



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2538

DATE FILMED \_\_\_\_\_ CAMERA NO. \_\_\_\_\_

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88040705378



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

9 July 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE NATIONAL HEALTH EMPLOYEES  
POLITICAL ACTION COMMITTEE

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This is a referral of the National Health Employees Political Action Committee ("the Committee") for failing to file sixteen (16) Reports of Receipts and Disbursements in a timely manner. The reports are the 1982 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General, and Year End Reports, the 1983 Mid-Year and Year End Reports, the 1984 April Quarterly, July Quarterly, October Quarterly, 12 Day Pre-General, 30 Day Post-General, and Year End Reports, the 1985 Mid-Year Report, and the 1986 July Quarterly and October Quarterly Reports. The 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, October Quarterly, and 12 Day Pre-General Reports were not filed by Election Day, November 6, 1984. The 1985 Mid-Year Report was not filed by Election Day, November 4, 1986.

If you have any questions regarding this matter, please contact Lisa Stolaruk at 376-2480.

Attachment

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE: 9 July 1987**

**ANALYST: Lisa Stolaruk**

**I. COMMITTEE:** National Health Employees Political  
Action Committee (C00153445)  
Mary K. Sellars, Treasurer  
P.O. Box 1398\*/  
Murfreesboro, TN 37130

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(i), (ii),  
(iii) and (iv)  
11 CFR 104.5(c)(1)(i), (ii)  
and (iii)  
11 CFR 104.5(c)(2)(i)(A)  
and (B)

**III. BACKGROUND:**

**Late Filing of Reports**

The National Health Employees Political Action Committee ("the Committee") failed to file sixteen (16) Reports of Receipts and Disbursements in a timely manner. The reports are the 1982 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General, and Year End Reports, the 1983 Mid-Year and Year End Reports, the 1984 April Quarterly, July Quarterly, October Quarterly, 12 Day Pre-General, 30 Day Post-General, and Year End Reports, the 1985 Mid-Year Report, and the 1986 July Quarterly and October Quarterly Reports. Prior Notice was sent to the Committee for all of the above reports except the 1982 April Quarterly Report because the Committee did not register with the Commission until April 9, 1982 (see Chart). The 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, October Quarterly, and 12 Day Pre-General Reports were not filed by Election Day, November 6, 1984. The 1985 Mid-Year Report was not filed by Election Day, November 4, 1986.

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\*/ All reports submitted during the 1985-1986 election cycle have been addressed "P.O. Box 799, Columbia, TN 38401," the address of the treasurer, Mary K. Sellars. Nevertheless, the address on the Committee's Statement of Organization is given here because none of the reports had the address change box checkmarked.

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**NATIONAL HEALTH EMPLOYEES  
POLITICAL ACTION COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

On June 19, 1985, a Non-Filer Notice was sent to the Committee for its failure to file the 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, 30 Day Post-General, and Year End Reports (Attachment 16).

On December 31, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1985 Mid-Year Report (Attachment 22). Also, on December 31, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Mid-Year Report and the 1986 July Quarterly, October Quarterly, and 30 Day Post-General Reports in a timely manner (Attachment 23).

The Committee filed the 1985 Mid-Year Report on January 27, 1987 (Attachment 24).

On March 5, 1987, in a conversation with the Reports Analysis Division ("RAD") analyst, Mary Sellars, treasurer of the Committee, said that she had mailed the 1983-1984 reports, but said she would mail copies of them to the Commission in a few days (Attachment 25).

The Committee filed the 1984 Year End Report on March 19, 1987 (Attachment 26). A note attached to the report explained:

1984 Year End Report had been sent and according to my copy the beginning balance of the 1985 Mid-Year report is the same as ending balance [sic] of the 1984 YE report. Copies of both are being mailed again.

On April 22, 1987, the RAD analyst contacted Mary Sellars to inquire about the Committee's failure to file 1982, 1983 and 1984 reports (Attachment 27). Ms. Sellars said that she had sent copies of them to the Commission previously, but would send copies again.

The Committee filed the 1982 April Quarterly, July Quarterly and Year End Reports, the 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, and 30 Day Post-General Reports on April 24, 1987 (Attachments 28 through 35). The 1984 30 Day Post-General Report disclosed one (1) contribution to a federal candidate totalling \$1,000 disbursed on October 2, 1984, indicating a 12 Day Pre-General Report should have been filed with the Commission by October 25, 1984 (Attachment 35, Page 3). The Committee was notified on October 1, 1984 that all

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**NATIONAL HEALTH EMPLOYEES  
POLITICAL ACTION COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3**

committees that have made contributions or expenditures in connection with the general election must file a pre-election report.

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

None.

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LATE FILING HISTORY<sup>1/</sup>

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1982 April Quarterly (1/1/82-3/31/82)	N/A	04/15/82	N/A	04/24/87 (Attachment 28)
1982 July Quarterly (4/1/82-6/30/82)	06/21/82 (Attachment 2)	07/15/82	N/A	04/24/87 (Attachment 29)
1982 October Quarterly (7/1/82-9/30/82)	09/21/82 (Attachment 3)	10/15/82	N/A	01/03/83 (Attachment 5)
1982 30 Day Post-General <sup>2/</sup> (10/1/82-11/22/82)	09/27/82 (Attachment 4)	12/02/82	N/A	01/03/83 (Attachment 6)
1982 Year End <sup>3/</sup> (11/23/82-12/31/82)	01/07/83 (Attachment 7)	01/31/83	N/A	04/24/87 (Attachment 30)
1983 Mid-Year* (1/1/83-6/30/83)	07/07/83 (Attachment 8)	07/31/83	06/19/85 (Attachment 16)	04/24/87 (Attachment 31)
1983 Year End* (7/1/83-12/31/83)	01/07/84 (Attachment 9)	01/31/84	06/19/85 (Attachment 16)	04/24/87 (Attachment 32)
1984 April Quarterly* (1/1/84-3/31/84)	03/22/84 (Attachment 10)	04/15/84	06/19/85 (Attachment 16)	04/24/87 (Attachment 33)
1984 July Quarterly* (4/1/84-6/30/84)	06/21/84 (Attachment 11)	07/15/84	06/19/85 (Attachment 16)	04/24/87 (Attachment 34)
1984 October Quarterly* (7/1/84-9/30/84)	09/21/84 (Attachment 12)	10/15/84	N/A	11/15/84 (Attachment 14)

<sup>1/</sup> Those reports identified with an asterisk were not filed by Election Day for the respective election cycle.

<sup>2/</sup> The Committee's Report covered October 1, 1982 through November 30, 1982.

<sup>3/</sup> The Committee's Report covered December 1, 1982 through December 31, 1982.

## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1984 12 Day Pre-General* (10/1/84-10/17/84) <sup>4/</sup>	10/01/84 (Attachment 13)	10/25/84	N/A	04/24/87 (Attachment 35)
1984 30 Day Post-General (10/18/84-11/26/84)	10/01/84 (Attachment 13)	12/06/84	06/19/85 (Attachment 16)	04/24/87 (Attachment 35)
1984 Year End (11/27/84-12/31/84)	01/07/85 (Attachment 15)	01/31/85	06/19/85 (Attachment 16)	03/19/87 (Attachment 26)
1985 Mid-Year* (1/1/85-6/30/85)	06/21/85 (Attachment 17)	07/31/85	12/31/86 (Attachment 22)	01/27/87 (Attachment 24)
1986 July Quarterly (4/1/86-6/30/86)	06/20/86 (Attachment 18)	07/15/86	N/A	10/27/86 (Attachment 20)
1986 October Quarterly (7/1/86-9/30/86)	09/19/86 (Attachment 19)	10/15/86	N/A	10/27/86 (Attachment 21)

<sup>4/</sup> Activity for the 12 Day Pre-General Report is contained on the 30 Day Post-General Report (10/1/84-11/26/84).

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 7JAN84  
 PAGE 2672

COMMITTEE	DOCUMENT	NON-PARTY RELATED		TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		RECEIPTS	DISBURSEMENTS			
NATIONAL HEALTH EMPLOYEES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NATIONAL HEALTH CORPORATION				NON-PARTY UNQUALIFIED		ID #C00153445
	1982 STATEMENT OF ORGANIZATION OCTOBER QUARTERLY			9APR82	3	82FEC/226/2999
	REQUEST FOR ADDITIONAL INFORMATION	8,926	7,150	1JUL82 -30SEP82	4	83FEC/240/2635
	REQUEST FOR ADDITIONAL INFORMATION 2ND POST-GENERAL			1JUL82 -30SEP82	1	83FEC/283/2673
	REQUEST FOR ADDITIONAL INFORMATION	6,521	400	1JUL82 -30SEP82	1	83FEC/285/0040
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -30NOV82	3	83FEC/240/2632
				1OCT82 -30NOV82	1	83FEC/283/2675
				1OCT82 -30NOV82	3	83FEC/284/4365
	TOTAL	15,447	0 7,550	0		16 TOTAL PAGES

All Reports have been reviewed.

Cash on Hand as of 12/31/82: \$4711.76  
 Debts Owed By the Committee: \$0  
 Debts Owed To the Committee: \$0

1982 April Quarterly, July Quarterly, 30 Day Post General and Year End  
 Reports can be found beginning at microfilm location 87FEC/466/2716

PASS 1 entry for the reports, RFAIs, and Second Notices has not been  
 done for the 1981-1982 "C" Index.

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 11MAY87  
PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL HEALTH EMPLOYEES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NATIONAL HEALTH CORPORATION				NON-PARTY QUALIFIED		ID #C00153445
1983	MID-YEAR REPORT	11,303	9,585	1JAN83 -30JUN83	4	87FEC/466/2734
	NOTICE OF FAILURE TO FILE			1JAN83 -30JUN83	1	85FEC/376/1240
	YEAR-END	17,690	16,211	1JUL83 -31DEC83	4	87FEC/466/2738
	NOTICE OF FAILURE TO FILE			1JUL83 -31DEC83	1	85FEC/376/2203
1984	APRIL QUARTERLY	11,807	4,724	1JAN84 -30MAR84	4	87FEC/466/2742
	NOTICE OF FAILURE TO FILE			1JAN84 -31MAR84	1	85FEC/376/2204
	JULY QUARTERLY	15,370	8,403	1APR84 -30JUN84	4	87FEC/466/2746
	NOTICE OF FAILURE TO FILE			1APR84 -30JUN84	1	85FEC/376/2205
	OCTOBER QUARTERLY	6,383	20,485	1JUL84 -30SEP84	5	84FEC/348/4965
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	85FEC/376/5314
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	2	85FEC/379/4825
	POST-GENERAL	6,966	4,525	1OCT84 -26NOV84	4	87FEC/466/2750
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	85FEC/376/2206
	YEAR-END	3,456	43	26NOV84 -31DEC84	3	87FEC/463/1840
	NOTICE OF FAILURE TO FILE			27NOV84 -31DEC84	1	85FEC/376/2207
	TOTAL	71,975	63,976	0	37	TOTAL PAGES

All Reports have been reviewed.  
Cash on Hand as of 12/31/84: \$13,794.25  
Debts Owed To the Committee: \$0  
Debts Owed By the Committee: \$0

PASS 1 entry for the reports, RFAIs, and Second Notices has not been done for the 1983-1984 "C" Index.

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-80)DATE 11MAY87  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL HEALTH EMPLOYEES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NATIONAL HEALTH CORPORATION				NON-PARTY QUALIFIED		ID #C00153445
1985	MID-YEAR REPORT	16,831	3,537	1JAN85 -30JUN85	4	87FEC/456/0332
	MID-YEAR REPORT - AMENDMENT	16,831	3,537	1JAN85 -30JUN85	4	87FEC/463/1836
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	87FEC/452/3315
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	1	87FEC/460/3593
	REQUEST FOR ADDITIONAL INFORMATION END			1JAN85 -30JUN85	2	87FEC/462/1086
	YEAR-END	16,627	2,500	1JUL85 -31DEC85	4	86FEC/396/0259
	YEAR-END - AMENDMENT	16,627	2,500	1JUL85 -31DEC85	5	87FEC/456/0343
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	1	87FEC/453/1145
	REQUEST FOR ADDITIONAL INFORMATION END			1JUL85 -31DEC85	7	87FEC/458/0526
1986	MISCELLANEOUS NOTICE FROM FEC			31DEC86	2	87FEC/452/3312
	APRIL QUARTERLY	8,207	6,750	1JAN86 -31MAR86	4	86FEC/411/2311
	APRIL QUARTERLY - AMENDMENT	8,592	6,700	1JAN86 -31MAR86	4	87FEC/456/0348
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	87FEC/453/1143
	REQUEST FOR ADDITIONAL INFORMATION END			1JAN86 -31MAR86	1	87FEC/458/0533
	JULY QUARTERLY	11,321	6,403	1APR86 -30JUN86	4	86FEC/442/3979
	JULY QUARTERLY - AMENDMENT	11,321	6,403	1APR86 -30JUN86	4	87FEC/456/0352
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	2	87FEC/453/1140
	REQUEST FOR ADDITIONAL INFORMATION END			1APR86 -30JUN86	1	87FEC/458/0534
	OCTOBER QUARTERLY	34,004	39,513	1JUL86 -30SEP86	5	86FEC/442/3974
	OCTOBER QUARTERLY - AMENDMENT	34,004	39,513	1JUL86 -30SEP86	10	87FEC/456/0356
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	2	87FEC/453/1137
	REQUEST FOR ADDITIONAL INFORMATION END			1JUL86 -30SEP86	1	87FEC/458/0535
	1 <sup>ST</sup> LETTER INFORMATIONAL NOTICE			1JUL86 -30SEP86	1	87FEC/460/1588
	POST-GENERAL	4,263	7,500	1OCT86 - 4NOV86	4	87FEC/452/3681
	POST-GENERAL - AMENDMENT	4,263	7,500	1OCT86 - 4NOV86	4	87FEC/456/0336
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 - 4NOV86	1	87FEC/454/1932
	POST-GENERAL - AMENDMENT	6,591	7,500	16OCT86 -24NOV86	5	87FEC/456/0327
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1253
	YEAR-END	1,010	0	5NOV86 -31DEC86	3	87FEC/452/3685
	YEAR-END - AMENDMENT	1,010	0	5NOV86 -31DEC86	3	87FEC/456/0340
	REQUEST FOR ADDITIONAL INFORMATION			5NOV86 -31DEC86	1	87FEC/454/1933
	TOTAL	94,976	0 66,153	0	93	TOTAL PAGES

All Reports have been reviewed.  
Cash on Hand as of 12/31/86: \$40,291.76  
Debts Owed To the Committee: \$0  
Debts Owed By the Committee: \$0

ATTACHMENT 1



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

June 21, 1982

**July Filing Notice for Unauthorized Political Committees  
Filing Second Quarterly or Monthly  
Reports of Receipts and Disbursements**

This notice summarizes the July reporting obligations of political committees which are not authorized by any Federal candidate. The notice explains requirements for filing reports of receipts and disbursements under the Federal Election Campaign Act of 1971, as amended.

**SECOND QUARTERLY REPORT**

Unauthorized political committees (i.e., committees not authorized by any Federal candidate) must file the Second Quarterly Report unless they are filing on a monthly basis (see below).

On this report, committees must disclose all reportable transactions from the later of:

- The date of registration, if this is the committee's first report; or
- The date of the close of books of the last report filed.

The Second Quarterly Report must disclose all financial activity of the committee not previously disclosed through June 30, 1982, and must be filed regardless of the amount of financial activity involved during the reporting period.

The Second Quarterly Report may be hand delivered on or before close of business July 15, 1982. Reports mailed first-class must be received no later than close of business July 15. Reports sent by registered or certified mail must be post-marked no later than midnight July 15. 11 CFR 104.5(c)(1)(i) and 104.5(e).

**MONTHLY REPORT**

Unauthorized committees reporting on a monthly filing schedule must file their monthly report by July 20, covering activity from June 1 through June 30, 1982. This report is filed in lieu of the Second Quarterly Report. These committees must continue to follow the regular monthly reporting schedule, unless they choose to formally change their filing frequency (see below). 11 CFR 104.5(c)(3).

**NOTIFICATION OF FILING  
FREQUENCY CHANGE**

Unauthorized committees that wish to change their reporting schedule during 1982 must notify the Commission of their intention by a letter submitted with the next report due. A committee may not change its filing frequency more than once during a calendar year. 11 CFR 104.5(c).

**WHAT FORM TO USE**

All unauthorized political committees should use FEC Form 3X with appropriate schedules for filing the report. If an unauthorized committee has qualified as a multicandidate committee during this reporting period, it should check the appropriate box on page one of FEC Form 3X. (See FEC Regulations at 100.5 (e)(3) for the definition of a multicandidate committee.)

**WHERE TO FILE**

Committees should consult the instructions on the reverse side of the Summary Page of the reporting form for details on where to file their reports.

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**FAILURE TO FILE REPORTS**

Committees should be aware that failure to file required reports may result in compliance proceedings under the provisions of the Federal Election Campaign Act. According to a revised Commission policy, although political committees that are not authorized by any Federal candidate will no longer receive mailgram notification of their failure to file reports, they nevertheless remain fully liable for failure to file any report required under the Act.

Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

**TO REQUEST FURTHER INFORMATION  
OR ADDITIONAL FORMS, CONTACT:**

Office of Public Communications  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
Telephone: (202)523-4068  
Toll Free: (800)424-9530

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Please peel off the label on the envelope used for this mailing and place it on the front of the reporting form. This will assist the Commission in the identification of the committee filing the report.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 21, 1982

**October Filing Notice for Unauthorized Political Committees  
Filing Third Quarterly or Monthly  
Reports of Receipts and Disbursements**

This notice summarizes the October reporting obligations of political committees which are not authorized by any Federal candidate. The notice explains requirements for filing reports of receipts and disbursements under the Federal Election Campaign Act of 1971, as amended.

