1,000, and to provide the Commission with a photocopy of the refund request letter. A Second Notice was mailed to the Network on August 1, 1985 for failure to respond (Attachment 8).

On August 9, 1985 Mr. James G. Pirolli, the Network's accountant, telephoned the RAD analyst concerning the RFAI of July 10, 1985. Mr. Pirolli stated that his firm would prepare a response to the letter, but that additional time was needed to obtain all of the pertinent information. The RAD analyst advised Mr. Pirolli of the Second Notice which had been sent to the Network and told him that it would be necessary to submit a response by August 30, 1985 (Attachment 9). On August 15, 1985, Mr. Pirolli sent a letter which stated his intention to submit a response by August 30, 1985 (Attachment 10).

The RAD analyst telephoned Mr. Pirolli on September 5, 1985 to inquire whether a response had been sent to the Commission. Mr. Pirolli stated that he had not received any information concerning the fundraiser from Ms. Hughes but that he expected to receive the information the following week (Attachment 11).

As of this date, a response has not been received by the Commission.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

89040760746

8 9 0 4 0 7 6 0 7 4 7

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 26SEP85
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
WOMENS NETWORK FOR POLITICAL AND ECONOMIC PARITY CONNECTED ORGANIZATION: BLANK				NON-PARTY NON-QUALIFIED ID #C00175216		
1984	REQUEST FOR ADDITIONAL INFORMATION				1	84FEC/296/4237
	STATEMENT OF ORGANIZATION			20JAN84	2	84FEC/291/1910
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	84FEC/299/0265
	JULY QUARTERLY	25,360	25,360	16FEB84 - 3APR84	7	84FEC/321/0957
	JULY QUARTERLY - AMENDMENT	25,360	25,360	16FEB84 - 3APR84	7	85FEC/376/1418
	REQUEST FOR ADDITIONAL INFORMATION			16FEB84 - 3APR84	1	85FEC/370/4892
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16FEB84 - 3APR84	2	85FEC/373/0523
	REQUEST FOR ADDITIONAL INFORMATION			16FEB84 - 3APR84	3	85FEC/378/0110
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16FEB84 - 3APR84	4	85FEC/383/3356
	NOTICE OF FAILURE TO FILE			4APR84 - 30JUN84	1	85FEC/370/1007
	NOTICE OF FAILURE TO FILE			1JUL84 - 30SEP84	1	85FEC/370/1008
	NOTICE OF FAILURE TO FILE			1OCT84 - 26NOV84	1	85FEC/370/1009
	NOTICE OF FAILURE TO FILE			27NOV84 - 31DEC84	1	85FEC/370/0568
	TOTAL	25,360	0 25,360	0	33	TOTAL PAGES

Ending cash on hand as of 3/3/84: \$ 0.00
 Debts and Obligations owed by committee: \$ 0.00
 Debts and obligations owed to committee: \$ 0.00
 All reports have been reviewed.

1984 July Quarterly Report

Attachment 2

Any information furnished on this report and attachments may not be made or used by any person for the purpose of obtaining information or for any other purpose, except as may be required by law and subject to the provisions of any applicable laws and regulations.

Name of the Organization			
<i>Women's Network for Political & Economic Parity</i>			
A. Full Name, Mailing Address and ZIP Code <i>Javern on the Green Central Park New York, NY</i>	Purpose of Disbursement <i>Fund Raising</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <i>4/3/84</i>	Amount of Cash Disbursement This Period <i>\$25,360</i>
B. 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 Cash Disbursement This Period
C. 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 Cash Disbursement 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 Cash 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 Cash 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 Cash 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 Cash 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 Cash 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 Cash Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (fill page this line number only)			

89040760749
84033310961



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RG-2

Dorothy Pitman Hughes, Treasurer
Women's Network for Political
and Economic Parity (W N P E P)
609 West 138th Street
New York, NY 10031

APR 16 1985

Identification Number: C00175216

Reference: July Quarterly Report (2/16/84-4/3/84)

Dear Ms. Hughes:

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 clarify all expenditures made for fundraising. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or E for Line 21 or 22 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

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,

Mike Tangney
Reports Analyst
Reports Analysis Division

950337048



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

BQ-3

May 9, 1985

Berothy Pitman Hughes, Treasurer
Woman's Network for Political
and Economic Party (W N P E P)
609 West 130th Street
New York, NY 10031

Identification Number: C00175216

Reference: July Quarterly Report (2/16/84-4/3/84)

Dear Ms. Hughes:

This letter is to inform you that as of May 8, 1985, the Commission has not received your response to our request for additional information, dated April 16, 1985. That notice 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). A copy of our original request is 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 Mike Tangney 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

Enclosure

3
2
5
0
3
7
3
3
0
3
3
9

ANALYST: Mike Tangney

CONVERSATION WITH: Ms. Dorothy Pitman Hughes, Treasurer

COMMITTEE: Women's Network For Political and Economic Parity

DATE: May 30, 1985

SUBJECT(S): Failure to respond to a Request For Additional Information and
Second Notice

I telephoned Ms. Hughes to determine why a response had not been received for letters sent to the committee. She stated that she had been very busy with several projects but would send in an amendment soon. She also stated that the fundraising activity mentioned in the letters was on behalf of the Jesse Jackson for President campaign and that her committee had never been active in Federal elections before but was concerned primarily with school board elections and involvement of women in politics. I advised her to send a response as soon as possible.

8 9 0 4 0 7 6 0 7 5 2

SCHEDULE C

FINANCED DISBURSEMENTS

Page 2 of 2 for
 Line Number 25
 (Use separate sheets for each
 category of the Detailed
 Summary Page)

Amended 1984 July Quarterly Report

Attachment 6

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)

WOMEN'S NETWORK FOR POLITICAL AND ECONOMIC PARITY (W N P E P)

89040760753
 11376112

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Revere on the Green Central Park at W. 67th St. New York, New York 10023	\$25,360 Fundraising party Jackson Free Camp Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/2/84	\$ 25,360.00
B. 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)		
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)			\$ 25,360.00
TOTAL This Period (last page this line number only)			\$ 25,360.00



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

RQ-2

JUL 10 1985

Dorothy Pitman Hughes, Treasurer
Women's Network for Political &
Economic Parity
609 West 138th Street
New York, NY 10031

Identification Number: C00175216

Reference: July Quarterly Amended Report (2/16/84-4/3/84)

Dear Ms. Hughes:

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution including an in-kind contribution to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

-Your report discloses 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.

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. In addition, please clarify why there are no itemized expenditures for items such as advertising, invitations or any solicitations associated with the fundraising event noted on your report.

-Your original July Quarterly Report disclosed contributions from individuals on Schedule A for Line 11(a) of the Detailed Summary Page. However, the Memo Entry line for unitemized contributions of this report indicates that there were no itemized contributions received. Please clarify this discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4043.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

ANALYST: Mike Tangney

CONVERSATION WITH: James G. Pirolli, Account for Renzi, Pinti & Co. representing

COMMITTEE: Women's Network For Political and Economic Parity

DATE: August 9, 1985

SUBJECT(S): Response to the Requests For Additional Information

Mr. Pirolli indicated that his firm would be preparing a response to the July 10, 1985 letter sent to the committee. He stated that additional time would be needed to get all of the data together. I informed Mr. Pirolli that additional letters had been sent to the committee and that in order to avoid any additional action it would be necessary to provide the requested information by the end of the month.

89040760757

Attachment 10

Renzi, Pinti & Co.
Certified Public Accountants

35 AUG 15 A 7: 57

A Professional Corporation

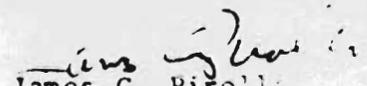
August 10, 1985

Mike Tangrey
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Tangrey:

This letter is a follow-up to our telephone conversation on August 9, 1985 concerning your letter of July 10, 1985 to Dorothy Pitman Hughes. As we discussed, Renzi, Pinti & Co. will prepare the response to that letter but additional time is necessary to collect the facts and financial data which we believe is necessary to adequately respond to the issue. From our conversation it is my understanding that our reply should be received by you no later than August 30, 1985 to avoid having the matter referred to the Office of General Council. It is our intention therefore to submit our response by that date.

Sincerely,


James G. Pirolli

cc: Emma C. Chappel.

9
7
5
4
3
2
1

ANALYST: Mike Tangney

CONVERSATION WITH: James G. Pirolli, Account for Renzi, Pinti & Co. representing

COMMITTEE: Women's Network For Political and Economic Parity

DATE: September 5, 1985

SUBJECT(S): Response to the Requests For Additional Information

I contacted Mr. Pirolli to determine whether a response to the RFAIs had been sent yet. He indicated that he had spoken to Ms. Hughes recently, had not received the information to prepare the response and expected to get all of the information by the week of September 9, 1985

89040760759

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

JAN 27 5:30

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:
1-27-86 5:00

RAD 85L-41
STAFF MEMBER:
Snyder

SENSITIVE

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer; Jesse Jackson for President Committee and Emma Chappell, as treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 434, 441a 11 C.F.R.
§ 110.1(a)(1)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred this Matter to the Office of General Counsel on the grounds that the Women's Network for Political and Economic Parity ("WNEP"), a non-party related, political committee, disclosed in its 1984 July Quarterly Report a payment of \$25,360 for a fundraising party for the Jesse Jackson for President Campaign.

SUMMARY OF ALLEGATIONS

The WNEP 1984 July Quarterly Report showed a \$25,360 disbursement for "fundraising." After RAD made a Request for Additional Information, Respondent filed an amended report, describing the disbursement as a payment to the Tavern on the Green restaurant for a "Fundraising party/J. Jackson Pres. Camp."

89040760760

Dorothy Pitman Hughes, treasurer of WNEP, told RAD that the Jesse Jackson for President Committee ("JJPC") authorized WNEP to hold this fundraising dinner.

The foregoing information indicates that there is reason to believe that WNEP and its treasurer violated 2 U.S.C. § 441a by making an excessive contribution to a Federal candidate, and that JJPC and its treasurer violated 2 U.S.C. § 441a(f) by accepting an excessive contribution and 2 U.S.C. § 434 by failing to report receipt of this contribution.

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act ("the Act") states that

No person shall make contributions -
(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

2 U.S.C. § 441a(a)(1). WNEP, which has not qualified as a multicandidate political committee, is defined as a person under the Act, 2 U.S.C. § 431(11), and thus is subject to the foregoing limitation. There is reason to believe therefore, that WNEP violated the Act by making an in-kind contribution of \$25,360 to a candidate's committee.

The Act further states that

No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section.

89040760761

2 U.S.C. § 441a(f). The apparent acceptance by JJPC of a \$25,360 in-kind contribution would violate the Act.

The Act also states that each report filed by a political committee shall disclose

the identification of each - ... (B) political committee which makes a contribution to the reporting committee, during the reporting period, together with the date and amount of any such contribution.

2 U.S.C. § 434(b)(3). JJPC's failure to report the in-kind contribution from WNEP indicates there is reason to believe JJPC violated that section.

It should be noted that the recommendation of making JJPC a respondent in this matter, despite the fact that RAD did not refer that committee to the Office of General Counsel, is in accordance with the Commission's action in MUR 2081, in which reason to believe findings were made against Citizens for Jack Kemp, despite the fact that only Citizens for Prosperity was referred in that Matter.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 441a(a)(1).
3. Find reason to believe that the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. § 434 and 441a(f).

89040760762

4. Approve and send the attached letters and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

January 24, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD Referral
2. Letter to Respondents
3. General Counsel's Legal and Factual Analysis

CS/6

89040760763

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Women's Network for Political and Economic)
Parity and Dorothy Pitman Hughes, as)
treasurer; Jesse Jackson for President)
Committee and Emma Chappell, as treasurer)

RAD 85L-41

(2139)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 30, 1986, the Commission decided by a vote of 6-0 to take the following actions in RAD 85L-41:

1. Open a MUR.
2. Find reason to believe the Women's Network for Political and Economic Parity and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 441a(a) (1).
3. Find reason to believe that the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. § 434 and 441a(f).
4. Approve and send the letters and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed January 24, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

1-30-86
Date

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

Received in Office of Commission Secretary:	Mon.,	1-27-86,	5:30
Circulated on 48 hour tally basis:	Tues.,	1-28-86,	4:00
Deadline for vote:	Thurs.,	1-30-86,	4:00

89040760764



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1986

Ms. Dorothy Pitman Hughes, Treasurer
Women's Network for Political and
Economic Parity
609 West 138th Street
New York, New York 10031

RE: MUR 2139
Women's Network for Political
and Economic Parity and
Dorothy Pitman Hughes,
Treasurer

Dear Ms. Hughes:

On January 30, 1986, the Federal Election Commission determined that there is reason to believe the Women's Network for Political and Economic Parity, and you, as treasurer, violated 2 U.S.C. § 441a(a)(1) a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-

89040760765

probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

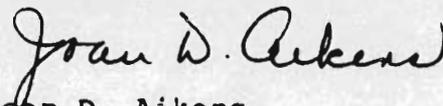
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 each counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

89040760766



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 4, 1986

Edward C. Coaxum, Jr., Esquire
Coaxum & Hewitt
Suite 1600 - The Illuminating Building
55 Public Square
Cleveland, Ohio 44113

RE: MUR 2139
Jesse Jackson for
President Committee
and Emma Chappell,
Treasurer

Dear Mr. Coaxum:

On January 30, 1986, the Federal Election Commission determined that there is reason to believe your clients the Jesse Jackson for President Committee and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434, 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 finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. 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 fifteen 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 clients the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

8 9 0 4 0 7 6 0 7 6 7

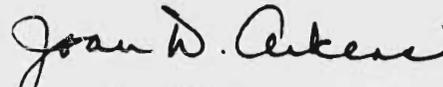
that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

89040760768

Fruder

RECEIVED
OFFICE OF THE REC
COMM SECRETARY

CCC# 9734

Coacum & Hewitt
Attorneys and Counsellors at Law
Suite 1600 The Illuminating Building
55 Public Square
Cleveland, Ohio 44113
(216) 241-7496

Edward C. Coacum, Jr.
James H. Hewitt, III

FEB 19 AM: 41

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
FEB 18 PM: 42
Off Counsel
James H. Hewitt, III

February 13, 1986

Ms. Joan D. Aikens, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

VIA FEDERAL EXPRESS

Re: Matter MUR 2139, Jesse Jackson for President Committee
(the "Committee") and Emma C. Chappell, Treasurer

Dear Ms. Aikens:

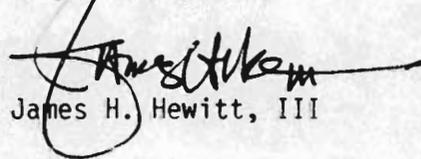
Your letter dated February 4, 1986, containing the Matter Under Review captioned above, was received by our office on February 6, 1986. This letter requests submission of our written reply within fifteen (15) days, or by February 20, 1986.

The purpose of this correspondence is to request a continuance to prepare our written reply. The Treasurer for the Committee, Ms. Emma Chappell, serves as a Vice President for the Continental Bank of Philadelphia, Pennsylvania. Very recently, Ms. Chappell has moved her offices from 1201 Chestnut Street to a facility at 16th and Locust Streets. Thus, we have been unable to review certain pertinent documents as they have been packed away during this moving process.

Accordingly, based on the above, we respectfully request an extension up to and including March 12, 1986, to submit our detailed response to the General Counsel's Factual and Legal Analysis.

We request that you contact the undersigned by telephone, and in writing, to advise whether this request for extension has been favorably granted. Thank you.

Very truly yours,


James H. Hewitt, III

JHH/gjs
cc: Emma C. Chappell

89040760769



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 24, 1986

James H. Hewitt, III, Esquire
Coaxum & Hewitt
Suite 1600
The Illuminating Building
55 Public Square
Cleveland, Ohio 44113

Re: MUR 2139
Jesse Jackson for President
Committee and Emma C.
Chappell, as treasurer

Dear Mr. Hewitt:

This is in reference to your letter dated February 13, 1986, requesting an extension of 20 days until March 12 to respond to the Commission's finding of reason to believe. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on March 12, 1986.

If you have any questions, please contact Charles Snyder, the attorney assigned to this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", written over a horizontal line.

By: Kenneth A. Gross
Associate General Counsel

89040760770

Rec
Aikens
3-12-86
GCA 9967

Snyder

Coaxum & Hewitt
Attorneys and Counsellors at Law
Suite 1600 The Illuminating Building
55 Public Square
Cleveland, Ohio 44113
(216) 241-7496

Edward C. Coaxum, Jr.
James H. Hewitt, III

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
86 MAR 12 P 3: 02
86 MAR 12 P 2: 30

March 11, 1986

VIA FEDERAL EXPRESS

Joan D. Aikens, Chairperson
Federal Election Commission
999 "E" Street, N.W.
Washington, D. C. 20463

Re: MUR 2139

Dear Ms. Aikens:

The undersigned attorneys for Jesse L. Jackson for President, Inc., the principal campaign committee for Reverend Jesse L. Jackson, Jr. (the "Jackson Campaign"), are submitting this letter in reply to your letter of February 4, 1986, advising of the above-referenced Complaint, and is intended to serve as our official response.

By letter dated February 13, 1986, we requested additional time to prepare our written reply, and by letter dated February 24, 1986, we were advised by the Office of the General Counsel that the Commission granted our request for extension to and including March 12, 1986.

As explained more fully below, an unlawful in-kind contribution to the Jackson Campaign did not take place and, therefore, we urge the Commission to enter a finding that no action should be taken against the Jackson Campaign and/or its Treasurer, Emma Chappell.

The General Counsel's Factual and Legal Analysis alleges that the Women's Network for Political and Economic Parity (WNPEP) and Dorothy Pittman-Hughes, as Treasurer, reported disbursing \$25,360.00 on April 3, 1984 to the Tavern on the Green Restaurant for a fund-raising party for and authorized by the Jackson Campaign. Acceptance of such an in-kind contribution would constitute a violation of the Federal Election Act. It was further alleged that the Jackson Campaign did not report acceptance of this contribution.

To assist your investigation, we thought it would be useful if we provided some background information about WNPEP and the fund-raiser organized in April, 1984 at the Tavern on the Green Restaurant.

In early 1984, several professional entertainers from radio, television and theatre, became motivated, like others, to join the groundswell of popular support for Reverend Jackson's historic candidacy

17709704068

Ms. Joan D. Aikens
March 11, 1986
Page 2

for the Democratic Party nomination for President. Thus, the idea was developed to sponsor a fundraiser at the Tavern on the Green Restaurant. The event was advertised as "Stars for Jesse L. Jackson for President Committee". This group of professional entertainers, being unfamiliar with organizing a fundraiser in which FEC requirements were necessary, approached Dorothy Pittman-Hughes, a local New York small businesswoman, with ties to an organization known as WNPEP for assistance.

The "stars" group designed a certain plan whereby they would each contribute approximately \$200.00 to raise the start-up costs for organizing this fundraiser. Approximately 100 individuals donated and the down payment for the Tavern on the Green fundraiser had been accomplished. We understand that the intent of all donors was to contribute to the Jackson Campaign.

Turning specifically to the April, 1984 Reception, members from all segments of the entertainment industry gathered together in support of Reverend Jackson's Campaign. Tickets sold at \$200.00 and each contributor signed information cards, listing name, address and occupation, as suggested by FEC requirements. The entertainers who organized the fundraiser, were given free access to the fundraiser at the Tavern on the Green Restaurant in consideration of their prior contribution in helping raise the start-up costs. Approximately \$70,000 was raised through ticket sales from this event and was accounted for by the Jackson Campaign in a timely manner through regular reports.

Unknown to Jackson Campaign officials, however, Ms. Hughes, having taken personal responsibility with the Tavern on the Green Restaurant for payment of expenses, prepared the check of WNPEP in the sum of \$25,360.00 to pay for the facility costs needed to sponsor this event. Thereafter, Ms. Hughes, in an attempt to comply with Federal reporting requirements, prepared a report of expenditures, without professional assistance, listing this disbursement on behalf of the Jackson Campaign. In a practical sense, the Jackson Campaign was unaware that Ms. Hughes or WNPEP made any payment to the Tavern on the Green Restaurant on its behalf until it was notified through the FEC General Counsel's Factual and Legal Analysis.

Thus, based on the above, it appears that Ms. Hughes was merely acting as an organizer for the "stars" group in setting up a fundraiser for the Jackson Campaign.

Of course, reviewing this situation in retrospect, the "stars" group should have prepared their checks individually to the Jackson Campaign and the National campaign office would have satisfied the costs related to the fundraiser.

We are advised that the names and addresses of all who contributed to this event through the "stars" group have been previously supplied

89040760772

Ms. Joan D. Aikens
March 11, 1986
Page 3

to FEC Staff Auditor, Michael Tangney. Our initial sampling of contacts with these donors has confirmed that each individual intended their contribution to benefit the Jackson Campaign, and not the WNPEP organization. At a minimum, we would be pleased to amend our FEC reports reflecting these contributions and expenditure and attempt to contact the others that supported this event to supply FEC officials with written confirmation that an unlawful in-kind contribution to our Committee did not take place. We also plan to aggregate each donor's contribution and make refunds, if necessary.

In a very real sense, therefore, without providing advance notice to the Jackson campaign, Ms. Hughes acted independently of the Jackson Campaign in gathering donations and paying expenses for a campaign fundraiser. Due to her technical inexperience with FEC requirements, these payments were incorrectly made and reported through WNPEP.

Accordingly, we respectfully submit that the events described above support significant mitigating circumstances that should weigh against any possible technical violations of the Act that may have occurred. In substance, these were contributions intended for the Jackson Campaign. Unfortunately, the form of these contributions was otherwise, in response to the apparent good faith attempt of Ms. Hughes to facilitate the event. Even if it is determined that these donations may not have been appropriately reported, this inadvertence can easily be remedied through an amended filing.