**THIRD QUARTERLY REPORT**

Unauthorized political committees (i.e., committees not authorized by any Federal candidate) must file the Third Quarterly Report unless they are filing on a monthly basis (see below).

On this report, committees must disclose all reportable transactions from the later of:

- The date of registration, if this is the committee's first report or
- The date of the close of books of the last report filed.

The Third Quarterly Report must disclose all financial activity of the committee not previously disclosed through September 30, 1982, and must be filed regardless of the amount of financial activity involved during the reporting period.

The Third Quarterly Report may be hand delivered no later than close of business October 15, 1982. Reports mailed first-class must be received no later than close of business October 15, 1982. Reports sent by registered or certified mail must be post-marked no later than midnight October 15. 11 CFR 104.5(c)(1)(i) and 104.5(e).

**NOTE:** If a committee filing on a quarterly basis makes contributions or expenditures in connection with the primary or general election(s) and such disbursements have not been previously reported, the committee must also file a Pre-election Report of Receipts and Disbursements. (Information concerning the general election reporting requirements will be mailed to all unauthorized committees prior to the election.)

**MONTHLY REPORT**

Unauthorized committees reporting on a monthly filing schedule must file their monthly report by October 20, covering activity from September 1 through September 30, 1982. This report is filed in lieu of the Third Quarterly Report. 11 CFR 104.5(c)(3).

**WHAT FORM TO USE**

All unauthorized political committees should use FEC Form 3X with appropriate schedules for filing the report. If an unauthorized committee has qualified as a multicandidate committee during this reporting period, it should check the appropriate box on page one of FEC Form 3X. (See FEC Regulations at 100.5(e)(3) for the definition of a multicandidate committee.)

**WHERE TO FILE**

Committees should consult the instructions on the reverse side of the Summary Page of the reporting form for details on where to file their reports.

**FAILURE TO FILE REPORTS**

Committees should be aware that failure to file required reports may result in compliance proceedings under the provisions of the Federal Election Campaign Act. According to a revised Commission policy, although political committees that are not authorized by any Federal candidate will no longer receive mailgram notification of their failure to file reports, they nevertheless remain fully liable for failure to file any report required under the Act.

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Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports and committees filing such documents will be required to refile.

**TO REQUEST FURTHER INFORMATION  
OR ADDITIONAL FORMS, CONTACT:**

Office of Public Communications  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
Telephone: (202)523-4068  
Toll-Free: (800)424-9530

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Please peel off the label on the envelope used for this mailing and place it on the front of the reporting form. This will assist the Commission in the identification of the committee filing the report.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 27, 1982

**GENERAL ELECTION REPORTS FILING NOTICE  
FOR UNAUTHORIZED POLITICAL COMMITTEES**

This notice summarizes the reporting obligations of unauthorized political committees for the Pre-General and Post-General Election Reports of Receipts and Disbursements to be filed under the Federal Election Campaign Act (the Act) of 1971, as amended.

**WHO MUST FILE**

All political committees which are not authorized committees of a candidate for Federal office, must file a Pre-General Election Report of Receipts and Disbursements by **October 21, 1982**, if the committee has made contributions or expenditures (including independent or coordinated expenditures) in connection with the general election and if such contributions or expenditures have not been previously disclosed.

All committees must file a Post-General Election Report due **December 2, 1982**, regardless of the total amount of financial activity during the respective reporting period. For committees that filed a Pre-General Election Report, the coverage dates for the Post-General Election Report will be October 14, 1982, through November 22, 1982. For committees which did not file a Pre-General Election Report, the coverage dates for the Post-General Election Report will be either the date of committee registration or the close of books of the last report filed, through November 22, 1982. These reports must disclose all financial activity not previously disclosed.

**NOTE:** Committees filing monthly reports are required to file the Pre-General and Post-General Reports. In addition, these committees must file a Year-End Report, due January 31, 1983. These reports are required to be filed in lieu of monthly reports due November, December and January.

**COMMITTEES NOT REQUIRED TO FILE THE PRE-GENERAL REPORT**

- Political committees (other than monthly filers) which will not make contributions or expenditures in connection with the 1982 general election during the period October 1, 1982 (or from the date of committee registration or close of books of last report filed, if after October 1) through October 13, 1982. **These committees must, however, file the Post-General Election Report.**
- Organizations which do not meet the definition of a "political committee" under the Act (2 U.S.C. §431(4)).

**NOTE:** Committees not required to file the Pre-General Report may wish to notify the Commission of this fact in writing prior to October 21, 1982, for the public record.

**DATE DUE**

The Pre-General Election Report must be hand-delivered or received by first class mail at the appropriate filing office no later than close of business **October 21, 1982**. Reports sent registered or certified mail must be postmarked no later than midnight **October 18, 1982**.

The Post-General Election Report must be hand-delivered or received by first class mail at the appropriate filing office no later than close of business on **December 2, 1982**. Reports sent by certified or registered mail must be postmarked no later than midnight **December 2, 1982**.

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The following chart is included for your convenience showing coverage dates and due dates for reports to be filed in October and for the following months.

NAME OF REPORT	PERIOD COVERED	REG./CERT. MAIL DATE	FILING DATE
Third Quarterly Report*	7/1** - 9/30/82	October 15, 1982	October 15, 1982
Pre-General Election Report	10/1 - 10/13/82	October 18, 1982	October 21, 1982
Post-General Election Report	10/14 - 11/22/82	December 2, 1982	December 2, 1982
Year-End Report	11/23 - 12/31/82	January 31, 1983	January 31, 1983

\*For committees filing monthly reports, the period covered will be September 1, 1982, to September 30, 1982, due October 20, 1982.

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

**WHAT FORM TO USE**

All unauthorized political committees required to file must use FEC Form 3X with appropriate schedules contained in this packet. Committees should consult the instructions on the back of each form for detailed information on the contents of the report.

Please peel off the label on the envelope used for this mailing and place it on the front of the reporting form. This will assist the Commission in the identification of the committee filing the report.

**WHERE TO FILE**

Committees should consult the instructions on the back of the Summary Page of Form 3X for instructions on where to file their reports.

**FAILURE TO FILE REPORTS**

Committees should be aware that failure to file required reports may result in compliance proceedings under the provisions of the Federal Election Campaign Act. According to a revised Commission policy, although political committees that are not authorized by any Federal candidate will no longer receive mailgram notification of their failure to file reports, they nevertheless remain fully liable for failure to file any report required under the Act.

Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

**FOR FURTHER INFORMATION OR TO REQUEST FORMS, CONTACT:**

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

Telephone: 202/523-4068  
Toll Free: 800/424-9530

83040705393

RECEIVED AT THE FEC

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

83 JAN 8 PM 2:14

Summary Page

ALLEN AREA

ALLEN AREA

1. Name of Committee (in Full)

NATIONAL HEALTH EMPLOYEES  
POLITICAL ACTION COMMITTEE

Address (Number and Street)

PO DRAWER 799  
101 WALNUT LANE

City, State and ZIP Code

COLUMBIA, TN 38401

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 \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate box)

- (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 \_\_\_\_\_  
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 7/1/82 through 9/30/82

6. (a) Cash on hand January 1, 1982 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 10) .....

(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 20) .....

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) .....

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

Mary K. Sellers  
Type or Print Name of Treasurer

Mary K. Sellers  
SIGNATURE OF TREASURER

12/29/82  
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 702-622-4088

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

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

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FEC FORM 3X (3/80)

8 8 3 0 4 0 7 0 2 5 3 6 3 9 4 5

RECEIVED AT THE FEC

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

83 JAN 1 10:27

(Summary Page)

ALION AREA

1. Name of Committee (in Full)  
**NATIONAL HEALTH EMPLOYERS  
POLITICAL ACTION COMMITTEE**

Address (Number and Street)  
**101 Walnut Lane  
PO Drawer 791**

City, State and ZIP Code  
**Columbia, TN 38401**

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 \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

- (a)  April 15 Quarterly Report  October 15 Quarterly Report
  - July 15 Quarterly Report  Monthly 31 Year End Report
  - July 31 Mid Year Report (Non-Election Year Only)
  - Monthly Report for \_\_\_\_\_
  - Twelfth day report preceding \_\_\_\_\_  
election on \_\_\_\_\_ in the State of \_\_\_\_\_
  - Thirtieth day report following the General Election  
on **Nov. 2, 1982** in the State of **TENNESSEE**
  - Termination Report
- (b) Is this Report an Amendment?  
 YES  NO

83040705595  
05032602632

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<b>10/1/82 through 11/30/82</b>		
6. (a) Cash on hand January 1, 19 <b>82</b>			\$ 4000.00
(b) Cash on Hand at Beginning of Reporting Period		\$ 2208.72	
(c) Total Receipts (from Line 10)		\$ 6521.65	\$ 20830.37
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 8730.37	\$ 24830.37
7. Total Disbursements (from Line 20)		\$ 400.00	\$ 16500.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 8330.37	\$ 8330.37
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)		\$	

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

**Mark K. Sellers**  
Type or Print Name of Treasurer

**Mark K. Sellers**  
SIGNATURE OF TREASURER **10/29/82**  
Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-6630  
Local 202-633-4088

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)



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 7, 1983

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

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

**WHAT MUST BE REPORTED**

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

**FILING DATE**

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

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the form for details.

**FAILURE TO FILE**

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

**1983 FILING REQUIREMENTS**

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

**FOR INFORMATION CALL:**

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

8 8 0 0 4 0 7 0 5 3 9 6



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 7, 1983

**SEMIANNUAL REPORT FILING REQUIREMENTS**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1983..

**WHAT MUST BE REPORTED**

Committees must disclose all financial activity of the committee from the later of, the last report filed or the date of registration,\* through June 30, 1983.

**FILING DATE**

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

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed form for details.

**FAILURE TO FILE**

According to Commission policy, political committees will not necessarily receive notification of their failure to file reports. However, they remain fully liable for failure to file any report required under the Act. In addition, failure to file required reports may result in compliance proceedings. Committees must submit legible reports which can be reproduced clearly. Illegible documents will not be accepted as reports, and committees filing such documents will be required to refile.

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1983, and disclose all financial activity of the committee from June 1 through June 30, 1983.

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

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

88040705397



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1984

**JANUARY 31 YEAR-END REPORT NOTICE**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration\* through December 31, 1983.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

**WHERE TO FILE**

Committees should consult the instructions on the enclosed form for details.

**COMPLIANCE**

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

**1984 FILING REQUIREMENTS**

See the January 1984 issue of the FEC Record for filing requirements during 1984.

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

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 22, 1984

**APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

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

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,\* through March 31, 1984.

**WHEN TO FILE**

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

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**COMPLIANCE**

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

\*The first report filed by a committee shall include all amounts received or disbursed in 1984, and prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b) Activity which occurred prior to 1984 should be reported separately.

83040705399

**A R E M I N D E R**

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

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

88040705400



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 1984

**JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

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

**WHAT MUST BE REPORTED**

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

**WHEN TO FILE**

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

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

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

**COMPLIANCE**

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

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

88040705401

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

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

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

September 21, 1984

**OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

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

**WHAT MUST BE REPORTED**

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

**WHEN TO FILE**

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

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

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

**COMPLIANCE**

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

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

-over-

83040705403

**A R E M I N D E R**

All committees that have made contributions or expenditures (including independent expenditures) in connection with an election, which have not previously been disclosed, must file a pre-election report for that election. (Although some committees may not be required to file pre-election reports, all committees, are required to file a post-general election report.)

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

88040705404



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

October 1, 1984

**GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

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

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

**WHAT MUST BE REPORTED**

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

**WHEN TO FILE**

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

\* \* \* \* \*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

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

**WHAT MUST BE REPORTED**

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

**WHEN TO FILE**

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

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

93040705405

**WHERE AND HOW TO FILE**

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

**QUARTERLY FILERS**

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

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

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

\* \* \*

**MONTHLY FILERS**

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

**COMPLIANCE**

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

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

9 8 0 4 0 7 0 5 4 0 6

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

FILED AT THE FEC

(Summary Page)

84 NOV 16 11:40 AM '84

ALHIA AREA

1 Name of Committee (in Full)

National Health Employees  
Political Action Committee

Address (Number and Street)

P.O. Drawer 799

City, State and ZIP Code

Indianapolis IN 46201

Check here if address is different than previously reported

2 FEC Identification Number

3  This committee qualified as a multicand-date committee during this Reporting Period on 10/1/84

4. TYPE OF REPORT (Check appropriate box)

- 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 7-1-84 through 7-30-84

6 (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(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 2B)

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)		\$ 7908.34
6 (b)	\$ 16,505.43	
6 (c)	\$ 6,353.42	\$ 29,409.81
6 (d)	\$ 23,158.85	\$ 36,316.15
7	\$ 20,485.29	\$ 23,612.59
8	\$ 2,673.56	\$ 12,703.56
9	\$ 0.00	
10	\$ 0.00	

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

For further information contact:

Federal Election Commission  
1-800-426-9930  
Line 707-523-4888

*[Signature]*

*[Signature]* 10/25/84  
Date

NOTE: This form is required to be filed with the Secretary of the Commission on the date specified in the instructions to this form.

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

FEC FORM 3R (3-80)

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17953



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1985

**JANUARY 31 YEAR-END REPORT NOTICE**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1985.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through December 31, 1984. Political committees that have not previously filed a financial report should report all financial activity from the date of registration\* through December 31, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1985.

**WHERE TO FILE**

Committees should consult the instructions on the enclosed form for details.

**COMPLIANCE**

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

**1985 FILING REQUIREMENTS**

See the January 1985 issue of the FEC Record for filing requirements during 1985.

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

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

88040705408

**A R E M I N D E R**

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

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

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## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

JUN 19 1985

RQ-7

Mary K. Sellars, Treasurer  
 National Health Employees  
 Political Action Committee  
 P.O. Box 1398  
 Murfreesboro, TN 37130

Identification Number: C00153445

Reference: Mid-Year (1/1/83-6/30/83), Year End (7/1/83-12/31/83), April Quarterly (1/1/84-3/31/84), July Quarterly (4/1/84-6/30/84), 30 Day Post-General (10/1/84-11/26/84), and Year End (11/27/84-12/31/84) Reports

Dear Ms. Sellars:

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

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

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

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

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

880409105410



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

June 21, 1985

**SEMIANNUAL REPORT NOTICE  
 FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.\*

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1985.

**WHERE AND HOW TO FILE**

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

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 1985.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee; even if such amounts were not received during the current reporting period. See 11 CFR 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

R 3 0 4 0 7 0 5 4 1 1

**COMPLIANCE**

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

FOR INFORMATION CALL: Information Services Division  
202/523-4068  
800/424-9530

88040705412

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

June 20, 1986

**WHO MUST FILE**

All Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by July 15, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report filed through June 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through June 30, 1986.\* For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1986.

**WHERE AND HOW TO FILE**

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

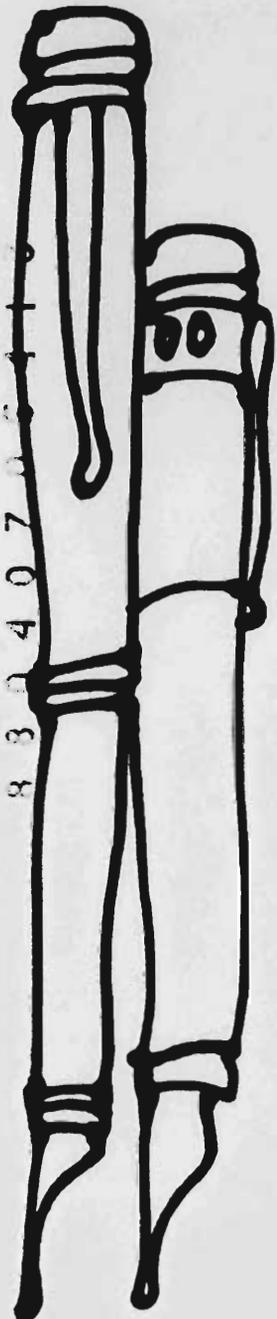
**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by July 20, 1986, and disclose all financial activity of their committee from June 1 through June 30, 1986. (See the schedule of monthly reports on the reverse side.)

**COMPLIANCE**

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

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



**REMINDERS**

**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report, if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

**MONTHLY FILERS**

Committees that file monthly reports must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than mid-night October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

<b>REPORT</b>	<b>PERIOD COVERED</b>	<b>FILING DATE</b>
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

**INDEPENDENT EXPENDITURES**

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

88040705414

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

September 19, 1986

**WHO MUST FILE**

ALL Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by October 15, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report filed through September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.\* For more detailed instructions, consult your campaign guide.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight October 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1986.

**WHERE AND HOW TO FILE**

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

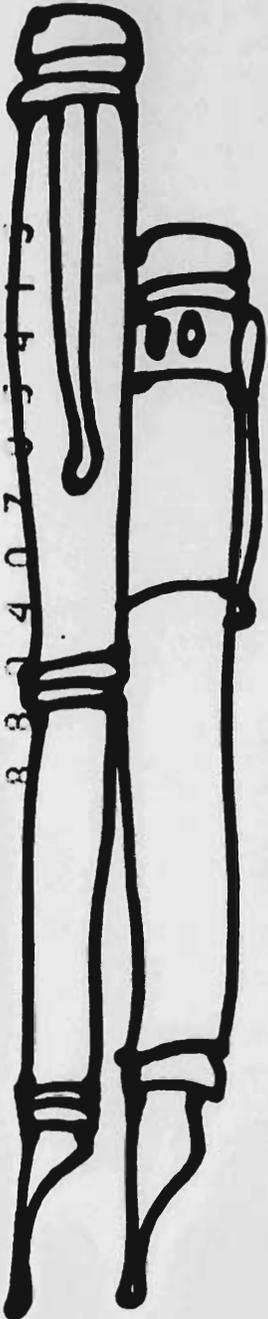
**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by October 20, 1986, and disclose all financial activity from September 1 through September 30, 1986. (See Monthly Filers on the reverse side.)