There exists no evidence to suggest that the April, 1984 fundraiser was carried out in a willful or deliberate manner to circumvent the requirements of the federal election law. We request that the Commission consider the sincere efforts demonstrated by Ms. Hughes, the professional entertainers, the WNPEP organization and the past efforts of the Jackson Campaign in attempting to insure compliance with FEC requirements and determine that there is no reasonable basis that a violation exists and decide that no action be taken against the Jackson Campaign or its Treasurer, Emma Chappell.

Please let us know, at the address and telephone number set forth above on this letterhead, if the Jackson Campaign can provide any further information you require in considering this Complaint. Thank you.

Very truly yours,

Edward C. Coaxum Jr.

Edward C. Coaxum, Jr.

James H. Hewitt, III

James H. Hewitt, III

39040760773

COUNTY OF Manhattan

AFFIDAVIT

86 APR 1 AM 11:03

DOROTHY PITTMAN-HUGHES, being first duly sworn avers and states as follows:

- (1) I live at 609 West 138th Street N.Y.C. 10031
- (2) I served as Treasurer of the Women's Network for political and Economic Party (WNPEP)
- (3) In connection therewith, I am familiar with circumstances of a certain MUR 2139 being conducted by the Federal Election Commission. On April 3, 1984, WNPEP Co-Sponsored a reception at the Tavern on the Green Restaurant in New York City, New York for the Jackson Campaign:
- (4) The Co-Sponsored were:
 - (a) The Westside Committee for Jackson
 - (b) The Stars Committee for Jackson
 - (c) VAC-PAC
 - (d) Citizen Committee for Jackson
- (5) In order to pay for the facilities expense for this fund raiser, donations of approximately \$200.00. from each member of this group of co-sponsors was advanced. Each donor filled out a form, indicating their name address and occupation as required by the Federal Election Commission for all coordinator for this event. Although the checks themselves were made payable to WNPEP each individual regarded this as a contribution to the Jackson Campaign by making this advance purchase of a ticket.
- (6) Copies of a list of each individual contributor, together with address and occupation has already been supplied to the FEC. Thus, attempts at complete record keeping and reporting requirements have been accomplished;
- (7) Several months, after this report was filed. I received notice that WNPEP may have raised too much money for Jackson's campaign. Therefore violating the FEC regulations.

89040760774

(8) I sent more documentation to the FEC. In hope of reporting the information as required by FEC.

(9) I had several phone conversations with a FEC representative, and after sending the information available, and trying to show that I did what I knew how to do in reporting to FEC, I finally asked to cancel the PAC for the WNPEP. After the WNPEP membership decided that we were not aware enough of the FEC rules. To do for our National Community, what we hoped to so with use of a PAC.

(10) Finally, I received a letter from the FEC dated Feb. 4th, 1986 RE: MUR 2139 with an attached General Counsel's Factual and Legal Analysis
Summuary of Allegations
Description of Preliminary Proceedures for processing possible violations discovered by the FEC.
A statement of Designation of Counsel

(11) I was informed by Ms. Emma Chappell Treasurer of the Jackson for president committee, that in her opinion I did not need to obtain counsel= She further stated that the legal Representatives for the Jackson for President Committee was filing the necessary official response, in reply to the Feb. 4th letter received by me. As she had also received the same MUR 2139.

(12) Ms. Emma Chappell sited a Feb 13th, 1986 letter written by a Jackson for president Committee Attorney, Mr. Hewitt, 3rd

(13) I requested a copy of all correspondence in reference to WNPEP or Dorothy P. Hughes filed with the FEC by the Jackson for President Committee Attorney be sent to me.

(14) I was informed by Attorney James M. Hewitt III on Monday march 19th, 1986 at or about 11' o'clock P.M. that it is apparently a conflict of interest for the Jackson for Presidnet Committee Attorney to represent me in this matter and that I had not been represented by him in the Feb. 13th, 1986 letter requesting time from the FEC, TO prepare an official response.

8 2 0 4 0 7 6 0 7 7 5

89040760770

(15)

I therefore request that the FEC grant to me a time period of 60 days to contact the co-sponsors of the April 3rd event and or get affidavits from all the persons who made the advance ticket purchase in order to defray the cost of use of Tavern on the Green premises of services. If the FEC will accept this as some attempt to prove that WNPEP and I Dorothy P. Hughes as Treasurer did not make and Inkind Contribution of more than \$25,000 dollars to the Jackson for President Committee

(16)

I ask that you please inform me in writing of your answer to my request

(17)

These circumstance as were caused due to the relative inexperience of myself and others within WNEP in dealing with fund raisers and knowledge about filings associated with FEC regulations and requirements. I completed the required FEC reporting and disclosure forms, myself, without professional assistance as my best effort to inform the public of the true activity of our organization.

FURTHER, AFFIANT SAYETH NOT

Dorothy Pittman Hughes
DOROTHY PITTMAN-HUGHES

Sworn to before me, this 14th day of March, 1986

Deborah J. Hutton
Notary Public, State of New York
No. 31-4728146
Qualified in New York County
Commission Expires March 30, 1986

"Our time has come"

—Rev. Jesse L. Jackson

Stars for Jesse L. Jackson for President Committee

Dr. Thelma Adair
Ilunga Adell
Roberto Adorno
William Aiken
Florence Anthony
Nick Ashford
John Atchison
Phyllis Atchison
Tony A. Badillo
Lawrence R. Bailey Jr., Esq.
Lillian Baker
Jesse Banks
Joy Banks
Joe Barnes, Esq.
Mr. & Mrs. James Barrett
Hinton Battle
Bernard Beal
Robin V. Bell
Travis Bell
Felicia Bentine
Canute C. Bernard, M.D.
Ernest Booker
Jesse Boseman
Pam Brennan
Trevor Brooks, Esq.
Delethia Brown
Marguerite Brown
Dr. Houston Brummit
Stephen Bruschi, Esq.
W. Haywood Burns
Helen Burrell, D.D.S.
Rev. Calvin Butts
Vivian Campbell
Tony Casellas
Colette Charles
Kathryn Chenault
Bill Cherry
Bill Chong
Michelle Clark, M.D.
Ruth Clark
Kildare I. Clarke, M.D.
Johnnie Colson
Carol Conover
Harry Cooley
Philip C. Cox
Frankie Crocker
Jimmy Cumming
Regina Darby, Esq.
Norma Jean Darden
Andrea Darden
David Davis
Gene Davis

Renee Davis
Harold Dow
Alan Eaton
William Esson
Audrey Edwards
Cheryl Everette
George Faison
Kirk Fancher
Joy Farrell
Jackie Krygar Fisher
Roberta Flack
James Forsythe
Adriane Gaines
Colleen Goldberg
Johnnie Golson
Marilyn Goodman
Martin Goodman
Stan Gordon
Louis Gossett, Jr.
Gregory Gray
Jessica Hawkins-Greenidge
Kevin C. Greenidge, M.D.
Derry Grubb
Ellis Haizlip
Dudley A. Hall
Candis Hamilton
Joan Hamilton
Michael J. Handy
Joyce Hartsfield, Esq.
Linda Haynes
Theda Palmer Head
Eddie Heath
Joan Logue Henry
LaQuita Henry
Patricia M. Hinds
Sheldon Tatt Hinton
Sandra Hochman
Leon Hubbard
Dorothy Pitman Hughes
Patricia L. Irvin, Esq.
Howard Johnson
Wallace Johnston
Dr. Billy E. Jones
Jack M. Jordan
Flo Kennedy
Joe Kennedy
Vincent Kenyon
Don King
Bill Kochivama
Yuri Kochivama
Patti LaBelle
Denise LaMaute

C. Knox LaSister III, Esq.
Ellin LaVar
Valerie Lancaster
Kathleen Wyer Lane
Ruth Sanchez Laviere
Bob Law
Edward Lewis
Ida Lewis
Jackie Lewis
Michele Shay Lewis
Ed Lloyd
James MacDonald
Dr. Jim Malone
Dr. Rubie Malone
Vernon C. Manley
Pat Martin
Sam Mattingly
Kim Mayner
Lemard Mays
Marcia McBroom
Gil McGriff
Kevin C. Greenidge, M.D.
Derry Grubb
Ellis Haizlip
Dudley A. Hall
Candis Hamilton
Joan Hamilton
Michael J. Handy
Joyce Hartsfield, Esq.
Linda Haynes
Theda Palmer Head
Eddie Heath
Joan Logue Henry
LaQuita Henry
Patricia M. Hinds
Sheldon Tatt Hinton
Sandra Hochman
Leon Hubbard
Dorothy Pitman Hughes
Patricia L. Irvin, Esq.
Howard Johnson
Wallace Johnston
Dr. Billy E. Jones
Jack M. Jordan
Flo Kennedy
Joe Kennedy
Vincent Kenyon
Don King
Bill Kochivama
Yuri Kochivama
Patti LaBelle
Denise LaMaute

Alfonso Ribeiro
Del Robinson
Dinah Robinson
Manuel Rodriguez, Esq.
Howard E. Rollins, Jr.
Joyce Sanders
Vince Sanders
Joan Sandler
Kenneth L. Scott
Tad Schnugg
Dr. Luther W. Seabrook
Marianne R. Seabrook
Norma Shirley
Valerie Simpson
Meredith Sirmans, M.D.
Vernon Slaughter
Clarence O. Smith
Jack E. Smith
Willi Smith
Dr. Lodema Stephens
Raymond Sussman, Esq.
Percy Sutton
Evon Taylor
Susan L. Taylor
Dino Terrell
M.A. Terry
T.C. Thompkins
Rev. Nathaniel Tyler-Lloyd
Damon Upshaw
Roy Vaughn
William Velez
Connie Walters
Jim Walker
Cora Walker, Esq.
Fred Wallace
Lee Wallace
Fay Washington
Faye Wattleton
Ruby Weston
Rev. B.J. Whipper, Jr.
Greta White
Gladys Williams
Terrie M. Williams
Jack L. Willis
Mary P. Willis
Annie Wolinsky
Melvin Wolinsky
Peter Wong, M.D.
Gail Wright, Esq.
P. W. Yuen, Esq.
Peter Zeiler, Esq.

Tavern on the Green, Monday, April 2, 1984

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
MAR 21 1986
COMMUNICATIONS SECTION

SENSITIVE

In the Matter of
Women's Network for Political and
Economic Parity and Dorothy Pitman
Hughes, as treasurer; Jesse Jackson
for President Committee and Emma
Chappell, as treasurer

)
)
)
)
)
)
)

MUR 21389: 41

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 30, 1986, the Commission found reason to believe the Women's Network for Political and Economic Parity ("WNPEP") and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 441a(a)(1) and that the Jesse Jackson for President Committee ("JJPC") and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441a(f). The basis for these findings was WNPEP's report of a \$25,360 in-kind contribution to JJPC.

JJPC has filed a response arguing in essence that the \$25,360 payment in question should not have been reported as an in-kind contribution and suggesting that, while the case involved reporting errors, it accepted no excessive contribution from WNPEP. (See Attachment 1).

WNPEP also filed a response to the Commission's finding arguing that those who contributed to it in connection with the WNPEP fundraiser for JJPC in fact intended to contribute to JJPC. WNPEP requests sixty days in which to obtain affidavits from the various contributors. (See Attachment 2). The Office of General Counsel recommends that the Commission issue interrogatories and an order to respondent Dorothy Pitman Hughes, treasurer of WNPEP,

89040760778

in order to determine whether WNPEP received contributions that it used to pay for a fundraising drive for JJPC, or whether said contributions were earmarked for JJPC.

II. RECOMMENDATION

Approve and send the attached order, interrogatories and letter to Dorothy Pitman Hughes.

Charles N. Steele
General Counsel

May 1, 1986
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from counsel for Jesse Jackson for President Committee
2. Response from Dorothy Pitman Hughes
3. Order, interrogatories, and letter to Dorothy Pitman Hughes

89040760779



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CF*
DATE: MAY 5, 1986
SUBJECT: OBJECTION TO MUR 2139 -GENERAL COUNSEL'S REPORT
SIGNED MAY 1, 1986

The above-named document was circulated to the Commission on Friday, May 2, 1986 at 2:00 P.M.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, May 13, 1986.

89040760780

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Women's Network for Political and)	MUR 2139
Economic Parity and Dorothy Pitman)	
Hughes, as treasurer; Jesse Jackson)	
for President Committee and Emma)	
Chappell, as treasurer)	

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session of May 13, 1986, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2139:

Approve and send the order, interrogatories and letter to Dorothy Pitman Hughes, as recommended in the General Counsel's Report signed May 1, 1986.

Commissioners Aikens, Harris, Josefiak, McDonald, and McGarry voted affirmatively for this decision. Commissioner Elliott dissented.

Attest:

5-14-86
Date

Mary W. Dove
Mary W. Dove
Administrative Assistant

89040760781



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1986

Dorothy Pitman Hughes
Treasurer
Women's Network for Political and
Economic Parity
609 West 138th Street
New York, New York 10031

RE: MUR 2139
Women's Network for Political
and Economic Parity

Dear Ms. Hughes:

On February 4, 1986, you were notified that the Commission found reason to believe the Women's Network for Political and Economic Parity and you, as treasurer, violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

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

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

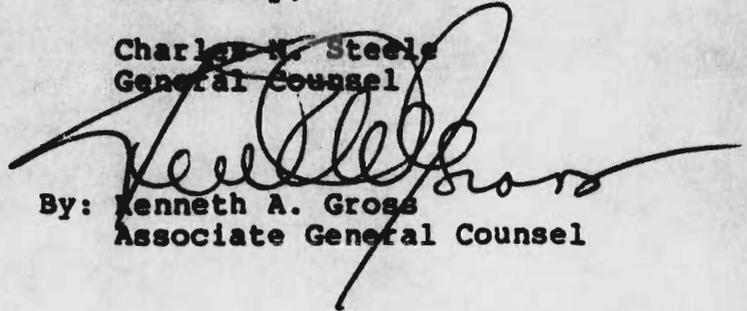
89040760782

Dorothy Pitman Hughes
Treasurer
Page 2

If you have any questions, please direct them to Charles
Snyder, the attorney handling this matter, at (202) 376-5690.

Sincerely,

Charles H. Steels
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena & Order
Questions

89040760783

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political and) MUR 2139
Economic Parity and Dorothy)
Pitman Hughes, as treasurer)
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within (10) days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand *May 16*, 1986.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

89040760784

**QUESTIONS
TO
DOROTHY PITMAN HUGHES**

Please respond to the following. As used in these questions, the terms listed below are defined as follows:

a. The term "documents or materials" shall mean, unless otherwise indicated, writings of any kind, including, but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, printouts, account statements, ledgers, billing forms, receipts, checks and other negotiable paper and compilations in your possession or control.

b. The term "identify" or "list" with respect to individuals shall mean to give the full name, last known residence address of such individual, and the last known place of business where such individual is or was employed. "Identify" or "list" with respect to other entities shall mean to give the full legal name, last known address of such entity, the entity's principal employee, if any, and the nature of the relationship between the entity and the Women's Network for Political and Economic Parity, and the dates of such relationship.

c. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these questions any information which may be otherwise construed to be out of its scope.

1. Identify all individuals and other entities that contributed funds that were used by the Women's Network for Political and Economic Parity ("WNPEP") to pay for a fundraiser for Jesse Jackson at the Tavern on the Green Restaurant in 1984 ("Jackson fundraiser").

2. Describe all solicitations made by you or WNPEP in order to raise money for the aforesaid Jackson fundraiser. Provide copies of all solicitation letters and telephone solicitation script used in connection with the aforesaid fundraiser, and provide copies of all records related to WNPEP's activities in connection with the Jackson fundraiser.

3. State whether the funds used by WNPEP were funds contributed to WNPEP or funds contributed to the Jesse Jackson for President Committee. Provide copies of all records that relate to these contributions, including copies

89040760785

of all correspondence from contributors, copies of contribution checks, pledge cards, and all other documents connected with the Jackson fundraiser.

4. Describe what agreements, contracts, or undertakings existed between yourself or WNPEP and the Jesse Jackson for President Committee concerning WNPEP's role, activities, and obligations in connection with the aforesaid Jackson fundraiser. Provide copies of all documents concerning said agreements, contracts, or undertakings.

5. Describe what dealings or agreements you or WNPEP had with an organization or group of professional entertainers, sometimes known as the "Stars for Jesse L. Jackson for President Committee" concerning the aforesaid Jackson fundraiser, and provide copies of all records related to your, or WNPEP's, dealings with said Stars for Jesse L. Jackson for President Committee.

6. State whether the members of the Stars for Jesse L. Jackson for President Committee, or any of them, and any other persons who contributed to the aforesaid Jackson fundraiser, made any designation, instruction, or encumbrance, whether direct, indirect, express, implied, oral, or written, that any of the aforesaid contributions, given to WNPEP, were intended as contributions to the Jesse Jackson for President Committee. Provide copies of all records, including affidavits from said contributors, relating to the purpose of the aforesaid contributions.

89040760786



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1986

Dorothy Pitman Hughes
Treasurer
Women's Network for Political
and Economic Parity
609 West 138th Street
New York, NY 10031

RE: MUR 2139
Women's Network for Political
and Economic Parity

Dear Ms. Hughes:

On May 21, 1986, this Office sent you a series of interrogatories issued under subpoena and order by the Federal Election Commission. You were notified that you were required to submit answers to these interrogatories within ten days.

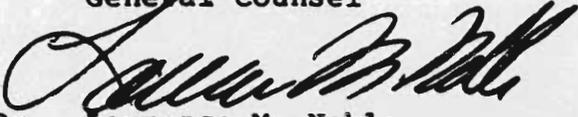
As you have thus far failed to submit the information required, your response is now past due.

Please be advised that your failure to comply with the Commission's subpoena and order may result in legal action against you. Consequently, it is necessary that you immediately submit sworn answers to the interrogatories previously sent to you.

If you have any questions, call Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

89040760787

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Women's Network for Political and)
Economic Parity and Dorothy Pitman)
Hughes, as treasurer, et al.)

MUR 2139

36 JUL 31 P 3: 48

EXECUTIVE SESSION

AUG 12 1986

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 16, 1986, the Commission issued, under order, a series of interrogatories to Dorothy Pitman Hughes, a respondent in the above-captioned matter. (See Attachment 1). Ms. Hughes has not responded to those interrogatories despite efforts by this Office to secure her cooperation through telephone calls and correspondence. (See Attachment 2). Accordingly, this Office recommends that the Commission authorize an enforcement suit against Ms. Hughes in the appropriate U.S. District Court.

II. RECOMMENDATION

Authorize the Office of General Counsel to file a civil suit for enforcement in the United States District Court against Dorothy Pitman Hughes.

31 July 1986
Date



Charles N. Steele
General Counsel

Attachments

- 1. Interrogatories and Order
- 2. Letter to Dorothy Pitman Hughes

89040760788

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political and) MUR 2139
Economic Parity and Dorothy)
Pitman Hughes, as treasurer, et al.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 12, 1986, do hereby certify that the Commission decided by a vote of 6-0 to authorize the Office of General Counsel to file a civil suit for enforcement in the United States District Court against Dorothy Pitman Hughes.

Attest:

8-12-86
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040760789

RECEIVED
GCC# 15.36
86 SEP 17 11:21

DOROTHY PITMAN HUGHES
609 West 138th Street
New York, N.Y. 10031

September 16, 1986

Lisa E. Klein, Esq.
Federal Election Commission
Washington, D.C. 20463

86 SEP 17 14:03

RECEIVED
GENERAL COUNCIL

Dear Att. Klein;

I hope this package of information will serve to clearly answer the questions Re: MUR2139.

I will forward more Affidavits as they come in to me.

Thank you.

Dorothy P. Hughes
Dorothy P. Hughes

89040760790

Answer to Question #1:

The individuals and entities contributing to pay for "Jackson Fundraiser" in question herein are set forth in Exhibit 1, attached and incorporated as if set forth fully. Further; payments were paid through W.N.P.E.P., not by W.N.P.E.P. The reason for this procedure is set forth in Affidavits of some "Stars", and attached as Exhibits 2-9. These are incorporated as if set forth in their entirety. Additional Affidavits are being submitted under separate cover, per my telephone conversations with Lisa E. Klein, Esq.

Answer to Question #2:

Neither W.N.P.E.P. nor I directly solicited funds for this affair. My duty was to make certain of the use of Tavern on the Green. I had to help with the smoothe running of the activities inside the Tavern, which included making certain that we left on time; advising the Master of Ceremonies when "notables" arrived. I was Hostess to Lt. Goodman's mother, Mrs. Marilyn Goodman. I arranged for her to help Tavern's cook bake a cake for Rev. Jackson and I arranged for the attached photograph to be taken and mailed to the press. I believe that this effort helped bring patrons to the door. Exhibit 10.

Answer to Question #3:

All funds deposited in W.N.P.E.P. Account (for reasons set forth in Exhibits 2-9) were collected in order to make advance payment for use of Tavern on the Green. The "Stars" made donations. The donars, amounts of contributions, were recorded. See Exhibits 11-18 and 24. No funds were used by W.N.P.E.P. Exhibit 19 shows itemized receipts. Exhibit 20 are copies of all checks.

3 9 0 4 0 7 6 0 7 9 1

Please note: The remaining money paid Tavern on the Green was paid in cash from door receipts. Persons handling this were:

Joseph Barnes, Esq.
11 Park Place Suite 903
New York, New York 10007

Regina Darby, Esq.
11 Park Place Suite 903
New York, New York 10007

Emma C. Chappell
National Treasurer for Jackson

Exhibit 21 shows some of the cash receipts and checks paid at the door.

Answer to Question #4:

No such agreements existed. Jackson's campaign coordinators were aware that several groups and individuals including but not limited to:

The Westside Committee For Jackson
The "Stars" (individuals and groups)
VAC-PAC
Citizens
W.N.P.E.P.

all wanted Jackson to appear at Tavern on the Green. The initial contact was made before I was asked to participate in this effort. I subsequently sent a follow-up letter to get a new date for Rev. Jackson to appear at the Tavern on the Green. This letter is attached as Exhibit 22. Although written on W.N.P.E.P. letterhead, the letter was from the "Stars" as stated. Exhibit 23 shows some of the individuals involved and the address to which contributions were to be sent. The address, as you will notice, is not that of W.N.P.E.P. This document is the invitation sent out soliciting contributions. This was not handled by me or W.N.P.E.P.

39040760792

Answer to Question #5:

There was no organization or group of professional entertainers, per se, as described in this question. "Stars" was loosely used to describe the individuals making their individual contributions as explained and substantiated above.

Answer to Question #6:

See Answers 1-5. Additional Affidavits will be submitted under separate cover.

39040760795

"Our time has come"

—Rev. Jesse L. Jackson

Stars for Jesse L. Jackson for President Committee

Dr. Thelma Adair
Ilunga Adell
Roberto Adorno
William Aiken
Florence Anthony
Nick Ashford
John Atchison
Phyllis Atchison
Tony A. Badillo
Lawrence R. Bailey Jr., Esq.
Lillian Baker
Jesse Banks
Joy Banks
Joe Barnes, Esq.
Mr. & Mrs. James Barrett
Hinton Battle
Bernard Beal
Robin V. Bell
Travis Bell
Felicia Bentine
Canute C. Bernard, M.D.
Ernest Booker
Jesse Boseman
Pam Brennan
Trevor Brooks, Esq.
Delethia Brown
Marguerite Brown
Dr. Houston Brummit
Stephen Bruschi, Esq.
W. Haywood Burns
Helen Burrell, D.D.S.
Rev. Calvin Butts
Vivian Campbell
Tony Casellas
Colette Charles
Kathryn Chenault
Bill Cherry
Bill Chong
Michelle Clark, M.D.
Ruth Clark
Kildare I. Clarke, M.D.
Johnnie Colson
Carol Conover
Harry Cooley
Philip C. Cox
Frankie Crocker
Jimmy Cumming
Regina Darby, Esq.
Norma Jean Darter
Annie Darter
Doris Darter
Gloria Darter

Renee Davis
Harold Dow
Alan Eaton
William Eaton
Audrey Edwards
Cheryl Everette
George Faison
Kirk Fancher
Joy Farrell
Jackie Krygar Fisher
Roberta Flack
James Forsythe
Adriane Gaines
Colleen Goldberg
Johnnie Golson
Marilyn Goodman
Marilyn Goodman
Stan Gordon
Louis Gossett, Jr.
Gregory Gray
Jessica Hawkins-Greenidge
Kevin C. Greenidge, M.D.
Derry Grubb
Ellis Haizlip
Dudley A. Hall
Candis Hamilton
Joan Hamilton
Michael J. Handy
Joyce Hartsfield, Esq.
Linda Haynes
Theda Palmer Head
Eddie Heath
Joan Logue Henry
LaQuita Henry
Patricia M. Hinds
Sheldon Tatt Hinton
Sandra Hochman
Leon Hubbard
Dorothy Pitman Hughes
Patricia L. Irvin, Esq.
Howard Johnson
Wallace Johnston
Dr. Billy E. Jones
Jack M. Jordan
Flo Kennedy
Joe Kennedy
Vincent Kenyon
Don King
Bill Kochivama
Yuri Kochivama
Fatti LaBelle
Denise LaMaute

C. Knox LaSister III, Esq.
Ellin LaVar
Valerie Lancaster
Kathleen Wyr Lane
Ruth Sanchez Laviere
Bob Law
Edward Lewis
Ida Lewis
Jackie Lewis
Michele Shay Lewis
Ed Lloyd
Ralph MacDonald
Dr. Jim Malone
Dr. Rubie Malone
Vernon C. Manley
Pat Martin
Sam Mattingly
Kim Mayner
Lemard Mays
Marcia McBroom
Gil McGriff
Lena Tipton Meyers
Kendall Minter
J.R. Mitchell
Harriet Morgan
Peck Morrison
Antisia Music
Mtume
Lanny D. Myers
Santiago Negrone
Jeanne Marie Neilson
Alice deLoache Nelson
Leslie Ann Neilson
Melbourne Nunes
Rev. Calvin Owens
Maxine Paige
Linda Peng
Alphonso Pinkney
Dr. Al Pinkney
Bill Pitman
Patrice Pitman
Joseph Plaskett
Robert J. Policastro
Teddy Powell
Lloyd Price
Jonelle Procope
Shervi Lee Ralph
Pat Ramsay
Walter C. Rauscher
La Grande Reed
Judith Reed, Esq.
Rosemarie Rhodes, Esq.

Alfonso Ribeiro
Del Robinson
Dinah Robinson
Manuel Rodriguez, Esq.
Howard E. Rollins, Jr.
Joyce Sanders
Vince Sanders
Joan Sandler
Kenneth L. Scott
Tad Schnugg
Dr. Luther W. Seabrook
Marianne R. Seabrook
Norma Shirley
Valerie Simpson
Meredith Sirmans, M.D.
Vernon Slaughter
Clarence O. Smith
Jack E. Smith
Willi Smith
Dr. Lodema Stephens
Raymond Sussman, Esq.
Percy Sutton
Evon Taylor
Susan L. Taylor
Dino Terrell
M.A. Terry
T.C. Thompkins
Rev. Nathaniel Tvier-Lloyd
Damon Upshaw
Roy Vaughn
William Velez
Connie Walters
Jim Walker
Cora Walker, Esq.
Fred Wallace
Lee Wallace
Fay Washington
Faye Wattleton
Ruby Weston
Rev. B.J. Whipper, Jr.
Greta White
Gladys Williams
Terrie M. Williams
Jack L. Willis
Mary P. Willis
Annie Wolinsky
Melvin Wolinsky
Peter Wong, M.D.
Gail Wright, Esq.
P. W. Yuen, Esq.
Peter Zeller, Esq.

Tavern on the Green, Monday, April 2, 1984

89040760795

.....

FEDERAL ELECTION COMMISSION

Docket No: MUR 2139

IN THE MATTER OF WOMEN'S NETWORK

FOR POLITICAL AND ECONOMIC PARITY

and DOROTHY PITMAN HUGHES, TREASURER

.....

:
: AFFIDAVIT IN SUPPORT OF
DISMISSAL OF ACTION AND
: EXPLANATION OF SOURCE OF
FUNDS

STATE OF NEW YORK:

ss:

COUNTY OF NEW YORK:

Adanni [Signature]

I, *Adanni [Signature]* of full age, upon my oath
depose and say as follows:

1. I am one of the persons listed on Exhibit A,
attached hereto, and incorporated as if fully setforth, as
"Stars for Jesse".

2. Exhibit A represents individuals, who, as I,
gave individual contributions, as a "Star for Jesse".
My contribution was \$ *200* , which was the advance payment of my
ticket to the party at Tavern On The Green, held April 3, 1984.

3. I, was present when for reasons of pure con-
venience, it was asked of Dorothy Pitman Hughes, to deposit
the individual contributions (all advance ticket payments), into
the Women's Network's account in order to pay Tavern On The
Green the required deposit. We thought that we were being

Exhibit 2

AFFIDAVIT OF Adunni Oshup Tabassi

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

89040760796

Alumni - Ashraf al-Bassi

Sworn to and signed
before me this *31st* day of *July*
July, 1986

Aura M. Garcia
Notary

AURA M. GARCIA
Notary Public, State of New York
No. 60-4520578
Qualified in Westchester County
Commission Expires *Feb 28, 1989*

89040760797

AFFIDAVIT OF Patrice Pitman

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

89040760799

Sworn to and signed
before me this 31st day of
July, 1986

Patricia Palmer

Aura M. Garcia
Notary

AURA M. GARCIA
Notary Public, State of New York
No. 62-4620573
Qualified in Westchester County
Commission Expires Feb 28, 1989

8 2 0 4 0 7 6 0 8 0 0

89040760801

.....

FEDERAL ELECTION COMMISSION

Docket No: MUR 2139

IN THE MATTER OF WOMEN'S NETWORK

FOR POLITICAL AND ECONOMIC PARITY

and DOROTHY PITMAN HUGHES, TREASURER

.....

:
: AFFIDAVIT IN SUPPORT OF
: DISMISSAL OF ACTION AND
: EXPLANATION OF SOURCE OF
: FUNDS

STATE OF NEW YORK:

ss:

COUNTY OF NEW YORK:

I, *Deletha Brown* of full age, upon my oath
depose and say as follows:

1. I am one of the persons listed on Exhibit A,
attached hereto, and incorporated as if fully setforth, as
"Stars for Jesse".

2. Exhibit A represents individuals, who, as I,
gave individual contributions, as a "Star for Jesse".
My contribution was \$*200.00*, which was the advance payment of my
ticket to the party at Tavern On The Green, held April 3, 1984.

3. I, was present when for reasons of pure con-
venience, it was asked of Dorothy Pitman Hughes, to deposit
the individual contributions (all advance ticket payments), into
the Women's Network's account in order to pay Tavern On The
Green the required deposit. We thought that we were being

AFFIDAVIT OF Delethia Brown

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

99040760802

Deletha Brown

Sworn to and signed

before me this *31* day of

July, 1986

Aura M. Garcia
Notary

AURA M. GARCIA
Notary Public, State of New York
No. 60-4520573
Qualified in Westchester County
Commission Expires *Feb 28, 1989*

89040760803

Q

.....

FEDERAL ELECTION COMMISSION

Docket No: MUR 2139

IN THE MATTER OF WOMEN'S NETWORK
FOR POLITICAL AND ECONOMIC PARITY
and DOROTHY PITMAN HUGHES, TREASURER

:
: AFFIDAVIT IN SUPPORT OF
DISMISSAL OF ACTION AND
: EXPLANATION OF SOURCE OF
FUNDS

STATE OF NEW YORK:

ss:

COUNTY OF NEW YORK:

I, *Jean H. Bernstein* of full age, upon my oath

depose and say as follows:

1. I am one of the persons listed on Exhibit A, attached hereto, and incorporated as if fully setforth, as "Stars for Jesse".

2. Exhibit A represents individuals, who, as I, gave individual contributions, as a "Star for Jesse". My contribution was \$ *400.00*; which was the advance payment of my ticket to the party at Tavern On The Green, held April 3, 1984.

3. I, was present when for reasons of pure convenience, it was asked of Dorothy Pitman Hughes, to deposit the individual contributions (all advance ticket payments), into the Women's Network's account in order to pay Tavern On The Green the required deposit. We thought that we were being

R 9 0 4 0 7 6 0 8 0 4

AFFIDAVIT OF Joan H. Bernstein

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

87040760805

2

Signed: *Janet Rosenberg*

Sworn to and signed
before me this *10th* day of
~~July~~ *Sept.*, 1986

Julius Liss
Notary

JULIUS LISS
Notary Public, State of New York
No. 24-2378600
Qualified in Kings County
Certificate Filed in New York County
Commission Expires March 30, 1987

8 2 0 4 0 7 6 0 8 0 6

AFFIDAVIT OF Dorothy P. Hughes

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

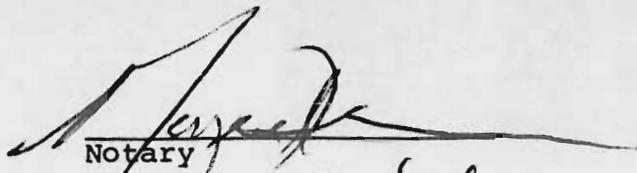
8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

89040760808

Dorothy P. Hughes

Sworn to and signed
before me this 31st day of
July, 1986



Notary

Moonjere S Jackson
AN Attorney AT LAW
In State of New Jersey

87040760809

AFFIDAVIT OF Florence Anthony

PAGE 2

practical. I thought that this procedure was alright, as did Dorothy and others present.

4. At no time were the contributions made considered other than the individual contributions of each of the "Stars".

5. The "Stars" were acting singularly.

6. At no time did the Women's Network nor Dorothy Pitman Hughes, intend to be or act as a committee in any way to make group contributions to the Presidential Campaign of Rev. Jesse L. Jackson.

7. No part of the funds which is the subject of this investigation or proceeding were other than individual contributions.

8. The lawyer present said that we were proceeding correctly. I, and I know others, had no reason to think or know that anyone was or might be using improper procedures.

9. If there were an error, it was in not realizing that our individual contributions could be considered anything other than our own personal contributions. I know that I have stated with great pride to many others that I gave my separate contribution.

89040760811

Sworn to and signed

Florence Anthony

before me this 31 day of

July

July, 1986

Beatrice Robinson
Notary

BEATRICE ROBINSON
Notary Public, State of New York
No. 408882
Qualified in New York County
Commission Expires March 30, 1987

31st day of July, 1986

89040760812

89040760813



Exhibit 10

8 9 0 4 0 7 6 0 8 1 4

MATCHING FUNDS CASH VOUCHER SHEET

Stars For Jesse Jackson Committee

<u>NAME</u> (PLEASE PRINT)	<u>CASH AMOUNT</u>	<u>COMMITTEE MEMBER SPONSOR</u>	<u>SIGNATURE</u>
<u>Firsythe, James</u>	<u>4 100</u>	<u>296 W 12th St. NY 10014</u>	_____
<u>Robinson, Doreh</u>	<u>200</u>	<u>210 W 12th St, NY 10014</u>	_____
<u>Head, Theda Palmer</u>	<u>200</u>	<u>44 W 62nd St NY 10023</u>	_____
<u>Johnson, Howard</u>	<u>200</u>	<u>2301 Fifth Ave. #488 NY 10037</u>	_____
<u>Clark, Ruth</u>	<u>200</u>	<u>392 Central Park West NY 10025</u>	_____
<u>Lewis, Jackie</u>	<u>200</u>	<u>425 E 58th St N.Y. 10022</u>	_____
<u>Fisher, Jacqueline</u>	<u>200</u>	<u>264 Washington Ave, ^{Bklyn} NY 11205</u>	_____
<u>Atchinson, Phyllis</u>	<u>200</u>	<u>50 Hamilton Terrace, NY. 10031</u>	_____
<u>Wallace, Fred</u>	<u>200</u>	<u>44 W 55th St, NY 10019</u>	_____
<u>Lane, Kathleen</u>	<u>200</u>	<u>1270 Fifth Ave #5E, NY 10029</u>	_____
<u>Velez, William</u>	<u>20</u>	<u>110 Riverside Dr. NY 10024</u>	_____
<u>Clark, Michele</u>	<u>200</u>	<u>887 River Road, Teaneck, N.J 07666</u>	_____
<u>Mays, Lemard</u>	<u>100</u>	<u>792 Columbus Ave #3R, NY 10025</u>	_____
<u>Antisia Music</u>	<u>200</u>	<u>130-24 236th St. Laurelton 11422</u>	_____
<u>Eaton, William</u>	<u>200</u>	<u>1650 B'way, Suite 1001, NY 10019</u>	_____
<u>Fancher, Kirk</u>	<u>120</u>	<u>1674 B'way, Suite 200, NY 10019</u>	_____

8 9 0 4 0 7 6 0 8 1 6

NAME (PLEASE PRINT)	ADDRESS	609 West 130th Street New York, NY 10031 (212) 862-8047	AMOUNT OF CHECK	COMMITTEE SPONSOR
Grey Pallard	% Royal Bank of Canada, George Town, Grand Cayman, Cayman Is, W.I.		300	
Margaret Vlaster	Black Retail Action Group, Rockett Station, PO Box 10185, NY 10185		400	
Famous Organization			100	
Le Grand Reed			300	
Johnnie Chandler	Woodhull Hospital		100	
Betty McNeill	362 65 th St, Bklyn 11220		100	
Vernon C. Manley	207 W. 106 th St, NY 10025		200	
Odetta S. Murray	654 Jefferson Ave, Bklyn 11221		200	
Carter Community Health Ctr. Pharmacy	97-04 Sutphin Blvd, Jamaica, NY 11435		250	
Melbourne Nurses			40	
Martin P. Carter	580 West End Ave, NY 10024		200	
Edward G. Lloyd	158-18 Riverside Ave, NY 10032		200	
Kevin C. Greenidge, MD	153 E 33 rd St.		200	
Darryl E. Greene			200	
Charles Child	34 Heratice St, NY 10014		200	Juan Sandler
			2890	
			2990	
			1250	

1740
340

(2990)

89040760817

J.S. DUFFLAN ACCOUNT

THE ROYAL BANK OF CANADA
GEORGE TOWN, GRAND CAYMAN
CAYMAN ISLANDS, W.I.



APRIL 2 19 84

PAY TO THE ORDER OF

WOMEN'S NETWORK PAC U.S. \$ 300.⁰⁰
Three hundred ⁰⁰/₁₀₀ U.S. DOLLARS

PAYABLE BY DEMAND
DRAFT ON NEW YORK

Paul Fisher - V.P.
Gay Roland Treas.

ACCOUNT NO.

24751

PRUDENTIAL-FINANCIAL
SPECIAL - POLITICAL-CONT.

BLACK RETAIL ACTION GROUP INC.

1227

ROCKEFELLER CENTER STATION P.O.
P.O. BOX 1192
NEW YORK, NY 10108

April 19 84 1-482
280

PAY TO THE ORDER OF

WOMEN'S NETWORK PAC \$ 400.⁰⁰
Four hundred ⁰⁰/₁₀₀ DOLLARS



Republic National Bank of New York
100 AVENUE OF THE AMERICAS
NEW YORK, N.Y. 10008

Jackson Fundraiser Margaret Kletter

⑆0 260048 28⑆ 26001680 2⑆ 1227

THE FAMOUS ORGANIZATION LTD.

192

April 2 19 84

1-434/280

WOMEN'S POLITICAL NETWORK

\$ 100.00

ONE HUNDRED**



FREEDOM NATIONAL BANK
OF NEW YORK
375 WEST 125TH STREET, NEW YORK, N.Y. 10027

[Signature]

Memo

⑆000192⑆ ⑆0 26004349⑆ 130 0016⑆

LE GRAND REED

376

PAY TO THE ORDER OF

WOMEN'S NETWORK PAC \$ 300.⁰⁰
Three hundred ⁰⁰/₁₀₀ DOLLARS

4-2 1984 1-12/210

Chemical Bank

CHEMICAL BANK
121 WALL STREET
NEW YORK, N.Y. 10038

AUTHORIZED SIGNATURE
[Signature]

⑆0 1000128⑆ 081⑆ 2190⑆ 0376

8 9 0 4 0 7 6 0 8 1 8

CHARLES CHILDS
 34 HORATIO ST.
 NEW YORK, NY 10014

2549

March 24 1984 1-30210

PAY TO THE ORDER OF *John Sandler* \$ 200.00

Two Hundred DOLLARS


MANUFACTURERS HANOVER TRUST COMPANY
 605 Street & Madison Avenue, New York, N.Y. 10017

OR *Jesse Jackson Campaign* *Charles Childs*

8940760818

89040760819

MARTIN P. CARTER
 ELAINE D. CARTER
 550 WEST END AVENUE
 NEW YORK, NY 10024

March 29 1984 2950

Pay to the order of The Women's Network \$200⁰⁰

Two Hundred and 00/100 Dollars

CHEMICAL BANK
 434 Park Avenue South
 New York, N.Y. 10018

Memo: Martha P. [unclear]

⑆021000128⑆030-221714⑆ 2950

EDWARD G. LLOYD
 CAROLE DARDEN-LLOYD
 110-18 RIVERSIDE DRIVE
 NEW YORK, NY 10032

3-29 84 100110

Pay to the order of Women's Network - P.E.P. \$200⁰⁰

Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER
 TRUST COMPANY
 129 Second Avenue, New York, N.Y. 10038

Jesse Jackson (cash) Edward G. Lloyd

⑆021000006⑆11450614169⑆65 0102

KEVIN C. GREENIDGE, M.D.
 153 EAST 32ND ST., NO. 1C
 NEW YORK, NY 10016

3/30 84 13079

Pay to the order of Women's Network \$200⁰⁰

Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER
 TRUST COMPANY
 230 Second Avenue, New York, N.Y. 10003

Jesse Jackson Cash Kevin C. Greenidge

⑆0210000306⑆10630620389⑆65 0107

CHEMICAL BANK
 55 Water Street
 New York, N.Y. 10041

Personal Money Order
 Not Valid Over \$1,000.00

1-12
 210

No. 7398871

March 30 1984

Pay to the Order of Women's Network PAC \$200⁰⁰

Address Jesse Jackson for President Signature Darryl E. Greene

⑆7398871⑆ ⑆021000128⑆ 000⑆777048⑆

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 6150884

3/30 1984

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL BANK 105 BANK **1000000**

Address Woodhull Hosp.

Signature Johnnie Chandler

⑈6150884⑈ ⑆021000128⑆ 000⑈777048⑈

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 6150883

3/30 1984

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL BANK 105 BANK **1000000**

Address Woodhull Hosp.