**COMPLIANCE**

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

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



**RECORDERS**

**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, and coordinated party expenditures in connection with a general election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary and general election filing requirements.

**MONTHLY FILERS**

Committees that are filing monthly must file a pre-general election report due on October 23, a post-general election report due on December 24, and a year-end report due January 31, 1987, instead of monthly reports on November 20, December 20 and January 20, 1987. See the schedule below.

<u>REPORT</u>	<u>PERIOD COVERED</u>	<u>REG./CERT. MAILING DATE</u>	<u>FILING DATE</u>
Pre-general	10/01 - 10/15	10/20/86	10/23/86
Post-general	10/16 - 11/24	12/24/86	12/24/86
Year-end	11/25 - 12/31	01/31/87	01/31/87

*See General Election Notice*

**INDEPENDENT EXPENDITURES**

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

A notice explaining general election filing requirements will be sent to you before the general election.

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

88040705416



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

(Summary Page)

06 OCT 27 09:46

1. Name of Committee (No Post)  
**National Health Employees Political Action Committee**

Address (Number and Street)  
**P.O. Drawer 799**

City, State and ZIP Code  
**Columbia, TN. 38401**

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

88040703410  
9673442397

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period	<u>7-1-86</u> through <u>9-30-86</u>		
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 41,215.71
(b) Cash on Hand at Beginning of Reporting Period		\$ 48,027.09	
(c) Total Receipts (from Line 1B)		\$ 34,004.12	\$ 53,533.50
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 82,031.21	\$ 94,949.21
7. Total Disbursements (from Line 2B)		\$ 39,513.30	\$ 52,231.30
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 42,517.91	\$ 42,517.91
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)		\$	

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

Mary K. Sellers  
Type or Print Name of Treasurer

Mary K. Sellers 10-20-86  
SIGNATURE OF THE ADJUDICATOR Date

For further information contact:  
Federal Election Commission  
800 E Street, N.W.  
Washington, D.C. 20463  
Tel. Room 202-451-6500  
Local 202-376-3120

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

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

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FEC FORM 3X (3/80)



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

EQ-7

DEC 31 1985

Mary K. Sellars, Treasurer  
National Health Employees  
Political Action Committee  
P.O. Box 1398  
Murfreesboro, TN 37130

Identification Number: C00153445

Reference: 1985 Mid-Year Report (1/1/85-6/30/85)

Dear Ms. Sellars:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Christopher L. Muland on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

97 033 10 24 03 73 J 5 4 1 9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

10-6

DEC 31 1986

Mary E. Sellars, Treasurer  
National Health Employees Political  
Action Committee  
P.O. Box 1398  
Narreesboro, TN 37130

Identification Number: C00153445

Reference: 1985-1986 Election Cycle Reports

Dear Ms. Sellars:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1985 Mid-Year (1/1/85-6/30/85)	7/31/85	not filed
July Quarterly (4/1/86-6/30/86)	7/15/86	10/27/86
October Quarterly (7/1/86-9/30/86)	10/15/86	10/27/86
30 Day Post-General (10/16/86-11/24/86)	12/4/86	not filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel

877345312

See to contact Christopher E. Roland on our toll-free number, (800) 434-9530. Our local number is (302) 376-2000.

Sincerely,



Lisa J. Stolaruk  
Chief, Party/Non-Party Branch  
Reports Analysis Division

8 8 0 4 0 7 0 5 4 2 1  
8 7 1 3 4 5 2 3 3 1 3

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

OF THE FEC

(Summary Page)

ALION AREA

ALION AREA

JAN 21 1985 12

1. Name of Committee (In Full)  
National Health Employees  
Political Action Committee

4. TYPE OF REPORT (Check appropriate boxes)  
 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 \_\_\_\_\_  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Twelfth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report  
(b) Is this Report an Amendment?  
 YES  NO

Address (Number and Street)  
P.O. Drawer 499

City, State and ZIP Code  
Columbia, TN 38401

Check here if address is different than previously reported.

2. FEC Identification Number  
N C 00 153 445

This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

SUMMARY

6. Covering Period 1-1-85 through 6-30-85

8. (a) Cash on hand January 1, 1985

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(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)

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

Mark Sellers  
Type or Print Name of Treasurer

Signature of Treasurer: \_\_\_\_\_ Date: 1-21-85

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9630  
Local 202-673-4000

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

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

Table with 6 empty columns for reporting period or other data.

FEC FORM 3X (3/80)

TELECON

**ANALYST:** Christopher Nuland

**CONVERSATION WITH:** Mary Sellars

**COMMITTEE:** National Health Care Employees Political Action Committee

**DATE:** 3/5/87

**SUBJECT(S):** 1983-1984 Reports

She said that she had mailed the 1983-1984 reports to the Commission, but she would mail copies of them in a few days.

88040705423

111. 7.1 end.

1984 year end Report had been  
sent & according to my copy  
the beginning balance of  
the 1985 mid year report is  
the same as ending balance  
of the 1984 yr report. Copies  
of both are being mailed again!

21. Section

JK

0  
1  
5  
7

For a Political Committee Other Than an Authorized Committee

(Summary Page)

11. FEC

ALIGN AREA ALIGN AREA

MAR 19 11:05

1 Name of Committee (In Full)  
*National Health Employees Political Action Committee*

Address (Number and Street)  
*P.O. DRAW # 277*

City, State and ZIP Code  
*Columbia, TN 38401*

Check here if address is different than previously reported.

2. FEC Identification Number  
*CID 153445*

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate box)

(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 \_\_\_\_\_ (Type of Election)  
 Twelfth day report preceding \_\_\_\_\_ 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 *11-26-84* through *12-31-84*

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(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 2B)

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)		\$ 7908.34
6(b)	\$ 11380.64	
6(c)	\$ 2456.71	\$ 45466.75
6(d)	\$ 15837.35	\$ 51175.09
7	\$ 45.10	\$ 37380.84
8	\$ 13794.25	\$ 13794.25
9	\$	
10	\$	

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

*Mary K. Sellers*  
 Vice or Print Name of Treasurer

*Mary K. Sellers*  
 SIGNATURE OF TREASURER

*3-15-89*  
 Date

For further information contact  
 Federal Election Commission  
 Toll Free 800 424 9530  
 Local 702 573 4168

*(has been reported previously.)*

NOTE: Submission of false information or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 417.

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

FEC FORM 3 (1988)

TELECON

ANALYST: Joseph Rawson

CONVERSATION WITH: Mary Sellars, Treasurer

COMMITTEE: National Health Employees Political Action Committee

DATE: April 22, 1987

SUBJECT(S): Non-Filing of Reports

I called Mary Sellars to ask her if they could send us copies of the missing 1982, 1983 and 1984 reports. She said that she had sent them in previously but would send us copies of them again. I suggested that in the future they send the reports by registered mail so that they would have a receipt if anything happened to them.

88040705426

For a Political Committee Other Than an Authorized Committee

RECEIVED BY THE FPC

(Summary Page)

ALION AREA

ALION AREA

1. Name of Committee (in Full)  
National Health Employees  
Political Action Committee

4. TYPE OF REPORT (Check appropriate box)  
(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 \_\_\_\_\_  
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

Address (Number and Street)  
P.O. Drawer 777

City, State and ZIP Code  
Columbia TN 38401

Check here if address is different than previously reported.

2. FEC Identification Number  
C-0015-3445

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

SUMMARY

3 7 8 3 4 8 7 2 7 1 4 3 2 7

5. Covering Period 1-1-82 through 3-31-82

6. (a) Cash on hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)

7. Total Disbursements (from Line 7)

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)		4804.25
6. (b)	4804.25	
6. (c)	5463.60	5463.60
6. (d)	10267.85	10267.85
7.	114.52	114.52
8.	10153.33	10153.33
9.		
10.		

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

Type or Print Name of Treasurer

SIGNATURE OF THE MEMBER

For further information contact  
Federal Election Commission  
Toll Free 800-424-9530  
Local 703 527-4000

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 6324.

All previous versions of FPC FORM 3 and FPC FORM 3X are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

HEALTH CARE  
7/79  
7/79

**CERTIFIED**  
P-514 740 663  
MAIL

JOE RASSON  
REPORTS ANALYSIS DIVISION  
FEDERAL ELECTION COMMISSION  
1325 K. STREET  
WASHINGTON, D.C. 20463

The postmark on this copy is illegible. It is also illegible on microfilm, the only record available.

(Summary Page)

ALIBY AREA

ALIBY AREA

1. Name of Committee (in Full)  
National Health Employees  
Political Action Committee

Address (Number and Street)  
P.O. Drawer 797

City, State and ZIP Code  
Columbia, TN 38401

Check here if address is different than previously reported.

2. FEC Identification Number  
C 0015-3445

3.  This committee qualified as a multicandidate committee during this reporting period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate box)

- (a)  April 15 Quarterly Report
  - July 15 Quarterly Report
  - October 15 Quarterly Report
  - January 31 Year End Report
  - July 31 Mid Year Report (Non Election Year Only)
  - Monthly Report for \_\_\_\_\_
  - Twelfth day report preceding \_\_\_\_\_ 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

38804062973

SUMMARY

- 5. Covering Period 4-1-82 through 6-30-82
- 6. (a) Cash on hand January 1, 1982
- (b) Cash on Hand at Beginning of Reporting Period
- (c) Total Receipts (from Line 10)
- (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)
- 7. Total Disbursements (from Line 20)
- 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)		\$ 4804.25
6(b)	\$ 10153.33	
6(c)	\$ 16600.77	\$ 22068.37
6(d)	\$ 26754.12	\$ 26868.64
7	\$ 20450.00	\$ 20564.52
8	\$ 6304.12	\$ 6304.12
9	-	
10	-	

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

Wanda Sellers  
Type or Print Name of Treasurer

Wanda Sellers  
SIGNATURE OF THE CLERK

For further information contact:  
Federal Election Commission  
Toll Free 800 426 9530  
Local 202 527 4188

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 6314.

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

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Summary Page

**1. Name of Committee (in full)**  
 National Health Employees  
 Political Action Committee

**Address (Number and Street)**  
 P.O. Drawer 799

**City, State and ZIP Code**  
 Columbia, TN. 38401

Check here if address is different than previously reported.

**2. FEC Identification Number**  
 C-0015-3445

This committee qualified as a multi-candidate committee during this reporting period on \_\_\_\_\_

**4. TYPE OF REPORT (check appropriate box)**

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 \_\_\_\_\_ (Date 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

**6. Covering Period** 12-1-82 through 12-31-82

**8. (a) Cash on hand January 1, 19** 82 .....

**(b) Cash on Hand at Beginning of Reporting Period** .....

**(c) Total Receipts (from Line 10)** .....

**(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(b) and 8(c) for Column B)** .....

**7. Total Disbursements (from Line 20)** .....

**9. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))** .....

**9. Debts and Obligations Owed TO The Committee** .....

**10. Debts and Obligations Owed BY the Committee** .....

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
8(a)		4804.25
8(b)	1302.50	
8(c)	3409.21	40927.03
8(d)	4711.76	45726.28
7	- 0 -	41014.52
9	4711.76	4711.76
9	-	
10	-	

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

Walter A. Sellers  
 Type or Print Name of Treasurer

Thomas J. Sullivan  
 SECRETARY OF THE BOARD

For further information contact:  
 Federal Election Commission  
 Toll Free 800-426-6930  
 Local 202-549-0880

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 632a.

All previous versions of FDC FORM 3 and FDC FORM 3X are obsolete and should no longer be used

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FEC FORM 3X (3/80)

For a Political Committee Other Than an Authorized Committee

(Summary Page)

REC'D APR 27 4:11:36

ALION AREA

ALION AREA

1 Name of Committee (In Full)

National Health Employees Political Action Committee

Address (Number and Street)

P.O. Drawer 799

City, State and ZIP Code

Columbia, TN 38401

Check here if address is different than previously reported.

2. FEC Identification Number

C-0015-3445

This committee qualified as a multicandidate committee during this Reporting Period on

4. TYPE OF REPORT (Check appropriate box)

- 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, Twelfth day report following the General Election, Termination Report

Is this Report an Amendment?

YES NO

SUMMARY

5 Covering Period 1-183 through 6-30-83

6 (a) Cash on hand January 1, 1983

(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 20)

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)

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

Signature of Treasurer

Signature of Treasurer

7 31 83

For further information contact:

Federal Election Commission

1 one 1-800-424-9630

1 one of 202-525-6700

NOTE: This form is to be filled out by the committee and filed with the person signing this report if the period is 7/1/81 - 6/30/82.

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

Table with 10 columns and 1 row, likely for filing or tracking information.

For a Political Committee Other Than a Member of a Legislature

FORM 278 OF FEC

(Summary Page)

ALIGN AREA [ ] ALIGN AREA [ ]

1 Name of Committee (No Full)  
 National Health Employees Political Action Committee

Address (Number and Street)  
 P O BOX 999

City, State and ZIP Code  
 Columbia, TN. 38401

Check here if address is different than previously reported.

2. FEC Identification Number  
 C-0015-3445

3  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate box)

(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

APR 27 4:38

SUMMARY

5. Covering Period 7-1-83 through 12-31-83

6 (a) Cash on hand January 1, 1983

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(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 2B)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)		\$ 4911.96
6 (b)	\$ 6427.28	
6 (c)	\$ 17640.82	\$ 28994.00
6 (d)	\$ 24120.10	\$ 38705.76
7	\$ 16211.76	\$ 25297.42
8	\$ 7908.34	\$ 7408.34
9	\$ - - -	
10	\$ - - -	

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)

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

Walter K. Sellers  
Type or Print Name of Treasurer

Walter K. Sellers  
SIGNATURE OF TREASURER

6-1-84  
Date

For further information contact  
 Federal Election Commission  
 Toll Free 800 424 9630  
 Local 202 573 6000

NOTE: Submission of false or erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 617c.

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

Table with 10 columns and 1 row, likely for tracking or administrative use.

FEC 0 (FORM 2) (3-81)

For a Political Committee Under State or Federal Law

RECEIVED BY THE FEC

(Summary Page)

ALIGN AREA

ALIGN AREA

1 Name of Committee (in Full)

National Health Employees Political Action Committee

Address (Number and Street)

P.O. Drawer 749

City, State and ZIP Code

Columbia, TN 38001

Check here if address is different than previously reported.

2 FEC Identification Number

C-0015-3445

3 This committee qualified as a multicandidate committee during the Reporting Period on

4. TYPE OF REPORT (Check appropriate box)

- (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, Thirtieth day report following the General Election, Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

6 Covering Period 1-1-84 through 3-30-84

7 (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 15)

(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 Cash and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10 Cash and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

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

Signature of Treasurer

Signature of Treasurer Date 4-15-84

For further information contact Federal Election Commission Tel Free 800 426 6930 Local 202 537 4200

Submission of false information or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c

All previous versions of FDC Form 3 and FEC Form 3 are obsolete and should no longer be used

Table with 5 empty columns

FEC FORM 3 (12/81)



For a Political Committee Other Than an Authorization Committee

RECEIVED 2 '86 FEC

(Summary Page)

ALION AREA

ALION AREA

1 Name of Committee (In Full)

National Health Employees Political Action Committee

Address (Number and Street)

PO Drawer 799

City, State and ZIP Code

Columbus, In 38401

Check here if address is different than previously reported.

2. FEC Identification Number

C-00153485

3. This committee qualified as a multi-candidate committee during this reporting period on

4. TYPE OF REPORT (Check appropriate box)

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non Election Year Only)
- Monthly Report for \_\_\_\_\_
- Twelfth day report preceding \_\_\_\_\_ 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

6 Covering Period 10-1-84 through 11-26-84

8 (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)

7 Total Disbursements (from Line 20)

9 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))

9 Debts and Obligations Owed TO The Committee (Itemize on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee (Itemize on Schedule C or Schedule D)

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	7708.34
8934.52	
6966.47	40810.34
15905.04	48718.38
4525.25	37337.74
11380.64	11380.64

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

Harriet Sellers  
Type or Print Name of Treasurer

Harriet A. Sellers  
SIGNATURE OF TREASURER

11 30 84  
Date

For further information contact  
Federal Election Commission  
Toll Free 800 424 9630  
Local 202 527 6080

NOTE: Submission of false information or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 6437c

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

FEC FORM 3 (3/81)

830407057

Statement of Receipts and Disbursements  
 Form 2, FEC FORM 3X

Name of Committee or Fund: Let's build the future together Political Action Comm.