Signature Jewel Porter

⑈6150883⑈ ⑆021000128⑆ 000⑈777048⑈

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 6150885

3/30 1984

Pay to the Order of Womens' Network (Jesse Jackson)

CHEMICAL BANK 105 BANK **1000000**

Address 362 65th St. Bklyn, N.Y. 11220

Signature Betty McNeill

⑈6150885⑈ ⑆021000128⑆ 000⑈777048⑈

VERNON C. MANLEY
207 W. 106TH STREET
NEW YORK, NY 10025

4/30 1984 141

1-708/220

Pay to the order of Womens' Network PAC \$ 200.00

Two Hundred and no/100 Dollars

EMIGRANT

EMIGRANT SAVINGS BANK
8 EAST 42ND STREET, NEW YORK, N.Y. 10017

Name Jesse Jackson Campaign Vernon C. Manley

⑆021000128⑆ 015039221 5⑈0144

89040760820

89040760821

MARTIN P. CARTER
 ELAINE D. CARTER
 500 WEST END AVENUE
 NEW YORK, NY 10024

March 30 1984 2950

Pay to the Order of The Women's Network \$200.00
Two hundred and 00/100 Dollars

CHEMICAL BANK
 424 Park Avenue South
 New York, N.Y. 10010

Memo _____

⑆021000128⑆ 030-221714-2950

[Signature]

EDWARD G. LLOYD
 CAROLE DARDEN-LLOYD
 115-18 RIVERSIDE DRIVE
 NEW YORK, NY 10022

3-28 1984 1-30/200

Pay to the Order of Women's Network - P.E.P. \$200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 1191 Second Avenue, New York, N.Y. 10022

Jessie Jackson (bank) *Edward G. Lloyd*

⑆21000206⑆ 1145061416965 0102

KEVIN C. GREENIDGE, M.D.
 153 EAST 32ND ST., NO. 1C
 NEW YORK, NY 10016

3/30 1984 1-30/200

Pay to the Order of Women's Network \$200.00
Two Hundred 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 230 Second Avenue, New York, N.Y. 10002

Jessie Jackson *Kevin Greenidge*

⑆021000306⑆ 1063062038965 0107

CHEMICAL BANK
 55 Water Street
 New York, N.Y. 10041

Personal Money Order
 Not Valid Over \$1,000.00

1-12
 210

No. 7398871

March 30 1984

Pay to the Order of Women's Network PAC \$200.00

Address Jessie Jackson for President Signature Darryl E. Greene

⑆2398871⑆ ⑆021000128⑆ 000-777048⑆

8 9 0 4 0 7 6 0 8 2 2

609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME (PLEASE PRINT)	ADDRESS	AMOUNT OF CHECK	COMMITTEE SPONSOR
✓ Vaughn, Roy O. ✓	322 W. 57 th St #28K N.Y. 10021	200	
Davis, Gene A.	23 W. 68 th St. N.Y. 10023	200	
✓ Gregory, Theodore M. ✓	250 George Rd. #260, Cliffsides, N.J. 07010	200	
✓ Lamante, Denise ✓	41 Hamilton Terrace, N.Y. 10031	100	Joe Barnes
✓ Maillard, Lucille ✓		100	
✓ Lewis, Michele Shay ✓	40 W. 86 th St. N.Y. 10024	100	
✓ Durden, Marjorie ✓		100	
✓ Greene, Cheryl Y. ✓	260 Convent Ave #93 N.Y. 10031	40	
✓ Shirley, Norma Elise ✓	155 W. 68 th St. #415 N.Y. 10023	100	
✓ Burrell, Helen Dr. ✓	120 West 58 th St, NY 10019	100	Alice D. Nelson
✓ Lopez, Georgette Adrienne	95 W. 95 th St. N.Y. 10025	300	
✓ Hart, Shellie H. Jr. ✓		100	
✓ Chenault, Kathryn C. ✓	475 Esplanade, Pelham Manor 10823	200	
✓ Hamilton, Charles ✓	28 Cadman Plaza West #70 NY 11201	200	
✓ Henry, Laquita ✓		100	Joe Barnes

2140
300
1840

2140
+300
2440

1840

840

2140

cc: 11/13

8 9 0 4 0 7 6 0 8 2 3

NAME
(PLEASE PRINT)

ADDRESS

609 West 138th Street
New York, NY 10031
(212) 852-6047

COMMITTEE SPONSOR

Marianne Camille Spraggins, Esq.	444 C.P.W., NY 10025	200
Colleen T. Goldberg	50 E. 89th St, NY 10028	200
Clarence D. Smith	5900 Arlington Ave, Bronx 10471	200
Jill Nelson	49 Clinton Ave, Dobbs Ferry, NY 10522	200
Ruby Weston	652 Eastern Pkwy, Bklyn 11210	100
Wanda D. Kemp	233 West 138th St #1A, NY 10030	100
Delores Cann		100
Houston Brummit, MD	145 E. 49th St, NY 10017	100 + 100
Anis Barghouti	747 Third Ave - 25th Fl, NY 10017	100
Jonelle Procope	335 E. 41st St #504, NY 10017	100
Herbert Brown, Jr.	120-2 Alcott Place, Bronx 10475	100
William R. Brown, P.C.	7c Madison Ave, NY 10016	100
Sharon Hope	Actor's Federal Credit Union, 165 W. 46th St, NY 10036	-100
Ellin LaVar	Harold Helwin Salon, 137 W. 72nd St, NY	100
Roberto Adorno	704 DeKalb Ave, Bklyn	100

2000
~~1000~~
~~1000~~

10

1000

2000

MARIANNE CAMILLE SPRAGGINS, EDC.
444 CENTRAL PARK WEST
NEW YORK, N.Y. 10025

791

March 19 84

PAY TO THE ORDER OF

John's Network PAC \$ 200.00 DOLLARS

The Chase Manhattan Bank, N.A.
1 New York Plaza, New York, N.Y. 10021

FOR ⑆021000021⑆ 017 1 077456⑆ 0791

DAVID C. GOLDBERG, M.D.
COLLEEN T. GOLDBERG
50 E. 80TH ST.
NEW YORK, NY 10029

1713

20 March 19 84

PAY TO THE ORDER OF

Women's Network PAC \$ 200.00 DOLLARS

CITIBANK
CITIBANK, N.A.
91st St. at Madison Ave.
New York, N.Y. 10028

Two hundred & no/100
CITIBANK
⑆021000089⑆ 027 60450759⑆ 1713
Colleen J. Goldberg

Merrill Lynch Cash Management Account

CLARENCE O. SMITH
ELAINE SMITH
5900 ARLINGTON AVE.
BRONX, NY 10471

222

3/27 19 84 25-80 440

Pay to the order of

Women's Network PAC \$ 200.00 Dollars

Two Hundred

BANK ONE.
BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43215

Elaine Smith
⑆044000804⑆ 3012593370⑆ 0222

JILL NELSON
GREGORY T. RICKS
49 CLINTON AVE.
DOBBS FERRY, NY 10522

206

3/28 19 84 50-25/218

PAY TO THE ORDER OF

The Women's Network PAC \$ 200.00 DOLLARS

Two Hundred

CITIBANK OF NEW YORK
COUNTY TRUST REGION
12 ASHFORD AVENUE, DOBBS FERRY, NY 10522

FUNDRAISER - 211X Jill Nelson
⑆021000021⑆ 017 1 077456⑆ 0791

89040760824

89040760825

HOUSTON BRUMMIT, M.D. 3467
 145 E. 48TH ST.
 NEW YORK, NY 10017
 28 Mar 1984 1-18/78

PAY TO THE ORDER OF WOMEN'S NETWORK P.A.C. \$ 100.00
One Hundred DOLLARS

EAB European American Bank
 A TRUST COMPANY
 100 Park Ave., New York, N.Y. 10022

for Ms. Jackson / Houston Brummit

⑆021001486⑆ 030-10170 3⑆ 3467

ANIS BARGHOUTI 2325
 747 THIRD AVENUE, 25TH FLOOR
 NEW YORK, N.Y. 10017
 4/14 1984 1-679/260

PAY TO THE ORDER OF Women Network \$ 100.00
Only One Hundred & 00/100 DOLLARS

The Merchants Bank of New York
 757 THIRD AVENUE NEW YORK, N. Y. 10017

for Anis Barghout

⑆026006790⑆ ⑆4 213839⑆

JONELLE PROCOPE 730
 325 EAST 41ST ST., APT. 504
 NEW YORK, N.Y. 10017
 3/28 1984 1-30/210

PAY TO THE ORDER OF Women's Network P.E.P. \$ 100.00
One Hundred Dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 1185 Avenue of the Americas, New York, N.Y. 10020

for Jonelle Procope

⑆021000306⑆ 11570609543⑆ ⑆5 0730

HERBERT BROWN, JR. 101
 120-2 ALCOTT PL.
 BRONX, NY 10475
 March 28 1984 1-30/210

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00
One Hundred and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
 88 West 125th Street, New York, N.Y. 10022

for Ms. Jackson Presidential Campaign Herbert Brown Jr.

⑆021000306⑆ 11570609543⑆ ⑆5 0101

89040760826

653 Eastern Pkwy
Brooklyn 11238
RUBY WESTON

3/30 1984 1152

Pay to the order of Women's Net-work, P.A.C. \$ 100.00
One hundred dollars Dollars

INDEPENDENCE SAVINGS BANK
120 COURT STREET
BROOKLYN, NEW YORK 11201

Memo: Ruby Weston

⑆226071211⑆ 9 602221146⑆ 1152

WANDA D. KEMP
233 WEST 130TH STREET NO. 1A
NEW YORK, NY 10030

March 31, 1984 692

Pay to the order of WOMEN'S Net-work P.A.C. \$ 100.00
one hundred and 00/100 Dollars

Citibank, N.A.
100 Irving Pl. nr. 14th St. New York, N.Y. 10003

CITIBANK

Memo: Jackie Campaign Wanda D Kemp

⑆021000089⑆ 0 67 58804773⑆ 0692

HOUSTON BRUMMIT, M.D.
145 E. 49TH ST.
NEW YORK, NY 10017

28 Nov 1984 3465

Pay to the order of WOMEN'S NETWORK-PAC \$ 100.00
DOLLARS

EAB European American Bank
A TRUST COMPANY
785 Park Ave. New York, N.Y. 10022

Memo: Houston Brummit

⑆021001486⑆ 0 30 10170 3⑆ 5976

⑆226070319⑆ 831 038553⑆ 0547

Memo: Dolores Cann

DOLLAR SAVINGS BANK OF NEW YORK
The better way.

Pay to the order of WOMEN'S NETWORK-PAC \$ 100.00
One hundred dollars Dollars

Memo: Dolores Cann

⑆226070319⑆ 831 038553⑆ 0547



WN.P.E.P.

Women's Network for Political and Economic Party

609 West 130th Street
New York, NY 10031
(212) 862-0047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHECK

COMMITTEE SPONSOR

Minter, Kendall	221 W. 57 th St, NY 10019	200	Jo Barnes
Nelson Alice D.		100	
Zieler Peter		200	RLD
Schnugg, Tad (Tea-George Fison)	Long Ridge Rd, Danbury, Ct 06810	200	"
Edwards, Audrey	45 Plaza St., Bklyn 11217	200	
Wolinsky, Melvin (att'y)	18-34 College Pt. Blvd, NY 11356 <small>College Point,</small>	400	
Nagroni, Santiago P.	183-85 Thompson St, NY 10012	100	RLD
Hall, L. Priscilla	20 So. Portland Ave, Bklyn 11217	200	"
Collins, Frederick N.	25 Eastern Pkwy, Bklyn 11238	200	DPH
Smith, Everett	323 Glenwood Ave, East Orange, N.J. 07017	100	Eileen Frank
Coleman, Robert Dr.	25 W. 132 nd St #9K, NY	100	Felicia Bentine
Springetti, Carol		200	Eileen Frank
Karen Thomas	959 Walnut St., Roselle, NJ 07068	50	Terrie M. Williams
Margaret E. Calhoun	814 Riverside Dr	50	
Elaine Gray	644 West 163 rd St, NY 10032	50	

2350	2350
400	1800
<u>1950</u>	<u>350</u>

1950

~~550~~

2350

Exh. 17

8 9 0 4 0 7 6 0 8 2 8

89040760829

1112
 JACKSON EVERETT SMITH
 323 GLENWOOD AVE.
 EAST ORANGE, NJ 07017
 3/30 19 84
 1-9719
 March 28
 TO THE ORDER OF Women's Network for Political & Econ Party \$ 100.00
one hundred and 00/100 DOLLARS
 Citibank, N.A.
 7 William St. at John St. CITIBANK
 New York, N.Y. 10038
 Love & Peace
 Everett Smith
 0210000894 035 04081901 1112

159
 PATRICE MILES
 86 STERLING PLACE
 BROOKLYN, NEW YORK 11217
 March 30, 84
 1-2719
 22
 TO THE ORDER OF Women's Network PAC \$ 100.00
One Hundred 00/100 DOLLARS
 The Chase Manhattan Bank, N.A.
 60 Wall Street, New York, N.Y. 10016
 Patricia Miles
 0210000211 022 1 094501 0159

AMERICAN EXPRESS COMPANY
 American Express Company
 \$10000
 Pay this Check to the Order of MORRIS FEYLAND
 MORRIS FEYLAND
 1800000081 93 1 270 79 26

HILL STREET BROWNIES, INC.
 382 CENTRAL PARK WEST
 NEW YORK, NY 10025
 1214
 1-3871
 4/2 19 84
 PAY TO THE ORDER OF Women's Network PAC \$ 100.00
one hundred 00/100 DOLLARS
 MANUFACTURERS HANOVER TRUST COMPANY
 90 West 60th Street, New York, N.Y. 10025
 For Patricia Miles
 0210003061 0640613519 265

UNITED STATES OF AMERICA POSTAL MONEY ORDER #47

32122124368840329 100271 200*00

PAID TO	ISSUE OFFICE	ISSUE DATE	ISSUE AMOUNT
Western National P.A.C.	Brooklyn, N.Y.	11238	200.00
609 W 138 th Street	Post Office		
New York, N.Y. 10036	Post Office		
MONEY ORDER		Pay to the order of	
		Cash	
		Rev. Jesse Jackson Corp.	

⑆00000800⑆ 32122124368⑆

89040760830

SANTIAGO P. NEGRONI
183-85 THOMPSON STREET
NEW YORK, N.Y. 10012

1433

3/27/1984

1-8/216
Branch 122

PAY TO THE
ORDER OF

Women's Network, P.K. \$ 100^{00/100}

One Hundred and 00/100 — DOLLARS

CHIEF, N.A.
555 La Guardia Place
New York, N.Y.
10012

CITIBANK

FOR

P.K.

Santiago P. Negroni

⑆021000089⑆ 122 72079088 ⑈ 1433

L. PRISCILLA HALL
20 SOUTH PORTLAND AVENUE
BROOKLYN, NY 11217

3/27/1984 1096

1-708/1200

Pay to the
order of

Women's Network \$ 200^{00/100}

Two hundred dollars and 00/100 — Dollars

EMIGRANT
EMIGRANT SAVINGS BANK
8 EAST 42ND STREET, NEW YORK, N.Y. 10017

Manager, Jackson Company, Prudential

L. Priscilla Hall

⑆226070403⑆ 760108968 ⑈ 1096

89040760831

BERNARD F. THOMAS
KAREN THOMAS
939 WALNUT STREET
ROSELLE, NJ 07268

MAR 30 1984 209

98-7001
2312

Pay to the order of Womens Network PAC \$ 50.00
fifty and 00/100 Dollars

CITY FEDERAL SAVINGS
One of America's Largest Financial Services Companies

Memo Person Don Karen Thomas
⑆221270017⑆ 085362334604⑆ 0209

MARGARET E. CALHOUN
818 RIVERSIDE DRIVE
NEW YORK, N.Y. 10022

380

3/30 1984 Branch 41

PAY TO THE ORDER OF Women's Network PAC \$ 50.00
Fifty & 00/100 DOLLARS

Citibank N.A.
Broadway at 40th Street
New York, N.Y. 10017
CITIBANK

FOR Pres Jackson's Presidential Campaign Margaret E. Calhoun
⑆021800089⑆ 04162411585⑆ 0380

ELAINE RAY
664 WEST 143RD ST.
NEW YORK, NY 10032

0819

MAR 30 1984 1-30/218

PAY TO THE ORDER OF Women's Network PAC \$ 50.00
Fifty Dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
844 Third Avenue, New York, N.Y. 10022

FOR Pres Jackson Don Elaine C. Ray
⑆021000306⑆ 11100608156⑆ 65 0819

89040760832

ELVIN WOLSKY
ATTY.-AT-LAW
10-34 COLLEGE POINT BLVD.
COLLEGE POINT, N.Y. 11356

1081

3/23/84

7-20710

PAY TO THE ORDER OF Women's Network PAC \$400.00 ✓
Four Hundred DOLLARS

National Bank of North America

10-34 College Point Blvd., College Point, N.Y. 11356 123

FOR

Elvin Wolsky
Elvin Wolsky

⑆001081⑆ ⑆021000322⑆ 2123 40 8686⑆

AUDREY EDWARDS
48 PLAZA ST.
BROOKLYN, NY 11217

2533

March 26, 1984

1-400
210

PAY TO THE ORDER OF The Women's Network PAC \$200.00 ✓
Two hundred and 00/100 DOLLARS

Citibank, N.A.
Park Ave. at 46th St.
New York, N.Y.
10108

CITIBANK

⑆021000089⑆ 049 50833588⑆ 2533
The Women's Network Audrey M. Edwards

89040760835



JOSEPH LLOYD SERLING
ATTORNEY AT LAW

10708

3/18 1984

MR
110

PAY TO THE ORDER OF Women's Network PAC
Two Hundred

\$ 200⁰⁰
DOLLARS

CHEMICAL BANK
31 West 53rd Street
New York, N.Y. 10019

Joseph Lloyd Serling

FOR PO 10708 • :021000128: 007-283726

KENDALL A. MINTER, ESQ. 1422
221 WEST 57TH STREET
NEW YORK, NY 10019 1-8/218/299

March 27, 1984

PAY TO THE ORDER OF Womens Network PEP \$ 200 -

Two Hundred and DOLLARS

Chequing, N.A. Private CITIBANK
Chequing, Canada
488 E. 6th St.
New York, N.Y.
10008

FOR Jesse Jackson Contribution Kendall Minter

•:021000089: 400 37132826 1422

Joe B
1/1/84
49200
✓

TAD SCHNUGG
LONG RIDGE RD.
DANBURY, CT 06810

281

3-22 1984

1-12/218

PAY TO THE ORDER OF WOMEN'S NETWORK PAC \$ 200.00
TWO HUNDRED AND 00/100 DOLLARS

CHEMICAL BANK

REV J JACKSON MINTER

Tad Schnugg

•:021000128: 074-239414 0281

PETER SHELLEY ZEILER
ATTORNEY AT LAW

2121

3/27 1984

1-579
260

PAY TO THE ORDER OF Women's Network, P.C.
Two hundred and 00/100

\$ 200⁰⁰

DOLLARS

The Merchants Bank of New York
666 BROADWAY, NEW YORK, N.Y. 10018

OR Political Contribution - business

Peter Shelley Zeiler

•:026006790: 1047089

89040760834

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,400.00

1-12
210

No. 7309871

March 31 1984

EMD
100
EMD
100

Pay to the Order of Women's Network For Political + Economic Parity

CHEMICAL BANK 200 AND 00 CTS
117 BANK

Address

Signature

Carol Sprungoth

⑈7309871⑈ ⑆021000128⑆ 000-777048⑈

⑈021000306⑆ 0000 204038⑈

Manufacturers Hanover
Trust Company
Member Since 1861

Dr. R. S. Cole
PAC

\$ 100.00
100 Dollars

DR R COLEMAN
6217 9840 0943 6471

3/30 84 101

1-30/210

R. Coleman

ALICE D. NELSON

No.

3/28 84 1-337/210

Pay to the Order of Women's Network - PAC \$ 100.00
One hundred 00 CENTS

AB AMALGAMATED BANK OF NEW YORK
124 2057 BARTON AVENUE BRONX, NEW YORK 10478

Anthony Nelson Alice d. Nelson

⑆026003379⑆ 28168670⑆ 0273

89040760835

NAME
(PLEASE PRINT)

ADDRESS

600 West 120th Street
Flushing, NY 11351
(212) 862-6047

AMOUNT OF CHECK

COMMITTEE SPONSOR

Dr. Lionel E. Mc Murren

175 West 92nd St NY 10025

50

Ronald R. Evans

135 Eastern Pkwy. # 7C, Bklyn 11238

100

Constance Jackson Collins

Comic Contracting Consultants, Assoc. 112 W. 120th St NY 10027 400

200

Lionel C. Wald

Richard Greene

200

Jurett C. Nichols

736 Eastern Pkwy, Bklyn 11213

200

Sandra Siread

191-18 Murdock Ave, St. Albans, NY 11412

200

J.Y. Hartsfield, Esq

200

Dudley A. Hall

200

Stanley W. Gordon

199 Park Ave, NY 10021

200

June C. Lennon

100

Emile A. Milne

100

Nana Neal

101-125 W. 147th St NY 10039

100

Calvin E. Johnson

136 E. 56th St NY 10022

200

Joel Prendergast Martin

300 E. 75th St NY 10021

200

2650
400
2250

2650
2200
450

2250
450

2650

JUNE C. LENNON

NUMBER
825

March 31, 1984

PAY TO THE
ORDER OF

Women's Network Political Action Comm \$100.00

One Hundred ⁰⁰/₁₀₀ DOLLARS



CENTRAL NATIONAL BANK
OF NEW YORK
675 SEAFIELD STREET, BROOKLYN, N.Y. 11210

June Lennon

⑆026008540⑆ 52⑉55407⑉⑆ 0825

EMILR A. MILNE

No. 213

Mar 30 84

PAY TO THE
ORDER OF

Women's Network PAC \$100.00

One hundred and ⁰⁰/₁₀₀ DOLLARS



The Chase Manhattan Bank, N.A.
290 2nd Ave., N.Y., N.Y. 10006

Emil A. Milne

⑆021000024⑆ 229 0 028311⑉ 0213



89040760837

DR. LIONEL E. MC MURREN

3 19 84 2312

1-7031
2288

Pay to the order of Women's Network P.A.C. \$ 50.00
Fifty and 00/100 Dollars

Dollar Dry Dock
Savings Bank

Memo: Isse Jackson Campaign Donation
⑆226070319⑆ 831033273 ⑆ 2312

RONALD R. EVANS
175 WEST 92ND ST.
NEW YORK, NY 10025

520

PAY TO THE ORDER OF Women's Network P.A.C. 4/11 1984 \$ 100.00
One hundred dollars and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
80 West 30th Street, New York, N.Y. 10001

Memo: Isse Jackson Campaign Donation
⑆021000306⑆ 10640521075⑆ 65 0520

CONSTANCE JACKSON COLLINS
GREGORY L. COLLINS
135 EASTERN PARKWAY, APT. 7C
BROOKLYN, NY 11238

612

PAY TO THE ORDER OF Women's Network 2 April 1984 \$ 200.00
Two hundred and 00/100 DOLLARS