Report covering the period From 10-1-87 to 11-26-87

	COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitized \$ <u>6,840.86</u> )	6,840.86	2,993.87	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) <b>TOTAL CONTRIBUTIONS</b> (other than loans) (add 11(a), 11(b) and 11(c))	6,840.86	2,993.87	11(d)
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>			12
<b>13. ALL LOANS RECEIVED</b>			13
<b>14. LOAN REPAYMENTS RECEIVED</b>			14
<b>15. OFFSETS TO OPERATING EXPENDITURES</b> (Refunds, Rebates, etc.)			15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			16
<b>17. OTHER RECEIPTS</b> (Dividends, Interest, etc.)	125.61	10,896.57	17
<b>18. TOTAL RECEIPTS</b> (Add 11(d), 12, 13, 14, 15, 16 and 17)	6,966.47	40,890.09	18
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>			19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>			20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	3,500.00	17,990.00	21
<b>22. INDEPENDENT EXPENDITURES</b> (see Schedule E)			22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES</b> (2 U.S.C. § 441 et al.) (Use Schedule F)			23
<b>24. LOAN REPAYMENTS MADE</b>			24
<b>25. LOANS MADE</b>			25
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>			
(a) Individuals/Persons Other Than Political Committees		4.00	26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) <b>TOTAL CONTRIBUTION REFUNDS</b> (Add 26(a), 26(b) and 26(c))		4.00	26(d)
<b>27. OTHER DISBURSEMENTS</b>	1,025.35		27
<b>28. TOTAL DISBURSEMENTS</b> (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	4,525.35	8,737.74	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS</b> (other than loans) from Line 11(d)	6,840.86	2,993.87	29
<b>30. TOTAL CONTRIBUTION REFUNDS</b> from Line 26(d)		4.00	30
<b>31. NET CONTRIBUTIONS</b> (other than loans) (Subtract Line 30 from Line 29)	6,840.86	2,989.87	31
<b>32. TOTAL OPERATING EXPENDITURES</b> from Line 19			32
<b>33. OFFSETS TO OPERATING EXPENDITURES</b> from Line 15			33
<b>34. NET OPERATING EXPENDITURES</b> (Subtract Line 33 from Line 32)			34

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule 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)  
*National Health Employees Political Action Committee*

89040705431

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>- Bill Bowen</i>	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10-2-84</i>	<i>1000.00</i>
<i>Burt Gordon</i>	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<i>10-18-84</i>	<i>2500.00</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

*AC*

SUBTOTAL of Disbursements This Page (optional) ..... *3500.00*

TOTAL This Period (last page this line number only) ..... *22.00*

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

**RAD REFERRAL # 87L-24**  
**STAFF MEMBER Sandie Dunham**

**SOURCE OF MUR: INTERNALLY GENERATED**

**RESPONDENTS: National Health Employees Political Action Committee and Mary K. Sellars, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)**

**INTERNAL REPORTS CHECKED: C Index**

**FEDERAL AGENCIES CHECKED: None**

87 SEP 17 PM 4:41

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

**I. GENERATION OF MATTER**

The National Health Employees Political Action Committee (the "Committee") and Mary K. Sellars, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for failure to timely file sixteen (16) Reports of Receipts and Disbursements in a timely manner.

**Background**

The Committee failed to file sixteen (16) Reports of Receipts and Disbursements in a timely manner. The reports were the 1982 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General, and Year End Reports; the 1983 Mid-Year and Year End Reports; the 1984 April Quarterly, July Quarterly, October Quarterly, 12 Day Pre-General, 30 Day Post-General, and Year End Reports; the 1985 Mid-Year Report; and the 1986 July Quarterly and October Quarterly Reports. Prior Notice was sent to the Committee for all of the above reports except the 1982

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April Quarterly Report because the Committee did not register with the Commission until April 9, 1982. The 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, October Quarterly, and 12 Day Pre-General Reports were not filed by Election Day, November 6, 1984. The 1985 Mid-Year Report was not filed by Election Day, November 4, 1986.

On June 19, 1985, a Non-Filer Notice was sent to the Committee for its failure to file the 1983 Mid-Year and Year End Reports, and the 1984 April Quarterly, July Quarterly, 30 Day Post-General, and Year End Reports. Notices were not sent prior to this time because the Committee's financial activity did not meet RAD's threshold for tracking.

On December 31, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1985 Mid-Year Report. Also, on December 31, 1986, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Mid-Year Report and the 1986 July Quarterly, October Quarterly, and 30 Day Post-General Reports in a timely manner.

The Committee filed the 1985 Mid-Year Report on January 27, 1987.

On March 5, 1987, in a conversation with the RAD analyst, Mary Sellars maintained that she had mailed the 1983-1984 reports, but said that she would mail copies to the Commission in a few days.

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The Committee filed the 1984 Year End Report on March 19, 1987. A note attached to the report explained:

1984 Year End Report had been sent and according to my copy the beginning balance of the 1985 Mid-Year report is the same as ending balance [sic] of the 1984 YE report. Copies of both are being mailed again.

On April 22, 1987, the RAD analyst contacted Mary Sellars to inquire about the Committee's failure to file 1982, 1983 and 1984 reports. Ms. Sellars said that she had sent copies of them to the Commission previously, but would send copies again.

The Committee filed the 1982 April Quarterly, July Quarterly and Year End Reports; the 1983 Mid-Year and Year End Reports; and the 1984 April Quarterly, July Quarterly, and 30 Day Post-General Reports on April 24, 1987. The 1984 30 Day Post-General Report disclosed one (1) contribution to a federal candidate totalling \$1,000 disbursed on October 2, 1984, indicating a 12 Day Pre-General Report should have been filed with the Commission by October 25, 1984. The Committee was notified on October 1, 1984 that all committees that have made contributions or expenditures in connection with the general election must file a pre-election report.

II. LEGAL AND FACTUAL ANALYSIS

The reporting requirements for an unauthorized political committee filing on a quarterly basis are set forth in 2 U.S.C. § 434(a)(4) as follows:

(A)(i) quarterly reports, in a calendar year in which a regularly scheduled

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general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year;

(ii) a pre-election report, which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election;

(iii) a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election; and

(iv) in any other calendar year, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year.

The following is a breakdown of the number of days each report was late:

<u>REPORT</u>	<u>DATE DUE</u>	<u>DATE FILED</u>	<u>DAYS LATE</u>
1982 April Quarterly	4/15/82	4/24/87	1,834
1982 July Quarterly	7/15/82	4/24/87	1,743
1982 October Quarterly	10/15/82	1/3/83	80

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1982 30 Day Post- General <sup>1/</sup>	12/2/82	1/3/83	32
1982 Year End <sup>2/</sup>	1/31/83	4/24/87	1,543
1983 Mid-Year	7/31/83	4/24/87	1,361
1983 Year End	1/31/84	4/24/87	1,178
1984 April Quarterly	4/15/84	4/24/87	1,104
1984 July Quarterly	7/15/84	4/24/87	1,013
1984 October Quarterly	10/15/84	11/15/84	31
1984 12 Day Pre-General <sup>3/</sup>	10/25/84	4/24/87	911
1984 30 Day Post-General	12/6/84	4/24/87	869
1984 Year End	1/31/85	3/19/87	777
1985 Year End	7/31/85	1/27/87	545
1986 July Quarterly	7/15/86	10/27/86	104
1986 October Quarterly	10/15/86	10/27/86	12

The Committee has consistently filed its reports in an untimely manner. Accordingly, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Committee and Mary K. Sellars, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

**III. RECOMMENDATIONS**

1. Open a MUR.

<sup>1/</sup> The Committee's Report covered October 1, 1982 through November 30, 1982.

<sup>2/</sup> The Committee's Report covered December 1, 1982 through December 31, 1982.

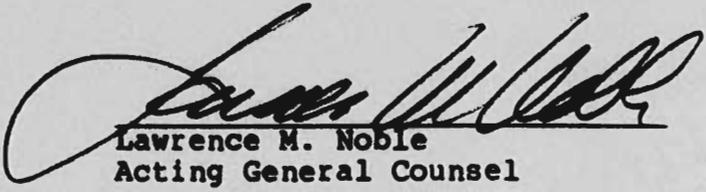
<sup>3/</sup> Activity for the 12 Day Pre-General Report is contained on the 30 Day Post-General Report.

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2. Find reason to believe that the National Health Employees Political Action Committee and Mary K. Sellars, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the attached letters and Factual and Legal Analysis.

Date

9/17/87

  
Lawrence M. Noble  
Acting General Counsel

Attachments:

- 1-Referral Materials
- 2-Proposed Letters and Factual and Legal Analysis

88040705443

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
National Health Employees Political Action  
Committee and Mary K. Sellars, as treasurer

) (MUR 2538)  
)  
) ~~RAD Ref. 87L-24~~  
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on September 22,  
1987, the Commission decided by a vote of 6-0 to take  
the following actions in RAD Ref. 87L-24:

1. Open a MUR.
2. Find reason to believe that the National Health  
Employees Political Action Committee and Mary K.  
Sellars, as treasurer, violated 2 U.S.C. § 434(a)  
(4) (A).
3. Approve the letters and Factual and Legal Analysis,  
as recommended in the First General Counsel's  
report signed September 17, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald,  
McGarry, and Thomas voted affirmatively for the decision.

Attest:

9-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	9-17-87,	4:41
Circulated on 48 hour tally basis:	Fri.,	9-18-87,	12:00
Deadline for vote:	Tues.,	9-22-87,	4:00

88040705444



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

28 September 1987

Mary K. Sellars, Treasurer  
National Health Employees  
Political Action Committee  
P.O. Box 1398  
Murfreesboro, TN 37130

RE: MUR 2538  
National Health Employees  
Political Action Committee  
and Mary K. Sellars, as  
treasurer

Dear Ms. Sellars:

On September 22, 1987, the Federal Election Commission found that there is reason to believe that the National Health Employees Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the 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 the 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

8 8 0 4 0 7 0 5 4 4 5

Office of the 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, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not 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 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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

8 8 0 4 0 7 0 5 4 4 6

GCC # 4539

# NHEPAC

## National Health Employees Political Action Committee

P.O. Box 1398  
Murfreesboro, TN 37130

October 12, 1987

VIA UPS NEXTDAY AIR

Federal Election Commission  
Washington, DC 20463

Attention: Office of the General Counsel

Re: MUR 2538  
National Health Employees Political Action Committee and  
Mary K. Sellars, Treasurer

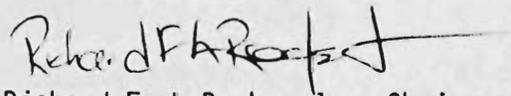
Gentlemen:

1. On behalf of and as Chairman of the National Health Employees Political Action Committee, I am interested in pursuing pre-probable case conciliation.
2. On behalf of the committee, we request that we be placed on "probation" and be given an opportunity to demonstrate that we as a group and our treasurer in particular are now fully aware of all filing requirements and that all of those requirements will be timely and adequately met by registered and/or certified mail. There is no question that we have been negligent in the handling of the required Federal Election Commission Reports. While many excuses could be made, the fact of the matter remains--as more than amply demonstrated by your fact sheet--that we have not filed the reports timely. As Chairman of the Committee for the last year, I have met with our Treasurer, Ms. Mary K. Sellars. Ms. Sellars has made a commitment--in writing which I have attached--to timely and adequately file the required reports. We have agreed that she will be filing those reports at least a week in advance of the deadline with copies to me as Chairman. In the event I fail to receive those copies, I will personally followup and assure that they are forthcoming within the requisite time period.
3. I, as well as Ms. Sellars, am available to meet with your staff to provide you with all the oral and written assurances that we possibly can that we will timely comply in the future.

I look forward to hearing from you and remain until then

Sincerely yours,

FOR THE COMMITTEE



Richard F. LaRoche, Jr., Chairman

RFL, Jr./lac

Enclosure

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 OCT 13 PM 2:49

HAND DELIVERED  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
87 OCT 13 PM 12:11

88040705447

**Columbia  
Health Care Center, Inc.**

P.O. Drawer 799  
101 Walnut Lane  
Columbia, TN 38401

October 9, 1987

Mr. Ted LaRoche, Chairman  
National Health Employees  
Political Action Committee  
814 South Church Street  
Murfreesboro, TN. 37130

RE: MUR 528

Dear Ted,

It is true we have not sent in these forms in a timely manner. Originally the Commission notified us when forms were due; however, this is no longer being done and we have been remiss in getting this done on time.

We failed to realize the importance of these reports as we never received any feedback from the Commission. About a year ago, we began receiving requests for additional information or amended reports, which we are now sending by registered mail.

We have now set up a system with our bookkeepers that will enable us to do a better job with these reports.

We have never intentionally withheld any information and do beg forgiveness for not realizing the importance of these reports. Please accept my personal commitment to be timely with all reports to the Federal Election Commission in the future.

Sincerely,



Mary K. Sellars

MKS/je

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Health Employees )  
Political Action Committee and )  
Mary K. Sellars, as treasurer )

MUR 2538

JAN 06 1988

SENSITIVE

EXECUTIVE SESSION

87 DEC 17 PM 4:18

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On September 22, 1987, the Commission found reason to believe that National Health Employees Political Action Committee and Mary K. Sellars, as treasurer, violated 2 U.S.C.

§ 434(a)(4)(A) by failing to file the 1982 April Quarterly, July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports; the 1983 Mid-Year and Year End Reports; the 1984 April Quarterly, July Quarterly, October Quarterly, 12 Day Pre-General, 30 Day Post-General and Year End Reports; the 1985 Mid-Year Report; and the 1986 July Quarterly and October Quarterly Reports in a timely manner. By letter dated October 12, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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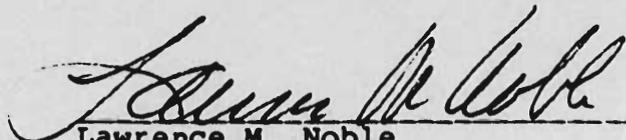
Accordingly, this Office recommends that the Commission enter into conciliation with respondents and approve the proposed conciliation agreement.

**III. RECOMMENDATIONS**

1. Enter into conciliation with National Health Employees Political Action Committee and Mary K. Sellars, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

12/17/87

  
Lawrence M. Noble  
General Counsel

**Attachments**

1. Request for conciliation
2. Proposed agreement and letter

88040705450

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Health Employees ) MUR 2538  
Political Action Committee and )  
Mary K. Sellars, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 6, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2538:

1. Enter into conciliation with National Health Employees Political Action Committee and Mary K. Sellars, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement attached to the General Counsel's report dated December 17, 1987,
3. Approve the letter attached to the General Counsel's report dated December 17, 1987.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens was not present during the consideration of this matter.

Attest:

1-7-88  
Date

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

83040705451

plm



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 11, 1988

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mary K. Sellars, Treasurer  
National Health Employees  
Political Action Committee  
P.O. Box 1398  
Murfreesboro, TN 37130

RE: MUR 2538  
National Health Employees  
Political Action Committee and  
Mary K. Sellars, as treasurer

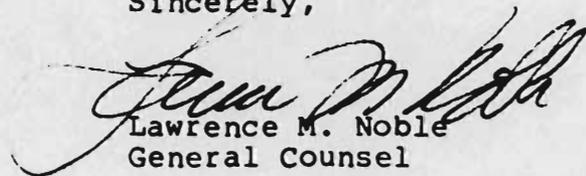
Dear Ms. Sellars:

On September 22, 1987, the Federal Election Commission found reason to believe that National Health Employees Political Action Committee and Mary K. Sellars, as treasurer, violated 2 U.S.C. § 434(a)(4)(A). At your request, on January 6, 1988, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL & ETHICS OFFICER

FROM: SCOTT E. THOMAS *ST*  
COMMISSIONER

SUBJECT: RECUSAL IN MUR 2538

DATE: FEBRUARY 5, 1988

I will henceforth recuse myself from any further consideration or action in connection with MUR 2538 (National Health Employees Political Action Committee).

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88 MAY 19 AM 11:40

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Health Employees Political	)	MUR 2538
Action Committee and Mary K.	)	
Sellars, as treasurer	)	

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Attached is a conciliation agreement which has been signed by Richard F. LaRoche, Jr., the Chairman of the National Health Employees Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on April 14, 1988. The \$8,400 check for the civil penalty has not yet been received.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with the National Health Employees Political Action Committee.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

5/18/88  
Date

*Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Conciliation Agreement
2. Letter to Respondent

88040705454

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Health Employees Political ) MUR 2538  
Action Committee and Mary K. )  
Sellars, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 23, 1988, the Commission decided by a vote of 4-0 to take the following actions in MUR 2538:

1. Accept the conciliation agreement with the National Health Employees Political Action Committee, as recommended in the General Counsel's Report signed May 18, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed May 18, 1988.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioner Thomas recused; Commissioner Josefiak did not cast a vote.

Attest:

5-24-88  
Date

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

Received in the Office of Commission Secretary: Thurs., 5-19-88, 11:40  
Circulated on 48 hour tally basis: Thurs., 5-19-88, 4:00  
Deadline for vote: Mon., 5-23-88, 4:00

88040705455



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 26, 1988

Richard F. LaRoche, Jr., Chairman  
National Health Employees  
Political Action Committee  
P.O. Box 1398  
Murfreesboro, TN 37130

RE: MUR 2538

Dear Mr. LaRoche:

On May 23, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on National Health Employees Political Action Committee's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. 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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

88040705456

*plm*

600#9303

RECEIVED  
FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

88 MAY 17 AM 10:47

In the Matter of	)	
	)	
National Health Employees	)	MUR 2538
Political Action Committee and	)	
Mary K. Sellars, 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 reason to believe that National Health Employees Political Action Committee and Mary K. Sellars, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A).