Citibank, N.A.
399 Park Avenue
New York, N.Y.
10022

CITIBANK

Memo: Donation Constance Jackson Coll
⑆021000089⑆ 022 27915606⑆ 0612

LOMIC CONTRACTING
CONSULTANTS, ASSOCIATES
112 WEST 120 STREET
NEW YORK, NY 10027

138

PAY TO THE ORDER OF Women's Network Apr. 2 1984 \$ 400.00
Four Hundred Dollars and 00/100 DOLLARS

Union Trust

UNION TRUST COMPANY
GREENWICH OFFICE
GREENWICH, CONNECTICUT 06830

Memo: Donation L. Child
⑆021010108⑆ ⑆ 249 723⑆ 0138

8 9 0 4 0 7 6 0 8 3 8

99040760839

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 7398870

March 29, 84

Pay to the Order of Women's Network PAC

CHEMICAL BANK **200000** CTS

Address Janet Nichols for President Signature Richard Greene

⑈7398870⑈ ⑆021000128⑆ 000=777048⑈

PERSONAL MONEY ORDER

DATE 3/30 19 84

1-12
210

No. 3451259

PAY TO THE ORDER OF Women's Network

PAY

122 NATWEST BANK USA **\$200**

National Westminster Bank USA
NEW YORK, N.Y.
NOT VALID OVER \$1,000.00

Signature Janet C. Nichols
ADDRESS 736 Eastern Parkway
CITY Brooklyn, N.Y. 11213 STATE

2 tickets for 4/2/84

⑈3451259⑈ ⑆021000322⑆ 001 ? 0002 5⑈

CHEMICAL BANK
55 Water Street
New York, N.Y. 10041

Personal Money Order
Not Valid Over \$1,000.00

1-12
210

No. 6832509

March 30 1984

Pay to the Order of Women's Network PAC

CHEMICAL BANK **200000** CTS

Address 191-18 Mordock Ave ST Albans NY 11412 Signature Sondia Sneed

⑈6832509⑈ ⑆021000128⑆ 000=777048⑈

J. Y. FIELD, ESQ.

3/28 1984

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200

Two hundred DOLLARS

The Chase Manhattan Bank, N.A.
125 Canal St., N.Y., N.Y. 10038

J. Y. Field

⑆021000021⑆ 222 1 028418 0662

DUDLEY A. HALL

NUMBER 215

4/2 1984

TO THE ORDER OF Women's Network P.A.C. \$ 200

Two hundred DOLLARS

BARCLAYS BANK OF NEW YORK
220 Nassau Street, New York, N.Y. 10038

Jane Jackson Res. Corp. *Dudley Hall*

⑆026008523⑆ 71-55994217⑆ 0215

CHECK IS IN PAYMENT OF FOLLOWING ITEMS	
DATE	AMOUNT

STANLEY W. GORDON
799 PARK AVENUE
NEW YORK, NY 10021

6160

APR 31 1984 1-12 215

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200

Two hundred and 00/100 DOLLARS

CHEMICAL BANK
1011 Broadway
New York, N.Y. 10018

Stanley W. Gordon

⑆006160⑆ ⑆021000128⑆ 027⑆ 318723⑆

39040760840

89040760841

NANA NEAL
101-125 W. 147TH ST.
NEW YORK, NY 10038

177

APR 14 1984

PAY TO THE ORDER OF Women's Network P.A.C. \$ 100.00

One Hundred ⁰⁰/₁₀₀ DOLLARS

THE BOWERY.
THE BOWERY SAVINGS BANK
100 WEST 117 STREET AT 117TH AVENUE, NEW YORK, N.Y. 10028

Jessie Jackson Campaign Joan [Signature]

⑆26070115⑆058 501240 4⑆0177

Sponsor J. B. Mitchell

CALVIN E. JOHNSON
135 E. 95TH ST.
NEW YORK, NY 10022

579

3/30 84

PAY TO THE ORDER OF Women's Network \$ 200.00

Two Hundred ⁰⁰/₁₀₀ DOLLARS

Bank Leumi
TRUST COMPANY OF NEW YORK
100 Broadway, New York, N.Y. 10038

Jessie Jackson Campaign [Signature]

⑆026002794⑆21006482⑆06 0579

JOEL PRENDERGAST MARTIN
300 EAST 75TH STREET
NEW YORK, NY 10021

3-28 84 2307

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200.00

Two Hundred ⁰⁰/₁₀₀ Dollars

CHEMICAL BANK
100 Park Avenue
New York, N.Y. 10017

2 tickets Joel Martin

⑆021000128⑆019⑆570686⑆2307

8 9 0 4 0 7 6 0 8 4 2

600 West 130th Street
New York, NY 10031
(212) 862-8047

NAME (PLEASE PRINT)	ADDRESS	AMOUNT OF CHECK	COMMITTEE SPONSOR
✓ FAUCHER, MIK	1674 B'WAY SUITE N.Y.C. 10019 200	\$ 120.00	<i>Liberta Fluck</i>
✓ DARBY, REGINA	394 BROADWAY N.Y.C. 10013		
✓ GONSON, JOHNNIE (Attorney)	243 EAST 4th ST. N.Y.C. 10009	\$ 100.00	M.A. TERRY
✓ BURNS, W. HAYWOOD	205-27 104 ST. HOLLIS N.Y. 11412	\$ 100.00	M.A. TERRY
✓ DAVIS, RENE (computer Dir.)	48-50 37th ST. #7U. SUNNYSIDE, NY 11101	\$ 100.00	
✓ CAMPBELL, VIVIAN (Dr.)	145 EAST 49th ST NYC 10017	\$ 200.00	M.A. TERRY
✓ BRUNNIT, HOUSTON, N.D.	111 HICK ST. BRKLYN, 11201	\$ 200.00	
✓ HANBY, MICHAEL	870 6th Av NYC 10001	\$ 200.00	REGINA DARBY
✓ C. KNOX ASSISTED III	354 West End Av. NYC 10024	\$ 250.00	BILL PITMAN
✓ JACK L. WILKS (Publisher)	2391 Webb Ave. #1B Bronx, 10468	\$ 100.00	"
✓ MARY P. WILKS	BRONX	\$ 200.00	"
✓ JACK E. SMITH	363 7th AVE. N.Y.C. 10001	\$ 200.00	"
✓ LUTHER W. SEABROOK (Dist. 30711)			
✓ MAIRIANN A. SEABROOK (Worlen)			
✓ WALLACE JOHNSTON CONSULTING ENGINEERS			

1770
250
1520

1770
1250
520

1520
520

1770

89040760843

JACK E. SMITH
FORDHAM HILL APTS.
2391 WEBB AVE., APT. 17B
BRONX, NY 10468

913

3-10 1984

13210

Pay to the order of Women's Network P.A.C. For Jesse Jackson \$ 100.00
ONE-Hundred Dollars Dollars

 The Chase Manhattan Bank, N.A.
67 York Avenue, New York, N.Y. 10022

Campaign Contribution
⑆021000021⑆ 240 0 071870⑆ 0913

Jack E. Smith

LUTHER W. SEABROOK
MARIANNE R. SEABROOK

673

7/26 1984

1-2/210/078

Pay to the order of Women's Network P.A.C. \$ 200.00
two hundred + 00/100 DOLLARS

 The Chase Manhattan Bank, N.A.
67 York Avenue & 125th Street
New York, N.Y. 10022

Donation
⑆021000021⑆ 078 1 048699⑆ 0673

Luther W Seabrook

89040760844

467
1-7082/2260

REGINA L. DARBY
205-27 104th Ave.
Holts, N.Y. 11912

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200.00
Two hundred ^{xx}/₁₀₀ DOLLARS

AMERICAN SAVINGS BANK
230 BROADWAY
NEW YORK, N.Y. 10003

Jesse Jackson Campaign Regina L. Darby

⑆226070623⑆ 003841643 7# 0640

2648
1-26/210

JOHNNIE M. GOLSON

Mar 20 1984

PAY TO THE ORDER OF Women's Network P.A.C. \$ 200.00
Two hundred - and 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
50 West 60th Street, New York, N.Y. 10020

FOR J. Jackson Johnnie M. Golson

⑆021000306⑆ 1064056377065 2648

386
1-12/210

W. HAYWOOD BURNS
243 E. 7TH ST.
NEW YORK, NY 10003

March 21 1984

PAY TO THE ORDER OF Women's Network for Political-Economic Parity \$ 100.00
One Hundred and 00/100 DOLLARS

CHEMICAL BANK
130TH ST & CONVENT AVE. NEW YORK, N.Y. 10034

Political Contribution W. Haywood Burns

⑆021000128⑆ 056-202490# 0386

114
1-7071/2260

RENEE DAVIS
205-27 104th Ave.
Holts, N.Y. 11912

3/21 1984

Pay to the order of The Women's Network PAC \$ 100.00
One hundred dollars & 00/100 DOLLARS

The Manhattan Savings Bank
345 MADISON AVE. NEW YORK, NY 10017
MANHATTAN INSURED MONEY MARKET ACCOUNT

Contribution Jesse Jackson Campaign Renee Davis

⑆226070717⑆ 011103126 4# 0114

878
1-7082/2260

VIVIAN CAMPBELL
46-49 37 STREET 7U
SUNNYSIDE, NY 11104

3/21 1984

PAY TO THE ORDER OF Women's Network - PAC \$ 100.00
One hundred DOLLARS

Jesse Jackson Campaign

The City of Manhattan Bank, N.A.
140 Broadway
New York, N.Y. 10038

For Contributions to Jesse Jackson Campaign

Chapter 100-100-100
 Cash on Hand
 Total of Checks
 Less: A. Discount
 Less: Other Deductions
 Amount of Cash



March 21 19 84

446 7-01/83

PAY TO THE ORDER OF Women's Network P.A.C. \$ 120.00/100
One Hundred and Twenty 00/100 DOLLARS

MERCANTILE SAFE DEPOSIT & TRUST COMPANY
 700 SECURITY BLVD.
 BALTIMORE, MARYLAND 21201

[Signature]

⑆00000446⑆ ⑆052000618⑆ ⑆614872 7⑆

89040760845

C. KNOX LABISTER III
 870 AVENUE OF THE AMERICAS
 NEW YORK, NY 10001

24 March 84 602 1-10/210

PAY TO THE ORDER OF Women's Network PAC \$ 200.00/100
Two Hundred Dollars — 00/100

BNB European American Bank
 & TRUST COMPANY
 70-00 HUNTER AVE., JAMAICA, N.Y. 11432

MEMO Donation Contribution *[Signature]*
 ⑆0200486⑆ 050-11248 ⑆ 0602

JACK L. WILLIS
 MARY P. WILLIS
 364 WEST END AVENUE
 NEW YORK, NY 10024

2/16 19 84 1868 1-12/210

PAY TO THE ORDER OF WOMENS NETWORK P.A.C. \$ 250.00
Two hundred fifty 00/100 DOLLARS

CHEMICAL BANK
 1501 BROADWAY, NEW YORK, N. Y. 10036

MEMO WESTSIDE Chemical Bank *[Signature]*
 ⑆02000128⑆ 004-217802⑆ 1868

SCHEDULE A

ITEMIZED RECEIPTS

Page _____ of _____ for
 LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)
Women's Network for Political + Economic Parity

A. Full Name, Mailing Address and ZIP Code <i>Carter Community Health Arts Pkwy 97-04 Sutphin Blvd. Jamaica, N.Y. 11435</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 250 ⁰⁰
	Occupation	3/27/84	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

B. Full Name, Mailing Address and ZIP Code <i>J. Grand Reed</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 300 ⁰⁰
	Occupation	4/2/84	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

C. Full Name, Mailing Address and ZIP Code <i>Lodema V. Stephens M.D.</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 400 ⁰⁰
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

D. Full Name, Mailing Address and ZIP Code <i>Melvin Wolynsky, atty. 18-34 College Pt. Blvd. N.Y. 11356</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 400 ⁰⁰
	Occupation	3/23/84	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

E. Full Name, Mailing Address and ZIP Code <i>Lionel C. Wald Somic Contracting Consultants 112 W. 120th St. N.Y.C. 10027</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 400 ⁰⁰
	Occupation	4/2/84	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

F. Full Name, Mailing Address and ZIP Code <i>Jack L. + Mary P. Hillis 354 West End Ave. N.Y.C. 10024</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 250 ⁰⁰
	Occupation	2/16/84	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

G. Full Name, Mailing Address and ZIP Code <i>Georgette Adrienne Lopez 95 W. 95th St. N.Y.C. 10025</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 300 ⁰⁰
	Occupation	3/27/84	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

99040760847

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

Name of Committee (in Full)
Women's Network for Political & Economic Parity

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Pat E. Flowers 215 Commonwealth Ave Mt Vernon, N.Y. 10552			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
B. Full Name, Mailing Address and ZIP Code Herbert L. Wright		4/2/84	400 ⁰⁰
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code Alice Jaye Wattleton 64 Jordan Ave. New Rochelle, N.Y. 10804		4/2/84	400 ⁰⁰
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code Walter Carter P.O. Box 3084 Ft. Worth, Texas 76105		4/2/84	400 ⁰⁰
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code Stanley J. West, M.D. 1049 Park Ave. N.Y.C. 10028		4/2/84	400 ⁰⁰
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Doctor	Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code Grey Pollards c/o Royal Bank of Canada Georgetown, Grand Cayman Cayman Is. N. I.		4/2/84	300 ⁰⁰
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code Margaret Vlastar Rockefeller Center Sta. P.O. P.O. Box 1192 N.Y.C. 10185		4/2/84	400 ⁰⁰
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

89040760848

REPORT OF RECEIPTS AND DISBURSEMENTS
 Federal Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Women's Network for
 Political and Economic
 Parity

Address (Number and Street)

609 W. 138th St.

City, State and ZIP Code

N.Y.C., 10031

Check here if address is different than previously reported.

2. FEC Identification Number

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 October 15 Quarterly Report

July 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

SUMMARY

5. Covering Period 2/16/84 through 4/3/84

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 Line 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)		\$ 0
6(b)	\$ 0	
6(c)	\$ 25,360	\$
6(d)	\$ 25,360	\$
7	\$ 25,360	\$
8	\$ 0	\$
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.

Dorothy Pitman Hughes
 Type or Print Name of Treasurer

Dorothy Pitman Hughes 7/5/84
 SIGNATURE OF TREASURER Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4088

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 3s are obsolete and should no longer be used.

--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

89040760849

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

Name of Committee (In Full)

**Women's Network for Political and Economic
Parity**

Report Covering the Period

From: **2/16/84** To: **4/3/84**

**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	25,360	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))	25,360	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)	25,360	18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	\$ 25,360	21
22. INDEPENDENT EXPENDITURES (use Schedule E)		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 e(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)	25,360	28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	25,360	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	25,360	31
32. TOTAL OPERATING EXPENDITURES from Line 19	25,360	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	25,360	34

39040760850

back

cover

Stars for Jackson Committee

Dr. Theima Adair
Roberto Adorno
William Aiken
Florence Anthony
Nick Ashford
John Atchinson
Travis Bell
Felicia Bentine
Pam Brennan
Deletha Brown
Marguerite Brown
Dr. Houston Brummit
Tony Casellas
Kathryn Cheneault
Bill Cherry
Michelle Clark
Mildred J. Clark, M.D.
Kildare I. Clarke, M.D., J.D.
Carol Conover
Harry Cooley
Philip C. Cox
Frankie Crucker
Dr. Mary Crosby
Norma Jean Darden
Andrea Darrell
Harold Dow
Bill Eaton
George Faison
Kuk Fancher
Joy Farrell
Johnnie Gibson
Matti Goodman
Stan Gordon
Louis Gussett, Jr.

Kevin C. Greenidge, M.D.
Candy Hamilton
Joan Hamilton
Michael J. Handy
Jennifer Harris, M.D.
Joyce Hartsfield, Esq.
Jessica Hawkins-Greenidge
Linda Haynes
Theda Palmer Head
Eddie Heath
LaQuita Henry
Patricia M. Hinds
Sandra Hochman
Patricia L. Ivins, Esq.
Howard Johnson
Dr. Billy E. Jones
Steven L. Jones
Jack M. Jordan
Flo Kennedy
Joe Kennedy
Vincent Kenyon
Don King
Bill Kochiyama
Yuri Kochiyama
Pam LaBelle
Denise LaMonte
Kathleen Wye Lane
C. Knox LaSister III, Esq.
Ruth Sanchez Lavetta
Bob Law
Ida Lewis
L.H. Lloyd
Ralph MacDonald
Dr. Jim Malone

Dr. Rubie Malone
Vernon C. Manley
Lena Tipton Meyers
Kendall Minter
J. R. Mitchell
Harriet Morgan
Mtume
Maxine Page
Dr. Al Pinkney
Patrice Pinman
Joseph Plaskett
Lloyd Price
Jonelle Procope
Del Robinson
Mannel Rodriguez, Esq.
Dr. Luther Sealbrook
Michele Shay
Valene Simpson
Donald Smart
Raymond Sussman, Esq.
M. A. Terry
T. C. Thompkins
Valhal Pub
Roy Vaughn
Connie Waters
Jim Walker
Lee Wallace
Ruby Weston
Rev. B. J. Whipple, Jr.
Gladys Williams
Terrie M. Williams
Ron Wolfe
Peter Wong, M.D.
Peter Zuckler, Esq.

★ ★ ★
The Stars
Come Out
For
Jesse Jackson

★ ★ ★

inside:
left and right flap.

EVENING'S FEATURED GUESTS

MASTER OF CEREMONIES
Howard E. Rollins, Jr.

Roberta Flack
IN A SPECIAL PERFORMANCE

"DREAMGIRL."
Sheryl Lee Ralph

"TAP DANCE KID" STARS
Alfonso Ribeiro
Hinton Battle

Marilyn Goodman,
MOTHER OF LT. ROBERT GOODMAN,
WILL PAY TRIBUTE TO REV. JACKSON

OPEN BAR AND BUFFET DINNER

YOU ARE CORDIALLY INVITED TO MEET REV. JESSE JACKSON
AT A FUNDRAISER ON THE EVE OF THE NEW YORK DEMOCRATIC
PRESIDENTIAL PRIMARY

MONDAY, APRIL 2, 1984

5:30 TO 8:30 P.M.

AT

TAVERN ON THE GREEN
CENTRAL PARK WEST AT 67TH STREET

BILL COSBY
HONORARY CHAIRPERSON

ROBERTA FLACK SUSAN L. TAYLOR
CO-CHAIRPERSON CO-CHAIRPERSON

DRESS: BLACK TIE (OPTIONAL)

PLEASE RSVP BY MARCH 28:
862-6047

SPONSOR • \$1,000 PATRON • \$200 SUPPORTER \$100

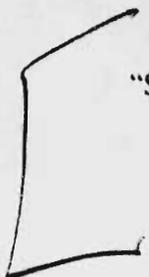
*INCLUDES PRIVATE PARTY HOSTED BY ROBERTA FLACK, 9 P.M.

PLEASE MAKE CHECKS PAYABLE TO
JESSE JACKSON FOR PRESIDENT COMMITTEE

7 5 8 0 9 2 0 4 0 6
TICKETS PURCHASED AT THE DOOR
PAYABLE ONLY BY CERTIFIED CHECK OR MONEY ORDER

envelope for response card

89040760853



"Stars For Jesse Jackson Committee"
394 Broadway-6th Floor
New York, New York 10013



emphasis
added by
me.



response card

**The Stars For Jesse Jackson Committee
Gala Celebration and Fundraiser
Monday, April 2, 1984**

I CANNOT ATTEND BUT ENCLOSE MY CONTRIBUTION OF \$ _____

NAME _____ TELEPHONE _____

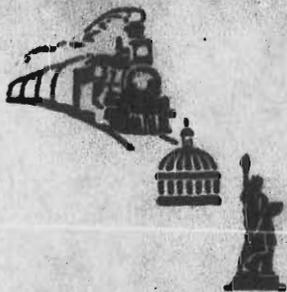
ADDRESS _____

PLEASE MAKE CHECKS PAYABLE TO: JESSE JACKSON FOR PRESIDENT COMMITTEE
394 BROADWAY—6TH FLOOR NEW YORK, NEW YORK 10013

PLEASE CONFIRM RESERVATIONS BY PHONE: (212) 862-6047

3
5
6
7
0
4
0
4
0
0
3

7



WNPEP

Women's Network for Political and Economic Parity

609 West 138th Street
New York, NY 10031
(212) 862-6047

18 November 1983

Mario Cooper
Scheduling
Jesse Jackson for President Committee
2100 M Street N.W.
Suite 316
Washington, D.C. 20036

Dear Mr. Cooper:

We are formally requesting a date in January or February 1984 for Rev. Jackson to appear at a fundraising event at Tavern on the Green, located in Central Park, New York City, sponsored by the WestSide Committee to Elect Rev. Jesse Jackson and the Women's Network for Political and Economic Parity (WNPEP). Total proceeds will benefit the Jackson Campaign.

The WestSide Committee is made up of fifteen (15) West Side organizations and several individuals, representing a Rainbow Coalition of men and women, Blacks, Whites, Jews, Asians and Latinos.

The Committee wishes to complete the arrangements with Tavern on the Green by the 10th December 1983.

We look forward to hearing from you soon.

Sincerely,

Dorothy P. Hughes, Founder and President
(for) Women's Network for Political and Economic Parity

DPH/MG-C

Ed. 11.1 20

89040760855

ALICE NELSON
LESLIE NELSON

No. 450

#101
 Name of Contributor Francis -11/6/68 L.
 Address 261 West 131 St. N.Y. Zip Code _____
 Occupation Self-Employed
 Business/Employer _____
 Business Address _____

INDIVIDUAL CONTRIBUTOR'S CARD

No. 345

#100 C/ries Leonard
 Name of Contributor _____
 Address 120-22 Dyckman Loop Bklyn N.Y. Zip Code 10475
 Occupation Insurance - Self-Employed
 Business/Employer _____
 Business Address Same address

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

#100 Nelson Alice D.
 Name of Contributor _____
 Address 123 Brown Place Bklyn N.Y. Zip Code 10475
 Occupation Actress - Teacher
 Business/Employer St. of Education
 Business Address 110 Livingston St. Bklyn, N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 343
Special Committee Member

SEE TERRY AT DOOR
 #100 Nelson Leslie A.
 Name of Contributor _____
 Address 123 Brown Place Bklyn, N.Y. Zip Code 10475
 Occupation Production Assistant
 Business/Employer WNEW-TV Channel 5
 Business Address 205 East 67th St N.Y. 10021

INDIVIDUAL CONTRIBUTOR'S CARD

No. 30857 - Committee Member

#100 Mrs. Lloyd Nathaniel (Reverend)
 Name of Contributor _____
 Address 311 Edgmont Ave. Mt. Vernon N.Y. Zip Code _____
 Occupation Pastor
 Business/Employer Trinity Baptist Church
 Business Address 224th St. Same Ave. N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 327
328

CASH

89040760856

INDIVIDUAL CONTRIBUTOR'S CARD

No. 237

Name of Contributor #100 Dittig ✓
(last) U. Dittig ✓
(first)

Address 27 Claremont Ave. NYC Zip Code 10550

Occupation Supervisor - Special Education

Business/Employer U. of St. John's

Business Address 100 Livingston St. Albany, N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

CASH -

No. 238

Name of Contributor #100 Fischer ✓
(last) Hope ✓
(first)

Address 110 West End Ave NYC Zip Code 10022

Occupation Secretary

Business/Employer Fashion Institute of Technology

Business Address 227 West 27th St. NYC Zip Code 10001

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 329
330

Name of Contributor #100 DITTO ✓
(last) Levin ✓
(first)

Address 750 Park Ave Zip Code _____

Occupation Music Publisher

Business/Employer _____

Business Address Same address

INDIVIDUAL CONTRIBUTOR'S CARD

No. 410

Name of Contributor #100 Young ✓
(last) Indien ✓
(first)

Address 14 West End Ave. NYC Zip Code 10022

Occupation Secretary - Self-employed

Business/Employer Mr. Cantor

Business Address 575 5th Ave NYC

INDIVIDUAL CONTRIBUTOR'S CARD

CASH

No. 34

Name of Contributor #100 Jackson ✓
(last) Davis ✓
(first)

Address 300 E. 4th St NYC Zip Code _____

Occupation Public Relations

Business/Employer NY Eye, Ear, Nose & Throat Hosp.

Business Address 300 E. 4th St NYC

89040760857

#100
 Name of Contributor Disunke, Stephen ✓
 Address 700 Columbus Ave NYC Zip Code _____
 Occupation Receptionist
 Business/Employer London House Publishers
 Business Address 201 E. 57th St.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 401

#104
 Name of Contributor Morton, Robert ✓
 Address 39 Hampton Court New Rochelle Zip Code 10805
 Occupation Asst. Buyer
 Business/Employer Harrold's
 Business Address 1000 3rd Ave N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 402

#100
 Name of Contributor Williams, Jeff ✓
 Address 3426 Baker Ave. 3x, N.Y. Zip Code _____
 Occupation Pharmacist
 Business/Employer Embassy - Williams Pharmacy
 Business Address 143rd St. & 7th Ave. N.Y.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 334

#100
 Name of Contributor deLoach, William ✓
 Address 10-49 Kichman Plaza 3x Zip Code 10453
 Occupation Retired
 Business/Employer _____
 Business Address _____

INDIVIDUAL CONTRIBUTOR'S CARD

No. _____

Name of Contributor _____
 Address _____ Zip Code _____
 Occupation _____
 Business/Employer _____
 Business Address _____

89040760858

No. 33

Name of Contributor 1100 ANNIE SHERIDAN ✓
(last) (first) (initial)

Address 303 WEST 114th STREET Zip Code 10023

Occupation PUBLIC HEALTH NUTRITIONIST

Business/Employer ALBERT EINSTEIN COLLEGE OF MEDICINE

Business Address 175 MADISON AVE. BR. BLDG. N.Y. 10017

INDIVIDUAL CONTRIBUTOR'S CARD

No. 337

Name of Contributor 110 VAN ANSON GEORGE ✓
(last) (first) (initial)

Address 230 WEST 76th St. 79D Zip Code 10023
(last) (first) (initial)

Occupation INVESTMENT BANKER
(last) (first) (initial)

Business/Employer GOLDMAN SACHS CO.

Business Address 85 BROAD ST. NEW YORK, N.Y. 10004

INDIVIDUAL CONTRIBUTOR'S CARD

No. 333

Name of Contributor 101 CHEN, LORI ✓
(last) (first) (initial)

Address 421 Remsen Avenue Bklyn, NY Zip Code 11212
(last) (first) (initial)

Occupation Engineer

Business/Employer Turner Construction Co.

Business Address 1633 3rd Ave. N.Y.C.

INDIVIDUAL CONTRIBUTOR'S CARD

No. 331

Name of Contributor 1100 DITTO ✓
(last) (first) (initial)

Address 53rd Street 72nd St Zip Code 10019
(last) (first) (initial)

Occupation Lawyer

Business/Employer _____

Business Address _____

INDIVIDUAL CONTRIBUTOR'S CARD

No. 330

Name of Contributor 1100 Nelson William ✓
(last) (first) (initial)

Address 1213 Brown Ave Bklyn Zip Code 10017
(last) (first) (initial)

Occupation Student

Business/Employer _____

Business Address _____

89040760859

89040760860

	<u>3/30</u>	<u>Pa'd</u>	<u>For</u>
	John W. Hall	\$200	2 - \$100
	George L. Vandusen	\$100	1 - \$100
	Sigrid Larson	\$100	1 - \$100
	Edith E. Boatwright	\$200	2 - \$100
	Ophelia Dismuke	\$100	1 - \$100
	Doris Johnson	\$100	1 - \$100
	Jeff Williams	\$100	1 - \$100
	Roberta Norton	\$100	1 - \$100
	Alfred L. Francis	\$100	1 - \$100
Rec. # 5247	- Reverend Nathaniel Knight - CASH	\$200	2 - \$100
Rec. # 5248	- Mr. Andrew Young - CASH	\$100	1 - \$100
	William de Bondie	\$100	1 - \$100

At Door - 4/2

	Yvonne Young	\$200	2 - \$100
	Hoye Fisher	\$100	1 - \$100
Rec. # 5245	- Len Jones - CASH	\$100	1 - \$100

Ad in - 3/27

	Marion Rodgers	\$200	2 - \$100
	Anthony Nelson	\$100	1 - \$100

\$2,200 total

Tickets sold by Alice de. Nelson
+ Leslie Ann Nelson

Ad 3/27 ALICE NELSON
Ad 3/30 LESLIE NELSON

patrons sold +
over \$100.
patrons sold over
\$1000 + 10
with

89040760861

Paid in	Date	Name	Price	For
332	3/30	John W. Hall	\$200	2 - \$100
333		George L. VanLanzen	\$100	1 - \$100
337		Sigrid Larson	\$100	1 - \$100
336		Fred E. Boatwright	\$200	2 - \$100
339		Opheelia Dismuke	\$100	1 - \$100
330		Doris Johnson	\$100	1 - \$100
403		Jeff Williams	\$100	1 - \$100
346		Roberta Norton	\$100	1 - \$100
402		Alfred L. Francis	\$100	1 - \$100
401		Reverend Nathaniel Boyd	\$200	2 - \$100
400		Mr. Andrew Young	\$100	1 - \$100
327		William deLoach	\$100	1 - \$100
328				

Ek. b. 1

Paid in	Date	Name	Price	For
21	4/2	Yvonne Young	\$200	2 - \$100
337		Hoye Fisher	\$100	1 - \$100
340		Len Jones	\$100	1 - \$100

Paid in	Date	Name	Price	For
331	3/27	Marion Rodgers	\$200	2 - \$100
335		Anthony Nelson	\$100	1 - \$100

\$2,200 total

Tickets sold by Alice de. Nelson
+ Leslie Ann Nelson

PA 3/27 ALICE NELSON
PA 3/30 LESLIE NELSON

patrons sold +100
over \$1000
patrons sold over
\$1000 +100
with

✓ 30 ✓

Joy Farrell Unpaid
Laguna \$100 & \$1000

✓ 31 ✓

✓ 32 -

Audrey Martin \$200

✓ 33 ✓

Denise

- 34 -

✓ 35 -

Denise

✓ 36-40 -

Denise

✓ 42 -

Dr. Billy Jones 200

✓ 43-4 ✓

William Aiken

✓ 45 -

Dr. Helen Russell \$100 & 1000

unpaid ✓ 46-7 -

Randall 46 (47 to be returned)

unpaid ✓ 48-50 -

Harriet Morgan

unpaid ✓ 51 -

Jonelle Procope

~~unpaid ✓ 52-54~~

unpaid ✓ 52-56

Jonelle Procope

✓ 57

Randall Martin

unpaid ✓ 58-9

Randall Martin (to be returned)

✓ 60

Ed Lloyd

unpaid ✓ 61-64

Ed Lloyd

paid 65

Kathy Chesnut

66

Ken Chesnut

67

Kathy Chesnut

68

Regina

~~69~~

unpaid 69

Joy Farrell

unpaid 70-71

Joy Farrell

72

Carl McCall

Joy Farrell

unpaid 72-73

Michelle (to be returned)

Michelle (returned)

264-8 *fol*

D. Leonard
Diane Lamonte

✓ 269-276

Harriet Morgan

277-282

Josephine Lopez

paid 284

Annalena

Bary Swanson

paid 285

Bary Swanson Obit

286

Louise West

287

Marcelith Simons

288

Joanne David

✓ 289-30

Kathleen A

291

292

Sydney Street

293

Charles Wilson

294

Mr. Al Cove

295

Miss Al Cove

paid 296-319

Kathy Chasault

320-2 3

Jean Logan Perry

~~321-2~~

323-6

Michele Clark

202

Converted to \$200

Diane Lamonte

Kathy Chasault

323 354-6 496-8

Kathy Chasault

1957 264

✓ Leon Merrick

paid 262

Herbert Brown

paid 263

Bob Rhone

TICKETS AT DOOR - PAID

* Joyce Hamer	R.L.D.	- Check
* Thomas Watkins	R.L.D.	- Check
* Vernon Manley	R.L.D.	- Check
* Calvin Johnson	R.L.D.	- Check
Robert T. Flynn	Kathleen Chenault	- Check
Patricia Wilson	Kathleen Chenault	- Check
Stephen Perry	Kathleen Chenault	- 2-100 Check
O.P Sherwood	Kathleen Chenault	} 3-100 Check
Ruby Sherwood	Kathleen Chenault	
O.P./Ruby Sherwood	Kathleen Chenault	
Ernie Moy	Kathleen Chenault	- M.O.
Jean Knutter	Kathleen Chenault	- M.O.
Leila Hardison	Marilyn Goodman	- Check
Shirley Ruiz	Marilyn Goodman	- Check
Martin Goodman	Marilyn Goodman	- Check

39040760864

①

COMPLIMENTARY AT DOOR

Melba Tolliver - 200

Angelo Del Torro - 200

Arthur Eave - 200

Minister Farakkan - 200

6 members of the Jesse Jackson Washington Headquarters

89040760865

TICKET AT DOOR - UNPAID

Dr. Hazel Wood	2-100
Mrs. Ray Baretto	1-100

39040760866

4/2/84

Paid List

Eileen Frank

- 1. Jackie Mc Cleure 1- 100
- 2. Mae Mc Cleure 1- 100
- 3. Ed Meyers 2- 100

- 4. Carol Jenkins #497
 - 5. Gus Hennings 297
 - 6. Elizabeth Jenkins 301
- } Kathy gave them \$100 tickets. They paid for 200. Make sure they are one \$200 list

- 7. Robin Carter \$200
- 8. Kevin Greenidge \$200 -pd.
- 9. Anthony Green \$200

89040760867

Michael J. Handy 3/30/34

tickets sold -

✓ Mr. Walter Robinson	(2)	\$200	tickets = \$400
✓ Mrs. Sarah Eady	(2)	\$100	tickets = \$200
✓ Mr. Ken Thompson	(1)	\$100	ticket = \$100
✓ Mrs. Hazel West	(1)	\$100	ticket = \$100
✓ Mrs. Gloria Saunders	(1)	\$100	ticket = \$100
✓ Mr. William Blanding	(1)	\$100	ticket = \$100
✓ Mrs. Paulette Caldwell	(1)	\$200	ticket = \$200
* Mrs. Edna Wells/Handy	(1)	\$100	ticket = \$100
			<hr/> \$1300

#406

216

215

** Mr. Dwight Greene (committed - not paid) (1) \$200 ticket

* ticket converted from \$100 to \$200 by virtue of over \$1000 in sales.

89040746085#8

Michael J. Handy 3/30/84

tickets sold -

	Mr. Walter Robinson	(2)	\$200	tickets = \$400
	Ms. Sarah Eady	(2)	\$100	tickets = \$200
#406	Mr. Ken Thompson	(1)	\$100	ticket = \$100
	Ms. Hazel West	(1)	\$100	ticket = \$100
	Ms. Gloria Saunders	(1)	\$100	ticket = \$100
	Mr. William Blanking	(1)	\$100	ticket = \$100
	Ms. Paulette Caldwell	(1)	\$200	ticket = \$200
#216	* Mrs. Edna Wells/Handy	(1)	\$100	ticket = \$100
				<u>\$1300</u>

#215 ** Mr. Dwight Greene (committed - not paid) (1) \$200 ticket

* ticket converted from \$100 to \$200 by virtue of over \$1000 in sales.

R D

4/2/84

79	Bertram Lee	1 - 200. ⁰⁰	Door
80	Robin Bell	1 - 200. ⁰⁰	Door
81	Eae Mitchell	5 - 100. ⁰⁰	Door
82	Unifred Hamilton	1 - 200. ⁰⁰	Door
83	Simone Thompson	1 - 100. ⁰⁰	Door

84	Judy Brown	3 - 100	Door
85	Nearis Hamilton	1 - 100	Door
86	Kipling Chas	1 - 100	Door
87	Chuck Jennings	1 - 100	Door
88	Will Warrington	1 - 100	Door
89	Jan Eatman	1 - 200	Door

90	Ed Pette	1 - 200	Door
91	James Haskins	1 - 100	Door

~~Bank of America 32-2655~~

92	Ali Niala	1 - 200	Door
93	Mohammed Helal	1 - 200	"
94	Mattar Taha	1 - 200	"
95	Naif Hamdan	1 - 200	"
96	Dr. Robert Cohen	1 - 100	" 662-7357

97	Louise Hay	1 - 100	"
98	Margaret Hayes	1 - 100	"

99	Genevieve Harker	1 - 200	"
----	------------------	---------	---

89040760870

89040760871

SNELLIE H. DART, JR. 474
 March 27 1984 113202
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 100.00
one hundred and 00/100 DOLLARS
 Citibank, N.A. Private CITIBANK
 300 Park Avenue, New York, N.Y. 10022
 SNELLIE H. DART, JR.
 @021000089: 400 37394226# 0474

✓ Chenault
1 ticket at
\$100
ticket # 310

KENNETH I. CHENAULT 2879
 KATHRYN C. CHENAULT
 476 ESPLANADE
 PELHAM MANOR, NY 10980
 March 27 84 1-9/210/288
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 200.00
Two Hundred and 00/100 DOLLARS
 Citibank, N.A. Private CITIBANK
 Citicorp Center, 300 N. Zeeb St., New York, N.Y. 10022
 Martin Jackson Kathryn C. Chenault
 @021000089: 400 37253773# 2879

✓ Chenault
2 tickets @
\$200 each
\$400
ticket # 66+67

EDWARD R. DUBLEY, JR. 229
 GEORGETTE ADELMINE LOPEZ
 88 WEST 69TH ST.
 NEW YORK, NY 10025
 27 Mar 1984 1-12/28
 PAY TO THE ORDER OF Women's Network P.E.P. \$ 300.00
Three Hundred and 00/100 DOLLARS
 Citibank, N.A. Private CITIBANK
 Citicorp Center, 700 Columbus Avenue, New York, N.Y. 10025
 donation Jess Jackson G. Lopez
 @021000089: 126 19870727# 0229

✓ Chenault
3 tickets
at \$100
ticket #s
306, 307 + 308

LUCILLE MAILLARD 1783
 26 March 1984 1-30/210
 The Women's Network \$ 100.00
one hundred and 00/100 DOLLARS
 MANUFACTURERS HANOVER TRUST COMPANY
 481 Eighth Avenue, New York, N.Y. 10022
 Jess Jackson Credit Lucille Maillard
 @021000306: 10040280943# 65 1783

✓

89040760872

NORMA ELISE SHIRLEY
60TH ST., 415
NY, NY 10020

3/27/84

PAY TO THE ORDER OF Women's Network PAC \$ 100.00

One hundred ~~40~~ ~~20~~ DOLLARS

CHEMICAL BANK
200 CALVERT STREET, NEW YORK, N.Y. 10002

Norma Shirley

⑆021000128⑆ 085-568953⑆ 1469

MICHELLE SHAY LEWIS
40 W. 80TH STREET
NEW YORK, NY 10024

March 25 1984 181

1-13/280

Women's Network PAC \$ 100.00

Two hundred dollars Dollars

CHEMICAL BANK
1288 Avenue of the Americas 128
New York, N.Y. 10020

Mrs. Jesse Jackson Fund / Women's Network PAC

⑆021000128⑆ 135-290651⑆ 0181

MARJORIE E DURDEN
85785416

NUMBER 253

1-8/210
3/22 19 84

PAY TO THE ORDER OF Women's Network PAC \$ 100

ONE (HUNDRED) DOLLARS

CITIBANK NA
162 AMSTERDAM AVE. AT 67TH ST.
NEW YORK, N.Y. 10023

Jessie Jackson Marjorie Durden

⑆021000089⑆ 096 85785416⑆ 0353

CHERYLL Y. GREENE
280 CONVENT AVE. 80
NEW YORK, NY 10021

27 March 1984 669

1-7041/220

PAY TO THE ORDER OF Women's Network PAC \$ 40.00

Forty and 00/100 DOLLARS

AMERICAN SAVINGS BANK
2002 BROADWAY
NEW YORK, N.Y. 10023

Chyll Greene

⑆226070432⑆ 032842843 8⑆ 0669

THE M. GREGOR
259 CUNY ROAD NO. 24D
CLIFFSIDE PARK, NJ 07010

66

3/27/84

1-3/210
17

Pay to the order of Women's Network PAC

\$200.00

Two hundred exactly

[Signature]

The Chase Manhattan Bank, N.A.
100 Wall Street, N.Y., N.Y. 10038

Contribution
The Chase Manhattan Company Theodore M. Gregory
⑆021000021⑆ 017 1 056329⑆ 1663



89040760873

LAQUITA HENRY

928

3-28-84

1-200
2100

PAY TO THE
ORDER OF

Women's Network Inc.

\$100.00

One Hundred

DOLLARS

Citibank, N.A.
Vanderbilt Ave. at 44th St.
New York, N.Y.
10017

CITIBANK

[Signature: Laquita Henry]

⑆021000089⑆ 099 60874533⑆ 0928



8 3 0 4 0 7 6 0 8 7 4

ROBERT VAUGHN, JR.
281 FIFTH ST., APT. 22K
NEW YORK, NY 10021

3-27 1984

PAY TO THE ORDER OF WOMEN'S NETWORK PAC, 2002 ✓
Two Hundred and 00 DOLLARS

700 MADISON AVENUE, NEW YORK, N.Y. 10022

MEMO: Ray O. Vaughn Jr.

⑆021000018⑆ ⑆53 5095⑆ 0225

DENISE LAMANTE, ESQ.
49 HAMILTON TERR.
NEW YORK, NY 10003

3-27-1984

PAY TO THE ORDER OF Women's Network \$100.00 ✓
One Hundred and 00 DOLLARS

CITIBANK, N.A.
110 West 57th St.
New York, N.Y. 10019

MEMO: Denise Lamante

⑆021000089⑆ 034 0886095⑆ 0429

DR. HELEN BURNELL

March 19 84

PAY TO THE ORDER OF Women Network Pk \$100.00 ✓
One hundred 00 DOLLARS

CITIBANK, N.A.
40 West 57th St.
New York, N.Y. 10019

MEMO: Helen Burnell, DDS

⑆021000089⑆ 121 71140617⑆ 0175

1-2000
+1050
745

CHARLES J. HAMILTON, JR.
28 CADMAN PLAZA WEST, 7-D
BROOKLYN HEIGHTS, NY 11201

March 27, 19 84

PAY TO THE ORDER OF Women's Network P.E.P. \$200.00 ✓
Two hundred and 00 DOLLARS

CITIBANK, N.A.
Park Ave. at 40th St.
New York, N.Y. 10018

MEMO: Charles J. Hamilton Jr.