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

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

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

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

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

1. Respondent, National Health Employees Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

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FEDERAL ELECTION COMMISSION  
88 MAY 18 AM 11:11

2. Respondent, Mary K. Sellars, is the treasurer of National Health Employees Political Action Committee.

3. Respondents failed to file sixteen (16) reports of receipts and expenditures in a timely manner.

4. The reports were filed between 12 and 1,834 days late as follows:

<u>Report Type</u>	<u>Date Due</u>	<u>Date Filed</u>	<u>Days Late</u>
1982 April Quarterly	4/15/82	4/24/87	1,834
1982 July Quarterly	7/15/82	4/24/87	1,743
1982 October Quarterly	10/15/82	1/3/83	80
1982 Post-General	12/2/82	1/3/83	32
1982 Year End	1/31/83	4/24/87	1,543
1983 Mid-Year	7/31/83	4/24/87	1,361
1983 Year End	1/31/84	4/24/87	1,178
1984 April Quarterly	4/15/84	4/24/87	1,104
1984 July Quarterly	7/15/84	4/24/87	1,013
1984 October Quarterly	10/15/84	11/15/84	31
1984 Pre-General	10/25/84	4/24/87	911
1984 Post-General	12/6/84	4/24/87	869
1984 Year End	1/31/85	3/19/87	777
1985 Year End	7/31/85	1/27/87	545
1986 July Quarterly	7/15/86	10/27/86	104
1986 October Quarterly	10/15/86	10/27/86	12

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V. Respondents failed to file timely reports in violation of 2 U.S.C. § 434(a)(4)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Eight Thousand Four Hundred Dollars (\$8,400), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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

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

X. 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

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

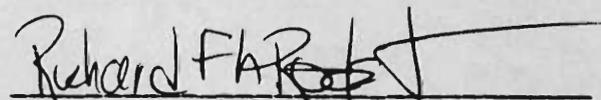
FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Date 5/25/88

FOR THE RESPONDENTS:

  
Richard F. LaRoche, Jr.  
Chairman

Date May 4, 1988

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MJR # 2538

DATE FILMED \_\_\_\_\_ CAMERA NO. \_\_\_\_\_

CAMERAMAN K.A.U.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

*NY 8.25.88*

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2538 .

118040712707



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*plm*

June 10, 1988

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Richard F. LaRoche, Jr., Chairman  
National Health Employees  
Political Action Committee  
P.O. Box 1398  
Murfreesboro, TN 37130

RE: MUR 2538

Dear Mr. LaRoche:

On May 23, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on the behalf of the National Health Employees Political Action Committee and Mary K. Sellars, as treasurer. The thirty (30) day period for compliance with the conciliation agreement has elapsed but the Commission still has not received your payment of the \$8,400 civil penalty as required by the agreement. Please be advised that this Office will seek the Commission's authorization to file civil suit against the Committee and its treasurer for failure to comply with the agreement if full payment of the civil penalty is not received by the Commission within 10 days of your receipt of this letter.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

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CCG#99603

National Health Employees Political Action Committee

P.O. Box 1398  
Murfreesboro, TN 37130

June 20, 1988

Lawrence M. Noble  
General Counsel  
The Federal Election Commission  
Washington, DC 20463

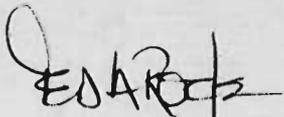
Re: National Health Corporation Political Action Committee  
Your File MUR 2538

Attention: Ms. Sandra Dunham

Dear Ms. Dunham:

As I have advised you, we have forwarded to you on May 14 the Cashier's Check #13007 for \$8,400. The bank says it has not cleared, and I have now stopped payment on that and am enclosing herewith Cashier's Check #13611 in the amount of \$8,400. I apologize for the loss of the first check.

Sincerely yours,



Richard F. LaRoche, Jr.

RFL, Jr./lac

Enclosure

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88 JUN 23 AM 9:10

Stop Payment Requests cannot be accepted until 30 days after the issue date. An Indemnity Bond will be required before this Cashier's check will be replaced or refunded.



**FIRST CITY BANK**  
RUTHERFORD CO., TENN.

13611

REMITTER National Health Corporation  
Political Action Committee

6/16 19 88

PAY TO THE ORDER OF Federal Election Commission \$ 8,400.00

FIRST CITY BANK  
87340 **8400 DOLS 00 CTS**

DOLLARS

**CASHIER'S CHECK**

BY *Debra A. Trimiew*

⑈013611⑈ ⑆064103406⑆ 010 012 3⑈

*CC# 9603*

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FEDERAL ELECTION COMMISSION  
88 JUN 27 PM 1:28

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 13611 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2538 AND NAME National Health Employees Political Action Cmte.

(Dunham)  
WAS RECEIVED ON 6/27/88. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 6/27/88

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Stop Payment Requests cannot be accepted until 30 days after the issue date. An Indemnity Bond will be required before this Cashier's check will be replaced or refunded.



**FIRST CITY BANK**  
MEMPHIS, TENN.

13007

REMITTER: National Health Corporation May 13, 19 88

Note: Remitter is National Health Corporation  
Political Action Committee  
ORDER OF Federal Election Commission

\$ \*\*8,400.00\*\*\*

THE SUM 8400 DOLLARS ONLY

DOLLARS

CASHIER'S CHECK

BY *Patricia Duffin*

⑆013007⑆ ⑆064103406⑆ 0180123⑆



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2-23-90

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2548.

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BEFORE THE FEDERAL ELECTION COMMISSION

88 MAY -6 PM 4:31

In the Matter of	)	
	)	
Illinois Democratic Party	)	
(Federal Account) and	)	MUR 2548
Joseph Griffin, as treasurer;	)	
Illinois Democratic Party (Non-	)	
Federal Account) and Joseph	)	
Griffin, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by the Reports Analysis Division after a review of the disclosure reports of the Illinois Democratic Party ("Federal Account"). The RAD review revealed that the non-federal account ("Non-Federal Account") had paid \$22,038.08 for apparent coordinated party expenditures during calendar year 1986 in possible violation of 11 C.F.R. § 102.5 and 2 U.S.C. § 441b. Based on the foregoing, on November 18, 1987, the Commission found reason to believe Illinois Democratic Party and Joseph Griffin, as treasurer (Federal and Non-Federal Accounts or "Respondents") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). The Commission also found no reason to believe Respondents violated 2 U.S.C. §§ 441a(f) and 441a(d). On December 23, 1987, Respondents' request for an extension of time until January 4, 1988, to answer the Commission's notification of reason to believe was granted. On January 7, 1988, Respondents submitted their response to the notification of reason to believe. (Attachment 1). In their answer, Respondents request that the Commission terminate its investigation into the matter or, in the alternative, Respondents request conciliation prior to a finding of probable cause to believe. (Attachment 1, pages 2, 3, 11).

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II. ANALYSIS

Essentially, Respondents do not dispute that the debt owed to the Non-Federal Account by the Federal Account was incurred when the Non-Federal Account paid for \$22,030.08 in coordinated party expenditures. 1/ In fact, Respondents state that the Non-Federal Account disbursed \$22,038.08 in coordinated party expenditures to finance political activity in connection with federal elections. (Attachment 1, pages 4, and 9). Respondents submit documents from their 30 Day Post General Election Report, Amended Post General Election Report and letters to and from the Commission to document these transactions. 2/ (Attachment 1, pages 26-52).

Respondents highlighted three areas. First, Respondents note that to address the concerns of RAD an independent audit was conducted of their Federal and Non-Federal Accounts which revealed that: the Federal Account had incurred debts to the Non-Federal Account, that permissible federal receipts were improperly deposited into the Non-Federal Account and that

1/ The debt owed to the Non-Federal Account by the Federal Account is the result of two transactions noted in the First General Counsel's Report of November 13, 1987. The first transaction was 6,038.08 for voter education expenditures and the second transaction involved \$16,000 in coordinated party expenditures for mailings on behalf of 21 federal candidates in the state of Illinois.

2/ Documents submitted by Respondents are the same materials that were part of the RAD referral in the First General Counsel's Report of November 13, 1987.

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improper accounting practices were utilized by these accounts. (Attachment 1 pages 6-7 and 41-42). Additionally, Respondents again made clear through reference to the correspondence with RAD that the debts owed the Non-Federal Account relate to federal activity and should have been reported as coordinated party expenditures. (Attachment 1, pages 7-8 and 51-52). Finally, Respondents note that prior correspondence with RAD indicates that the violation was not intentional. (Attachment 1, pages 8 and 51-52).

With regard to the debt owed to the Non-Federal Account by the Federal Account, the issue is whether the disbursement of \$22,030.08 in coordinated party expenditures from the Non-Federal Account constitutes violations of 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b. Respondents acknowledge that the \$22,038.08 in disbursements from the Non-Federal Account were coordinated party expenditures used to finance political activity in connection with federal elections. (Attachment 1, page 9). However, Respondents contend that only an unintentional "technical" violation of 11 C.F.R. § 102.5(a) has occurred. (Attachment 1, page 9). Respondents note that the purpose of 11 C.F.R. § 102.5(a) is to insure that prohibited monies are not used in connection with Federal Elections. (Attachment 1 pages 5 and 9). Therefore, Respondents contend that the underlying purpose of this section was not violated. (Attachment 1, pages 9 and 11).

Respondents maintain that in order for a violation of 2 U.S.C. § 441b to occur it is necessary to prove that the

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disbursements from the Non-Federal Account were made with funds deposited by national banks, corporation and labor organizations. (Attachment 1, pages 9-10). In response to the Commission's interrogatories, Respondents indicate that during calendar year 1986 the Non-Federal Account received \$7,050 in corporate contributions and \$45,300 in contributions from labor organizations. 3/ (Attachment 1, pages 19-24). According to Respondents no contributions from national banks were received by the Non-Federal Account. (Attachment 1, page 24).

Respondents contend, however, that the Non-Federal Account also maintained federally permissible itemized receipts totalling \$31,049.33 for the 1986 calendar year. 4/ (Attachment 1, page 10 and Answers to Interrogatories Attachment 1, pages 14-19 and 54-57). Thus Respondents claim that the Non-Federal Account exceeded by \$9,011.25 the amount of federally permissible itemized funds needed to be in compliance with 2 U.S.C. § 441b since the debt owed to the Non-Federal Account by the Federal Account was \$22,030.08. (Attachment 1, page 10). Furthermore, Respondents contend that there were also substantial non-itemized federally permissible funds deposited in the Non-Federal Account during the 1986 calendar year.

3/ Corporate and labor union contributions are cross-referenced to the state reports at Attachments 1, pages 58-147.

4/ Items listed as "federally permissible" contributions during calendar year 1986 are cross-referenced to the state reports at Attachment 1, pages 58-147.

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Respondents submit evidence that possible federally permissible contributions in the Non-Federal Account totalled \$31,049.33 at end of the calendar year 1986. Therefore, based on this aggregate total of possibly permissible receipts at year end, Respondents presume that there was enough federally permissible funds to cover the \$22,030.08 in coordinated party expenditures disbursed by the Non-Federal Account. Commission discussions in MUR 2536, however, have drawn this aggregate total methodology into question. The Commission has indicated instead that the last-in-first-out ("LIFO") analysis should be used to determine what kind of funds were in the account (e.g. union, corporate, permissible etc.) each time an expenditure for federal activity occurred. Consequently, the Office of General Counsel has submitted additional questions exploring this issue to Respondents to determine whether or not a 2 U.S.C. § 441b violation, in fact, has occurred. Interrogatories exploring how "federally permissible funds" were "mistakenly" deposited in the Non-Federal are also included.

Respondents maintain that only a technical violation of 11 C.F.R. § 102.5(a) has occurred in this matter. Respondents, quoting the Commission's Factual and Legal Analysis, state that the purpose of 11 C.F.R. § 102.5 is to guard against the use of prohibited funds in federal elections. Respondents, however,

erroneously rely on aggregate year-end totals for federally permissible receipts to prove that there was no use of prohibited funds in this case. As acknowledged by Respondents, 11 C.F.R. § 102.5(a)(1) states that only funds subject to the prohibitions and limitations of the Act may be deposited in a committee's federal account, and all disbursements, contributions, expenditures and transfers by such committees in connection with federal elections must be made by the federal account. Thus the language of this section is clear that if a committee has two accounts (State and Federal), only the Federal account may make disbursements in connection with federal elections, whether or not the non-federal account contains prohibited funds.

While it is true that 11 C.F.R. § 102.5(a) insures that prohibited monies are not used to finance federal elections, this is not the sole purpose of 11 C.F.R. § 102.5(a). Both 2 U.S.C. § 441b and 11 C.F.R. 102.5 operate to keep prohibited funds out of federal elections, but they are not synonymous. 2 U.S.C. § 441b is a flat prohibition on contributions or expenditures by national banks, corporations and labor organizations in connection with federal elections and the acceptance of such prohibited contributions by political committees. On the other hand, 11 C.F.R. § 102.5(a) is much broader in scope. Section

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102.5(a) delineates the steps that must be taken by organizations that finance both federal and non-federal election activity. Moreover, it provides that all contributions deposited in the federal account must be designated for the federal account, that any solicitations to the federal must expressly state that the contribution will be used in connection with a federal election, and that contributors must be informed that all contributions are subject to the prohibitions and limitations of the Act.

11 C.F.R. § 102.5(a)(2).

Therefore, the \$22,030.08 in coordinated expenditures disbursed by the Non-Federal Account for federal election activity makes out a clear violation of 11 C.F.R. § 102.5(a), regardless of whether or not the disbursements involved the use prohibited funds. However, if it is found that the \$22,030.08 in disbursements from the Non-Federal Account for federal election activity did not contain prohibited funds this factor may be considered in mitigation of the civil penalty.

In light of the additional information needed to resolve this matter the Office of General Counsel requests that the Commission decline at this time to enter conciliation prior to a finding of probable cause to believe. The Office of General Counsel also recommends that the Commission approve the interrogatories and letter to Respondents attached to this report.

### III. RECOMMENDATIONS

1. Decline at this time to enter into conciliation prior to a finding of probable cause to believe with Illinois Democratic Party (Federal Account) and Joseph Griffin, as treasurer; and Illinois Democratic Party (Non-Federal Account) and Joseph Griffin, as treasurer.

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2. Approve attached letter, interrogatories and request for documents.

Lawrence M. Noble  
General Counsel

Date 5/6/88

By: *Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Response of Illinois Democratic Party
2. Letter to Respondents
3. Interrogatories and Request for Documents

Staff Person: Deborah Curry

90040782350



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 16, 1988

John F. Kennedy, Esquire  
Coffield, Ungaretti, Harris, Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60620

RE: MUR 2548  
Illinois Democratic  
Party (Federal and  
Non-Federal Account)  
and Joseph Griffin, as  
treasurer

Dear Mr. Kennedy:

On November 23, 1987, you were notified that the Federal Election Commission found reason to believe that your client violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). The Commission also found no reason to believe 2 U.S.C. §§ 441a(f) and 441a(d) were violated. On January 7, 1988, you submitted a request to enter into conciliation prior to a finding of probable cause to believe. We apologize for the delay in responding to your request.

The Commission has reviewed your request and determined to decline at this time to enter into conciliation prior to a finding of probable cause to believe because additional information is necessary. Your client is requested to respond to the attached interrogatories and request for documents. Such information should be submitted to the Office of the General Counsel within 15 days of receipt of this letter.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

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*flm*

John F. Kennedy, Esquire  
Page 2

If you have any questions, please contact Deborah Curry, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories and Request for Documents

00040762352

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Illinois Democratic Party )  
(Federal Account) and )  
Joseph Griffin, as treasurer; )  
Illinois Democratic Party (Non- )  
Federal Account) and Joseph )  
Griffin, as treasurer )

MUR 2548

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2548:

1. Decline at this time to enter into conciliation prior to a finding of probable cause to believe with Illinois Democratic Party (Federal Account) and Joseph Griffin, as treasurer; and Illinois Democratic Party (Non-Federal Account) and Joseph Griffin, as treasurer, as recommended in the General Counsel's report signed May 6, 1988.
2. Approve the letter, interrogatories and request for documents, as recommended in the General Counsel's report signed May 6, 1988.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

5-11-88

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	5-6-88,	4:31
Circulated on 48 hour tally basis:	Mon.,	5-9-88,	4:00
Deadline for vote:	Wed.,	5-11-88,	4:00

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**Coffield Ungaretti Harris & Slavin**

3500 Three First National Plaza, Chicago, Illinois 60602  
Telephone: 312/977-4400 Telecopier: 312/977-4405  
Cable: CUHSLAW, Telex: 270286

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88 JUN -9 AM 9:36

VIA FEDERAL EXPRESS

June 7, 1988

Ms. Deborah Curry  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2548--Illinois Democratic Party

Dear Ms. Curry:

Please be advised that on May 21, 1988, we received from the Federal Election Commission ("Commission") a supplemental set of Interrogatories and Requests for Documents attendant to the above-referenced matter.

Pursuant to Commission procedure, it is our understanding that the Illinois Democratic Party ("Respondent") must comply with this supplemental discovery on or before June 6, 1988. We respectfully request an extension of time in which to substantively respond to this discovery.

Generally, the additional inquiry seeks information and documentation relating to the date and amount of each expenditure made by the Illinois Democratic Party Non-Federal Account in connection with federal elections; the total amount of funds on hand in the Non-Federal Account on the dates the transactions occurred; and the source of funds received from the Non-Federal Account constituting the balances in the accounts on the dates that expenditures in connection with federal elections occurred.