⑆021000089⑆ 049 05407192⑆ 0671

1 ticket of
\$200
ticket # 65

Stars For Jesse Jackson Committee

<u>NAME</u> <u>(PLEASE PRINT)</u>	<u>ADDRESS</u>	<u>AMOUNT OF CHECK</u>
<u>Alfred L. Francis</u>	<u>261 West 131st St., N.Y.</u>	
<u>Alice D. Nelson</u>	<u>128 BROWN PLACE, BRONX 10475</u>	
<u>William de Loaché</u>	<u>10-14 J RICHMAN PLAZA, BRONX 10453</u>	
<u>Leslie Ann Nelson</u>	<u>128 BROWN PLACE, BRONX 10475</u>	
<u>Ophelia W. Dismuke</u>	<u>700 Columbus Ave, NY 10025</u>	
<u>Roberta B. Morton</u>	<u>39 Hampton Oval, New Rochelle, NY 10805</u>	
<u>Jeff Williams</u>	<u>3424 Barker Ave, Bronx</u>	
<u>Sigrid J. Aarons</u>	<u>303 West 66th St, NY 10023</u>	
<u>John W. Hall</u>	<u>424 Remsen Ave, Bklyn 11212</u>	
<u>Marian Rogers</u>	<u>530 East 72nd St, NY 10021</u>	
<u>Ruth Boatwright</u>	<u>750 Park Ave, N.Y.</u>	
<u>Doris Jackson</u>	<u>300 E. 40th St, NY</u>	
<u>George L. Van Amson</u>	<u>230 West 76th St. # 9D, NY 10023</u>	
<u>Betty J. Dapson</u>	<u>115-95 223rd St, Cambria Heights, NY 11411</u>	
<u>✓ Joseph F. Taylor</u>	<u>50 West 97th St, NY 10025</u>	

Stars For Jesse Jackson Committee

<u>NAME</u> <u>(PLEASE PRINT)</u>	<u>ADDRESS</u>	<u>AMOUNT OF C</u>
<u>Louis Gossett Jr.</u>	<u>_____</u>	<u>_____</u>
<u>Don King</u>	<u>32 E. 69th St., NY 10021</u>	<u>_____</u>
<u>F. Peter Akerele</u>	<u>_____</u>	<u>_____</u>
<u>Roscoe C. Brown, Jr.</u>	<u>20 Commerce St, NY 10014</u>	<u>_____</u>
<u>Anton E. Burnette</u>	<u>276 Riverside Dr. #28, NY 10025</u>	<u>_____</u>
<u>Mary E. Green-Cohen</u>	<u>121 W. 72nd St, NY 10023</u>	<u>_____</u>
<u>Genevieve Joyce Hamer</u>	<u>345 W. 145th St. #12C3, NY 10031</u>	<u>_____</u>
<u>Jessica Hawkins-Greeridge</u>	<u>95 W. 95th St NY 10025</u>	<u>_____</u>
<u>William Watson Hines, III</u>	<u>626 Riverside Dr., NY 10031</u>	<u>_____</u>
<u>Lionel Howard</u>	<u>PO Box 344, NY 10027</u>	<u>_____</u>
<u>Vincent S. Kenyon</u>	<u>_____</u>	<u>_____</u>
<u>Paul Martin, DDS</u>	<u>_____</u>	<u>_____</u>
<u>Lemard Mays</u>	<u>130-24 236th St, Laurelton, NY 11422</u>	<u>_____</u>
<u>C.D. Moore</u>	<u>Upper Lake House, Croton-On-the-Hudson, NY 10520</u>	<u>_____</u>
<u>Edward Myers</u>	<u>21 Forster Ave, Mt. Vernon, NY 10552</u>	<u>_____</u>

Stars For Jesse Jackson Committee

<u>NAME</u> (PLEASE PRINT)	<u>ADDRESS</u>	<u>AMOUNT OF</u>
<u>Earl E. Osborne</u>	<u>64 Garden St Teaneck, NJ 07666</u>	
<u>Don K. Lyles</u>		
<u>Jennifer D. Harris</u>		
<u>Mary C. Crosby</u>	<u>114-89 180th St St Albans, NY 11434</u>	
<u>William A. Crosby</u>		
<u>Manuel J. Cabrera</u>	<u>936 West End Ave, NY 10025</u>	
<u>Patricia M. Hinds</u>	<u>320 W 108th St #3A, NY 10025</u>	
<u>William L. Blanding</u>		
<u>Paulette M. Caldwell</u>	<u>1 Washington Sq Village, NY 100</u>	
<u>Edna D. Wells</u>		
<u>Walter F. Robinson</u>	<u>111 Hicks St. #2F, Bklyn 11201</u>	
<u>Sarah Eady</u>	<u>18-25 215th St #8K, Bayside, NY 11360</u>	
<u>Kenneth L. Thompson</u>	<u>2425 Williamsbridge Rd, Bronx 10469</u>	
<u>Hazel West</u>	<u>170-40 130th Ave #3D, Jamaica, NY 11434</u>	
<u>Gloria F. Saunders</u>	<u>110-33 173rd St, Jamaica, NY 11430</u>	

Stars For Jesse Jackson Committee

<u>NAME</u> <u>(PLEASE PRINT)</u>	<u>ADDRESS</u>	<u>AMOUNT OF</u>
<u>Maurice Phillips</u>	<u>348 East 149th St, Bronx</u>	<u> </u>
<u>Bernard Farris</u>	<u>150 Montague St, Bklyn</u>	<u> </u>
<u>Owen Jones</u>	<u>786 Lenox Rd, Bklyn</u>	<u> </u>
<u>Carlton Sparks</u>	<u>840 Grand Concourse, Bronx</u>	<u> </u>
<u>Donald Bean</u>	<u>120-27 NY Blvd, NY 11434</u>	<u> </u>
<u>Kenneth Chace</u>	<u>133 East 54th St, NY</u>	<u> </u>
<u>Willie Bryant</u>	<u>119 Mc Namara St, NY</u>	<u> </u>
<u>John Hamilton</u>	<u>899 Franklin Ave, Bklyn</u>	<u> </u>
<u>Winthrop Holder</u>	<u>415 C.P.W., NY 10019</u>	<u> </u>
<u>Clarence Shelton</u>	<u>50 West 97th St, NY</u>	<u> </u>
<u>Rita Falkener</u>	<u>50 Pierrepont St, Bklyn 11201</u>	<u> </u>
<u>Vince Sanders, Sr.</u>	<u>4601 - 39th Ave #506, Sunnyside NY 11104</u>	<u> </u>
<u>William K. Lyles, Ph.D.</u>	<u>P.O. Box 257, Staten Island 10301</u>	<u> </u>
<u>Benjamin F. Hill, III</u>	<u>941 Fulton St. #3B, Bklyn 11238</u>	<u> </u>
<u>Shelley L. Moore</u>	<u>270 Jay St, Bklyn 11201</u>	<u> </u>

Stars For Jesse Jackson Committee

<u>NAME</u> <u>(PLEASE PRINT)</u>	<u>ADDRESS</u>	<u>AMOUNT OF CHECK</u>
<u>Vernon L. Slaughter (CBS)</u>	<u>14 Westview Ave. # 708, Tuckahoe, NY 10707</u>	
<u>Edwina E. Dowell</u>	<u>284 Flatbush Ave, Bklyn 11217</u>	
<u>Waldo C. Falkner, Jr.</u>	<u>50 Pierrepoint St., Bklyn 11201</u>	
<u>Albert M. Munson, II</u>	<u>30 W. 141st St. NY 10037</u>	
<u>Robert Wilson</u>	<u>4054 Linden Blvd, Suite 100, St. Louis, Mo 63108</u>	
<u>(Daniel Lamante) Cordia L. Beverley MD</u>	<u>950 Park Avenue, NY 10028</u>	
<u>Juliet F. Randall</u>	<u>11A So. Portland Ave, Bklyn 11217</u>	
<u>Keith H. Williamson</u>		
<u>Oswald Silvera</u>	<u>395-192 So End Ave, NY 10280</u>	
<u>Clarence L. James Jr.</u>	<u>90 Kent Ln, Trumbull, Ct 06611</u>	
<u>Margaret B. Young</u>	<u>330 Oxford Rd, New Rochelle, NY 10804</u>	
<u>Joan Sandler</u>	<u>392 C.P.W. #140, NY 10025</u>	
<u>Andrew Brain</u>	<u>382 CPW, NY 10025</u>	
<u>Luke C. Harris, Jr.</u>	<u>736 West End Ave. #1B, NY 10027</u>	
<u>Myron E. Jackson</u>	<u>2564 Dysart Road, University Heights, Ohio 44118</u>	

Stars For Jesse Jackson Committee

<u>NAME</u> <u>(PLEASE PRINT)</u>	<u>ADDRESS</u>	<u>AMOUNT OF CHE.</u>
<u>Jackye Meshelle McClure</u>	<u>101 E. 15th st, NY 10003</u>	
<u>Willie Kathryn Suggs</u>	<u>406 W 46th st NY 10036</u>	
<u>Kevin T. Scott</u>	<u>44 Strawberry Hill Ave, Stamford, Ct.</u>	
<u>Nedra Neal</u>	<u>50 W. 93rd st. NY</u>	
<u>Michael Neal</u>	<u>50 W 93rd st NY</u>	
<u>Drs Fred & Lennette Benjamin</u>	<u>500 E. 63rd st #26c, NY 10021</u>	
<u>Jacqueline Proctor</u>	<u>345 E. 54th st #2c, NY 10022</u>	
<u>Joseph Flaskett</u>	<u>29-33 Butler St, E Elmhurst, NY 11369</u>	
<u>✓ G. P. Sherwood</u>	<u>6 Glen Rd, Larchmont, NY 10538</u>	
<u>✓ Ruby Sherwood</u>	<u>6 Glen Rd, Larchmont, NY 10538</u>	
<u>✓ Robert T. Flynn</u>	<u>142 E. 13th st, NY 10003</u>	
<u>✓ Stephen J. Perry</u>		
<u>Trevor Brooks % Abraham & Hans Carl Construction Corp.</u>	<u>170 B'way, Suite 612, NY 10038</u>	
<u>Patricia L. Irvin</u>	<u>230 W. 55th st, NY 10019</u>	
<u>Leon Knight, Jr.</u>	<u>315 E. 84th st. #29, NY</u>	



W.N.P.E.

Women's Network for Political and Ec...

609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHE

Badillo, Tony

Jones, Steven

Schwartzberger, Neil

Lewis, Evon

Reed, Le Grand

Domingo, Joyce V

Calvin Owens - Community Protestant Church 2053 Asch Loop N, Bronx 10475

Powell, Alton W.

Paige, Daisy M.

Casellas, Amanda C.

37 E. 18th St. NY

Episcopal Mission

105 Chamber St - 2nd Fl, NY

369 Madison Ave, NY

Newley Assoc. Suite 1002

211 E. 43rd St. N.Y.

2508 Adam Clayton Powell Blvd, NY 10039

8 9 0 4 0 7 6 0 8 8 3



W.N.P.E.P.

Women's Network for Political and Economic Power

609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHECK

<u>Grey Pallard % Royal Bank of Canada, George Town, Grand Cayman, Cayman Is, W.I.</u>		
<u>Margaret Vlaster Black Retail Action Group, Rockefeller Station, PO Box 10185, NY 10185</u>		
<u>Famous Organization</u>		
<u>LeGrand Reed</u>		
<u>Johnnie Chandler</u>	<u>Woodhull Hospital</u>	
<u>Betty McNeill</u>	<u>362 65th St. Bklyn 11220</u>	
<u>Vernon C. Manley</u>	<u>207 W. 106th St, NY 10025</u>	<u>0</u>
<u>Odetta S. Murray</u>	<u>654 Jefferson Ave, Bklyn 11221</u>	<u>0</u>
<u>Carter Community Health Ctr. Pharmacy 97-04 Sutphin Blvd. Jamaica, NY 11435</u>		<u>0</u>
<u>Melbourne Nurses</u>		
<u>Martin P. Carter</u>	<u>580 West End Ave, NY 10024</u>	<u>2</u>
<u>Edward G. Lloyd</u>	<u>158-18 Riverside Ave, NY 10032</u>	<u>0</u>
<u>Kevin C. Greenidge, MD</u>	<u>153 E. 32nd St.</u>	<u>0</u>
<u>Darryl E. Greene</u>		<u>0</u>
<u>Charles Child</u>	<u>34 Horatio St, NY 10014</u>	<u>0</u>

4 8 8 0 9 2 0 4 0 6 8



W
Women's Picture

609 West 136th Street
New York, NY 10031
(212) 862-6047

NAME
(PLEASE PRINT)

ADDRESS

AMOU

W. Douglas & D. Browne

3511 Barnes Ave, Bronx 10467

Jose Marcial

2 Lenox Ave, NY 10026

Vivian Meyer

Fatima Deanda

365 W. 25th St. NY 10001

Anonymous

I. Mangual

Bronx

James Frederick Moore, III

400 C.P.W. #20 V, NY 10025

Herbert L. Wright

Karole F. Steven

112-30 No. Blvd. #14, Corona, NY 11368

Alyce Faye Wattleton

64 Verdun Ave, New Rochelle 10804

Curtis A. Wood Jr.

401 Clinton Ave, Bklyn 11238

Walter Carter

P.O. Box 3087, Ft. Worth, Texas 76105
PH 451-1903

Stanley T. West, MD

1049 Park Ave, NY 10028

Carib Aire-Conditioning Co.

Patricia McPartland

8 9 0 4 0 7 6 0 8 8 5



WNPE

Women's Network for Political and

679 West 138th Street
New York, NY 10031
(212) 862-6047

NAME

ADDRESS

AMOUNT OF CH

(PLEASE PRINT)

Temple of Natural Healing

Pat L. Francis

Roxanna B. Broadus

Barrington D. Shaw

Sadie M. Strong

Wilhelmena Strong

Marjorie Strong

Walter S. Moore

Stephanie Wright

Aisha Abdul-Wahhab

Mustafa Jalil Abdus-Salam

The Fragrance Lab, Inc.

55 W. Palisade Ave, Englewood, NJ 07631

205 Commonwealth Ave, Mt. Vernon, NY 10552

3160 Albany Crescent, Bronx 10463

201 W. 70th St, NY 10023

188 W. 135th St, NY 10030

170 Hamilton Ave, New Rochelle, NY 10801

2186 5th Ave #15R, NY 10037

354 W. 123rd St, NY 10027

4000 Bell Ave, Bronx 10466

154 W. 120th St, NY 10027

PO Box 675, Triboro Sta, NY 10035

8 9 0 4 0 7 6 0 8 8 0



W.N.P.E.I.

Women's Network for Political and Eco

609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHEQ

<u>Marianne Camille Spraggins, Esq.</u>	<u>444 C.P.W., NY 10025</u>	
<u>Colleen T. Goldberg</u>	<u>50 E. 89th St, NY 10028</u>	
<u>Clarence D. Smith</u>	<u>5900 Arlington Ave., Bronx 10471</u>	
<u>Jill Nelson</u>	<u>49 Clinton Ave, Dobbs Ferry, NY 10522</u>	
<u>Ruby Weston</u>	<u>652 Eastern Pkwy, Bklyn 11210</u>	
<u>Wanda D. Kemp</u>	<u>233 West 138th St. #1A, NY 10030</u>	
<u>Delores Cann</u>		
<u>Houston Brummit, MD</u>	<u>145 E. 49th St, NY 10017</u>	<u>100</u>
<u>Anis Barghouti</u>	<u>747 Third Ave - 25th Fl, NY 10017</u>	
<u>Jonelle Procope</u>	<u>325 E. 41st St. #504, NY 10017</u>	
<u>Herbert Brown, Jr.</u>	<u>120-2 Alcott Place, Bronx 10475</u>	
<u>William R. Brown, P.C.</u>	<u>76 Madison Ave, NY 10016</u>	
<u>Sharon Hope</u>	<u>Actor's Federal Credit Union, 165 W. 46th St. NY 10</u>	
<u>Ellin La Var</u>	<u>Harold Melvin Salon, 137 W. 72nd St, NY</u>	
<u>Roberto Adorno</u>	<u>724 DeKalb Ave, Bklyn</u>	



WNPEF

Western National Political Education Fund

600 West 138th Street
New York, NY 10031
(212) 863-6047

NAME
(PLEASE PRINT)

ADDRESS

AMOUNT OF CHECK

Dr. Lionel E. Mc Murren

Ronald R. Evans

Constance Jackson Collins

Lionel C. Wald

Richard Greene

Janet C. Nichols

Sandra Sneed

J.Y. Hartsfield, Esq

Dudley A. Hall

Stanley W. Gordon

June C. Lennan

Emile A. Milne

Nana Neal

Calvin E. Johnson

Joel Prendergast Martin

175 West 92nd St NY 10025

135 Eastern Pkwy. # 7C, Bklyn 11238

Lomic Contracting Consultants, Assoc. 112 W. 120th St. N

736 Eastern Pkwy, Bklyn 11213

191-18 Murdock Ave, St. Albans, NY 11412

799 Park Ave, NY 10021

101-125 W. 147th St, NY 10039

136 E. 56th St, NY 10022

300 E. 75th St, NY 10021

89040760890

NAME
(PLEASE PRINT)

ADDRESS



WJ
Women's Network

609 West 138th Street
New York, NY 10031
(212) 862-6047

AIMOU

- ✓ Vaughn, Roy O. ✓
- Davis, Gene A.
- ✓ Gregory, Theodore M. ✓
- ✓ Lamaute, Denise ✓
- ✓ Maillard, Lucille J. ✓
- ✓ Lewis, Michele Shay ✓
- ✓ Durden, Marjorie ✓
- ✓ Greene, Cheryl Y. ✓
- ✓ Shirley, Norma Elise ✓
- ✓ Burrell, Helen Dr. ✓
- ✓ Lopez, Georgette Adrienne ✓
- ✓ Hart, Shellie H. Jr. ✓
- ✓ Chenault, Kathryn C. ✓
- ✓ Hamilton, Charles ✓
- ✓ Henry, Laquita ✓

- 322 W. 57th St #28K N.Y. 10021
- 23 W. 68th St. N.Y. 10023
- 250 Gorge Rd. #26D, Cliffside, N.J. 0701
- 41 Hamilton Terrace, N.Y. 10031
- 40 W. 86th St. N.Y. 10024
- 260 Convent Ave #93 N.Y. 10031
- 155 W. 68th St. #415 N.Y. 10023
- 120 West 58th St, NY 10019
- 95 W. 95th St. N.Y. 10025
- 475 Esplanade, Pelham Manor 10803
- 28 Cadman Plaza West #7D NY 11201



609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME

(PLEASE PRINT)

ADDRESS

39040760891

- ✓ BRUNNIT, HOUSTON, U.D. (D.R.) ✓ 145 EAST 49 ST.
N.Y.C. 10017
- ✓ FORSYTHE, JAMES ✓ 290 WEST 12 ST.
N.Y.C. 10014
- ✓ ROBINSON, DINAH ✓ 44 WEST 62 ST.
N.Y.C. 10023
- ✓ ALAN EATON (F.B. Red.) (Tavern owner) ✓ 63 LAFAYETTE AVE.
BROOKLYN, N.Y. 11217
- ✓ VALHALL PUB INC. ✓ 2301 FIFTH AVE. #48B
N.Y.C. 10037
- ✓ HEAD, THEDA PALMER ✓ 392 CEN. PARK WEST
N.Y.C. 10025
- ✓ JOHNSON, HOWARD ✓ 425 EAST 58 ST.
N.Y.C. 10022
- ✓ CHARK, RUTH ✓ 364 WASHINGTON AVE.
BKLYN, N.Y. 11205
- ✓ LEWIS, JACKIE ✓ 50 HAMILTON TERRACE
N.Y.C. 10031
- ✓ FISHER, JACQUELINE ✓ 44 WEST 55 ST.
N.Y.C. 10019
- ✓ ATCHINSON, PHYVUS ✓ 1270 FIFTH AVE. #5F
N.Y.C. 10029
- ✓ WANNACE, FRED ✓ 110 RIVERSIDE DR.
N.Y.C. 10024
- ✓ LANE, KATHLEEN ✓ 887 RIVER ROAD
TEANECK, N.J. 0766
- ✓ VELEZ, WILLIAM ✓ 792 COLUMBUS AVE. #3R
N.Y.C. 10025
- ✓ CHARK, MICHELE ✓ 1650 B'WAY, SUITE
N.Y.C. 10019 1001
- ✓ ANTISIA, MUSIC ✓ 1674 B'WAY, SUITE
N.Y.C. 10019 200
- ✓ EATON, WILLIAM ✓



609 West 138th Street
New York, NY 10031
(212) 862-6047

NAME

ADDRESS

(PLEASE PRINT)

✓ <u>FANCHER, MICK</u> ✓	<u>1674 B'WAY, SUITE</u> <u>N.Y.C. 10019 200</u>
✓ <u>DARBY, REGINA</u> ✓	<u>394 BROADWAY</u> <u>N.Y.C. 10013</u>
✓ <u>GOLSON, JOHNNIE</u> ✓	
(Attorney)	
✓ <u>BURNS, W. HAYWOOD</u> ✓	<u>243 EAST 4TH ST.</u> <u>N.Y.C. 10009</u>
✓ <u>DAVIS, RENEE</u> ✓	<u>205-27 104 ST.</u> <u>HOLLS N.Y. 11412</u>
(Computer Oper.)	
✓ <u>CAMPBELL, VIVIAN</u> ✓	<u>48-50 57 ST. #7U.</u> <u>SUNNYSIDE, NY 11101</u>
(Dr.)	
✓ <u>BRUNNIT, HOUSTON, N.D.</u> ✓	<u>145 EAST 49 ST</u> <u>NYC 10017</u>
✓ <u>HANDY, MICHAEL</u> ✓	<u>111 HICK ST.</u> <u>BRKLYN, 11201.</u>
✓ <u>C. KNOX ASSISTED III</u> ✓	<u>870 6th Av</u> <u>NYC 10001</u>
✓ <u>JACK L. WILLIS (Publisher)</u> ✓	<u>354 West End Av.</u> <u>NYC 10024</u>
✓ <u>MARY P. WILLIS</u> ✓	
✓ <u>JACK E. SMITH</u> ✓	<u>2391 Webb Ave. #1B</u> <u>Bronx, 10468</u>
✓ <u>LUTHER W. SEABROOK</u> (Dist. 30P. 11)	
✓ <u>MAIRIANE R. SEABROOK</u> (N.Y.C. 10011)	<u>BRONX</u>
✓ <u>WILLACE JOHNSTON CONSULTING ENGINEERS</u> ✓	<u>363 7th AVE.</u> <u>N.Y.C. 10001</u>
_____	_____
_____	_____
_____	_____

8 9 0 4 0 7 6 0 8 9 2

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
 Women's Network for Political) MUR 2139
 and Economic Parity and Dorothy)
 Pitman Hughes, as treasurer;)
 Jesse Jackson for President)
 Committee and Emma Chappell,)
 as treasurer)

07 JAN 12 11:02
 FEDERAL ELECTION COMMISSION SECRETARY

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 30, 1986, the Commission found reason to believe that the Women's Network for Political and Economic Parity ("WNPEP") and Dorothy Pitman Hughes, as treasurer, violated 2 U.S.C. § 441a(a)(1), and that the Jesse Jackson for President Committee ("JJPC") and Emma Chappell, as treasurer, violated 2 U.S.C. §§ 434 and 441a(f). The basis for these findings was WNPEP's report of a \$25,360 in-kind contribution. This in-kind contribution, as reported by WNPEP, resulted from WNPEP's paying for a fund-raising dinner for JJPC at the Tavern on the Green restaurant.