The Respondent in this matter respectfully requests an extension of thirty (30) days in which to respond to the Commission's additional inquiries. In support of this request for an extension of time, the Respondent wishes to bring to the Commission's attention the following facts:

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Ms. Deborah Curry  
June 7, 1988  
Page 2

1. The Commission and Respondent have enjoyed a long-standing professional relationship. The Respondent has always acted in good faith in responding to the Commission and continues to act in good faith in this matter;
2. The Respondent did not receive the Commission's supplemental discovery, dated May 16, 1988, until May 21, 1988;
3. The Respondent is working diligently to compile all relevant information and documentation relating to the supplemental discovery requested by the Commission;
4. The process of gathering the information and documentation necessary to comply with the additional inquiry is a necessarily time-consuming one. This process is further intensified by the scope of the interrogatories and the nature of the documents requested;
5. The Respondent, through its attorney John F. Kennedy, immediately informed the Federal Election Commission, through its attorney Deborah Curry, of the diligence exercised by the Respondent to date in complying with the recent discovery and the need for an extension of time in which to respond;
6. No party to this action, including the Federal Election Commission, will be prejudiced by granting the Respondent an additional thirty (30) days in which to respond to the Supplemental Discovery. In fact, the interests of all concerned will be better served by granting the Respondent an additional thirty (30) days in which to respond by ensuring that a complete and full disclosure of the facts relating to MUR 2548 is obtained.

Based upon the foregoing, the Respondent requests that the Commission give serious consideration to this request for an extension of time in which to respond to the Commission's discovery regarding MUR 2548. The Respondent realizes that granting such an extension is the exception rather than the rule. Please advise regarding the Commission's decision regarding this request.

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Coffield Ungaretti Harris & Slavin

Ms. Deborah Curry  
June 7, 1988  
Page 3

If you have any questions regarding this matter please do not hesitate to contact me.

Thank you for your time and consideration in this matter.

Very truly yours,



John F. Kennedy

JFK:dk

cc: J. Timothy Eaton  
Warren Ribley

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 16, 1988

John F. Kennedy, Esquire  
Coffield, Ungaretti, Harris, Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60602

RE: MUR 2548  
Illinois Democratic Party  
(Federal and Non-Federal  
Account) and Joseph  
Griffin, as treasurer

Dear Mr. Kennedy:

This is in response to your letter dated June 7, 1988, which we received on June 9, 1988, requesting an extension of 30 days to respond to the Commission's supplemental set of Interrogatories and Request for Documents. 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 July 6, 1988.

If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

90040782357

**Coffield Ungare, Harris & Slavin**

3500 Three First National Plaza, Chicago, Illinois 60602  
Telephone: 312/977-4400 Telecopier: 312/977-4406  
Cable: CUHSLAW, Telex: 270286

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FEDERAL EXPRESS

August 3, 1988

Ms. Deborah Curry  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION  
88 AUG -4 PM 12: 30

Re: MUR 2548 -- Illinois Democratic Party

Dear Ms. Curry:

Please be advised that the Illinois Democratic Party, the Respondent in the above-captioned matter, will answer the supplemental interrogatories propounded upon it by the Federal Election Commission and will produce all responsive documents attendant thereto to the Commission by August 10, 1988.

Respondent realizes that its responses to this supplemental discovery are overdue and appreciates the cooperation and patience the Commission has shown in this matter. Please be assured that the delay was due to circumstances beyond the Respondent's control. Initially, coordinating the production of documents from the Respondent proved problematic due to the nature of the documents requested. Additionally, the Illinois Democratic Party National Convention suspended our efforts to effectively communicate with the Respondent on this matter. Finally, the handling attorney on this matter, John F. Kennedy was involved in a major project in the State of Texas requiring his full attention.

Respondent realizes that the discovery deadlines set by the Commission must be adhered to and respectfully requests that the Commission overlook the delay in this case.

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Coffield Ungaretti Harris & Slavin

• Ms. Deborah Curry  
August 3, 1988  
Page 2

If you have any questions regarding this matter please do not hesitate to contact us.

Very truly yours,

*John F Kennedy*  
John F. Kennedy *JFK*

JFK/gbw

cc: J. Timothy Eaton

90040782359

BEFORE THE FEDERAL ELECTION COMMISSION

88 AUG -8 PM 4: 33

In the Matter of )  
 )  
Illinois Democratic Party )  
(Federal Account) and )  
Joseph Griffin, as treasurer; )  
Illinois Democratic Party (Non- )  
Federal Account) and Joseph )  
Griffin, as treasurer )

MUR 2548

**SENSITIVE**

COMPREHENSIVE INVESTIGATIVE REPORT #1

I. BACKGROUND

This matter was generated by the Reports Analysis Division after a review of the disclosure reports of the Illinois Democratic Party ("Federal Account"). The RAD review revealed that the non-federal account ("Non-Federal Account") had paid \$22,038.08 for apparent coordinated party expenditures during calendar year 1986 in possible violation of 11 C.F.R. § 102.5 and 2 U.S.C. § 441b. Based on the foregoing, on November 18, 1987, the Commission found reason to believe Illinois Democratic Party and Joseph Griffin, as treasurer (Federal and Non-Federal Accounts or "Respondents") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). The Commission also found no reason to believe Respondents violated 2 U.S.C. §§ 441a(f) and 441a(d). Subsequently, Respondents requested conciliation prior to a finding of probable cause to believe. On May 11, 1988, the Commission declined to enter into conciliation prior to a finding of probable cause to believe with Respondents and instead approved interrogatories and a request for documents.

Respondents requested and were granted an extension of time until July 6, 1988, to answer the Commission's request for information. Since no response was received by that date,

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Respondents were contacted by phone regarding the matter. Respondents indicated that the gathering together of the Committee's records took more time than anticipated and that the actual source records were not received by Respondents until the due date for the response. Additionally, Counsel for Respondents was out of town for 12 days on work related matters.

According to Respondents a response will be submitted by August 10, 1988. Upon receipt of this information and review by this Office, a report will be circulated to the Commission with appropriate recommendations.

Lawrence M. Noble  
General Counsel

8/8/88  
Date

By: *Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

Staff Person: Deborah Curry

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: *MWE* MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: AUGUST 10, 1988

SUBJECT: MUR 2548  
Comprehensive Investigative Report #1  
Signed August 8, 1988

The above-captioned matter was received in the Secretariat at 4:33 P.M. on Monday, August 8, 1988 and circulated to the Commission on a 24-hour no-objection basis at 11:00 A.M. on Tuesday, August 9, 1988.

There were no objections to the report.

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**Coffield Ungaretti Harris & Slavin**

3500 Three First National Plaza, Chicago, Illinois 60602  
Telephone: 312/977-4400 Telecopier: 312/977-4406  
Cable: CUHSLAW, Telex: 270286

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88 AUG 10 AM 9:50

VIA FEDERAL EXPRESS

August 9, 1988

Ms. Deborah Curry  
Federal Election Commission  
999 E. Street N.W.  
Washington, D.C. 20463

Re: Federal Election Commission - MUR 2548

Dear Ms. Curry:

Enclosed you will find the Illinois State Democratic Party's ("Respondents") Answers to the Supplemental Interrogatories and Response to the Request for Documents submitted by the Federal Election Commission in the above-referenced matter.

The LIFO accounting analysis of the Respondent's Non-Federal Account was conducted using the date the subject checks cleared the account as the appropriate point of reference for the analysis rather than the date the check was issued. Such point of reference is most theoretically sound because it focuses on the date the expenditure was actually made. Further, it is most consistent with generally accepted accounting practices.

The Respondent's Answers to the supplemental discovery was prepared by this office in conjunction with Respondent's accountants and we are fully prepared to discuss any questions you may have regarding this case.

Thank you for your patience and cooperation in this matter.

Very truly yours,



John F. Kennedy

JFK:elp

cc: J. Timothy Eaton

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BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF THE ILLINOIS )  
DEMOCRATIC PARTY (FEDERAL )  
ACCOUNT) AND JOSEPH GRIFFIN ) MUR 2548  
AS TREASURER; ILLINOIS )  
DEMOCRATIC PARTY (NON-FEDERAL )  
ACCOUNT) AND JOSEPH GRIFFIN, )  
TREASURER. )

ANSWER TO SUPPLEMENTAL INTERROGATORIES  
AND RESPONSE TO REQUEST FOR DOCUMENTS

Pursuant to instructions from the Federal Election Commission, the Illinois State Democratic Party ("Respondent") submits its Answers to the Supplemental Discovery in a narrative form to avoid repetition of information.

INTERROGATORY #1

Respondent made three expenditures for federally related campaign expenses from its Non-Federal Account, numbered 59-2884-7, in October, 1986. The expenditures totaled \$22,030.08 and were made to Illinois Bell on October 15, 1986, in the amount of \$115.26; Satellite Communications, Inc. on October 17, 1986, in the amount of \$5,922.82; and Conotab on October 20, 1968, in the amount of \$16,000. See Group Exhibit 1.

INTERROGATORY #2

The Federal Election Commission requested, through Supplemental Interrogatories and Document Requests that Respondent provide a LIFO (last in/first out) accounting analysis of the funds available in the Non-Federal Account on each respective date to determine whether or not the Non-Federal Account had

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federally permissible funds in the account to cover the expenditures.

The LIFO analysis revealed that on each date of the subject expenditures, the Non-Federal Account maintained a balance of federally permissible funds in excess of the expenditures. For purposes of this analysis, the Respondent determined, through reconciled bank statements, that as of September 30, 1986, the Non-Federal Account contained \$13,960 in federally permissible funds. Inasmuch as there were no expenditures from the Non-Federal Account in September, and \$13,960.00 in federally permissible funds in the Account at month's end, such funds provided the base amount of federally permissible funds for the month of October. See Group Exhibit 2 for a copy of the September bank statement and source documents. All non-federal receipts are high-lighted in yellow.

Further, the reconciled bank statements and underlying source documents for the month of October, 1986, revealed that the Non-Federal Account received at least seven deposits of federally permissible funds before October 20, 1986, the cut-off date for this analysis, bringing the available balance in the Non-Federal Account above the subject expenditures on the respective dates. A breakdown of the federally permissible receipts, including the date of the receipts, the amount and the available balance of federally permissible funds following the federal expenditures is set forth as follows:

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LIFO ANALYSIS

<u>Date</u>	<u>Federally Per- missible Receipts</u>	<u>Federal Expenditure</u>	<u>Available Balance After Expenditure</u>
9/30/86	-0-	-0-	13,960.00 - carry over from September 1986.
10/1/86	2651.00	-0-	
10/3/86	721.00	-0-	
10/7/86	2500.00	-0-	
10/10/86	856.85	-0-	
10/14/86	366.00	-0-	
10/15/86	1000.00	115.26 (Illinois Bell)	21,939.59
10/16/86	1596.48	-0-	
10/17/86	-0-	5,922.86 (Satellite Communications)	17,613.21
10/20/86	-0-	16,000.00 (Conotab)	1,613.21

Based upon the foregoing, it is clear that when the Non-Federal Account disbursed funds for the subject expenditures, the available balance of federally permissible funds in the Account exceeded the expenditures. Thus, although a technical violation of 11 C.F.R. § 102.5(a) has occurred inasmuch as the expenditures came from the Respondent's Non-Federal Account, no prohibited monies were used for these expenditures.

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INTERROGATORY #3

A list of all contributors, the dates of the contributions and amounts for the month of October, 1986, is set forth below. The list is comprised of federally permissible and non-federal receipts for each date in October in which funds were deposited. Further, each entry is supported by their underlying source documents, unless otherwise noted. Respondent's investigation into unavailable source documents continues. The source documents, attached as Group Exhibit 3, include the monthly bank statement, the deposit slips, and the checks from the contributors. The deposit slips are highlighted in yellow to indicate which deposits are non-federal receipts.

SUMMARY - October 1, 1986 Receipts; See Group Exhibit 3-2.

**Non-Federal Receipts	2,651.00
*Federally Permissible Receipts	16,846.00
Total	<u>19,497.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Illinois Central Committee of Christian County	346.00	September 30, 1986
*Illinois House Democratic Majority	3,500.00	September 25, 1986
*Friends of Michael J. Madigan	8,000.00	September 25, 1986
*U.S. Steelworker	5,000.00	Source documents unavailable
*Cass County	88.00	September 30, 1986

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**Elmer J. Purcell	34.00	September 29, 1986
**Jersey County Central Committee	139.00	September 29, 1986
**William McCord	90.00	September 30, 1986
**ASDC Dollars for Democrats	2,200.00	Source documents unavailable
**Donna Ginther	100.00	Source documents unavailable

**SUMMARY - October 3, 1986 Receipts; See Group Exhibit 3-3.**

**Federally Permissible Receipts	721.00
*Non-Federal Receipts	<u>17,262.00</u>
Total	<u>17,983.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Amalgamated Clothing and Textile Workers Union	5,000.00	September 10, 1986
*Knox County Democratic Central Committee	48.00	Date unavailable
*Williamson County Democratic Organization	266.00	September 29, 1986
*Shelby County Central Committee	71.00	September 30, 1986
*Illinois Mississippi Valley Credit Union	377.00	October 1, 1986
*Citizens for Shepherd	500.00	October 2, 1986
*Democratic Party of Cook County	5,000.00	October 3, 1986
*Committee to Re-Elect Roland Burris State Comptroller	2,500.00	October 3, 1986
*Flanigan, Bilten, and Branagan	1,000.00	Source documents unavailable

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*U.S. Steelworkers District #31	600.00	Source documents unavailable
*U.S. Steelworkers District #34	1,000.00	Source documents unavailable
*U.S. Steelworkers District #32	900.00	Source documents unavailable
**John A. Nudo	50.00	September 30, 1986
**Maurice Trexler	136.00	October 1, 1986
**Randy Walker	335.00	Source documents unavailable
**Evelyn Craig	50.00	Source documents unavailable
**39 Ward Regular Democratic Organization	50.00	Source documents unavailable
**JoAnne Alter	100.00	Source documents unavailable

SUMMARY - October 7, 1986; See Group Exhibit 3-4.

**Federally Permissible Receipts	2,500.00
*Non-Federal Receipts	<u>16,500.00</u>
Total	<u>19,000.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Citizens Committee to Re-Elect George Dunne	3,000.00	October 3, 1986
*America's Leaders Fund	5,500.00	October 6, 1986
*Laborers' Political League Fund	1,500.00	October 2, 1986
*T.I.P. Educational Fund Hotel Employees and Restaurant Employees Institutional Union	2,500.00	October 1, 1986

*Political Educational Fund of Building and Contribution Trades Department	1,000.00	October 2, 1986
*Friends of Edward J. Rosewell	3,000.00	October 7, 1986
**Continental Bank	2,500.00	October 6, 1986

**SUMMARY - October 10, 1986 Receipts; See Group Exhibit 3-5.**

**Federally Permissible Receipts	856.85
*Non-Federal Receipts	<u>35,837.85</u>
Total	<u>36,694.35</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Citizens for Hynes	3,000.00	October 10, 1986
*Sheriff Richard J. Elrod	3,000.00	October 8, 1986
*Friends of Stanley T. Kusper, Jr.	1,000.00	October 9, 1986
*Committee to Re-Elect Roland Burris State Comptroller	2,500.00	October 9, 1986
*Citizens for Judith Ann Calder	1,000.00	October 7, 1986
*Democratic Party of Cook County	5,000.00	October 8, 1986
*P. E. Cross Election Commission	150.00	October 3, 1986
*Fulton County Democratic Central Committee	122.00	October 3, 1986
*Edgar County Democrats	35.50	October 3, 1986
*Macon County Democrat Central Committee	30.00	October 2, 1986

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*Democratic Congressional Campaign Committee	20,000.00	October 8, 1986
**ASDC/Democratic Party	737.34	October 30, 1986
**Raymond D. or Charles Woods	119.00	October 2, 1986
**Dennis L. or Patrick K. Potthast	20.00	October 3, 1986

**SUMMARY** - October 14, 1986 Receipts; See Group Exhibit 3-6.

**Federally Permissible Receipts	366.00
*Non-Federal Receipts	15,517.00
Total	<u>15,883.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Friends of Michael J. Madigan	7,500.00	October 13, 1986
*Democratic Central Committee	17.00	October 6, 1986
*The Committee to Re-Elect the Democratic Senate	8,000.00	October 9, 1986
**Richard or Bea Purdeu	85.00	October 7, 1986
**Dick Allen for States Attorney	35.00	October 8, 1986
**Brown Company Democratic Committee	110.00	October 1, 1986
**Ben Goode	34.00	October 9, 1986
**Boone County Democratic Party	102.00	October 13, 1986

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**SUMMARY - October 15, 1986 Receipts; See Group Exhibit 3-7.**

**Federally Permissible Receipts	1,000.00
*Non-Federal Receipts	0.00
Total	<u>1,000.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
**Citizens for Cardiss Collins	1,000.00	October 15, 1986

**SUMMARY - October 16, 1986 Receipts; See Group Exhibit 3-8.**

**Federally Permissible Receipts	1,596.48
*Non-Federal Receipts	42,924.70
Total	<u>44,521.18</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Friends of Michael J. Madigan	35,000.00	October 15, 1986
*Illinois House Democratic Majority	5,000.00	October 15, 1986
*Senator Vince DeMuzio Committee	2,924.70	October 15, 1986
**Russo for Congress Committee	1,596.48	October 14, 1986

**SUMMARY - October 20, 1986; See Group Exhibit 3-9.**

**Federally Permissible Receipts	0.00
*Non-Federal Receipts	31,040.00
Total	<u>31,040.00</u>

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<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Friends of Michael J. Madigan	28,240.00	October 20, 1986
*Friends of Michael J. Madigan	2,800.00	October 20, 1986

**SUMMARY** - October 21, 1986 Receipts; See Group Exhibit 3-10.

**Federally Permissible Receipts	5,225.00
*Non-Federal Receipts	22,343.00
Total	<u>27,568.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Dick Allen for States Attorney	950.00	October 16, 11986
*The 43d Ward Democratic Party	882.00	October 15, 1986
*Durbin for Congress Committee	2,000.00	October 15, 1986
*Cahnman for State Senator Committee	511.00	October 15, 1986
*Friends of Michael J. Madigan	8,000.00	October 20, 1986
*Democratic Congressional Campaign Committee	10,000.00	October 17, 1986
**Bruce for Congress	1,500.00	October 21, 1986
**James Cosletto	25.00	Source documents unavailable
**ASDC/Democratic Party	3,700.00	Source documents unavailable; Funds received from the Democratic National Committee

00040702375

**SUMMARY - October 22, 1986 Receipts; See Group Exhibit 3-11**

**Federally Permissible Receipts	700.00
*Non-Federal Receipts	<u>2,615.00</u>
Total	<u>3,315.00</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Citizens for Robert S. Wronski	2,600.00	October 16, 1986
*Shelby County Democratic Central Committee	15.00	October 16, 1986
**David or Dixie Dobill	50.00	October 7, 1986
**1st Congressional District Charles A. Hayes	650.00	October 20, 1986

**SUMMARY - October 23, 1986 Receipts; See Group Exhibit 3-12.**

**Federally Permissible Receipts	150.00
*Non-Federal Receipts	<u>20,406.48</u>
Total	<u>20,556.48</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Senator Vince DeMuzio Committee	2,352.73	October 22, 1986
*Durbin for Congress Committee	6,000.00	October 22, 1986
*Illinois Trial Lawyers Association	2,500.00	October 21, 1986
*The Committee to Re-Elect the Democratic Senate	6,000.00	October 22, 1986
*ASDC/Democratic Victory Fund	3,553.75	October 17, 1986
**Richard E. Burgoyne	25.00	October 20, 1986
**Gary Hannig	125.00	October 3, 1986

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SUMMARY - October 27, 1986 Receipts; See Group Exhibit 3-13.