On May 13, 1986, the Commission voted to approve sending Dorothy Pitman Hughes a series of interrogatories, under order, concerning the nature of the dinner in question and the origin and purpose of the funds that paid for it. When Ms. Hughes failed to respond, the Commission voted on August 12, 1986 to authorize the Office of General Counsel to file a civil suit for enforcement in the United States District Court. On September 16, 1986, Dorothy Pitman Hughes responded to the

89040760893

interrogatories, after being notified that suit would be filed, thus obviating the need to proceed to suit.

The substance of Ms. Hughes' response (Attachment 1) may be summarized as follows:

1. WNPEP helped organize and sponsor the fundraiser, but did not actually contribute to JJPC;

2. Solicitations for the fundraiser asked that checks be made out to JJPC, not WNPEP;

3. Some of the individuals who helped sponsor the fundraiser were associated with certain groups - such as WNPEP, Stars for Jesse L. Jackson for President, the Westside Committee for Jackson, and others - but said individuals contributed to JJPC as individuals, and not on behalf of any other group.

4. All the individuals who contributed the \$25,360 in question intended to contribute to JJPC, not WNPEP. These persons, including the "stars" and members of the other groups involved, helped organize the fundraiser; and they paid their money to WNPEP so that WNPEP could deposit their checks into its account, which would then have sufficient funds to cover the costs of holding the fundraiser at Tavern on the Green.

II. LEGAL AND FACTUAL ANALYSIS

Ms. Hughes' response to the interrogatories raised as many questions as it answered. First, the response raises the possibility that the contributions received by WNPEP were earmarked for JJPC. Under the Federal Election Campaign Act

89040760894

("the Act"), with respect to the limitations on the amount of contributions,

all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate. The intermediary or conduit shall report the original source and the intended recipient of such contributions to the Commission and to the intended recipient.

2 U.S.C. § 441a(a)(8). See also 11 C.F.R. § 110.6(c). Under the Commission's regulations, the term "earmarked" refers to "a designation, instruction, or encumbrance (including those which are direct or indirect, express or implied, oral or written) which results in all or any part of a contribution ... being made to ... a clearly identified candidate or a candidate's authorized committee." 11 C.F.R. § 110.6(b). The conduit is not only required to report the contribution to the recipient and to the Commission, but the "intended recipient shall disclose on his next report each conduit through which the contribution passed." 11 C.F.R. § 110.6(c)(3). The reports filed by the conduit must include, inter alia, "The date the contribution was passed on to the intended recipient, and whether the contribution was passed on in cash, by the contributor's check, or by the conduit's check." 11 C.F.R. § 110.6(c)(4)(iii).

39040760895

Ms. Hughes' response does not make clear what instructions were made to WNPEP by the contributors who made out their checks to that organization. Also, it was not stated whether JJPC was informed of these contributions. Thus, there is a possibility that WNPEP violated 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6 by failing to report contributions made through an intermediary, and that it also violated 2 U.S.C. § 434(b) by inaccurately reporting a \$25,360 in-kind contribution to Jesse Jackson. In the view of this Office, further investigation is necessary in order to establish whether or not WNPEP in fact acted as a conduit for earmarked contributions.

Second, the response raises questions concerning the origins of the fundraiser itself. The determination of whether WNPEP acted as a conduit is dependent upon establishing who organized and sponsored the fundraiser. The original solicitation for this event (Attachment 1, pp. 50-53) suggests that the fundraiser was being sponsored by the "Stars for Jesse Jackson." The solicitation's "cover" reads: "The Stars Come Out for Jesse Jackson." The envelope for the response card is addressed to: "Stars for Jesse Jackson Committee/394 Broadway - 6th Floor/New York, N.Y. 10013." At the same time, the solicitation itself states: "PLEASE MAKE CHECKS PAYABLE TO JESSE JACKSON FOR PRESIDENT COMMITTEE." Thus, it is unclear whether the "Stars," by themselves or in conjunction with WNPEP, qualified as a political committee. It seems necessary to obtain further information concerning the planning behind its fundraiser.

89040760890

Third, the materials attached to the response raise, for the first time, the possibility that no adequate disclaimer appears on the solicitation made in connection with the fundraiser. The solicitation does not state who paid for it, or whether it was authorized by any candidate, in apparent violation of 2 U.S.C. § 441d. Ms. Hughes did not state who paid for the solicitation, only that the "invitation sent out soliciting contributions ... was not handled by me or W.N.P.E.P." (Attachment 1, P. 3). Clearly, more information is needed concerning the solicitation, including the identification of the person(s) and/or the committee(s) that paid for it.

Adding to the confusion is a letter (Attachment 1, p. 54), on WNPEP stationery, dated 18 November, 1983, and addressed to Mario Cooper of JJPC. The letter seeks to schedule Reverend Jackson's appearance at Tavern on the Green. Ms. Hughes states that: "Although written on W.N.P.E.P. letterhead, the letter was from the 'Stars' as stated." But the letter, which bears Ms. Hughes' name as its author, states the proposed fundraiser would be "sponsored by the Westside Committee to Elect Reverend Jesse Jackson and the Women's Network for Political and Economic Parity (WNPEP). Total proceeds will benefit the Jackson Campaign. The WestSide Committee is made up of fifteen (15) West Side organizations and several individuals, representing a Rainbow Coalition of men and women, Blacks, Whites, Jews, Asians, and Latinos." No mention was made of the "Stars" groups.

89040760897

In summary, serious questions remain as to the identity of the persons or groups who sponsored the fundraiser. It has not been established how much money was spent - or by whom - on the sending out of solicitations or for other purposes related to organizing the fundraiser. It appears necessary therefore to ask additional questions of Ms. Hughes concerning the various issues discussed above. Also, it may be necessary to ask further questions, now not foreseen, based on her responses. She may also be able to identify the other persons with information relevant to the inquiry. In view of these considerations, and in light of the fact that the Act may have been violated on grounds other than those previously presented to the Commission, this Office recommends that the Commission authorize the taking of the deposition of Dorothy Pitman Hughes.

III. RECOMMENDATIONS

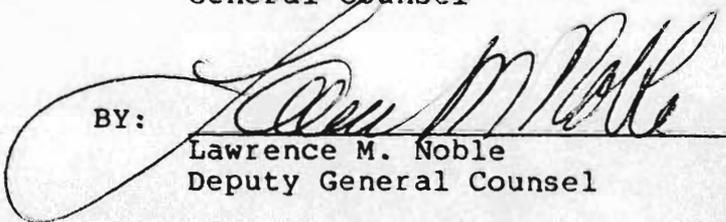
1. Authorize the Office of General Counsel to take the deposition of Dorothy Pitman Hughes.
2. Approve and issue the attached subpoena.
3. Approve and send the attached letter.

Charles N. Steele
General Counsel

Date

1/9/87

BY:



Lawrence M. Noble
Deputy General Counsel

Attachments

1. Response of Dorothy Pitman Hughes
2. Subpoena
3. Letter to Dorothy Pitman Hughes

29040760898



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL
FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN JM
DATE: JANUARY 13, 1987
SUBJECT: OBJECTIONS - MUR 2139 - GENERAL COUNSEL'S REPORT
SIGNED JANUARY 9, 1987

The above-captioned document was circulated to the Commission on Monday, January 12, 1987 at 4:00 P.M.

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

Commissioner Aikens _____
Commissioner Elliott _____ X
Commissioner Josefiak _____ X
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for 1-27-87.

89040760899

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political and)
Economic Parity and Dorothy)
Pitman Hughes, as treasurer;) MUR 2139
Jesse Jackson for President)
Committee and Emma Chappell, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 29, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2139:

1. Find reason to believe that the Women's Network for Political and Economic Parity the Westside Committee for Jackson, and Stars for Jesse L. Jackson for President, have violated 2 U.S.C. § 441d.
2. Return the January 9, 1987 report from the Office of General Counsel with the direction that the Office of General Counsel prepare an appropriate Factual and Legal Analysis pursuant to the discussion held at this meeting.
3. Direct the Office of General Counsel to send appropriate letters.

(continued)

89040760900

4. Authorize the Office of General Counsel to take the deposition of Dorothy Pitman Hughes, and issue the subpoena attached to the General Counsel's report dated January 9, 1987, if necessary, if the responses from the respondent committees are inadequate.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

January 30, 1987
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040760901



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

Dorothy Pitman Hughes
Treasurer
Women's Network for Political
and Economic Parity
609 West 138th Street
New York, New York 10031

RE: MUR 2139
Women's Network for Political
and Economic Parity and
Dorothy Pitman Hughes, as
treasurer

Dear Ms. Hughes:

On January 29, 1987, the Federal Election Commission determined that there is reason to believe the Women's Network for Political and Economic Parity violated 2 U.S.C. §441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

89040760902

Dorothy Pitman Hughes

Page 2

recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

89040760903



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

Westside Committee for Jackson
394 Broadway - 6th Floor
New York, NY 10013

RE: MUR 2139
The Westside Committee
for Jackson

Dear Sir/Madam:

On January 29, 1987, the Federal Election Commission determined that there is reason to believe the Westside Committee for Jackson violated 2 U.S.C. §441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

89040760904

plm

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder the attorney assigned to this matter, at (202)376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

89040760905



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

The Stars for Jesse L. Jackson
for President
394 Broadway - 6th Floor
New York, N.Y. 10013

RE: MUR 2139
The Stars for Jesse L. Jackson
for President

Dear Sir/Madam:

On January 29, 1987, the Federal Election Commission determined that there is reason to believe The Stars for Jesse L. Jackson for President violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

89040760900

plm

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder the attorney assigned to this matter, at (202)376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

99040760907

QCC#2829
RECEIVED AT THE FEC

87 MAR 4 AM: 30

BARNES & DARBY
11 PARK PLACE
NEW YORK, NEW YORK 10007
(212) 267-1622

February 24, 1987

MIDTOWN OFFICE
60 EAST 42nd STREET
SUITE 1900
NEW YORK, NY 10165
(212) 870-1200

JOSEPH N. BARNES
REGINA L. DARBY

CATHY A. BELL
DAVID CHEN
JONATHAN REICE

of Counsel
L. BENET McMILLAN

87 MAR 4 AM: 07

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Charles Snyder, Esq.
Office of General Counsel
Federal Election Commissions
999 East Street N.W.
Washington, D.C. 20463

Re: MUR 2139
The Westside Committee for Jackson

Dear Mr. Snyder:

Pursuant to our telephone conversation today, please be advised that it is my understanding that "the Stars Salute Jesse Jackson" was a onetime fundraiser given by the Westside Committee for Jesse Jackson under the direction of the Women's Network, P.C.

Enclosed, please find documents indicating the above and soliciting my support and energy for the same. My role in the aforesaid event was that of an active volunteer, for example, I solicited attendees, stuffed envelopes, made phone calls, etc.

Although I played an active role in bringing about a successful event, I did not cash any checks nor sign any checks for the aforesaid event. Whatever checks that were given to me by my friends were promptly turned over to the Women's Network, P.A.C.

If you have any questions regarding the above, please do not hesitate to contact my office.

Sincerely,

Regina L. Darby
Regina L. Darby

Encls

8
0
6
0
9
2
0
4
0
6
8

WESTSIDE COMMITTEE FOR JESSE JACKSON
150 West 80th Street
New York, NY 10024

The Westside Committee for Jesse Jackson for President, invites you and members of your firm to support Jesse Jackson's candidacy by becoming a patron for:

THE STARS SALUTE TO JESSE JACKSON
TAVERN ON THE GREEN
in Central Park
FRIDAY, MARCH 30, 1984
.. 6:00 P.M. to Midnight ..

Your contribution of \$250.00 entitles you to cocktails, buffet dinner, dancing and entertainment by some of New York's finest stars and celebrities. If you wish, your name will be included on the list of Patrons for the dinner which will be printed for the Benefit Program.

Make your check out today to:

WOMEN'S NETWORK, P.A.C.
c/o The Westside Committee for Jesse Jackson
150 West 80th Street
New York, New York 10024

.. Single tickets available at \$100.00 ..

Jesse Jackson not only represents the legitimate aspirations of millions of minority Americans but he is also a viable candidate. Your support is needed to make THE STARS SALUTE TO JESSE JACKSON a gala fundraiser.

Thank you.

Contact Numbers: 787-5241 [Bill Pitman, Chairman]
759-3223 [Flo Kennedy, Chairman]
534-7415 [Carole Conover, Director of Media & Entertainment]

Please include the name and address of where you wish the tickets to be sent. Also note whether or not you want your names(s) included on the printed program. If you cannot attend the event but wish to be a Patron, please advise us. ...

AUTHORIZED BY JESSE JACKSON for PRESIDENT COMMITTEE
Samuel Voggie, Treasurer

89040760909

89040760910

Make all checks payable to:
Women's Network P.A.C.

will attend

Enclosed is \$_____ for _____ tickets

not attend but

Enclosed is my contribution
of \$ _____

AUTHORIZED BY JESSE JACKSON for PRESIDENT COMMITTEE
Samuel Voggie, Treasurer

STARS SALUTE TO JESSE JACKSON

includes:

"DREAM GIRLS"

"TAP DANCE KID"

SANDMAN SIMS

FIRE AND ICE

KEN PRYMUS

YAHEE

ROY AYRES

J.R. MITCHELL &
MARCELLUS GREEN in a
Tribute to THELONIOUS MONK

and more to follow...

The Westside Committee
150 West 80th Street
New York, N.Y. 10024

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Westside Committee for Jackson, et al.

MUR 2139

37 APR 24
All: 24

COMPREHENSIVE INVESTIGATIVE REPORT #1

On January 29, 1987, the Commission found reason to believe the Westside Committee for Jackson (as well as other parties) violated 2 U.S.C. § 441d. A notification letter was sent to the Westside Committee for Jackson ("Westside") at 394 Broadway, New York, N.Y. That address appeared on the solicitation letter which gave rise to the Commission's finding (said solicitation, however, did not bear the name of the Westside Committee for Jackson).

This Office received a response to the notification in the form of a telephone call and letter (see Attachment) from Regina Darby, who resides at 394 Broadway, New York, N.Y. Ms. Darby stated that she was not an organizer or officer of Westside, but rather agreed to contribute money and to do volunteer work for the Jackson Campaign, in response to a solicitation letter she received from Westside. She attached a copy of that solicitation. (See Attachment).

The solicitation letter bears the letterhead: "WESTSIDE COMMITTEE FOR JESSE JACKSON." It gives the organization's address as 150 West 80th Street, New York, N.Y. 10024, and lists two chairmen, Bill Pitman and Flo Kennedy. (The only disclaimer on this solicitation letter states that it is "authorized by

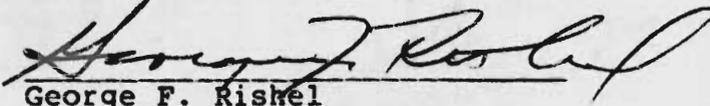
89040760911

Jesse Jackson for President Committee Samuel Voggie, treasurer"). This Office has learned that the 150 West 80th St. address is the home address of Bill Pitman, one of the persons named as Chairman of Westside. According to respondent Dorothy Pitman Hughes, Bill Pitman (Ms. Hughes' ex-husband) is now in a hospital with terminal cancer. Therefore, this Office will re-send the notification of the Commission's January 29, 1987, action that it found reason to believe Westside violated 2 U.S.C. § 441d to Westside's other chairman, Flo Kennedy. Ms. Kennedy is an attorney in New York, and her address has been obtained through Martindale-Hubbell. After obtaining Ms. Kennedy's response on behalf of Westside, this Office will report again.

Lawrence M. Noble
Acting General Counsel

4/24/87
Date

BY:


George F. Riskel
Acting Associate General Counsel

Attachment
Response of Regina Darby

89040760912



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 8, 1987

Florence Kennedy, Esquire
Westside Committee for Jackson
8 E. 48th Street
New York, NY

RE: MUR 2139
The Westside Committee
for Jackson

Dear Ms. Kennedy:

On January 29, 1987, the Federal Election Commission determined that there is reason to believe the Westside Committee for Jackson violated 2 U.S.C. §441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because it appears that you are the chairman of the Westside Committee for Jackson. The Office of General Counsel, in its efforts to ascertain the Committee's address, obtained a copy of a solicitation letter that named you as Chairman of The Westside Committee for Jesse Jackson. We are also sending to you copies of the letter that gave rise to the Commission's finding (Exhibit 1) and the letter that named you as chairman of the Westside Committee for Jackson.

If you have any questions, please contact Charles Snyder the attorney assigned to this matter, at (202)376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosures

Notification letter
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Exhibits (2)

89040760913



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1987

Dorothy Pitman Hughes
609 West 138th Street
New York, New York 10031

RE: MUR 2139
Women's Network for Political
and Economic Parity and
Dorothy Pitman Hughes, as
treasurer

Dear Ms. Hughes:

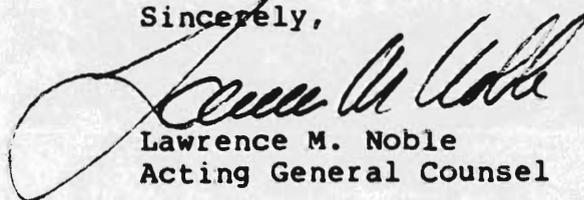
On January 30, 1986, you were notified that the Commission found reason to believe the Women's Network for Political and Economic Parity and you, as treasurer, violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached order which requires you to appear and give sworn testimony on October 8, 1987, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code. Please present all documents relevant to the above referenced matter at 1 p.m. on that date at the place indicated on the attached subpoena. The deposition will begin after attorneys representing the Commission have reviewed the aforesaid documents.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

If you have any questions, please direct them to Charles Snyder, the attorney handling this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Subpoena

89040760914

plm

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Network for Political and) MUR 2139
Economic Parity and Dorothy)
Pitman Hughes, as treasurer)
et al.)

SUBPOENA

TO: Dorothy Pitman Hughes

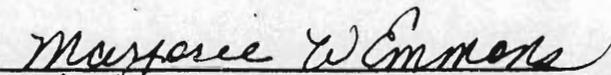
Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for a deposition with regard to the Women's Network for Political and Economic Parity and a fundraiser held for Jesse Jackson at the Tavern on the Green in 1984. Notice is hereby given that the deposition is to be taken on October 8, 1987 at U.S. Attorney's Office, Room 453b, 1 St. Andrew's Plaza, New York, N.Y., beginning at 1 p.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this ^{14th} day of September, 1987.



Scott E. Thomas
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

89040760915

600 # 4547

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 OCT 13 AM 11:08

Rogers & Wells
Two Hundred Park Avenue
New York, N.Y. 10166

1737 H STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 331-7780
TELECOPIER (202) 331-0463
TELEX 248439 WASHUR

201 NORTH FIGUEROA STREET
LOS ANGELES, CA. 90012-2638
TELEPHONE (213) 580-1000
TELECOPIER (213) 580-1234
(213) 580-1070
TELEX 194756 RWLSA

TELEPHONE (212) 678-8000
TELECOPIER (212) 678-8160
(212) 678-8375
TELEX 234493 RKWUR

47 AVENUE HOCHÉ
75008-PARIS, FRANCE
TELEPHONE 47-83-11-00
TELECOPIER 39-1-4267-8081
TELEX 290617 EURLAW

58 COLEMAN STREET
LONDON EC2R 5BE, ENGLAND
TELEPHONE 01.626.0101
TELECOPIER 441.638-2008
TELEX 864964 USLAW

October 9, 1987

Charles Snyder, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: Dorothy Pitman Hughes
MUR 2139

Dear Mr. Snyder:

As you requested at Ms. Hughes' deposition yesterday afternoon, I am forwarding a copy of an unsigned letter dated November 18, 1983 to Mr. Arnold Pinkney.

Sincerely,

Blair Soyster

Margaret Blair Soyster

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 13 PM 2:47

0
1
6
0
9
1
6
0
7
0
4
0
7
0
6
8



WNPEP

Women's Network for Political and Economic Parity

609 West 138th Street
New York, NY 10031
(212) 862-6047

18 November 1983

Mr. Arnold Pinkney
National Campaign Director
Jesse Jackson for President Committee
2100 M Street N.W.
Suite 316
Washington, D.C. 20036

Dear Mr. Pinkney:

We were advised by Mario Cooper, Scheduling, that individual members of our organization could send group contributions directly to the Committee.

We would like advice as to how our members could be enlisted to work as the campaign desires.

We have made a request for Rev. Jackson to appear at a fundraising event at Tavern on the Green, sponsored by the WestSide Committee to Elect Rev. Jesse Jackson and the Women's Network for Political and Economic Parity (WNPEP).

Please call upon us for any support needed.

Sincerely,

Dorothy P. Hughes, Founder and President
(for) Women's Network for Political and Economic Parity

DPH/MG-C

89040760917



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

23 October 1987

Mr. Joseph N. Barnes, Esquire
Barnes & Darby
11 Park Place
New York, New York 10007

Re: MUR 2139
The Stars for Jesse Jackson
for President Committee

Dear Mr. Barnes:

On January 29, 1987, the Federal Election Commission determined that there is reason to believe the Stars for Jesse Jackson for President Committee violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because we received information that you chaired meetings of the Stars for Jesse Jackson for President Committee in connection with organizing a fundraiser for Jesse Jackson at Tavern on the Green Restaurant in 1984. We are also sending you a copy of the solicitation that gave rise to the Commission's finding. Please respond in accordance with the directions contained in the enclosed notification letter and procedures.

If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures

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

89040760918