**Federally Permissible Receipts	6,710.40
*Non-Federal Receipts	<u>35,483.44</u>
Total	<u>42,193.84</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Henry County Democratic Committee	401.17	October 24, 1986
*Henry County Democratic Central Committee	698.00	Source documents unavailable
*Rock Island County Democratic Central Committee	1,768.00	October 24, 1986
*Mercer County	570.00	Source documents unavailable
*Rock Island County Democratic Central Committee	2,350.00	October 24, 1986
*Senator Vince DeMuzio	301.92	October 24, 1986
*Democratic Commissioners for Suburban Cook Cty.	4,168.75	October 24, 1986
*The Committee to Re-Elect the Democratic Senate	225.00	October 23, 1986
**Brian L. Crowe	100.00	October 17, 1986
**Thomas Rakowski	100.00	October 20, 1986
**Claude E. Whitaker	100.00	October 21, 1986
**Edward H. Marsalek	100.00	October 16, 1986
**Arthur L. Dunne	100.00	October 17, 1986
**Daniel J. White Re-Election Committee	100.00	October 17, 1986
**Judge Irwin Cohen	100.00	October 21, 1986
**Charles J. Grupp	100.00	October 20, 1986

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**Irving R. Norman	100.00	October 18, 1986
**Louis J. Giliberto	100.00	October 20, 1986
**John W. Rodgers	100.00	October 20, 1986
**Committee to Retain John V. Virgilio	100.00	October 16, 1986
**Committee to Retain Judge Novoselsky	100.00	October 16, 1986
**Charles Durham	100.00	October 20, 1986
**Richard L. Cumy	100.00	October 20, 1986
**Clark for Supreme Court	100.00	October 20, 1986
**Gary Bozick	100.00	October 20, 1986
**George Zimmerman	100.00	October 20, 1986
**Committee to Re-Elect Lawrence A. Passarello	100.00	October 20, 1986
**Baugh	318.00	Source documents unavailable
**Dick Allen for States Attorney	41.17	October 24, 1986
**P.E. Cross Election Committee	15.00	October 20, 1986
**Dick Allen for States Attorney	15.78	October 22, 1986

**SUMMARY** - October 28, 1986 Receipts; See Group Exhibit 3-14.

**Federally Permissible Receipts	5.00
*Non-Federal Receipts	<u>1,693.67</u>
Total	<u>1,698.67</u>

<u>Contributor Names</u>	<u>Amount of Contribution</u>	<u>Date of Contribution</u>
*Sheriff Richard J. Elrod	1,693.67	October 28, 1986

\*\*Leotha A. Jones 5.00 October 19, 1986

Summary - October 29, 1986 Receipts; See Group Exhibit 3-15.

**Federally Permissible Receipts	5,870.00
*Non-Federal Receipts	<u>4,600.00</u>
Total	<u>10,470.00</u>

<u>Contributor</u> <u>Names</u>	<u>Amount of</u> <u>Contribution</u>	<u>Date of</u> <u>Contribution</u>
*Democratic Commissioners for Suburban Cook Cty.	3,000.00	October 29, 1986
*Committee on Letter Carriers Political Education	1,500.00	October 16, 1986
*Western Illinois Democratic Days	100.00	October 14, 1986
**Nonpartisan Committee to Re-Elect Judge Lester D. McCurrie	100.00	
**Joseph Schneider	100.00	October 27, 1986
**Frank W. Barbaro	100.00	October 23, 1986
**Hon. Sophia H. Hall	100.00	October 20, 1986
**Earl E. Strayhorn	100.00	October 21, 1986
**Stephen A. Shiller	100.00	October 21, 1986
**Thomas A. Hett	100.00	October 18, 1986
**Christy A. Berkos	100.00	October 17, 1986
**Linda Raddatz	70.00	October 21, 1986
**Machinists Non Partisan Political League	5,000.00	October 16, 1986

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INTERROGATORY #4

The Non-Federal Account received a total of \$3,400 in receipts during the month of October 1986 attributable to corporations or labor unions. All of these receipts were deposited on or before October 7, 1986. See Group Exhibit 3-4; 3-3; 3-2 respectively. Notwithstanding these receipts, as previously stated, the Non-Federal Account maintained an available balance of federally permissible funds in excess of the expenditures. A list of the contributors, the amount, and the dates of contribution is set forth as follows:

<u>Name</u>	<u>Amount</u>	<u>Date</u>
Laborers' Political Education Fund	\$1,700.00	October 7, 1986
T.I.P. Education Fund-Hotel Employees International Union	\$2,500.00	October 7, 1986
Political Education Fund of Building and Construction Trades	\$1,000.00	October 7, 1986
A.C.T.W.U. Chicago & Central States Political Education Committee	\$5,000.00	October 3, 1986
Flanigan, Bilton, & Brannigan	\$1,000.00	October 3, 1986
United Steelworkers of America - District 31 Activities Fund	\$ 600.00	October 3, 1986
United Steelworkers of America - District 34 Legislative Fund	\$1,000.00	October 3, 1986

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United Steelworkers of  
America - District 32  
Political Educ. Fund                   \$ 900.00                   October 3, 1986

United Steelworkers of  
America - Political Action  
Fund Education Account               \$5,000.00               October 1, 1986

INTERROGATORY #5

As previously demonstrated in the Respondent's Answer to Interrogatory #3, there were federally permissible funds available in the Non-Federal Account in excess of the amount of each expenditure on the three respective dates. Further, Respondents have provided the bank statements and underlying source documents for the months of September and October, 1986 in support of its analysis. See Group Exhibits 2 and 3.

In response to Interrogatory #5, note that the audit performed on the Non-Federal Account was not performed for the purposes of complying with federal election law but, rather, to determine that the Respondent's financial statements represented the true financial status of the account. It was through this audit that the Respondent, and not the auditors, learned that "permissible federal receipts" were deposited in the Non-Federal Account. Those receipts are the subject of this inquiry. A breakdown of those receipts can be found in Respondent's Answer to Interrogatory #3 and the underlying source documents are attached as Group Exhibit 3.

INTERROGATORY #6

A list of each "federally permissible receipt" is provided in Respondent's Answer to Interrogatory #3. Conditions 6(a), 6(b)

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or 6(c) do not apply to the "federally permissible receipts" solicited by the Respondent. Respondent is unaware of any affirmative duty to inform contributors of the prohibitions and limitations of 2 U.S.C. §441b and 11 C.F.R. 102.5. However, Respondent affirmatively states that it has, at all times, complied with all rules and regulations attendant to the solicitation of funds and has never knowingly, nor intentionally acted contrary to these regulations.

RELIEF REQUESTED

Respondent respectfully renews its request to enter into a pre-probable cause conciliation agreement regarding MUR 2548 inasmuch as Respondent has demonstrated that, although a technical violation of 11 U.S.C. 102.5 has occurred in the inadvertent commingling of federally permissible and non-federal funds in the Non-Federal Account, the account maintained permissible federal funds in the available balance in excess of the subject expenditures. Thus, no prohibited monies were used to make these expenditures.

Respectfully submitted,

  
One of the Attorneys for the  
Illinois State Democratic Party

Of Counsel:

Joseph A. Cari, Jr.  
J. Timothy Eaton  
Coffield Ungaretti Harris & Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60602  
(312) 977-4400

0004073380

PERSONS WITH KNOWLEDGE OF MUR 2548

Warren Ribley  
Illinois State Democratic Party

Michael McGann  
Illinois State Democratic Party

Attorney John F. Kennedy  
Illinois State Democratic Party  
Coffield Ungaretti Harris & Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60602  
(312) 977-4400

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VERIFICATION

I, Warren Ribley, do hereby state on oath on behalf of Joseph Griffin, Treasurer of the Illinois State Democratic Party, that the foregoing Answer to the Supplemental Interrogatories and Document Request for Federal Election Commission MUR 2548 is true and correct.

\_\_\_\_\_  
Warren Ribley on behalf  
of Joseph Griffin, Treasurer of the  
Illinois State Democratic Party

Subscribed and Sworn to before  
me this \_\_\_\_\_ day of August, 1988.

\_\_\_\_\_  
Notary Public  
My Commission Expires: \_\_\_\_\_

0004032382

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ILLINOIS DEMOCRATIC PARTY

1139

PAY TO THE ORDER OF

Lasalle National Bank

October 20

19 86

2-80/710

Thirty one thousand and forty dollars and NO/100

\$ 31,040.00

DOLLARS

Lasalle National Bank

0

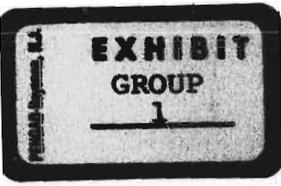
Chicago, Illinois 60601

FOR Certified check for Satellite Productions

⑆001139⑆ ⑆071000505⑆ 59⑆⑆⑆ ⑆884⑆⑆⑆ ⑆⑆⑆

⑆⑆⑆0003104000⑆⑆

*[Handwritten Signature]*



4 8 3 2 7 0 4 0 0 0

9 0 0 4 0 7 6 2 3 8 5

1099

ILLINOIS DEMOCRATIC PARTY

October 9 19 86

2-80/710

PAY TO THE ORDER OF Illinois Bell Telephone \$ 700.00

Seven hundred dollars and no/100 DOLLARS

*S. Richard McLean*

LaSalle National Bank  
Chicago, Illinois 60600

FOR Toll free number

⑆001099⑆ ⑆071000505⑆ 59⑈288⑈7⑈ ⑆0000070000⑆

TELLER NO. 15

1111

ILLINOIS DEMOCRATIC PARTY

OCT 13 1986

October 13 19 86

2-80/710

PAY TO THE ORDER OF Satellite Productions \$ 7,500.00

Seven thousand five hundred dollars and no/100 DOLLARS

*S. Richard McLean*

LaSalle National Bank  
Chicago, Illinois 60600

FOR

⑆001111⑆ ⑆071000505⑆ 59⑈288⑈7⑈ ⑆0000750000⑆

90040782386

Satellite Communications Production #59228

10-13 \$7500 #111

10-20 \$1,040 #1159

II Bell \$115.26

10-9 100.00 #1099

Constab 10-27-86 16000

10-15 \$26,576 #150

10-20 \$26,724 #151

Date 10/15/86 14:49 019  
9990-0741 W001 0 0 4

LASALLE NATIONAL BANK  
135 S LASALLE ST  
CHICAGO IL 60690

Checks and other items are received for deposit subject to verification and the provisions of the Uniform Commercial Code.

DEBIT

WE HAVE CHARGED YOUR ACCOUNT THIS DAY COVERING THE FOLLOWING:  
WIRE TRANSFER TO FED

ILLINOIS DEMOCRATIC PARTY  
ATTN GLEN WHERFEL  
C/O LUSSENHOP & WHERFEL  
104 MAIN ST  
PARK RIDGE IL 60068

Account Number

59-2884-7

Total

26,676.00

This is the only advice of this transaction that you will receive. Please retain for your records.

Form 4CF 5

Date 10/20/86 14:50 319  
9990-3192 W001

LASALLE NATIONAL BANK  
135 S LASALLE ST  
CHICAGO IL 60690

Checks and other items are received for deposit subject to verification and the provisions of the Uniform Commercial Code.

DEBIT

WE HAVE CHARGED YOUR ACCOUNT THIS DAY COVERING THE FOLLOWING:  
WIRE TRANSFER TO FED

ILLINOIS DEMOCRATIC PARTY  
ATTN GLEN WHERFEL  
C/O LUSSENHOP & WHERFEL  
104 MAIN ST  
PARK RIDGE IL 60068

Account Number

59-2884-7

Total

26,724.00

This is the only advice of this transaction that you will receive. Please retain for your records.

Form 4CF 5

90040782388

ILLINOIS DEMOCRATIC PARTY  
 ATTN GLEN UHERFEL  
 C/O LUSSENHOP & UHERFEL  
 104 MAIN ST  
 PARK RIDGE IL 60068

CHECKING BALANCE SUMMARY				19,435.39
PRIOR STATEMENT	08/29/86			57,193.73
DEPOSITS AND OTHER CREDITS				55,460.69
CHECKS AND OTHER DEBITS				21,158.44
ENDING BALANCE	09/30/86			

CHECK #	DATE	AMOUNT	CHECK #	DATE	AMOUNT
1035	09/02/86	✓267.59	1059	09/17/86	✓1,075.84
1038	09/18/86	✓403.80	1060	09/18/86	✓474.17
1039	09/03/86	✓113.08	1061	09/23/86	✓1,000.00
1040	09/03/86	✓200.31	1062	09/17/86	✓93.80
1041	09/02/86	✓44.00	1063	09/23/86	✓108.00
1043	09/08/86	✓55.00	1064	09/23/86	✓10,000.00
1044	09/02/86	✓100.00	1065	09/19/86	✓16,000.00
1045	09/02/86	✓1075.84	1065	09/22/86	✓54.09
1045	09/02/86	✓30.00	1065	09/19/86	✓106.50
1047	09/02/86	✓244.94	1068	09/29/86	✓600.00
1048	09/03/86	✓110.00	1068	09/30/86	✓81.40
1049	09/03/86	✓32.50	1071	09/30/86	✓26.25
1050	09/10/86	✓15,000.00	1073	09/29/86	✓113.51
1053	09/24/86	✓127.00	1075	09/30/86	✓188.40
1054	09/11/86	✓35.00	1075	09/30/86	✓72.00
1055	09/12/86	✓1,075.84	1078	09/29/86	✓164.25
1056	09/24/86	✓2,788.53	1079	09/29/86	✓129.00
1057	09/18/86	✓81.40	1080	09/30/86	✓39.36
1058	09/18/86	✓49.73	1082	09/29/86	✓4,500.00

DATE	DESCRIPTION	DEBIT	CREDIT
09/03/86	DEPOSIT		949.73
09/03/86	DEPOSIT		4,500.00
09/10/86	DEPOSIT		1,550.00
09/15/86	DEPOSITED ITEMS RETURNED	50.00	
09/16/86	DEPOSIT		37,385.00
09/19/86	WIRE TRANSFER TO FED	792.56	
09/18/86	WIRE TRANSFER TO FED	1,500.00	
09/19/86	DEPOSIT		2,850.00
09/24/86	DEPOSIT		3,450.00
09/30/86	WIRE TRANSFER TO FED	1,388.43	

DAILY CHECKING BALANCE SUMMARY		BALANCE	
DATE	TOTAL DEBITS	TOTAL CREDITS	BALANCE
08/29/86	1,887.12	5,448.73	19,435.39
09/02/86	483.39		17,549.27
09/03/86	669.94	1,550.00	22,513.61
09/03/86	32.50		21,343.57
09/10/86	144.00		23,361.17
09/11/86	55.00		23,217.17
09/12/86	50.00		23,152.17
09/15/86		37,385.00	23,112.17
09/16/86	1,169.64		60,997.17
09/17/86	4,113.00	2,850.00	59,827.53
09/18/86	10,454.00		55,714.53
09/19/86	16,000.00		49,110.53
09/22/86	1,108.00	9,450.00	32,110.53
09/23/86	16,097.00		31,002.53
09/24/86	408.56		24,355.53
09/29/86	2,788.53		23,346.77
09/30/86			21,158.44

If you have any questions about your statement  
 please call 443-2210

Some items may be Account Balancing Section  
 If you have moved since receiving your last statement,  
 please notify the Bank of your new address

EXHIBIT  
 GROUP  
 2

0004072389



PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY ENDORSED LIST EACH CHECK SEPARATELY.

CHECKS	DOLLARS	CENTS
1974 MARD		
DEAN, DRG.	500	00 ✓
E. Hines - Hynes	500	00 ✓
Michael Crane	350	00 ✓
Wm. Colson	500	00 ✓
NORCROSS	250	00 ✓
KATZ	200	00 ✓
MANTWICK	500	00 ✓
Mr. Cannon	1000	00 ✓
WORSEK, R.	200	00 ✓
KANTER	200	00 ✓
Worser, L.	200	00 ✓
BOTER	150	00 ✓
Crowley	250	00 ✓
Biggins	200	00 ✓
V. HON	200	00 ✓
Tisonak	200	00 ✓
KANT	200	00 ✓
CARROW	200	00 ✓
Pollack & Wiers	1000	00 ✓
NEWMAN	1000	00 ✓
KATZ	200	00 ✓
O'Keefe, etc.	1000	00 ✓
BOGERT	50	00 ✓
Philip KUTNIK	250	00 ✓
Glass	50	00 ✓
BERGAN	50	00 ✓
BOHLEN	50	00 ✓
<b>TOTAL CHECKS</b>	<b>9450</b>	<b>00</b>

DEPOSIT TICKET

PLATFORM COMM. SEPT 7 FUNDRAISER

GENERAL CONTRIBUTIONS

Barbara  
 all of the about all from  
 the September 23rd  
 Fundraiser sponsored  
 by Tom Hynes

0004072391

ENTER TOTAL ON OTHER SIDE

7641.07

6

**LaSalle National Bank**

135 South LaSalle Street  
Chicago, Illinois 60690  
Member FDIC

**CUSTOMER TRANSACTION RECEIPT**

The transaction for which this receipt is issued is accepted subject to the provisions of the Illinois Uniform Commercial Code and the conditions appearing on the signature cards. Total subject to item verification.

The bank office location, transaction type, letter number, account number, date, transaction number and amount of your transaction are shown below.

Always Obtain a Registered Receipt When Making a Transaction

LB DPCK 0019 859-2884-2 11 27-10 0974486 00677 911 480-00

Form 91038-11/85

070407239-2





9004072395



*1/15/10*

322

70-202/710

15 19

5/00/10

100 DOLLARS

KEARNS FOR CONGRESS

PAY TO THE ORDER OF

*One Hundred and 00/100*

NATIONAL BANK OF GENEVA  
21 NORTH THIRD STREET, GENEVA, ILLINOIS 60134

*Think the same*

⑆071905820⑆ ⑆0130 392⑆ 032⑆

*Pay to the order of*

9 0 0 4 0 7 2 3 9 6

pep q/m



FRIENDS OF LANE EVANS COMMITTEE 9-44  
BOX 1222 PH. 308-788-LANE  
ROCK ISLAND, IL 61204-1222

JA 2823

Sept 15 1984

78-117  
711

*Miss Linda Evans Party*  
*Don Howard* \$ 100.00

100.00



FIRST NATIONAL BANK  
OF THE QUAD CITIES  
ROCK ISLAND BRANCH 61201

*Loch Kelly*

ST-1010

⑆07⑆⑆0⑆⑆74⑆ 00 1984 4⑆ 2823

*Miss Linda Evans Party*



0004072397



**COLLINS FOR CONGRESS** 12-85  
PH. 815-722-4886  
210 N. BROADWAY ST.  
JOLIET, IL 60435

426

70-JES-C711

SEP. 16 19 86

5 18.00

PAY TO THE ORDER OF

ILLINOIS DEMOCRATIC PARTY

ONE HUNDRED FIFTY

DOLLARS



Champion Federal

Member FDIC

*Timothy M. Bradley*

FOR

⑆000426⑆ ⑆271170251⑆ 2705 709049⑆

*Request in full amount  
Fred West  
Richard*

ILLINOIS DEMOCRATIC PARTY

DEPOSIT DOCKET

DATE

SEP 16 1988

(TAPE)

#91686•

250.00+  
 100.00+  
 25.00+  
 2,000.00+  
 5.00+  
 500.00+  
 2,000.00+  
 9,500.00+  
 7,000.00+  
 8,500.00+  
 8,000.00+  
 5.00+

37,685.00+✓

FEDERAL CONTRIBUTIONS

0

STATE CONTRIBUTIONS

37885.00 ✓

TOTAL

37885.00

NOTES:

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900407012  
2398

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0.T#

250.00+  
100.00+  
25.00+  
2000.00+  
5.00+  
500.00+  
2000.00+  
9500.00+  
7000.00+  
8500.00+  
8000.00+  
37880.00T

+ 5.00 - CASH

0004072399

**LaSalle National Bank**

135 South LaSalle Street  
Chicago, Illinois 60690  
Member FDIC

**CUSTOMER TRANSACTION RECEIPT**

The transaction for which this receipt is issued is accepted subject to the provisions of the Illinois Uniform Commercial Code and the conditions appearing on the signature cards. Total subject to item verification.

The bank office location, transaction type, issuer number, account number, time, date, transaction number and amount of your transaction are shown below.

Always Obtain a Registered Receipt When Making a Transaction

LB DPCC 0067 #59-2884-7 08 28 46 09/16/86 37885.00

ILLINOIS DEMOCRATIC PARTY

DEPOSIT DOCKET

DATE

SEP 10 1986

(TAPE)

#91086•

50.00+  
 25.00+  
 100.00+  
 100.00+  
 100.00+  
 100.00+  
 100.00+  
 50.00+  
 100.00+  
 50.00+  
 50.00+  
 50.00+  
 50.00+  
 25.00+  
 100.00+  
 100.00+  
 100.00+  
 100.00+  
 200.00+  
 1,550.00+

FEDERAL CONTRIBUTIONS 1350.00

STATE CONTRIBUTIONS 200.00 ✓

TOTAL 1550.00

NOTES:

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000407019 2400











FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

November 23, 1987

Joseph Griffin, Treasurer  
Illinois Democratic Party  
P.O. Box 10045  
Springfield, IL 62791

RE: MUR 2548  
Illinois Democratic Party  
(Federal Account) and  
Joseph Griffin, as treasurer;  
Illinois Democratic Party  
(Non-Federal Account) and  
Joseph Griffin, as  
treasurer

Dear Mr. Griffin:

On November 18, 1987, the Federal Election Commission found that there is reason to believe Illinois Democratic Party (Federal Account and Non-Federal Account) and you, as treasurer, violated 11 C.F.R. § 102.5(a) of Commission regulations and violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission also found no reason to believe a violation of 2 U.S.C. §§ 441a(f) and 441a(d) had occurred. The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the 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 the General Counsel will make recommendations to the Commission

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either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the 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, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not 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 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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Interrogatories

9004072406

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT(s): Illinois Democratic Party (Federal Account) and Joseph Griffin, as treasurer; Illinois Democratic Party (Non-Federal Account) and Joseph Griffin, as treasurer MUR 2548

A. FACTS

While the factual background of the \$22,038.08 debt owed by the Federal Account to the Non-Federal account is quite detailed, (See Attachment 1), this matter arises primarily from two transactions that formed the basis for the \$22,038.08 owed to the Non-Federal by the Federal Account. These transactions were listed on their amended 30 Day Post General Report posted February 5, 1987, as a debt owed to the Non-Federal Account by the Federal Account.

1. Voter Education Expenditures

On the detailed summary page of its original 30 Day Post General Election Report, posted December 4, 1986, the Federal Account disclosed two disbursements (\$5,922.82 Voter Education/TV Ad and \$115.26 Voter Education/Toll Free "800" number) totalling \$6,038.08. The disbursements were reported under the line item for operating expenditures and characterized as voter education expenses.

RAD sent an RFAI on January 14, 1987, requesting clarification of the voter education expenditures. RAD indicated in its letter, to the Federal Account, that if expenditures were

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made on behalf of a federal candidate then they should be disclosed as either contributions in-kind or as coordinated party expenditures.

In a letter to the Commission, dated January 31, 1987, the Federal Account explained that the voter education expenditures were tools to advise voters on how to vote a straight democratic ticket and that names of federal candidates were not specifically mentioned.

Nevertheless, on its amended 30 Day Post General Report, posted February 5, 1987, the Federal Account listed the two disbursements, totalling \$6,038.08, as debts owed by the Federal Account to the Non-Federal Account. Subsequently, in a letter dated March 20, 1987, the Federal Account further clarified these expenditures explaining that the debts to the Non-Federal account related to federal election activity and that the debt should have been characterized as coordinated party expenditures.

## 2. Mailings

The original 1986 30 Day Post General Election Report of the Federal Account, posted December 4, 1986, disclosed \$16,000 in coordinated party expenditures for mailings on October 27, 1987, on behalf of twenty-one (21) federal candidates in the State of Illinois. Of the \$16,000 spent for coordinated party expenditures by the Federal Account, \$8,500 was allocated on behalf of the Democratic Senatorial candidate in the State of Illinois and the remaining \$7,500 was equally divided (\$375 per candidate) among twenty (20) Democratic Congressional candidates in Illinois.

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On its amended 1986 30 Day Post General Election Report, posted February 5, 1987, the Federal Account disclosed the \$16,000 in coordinated party expenditures as a debt also owed by the Federal account to the Non-Federal Account.

3. **\$22,038.08 Debt Owed by Federal Account to the Non-Federal Account.**

The two transactions, for voter education expenditures (\$6,038.08) and expenditures for candidate mailings (\$16,000), total \$22,038.08 in coordinated expenditures that were paid for by the Non-Federal Account instead of the Federal Account. Communications between RAD and the Federal Account indicate that the payment of the coordinated expenditures by the Non-Federal Account was due to error. However, the Federal Account noted that the Non-Federal Account "received considerable receipts that were permissible federal receipts and should have been deposited into the Federal Account" instead of the Non-Federal Account. Since the Federal Account did not have enough money to reimburse the Non-Federal Account for the expenditures, pursuant to advice from a RAD analyst, the Federal Account reported the expenditures on Schedule D as money owed to the Non-Federal Account.

The letter accompanying the 1986 30 Day Post General Election Report, posted February 5, 1987, stated that the Federal Account would reimburse the Non-Federal Account as soon as permissible receipts became available.

The 1987 Mid-Year Report for the Federal Account indicated that \$21,000 of the debt owed to the Non-Federal Account had been retired during the mid-year reporting period. Additionally, in a

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letter accompanying the report, the Federal Account noted that the remaining debt of \$1,038.08 was retired July 23, 1987 from the cash on hand at the end of the 1987 Mid-Year Report. According to the Federal Account the \$1,038.08 was not reflected on the 1987 Mid-Year Report because it did not occur during that time period.

B. Analysis

1. Financing Political Activity In Connection With Federal Elections Under 11 C.F.R. § 102.5(a)

According to the record in this matter, the two transactions constituting coordinated party expenditures and totalling \$22,038.08 were actually paid for by the Non-Federal Account. This raises the issue of whether a violation occurred when the Non-Federal Account paid for political activity in connection with federal elections.

To ensure that prohibited monies are not used in connection with federal elections, 11 C.F.R. § 102.5 prescribes certain requirements for organizations that intend to finance both federal and non-federal activity. Pursuant to 11 C.F.R. 102.5(a)(1)(i), only funds subject to the prohibitions and limitations of the Act may be deposited in a committee's federal account and all disbursements, contributions, expenditures and transfers by such committees in connection with federal elections must be made by the federal account.

The Federal Account admits to financing political activity in connection with Federal elections from its Non-Federal Account. Therefore, it appears that the \$22,038.08 in

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coordinated party expenditures paid for by the Non-Federal Account constitutes a violation of 11 C.F.R. § 102.5(a). Consequently, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe the Federal Account and Joseph Griffin, as treasurer, and the Non-Federal Account and Joseph Griffin, as treasurer, violated 11 C.F.R. § 102.5(a).

**2. Contributions from Banks, Corporations and Labor Unions Under 2 U.S.C. § 441b**

Another issue raised by this referral is whether expenditures in question were made with funds prohibited under the Act. 2 U.S.C. § 441b makes unlawful contributions or expenditures by national banks, corporations and labor unions in connection with federal elections.

Under Illinois state law, political committees may receive contributions of an unlimited amount from banks, corporations and labor unions. Therefore, expenditures may have been made with funds that contain contributions prohibited by 2 U.S.C. § 441b.

The Office of General Counsel recommends that the Commission find reason to believe the Federal Account and Joseph Griffin, as treasurer, and the Non-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441b and approve interrogatories exploring the source and nature of the funds in the Non-Federal Account.

**3. Coordinated Party Expenditure Limit Under 2 U.S.C. § 441a(d)**

An additional issue raised by the RAD referral is whether

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the reclassification of the voter education expenditures (\$6,038.08) as coordinated party expenditures by the Federal Account caused the Federal Account to exceed the state limit for coordinated party expenditures.

Section 441a(d) provides for expenditures within certain limits by a political party's national committee or state committees in connection with House or Senate campaigns. Such expenditures may be made "[n]otwithstanding any other provision of law with respect to limitations or expenditures or limitations on contributions." The Senate limit for Illinois was \$367,978.32 in 1986 and the limit for House candidates was \$21,810 during 1986. See 2 U.S.C. § 441(a)(d)(3). (See also April 1986 Record Vol 12, Number 4, pages 1-2).

The Federal Account is registered with the Commission as a party committee. As noted, supra, of the \$16,000 in coordinated party expenditures for mailings, \$8,500 was allocated on behalf of the Democratic Senatorial Candidate in the state of Illinois and \$7,500 was equally divided in expenditures of \$375 among 20 Democratic congressional candidates in the State. Therefore, it is unlikely that the additional \$6,038.08 now characterized by the Federal Account as coordinated party expenditures would have caused the Federal Account to exceed the coordinated party expenditure limit for Illinois. 1/ Consequently, the Office of

1/ Records on file at the Commission list only the \$16,000 in coordinated party expenditures initially noted in the original 1986 30 Day Post General Election Report. No other coordinated party expenditures appears to have been made by the committee, or any other political committee authorized by the Federal Account to spend against the State limit.

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General Counsel recommends that the Commission find no reason to believe that the Federal Account and Joseph Griffin, as treasurer, and the Non-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441a(d) by exceeding Section 441a(d) limits. 2/

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2/ The recommendation of this Office cites to both 2 U.S.C. §§ 441a(f) and 441a(d) in this matter, since section 441a(d) establishes the limitation for coordinated party expenditures and Section 441a(f) prohibits political committees from making expenditures exceeding the limitations of Section 441a.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the )  
 )  
Illinois Democratic Party ) MUR 2548  
(Federal Account) and Joseph )  
Griffin, as treasurer; Illinois )  
Democratic Party (Non-Federal )  
Account) and Joseph Griffin, as )  
treasurer )

INTERROGATORIES

TO: Joseph Griffin  
Treasurer  
P.O. Box 10045  
Springfield, IL 62791

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

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INSTRUCTIONS

In answering these interrogatories furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1986 to December 31, 1986.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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**INTERROGATORIES**

According to reports filed at the Commission, Illinois Democratic Party has indicated that the \$22,038.08 in coordinated party expenditures were paid by the State Account. Please answer the following questions relating to the source of funds in the State Account:

1. How much in federal funds were deposited in the State Account during calendar year 1986? Please give dates, amounts and contributor names.
2. Were contributions from corporations deposited in the State Account during calendar year 1986? If so, please state the amount in corporate contributions to the State Account and the date of all deposits.
3. Were contributions from labor unions deposited in the State Account during calendar year 1986? If so, please state the amount in contributions made by labor unions to the State account and the date of all deposits.
4. Were contributions made to the State Account by national banks during calendar year 1986? If so, please state the amount in contributions made by national banks to the State Account and the dates of all deposits.
5. In years prior to calendar year 1986, did the State Account receive funds from national banks, corporations and labor unions. If so, to what extent were such funds received and during what years.

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**DESCRIPTION OF PRELIMINARY PROCEDURES  
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE  
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of the General Counsel where they are assigned to a staff member.

Following review of the information which generated the matter, a recommendation on how to proceed, based on a preliminary legal and factual analysis, shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act of 1971, as amended (hereinafter "the Act") may have occurred or is about to occur; or (b) that the Commission find no reason to believe that a possible violation of the Act has occurred or is about to occur, and that the Commission close the file in the matter.

Thereafter, if the Commission decides by an affirmative vote of four Commissioners to open a Matter Under Review (MUR) and finds that there is reason to believe that a violation of the Act has been committed or is about to be committed, the Office of the General Counsel shall conduct an investigation into the matter. Within 15 days of notification of the Commission's finding(s), a respondent(s) may submit any factual or legal materials relevant to the allegations. During its investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order written answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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If the investigation warrants, and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief stating their position on the issues. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four Commissioners that there is probable cause to believe that a violation of the Act has been committed, or is about to be committed, conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the Act through conciliation the Office of the General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Act. Thereafter, the Commission may, upon an affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

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January 1987

ILLINOIS DEMOCRATIC PARTY  
LIFO ANALYSIS OF CASH RECEIPTS  
SEPTEMBER, 1986

9004082419

<u>Date</u>	<u>Deposits</u>		<u>Disbursements</u>		<u>Bank Balance</u>
	<u>Federal</u>	<u>Non- Federal</u>	<u>Federal</u>	<u>Non- Federal</u>	
1	-0-	-0-	-0-	-0-	
2	-0-	-0-	-0-	-0-	
3	4,810.00	638.73	-0-	-0-	
4	-0-	-0-	-0-	-0-	
5	-0-	-0-	-0-	-0-	
6	-0-	-0-	-0-	-0-	
7	-0-	-0-	-0-	-0-	
8	-0-	-0-	-0-	-0-	
9	-0-	-0-	-0-	-0-	
10	1,350.00	200.00	-0-	-0-	
11	-0-	-0-	-0-	-0-	
12	-0-	-0-	-0-	-0-	
13	-0-	-0-	-0-	-0-	
14	-0-	-0-	-0-	-0-	
15	-0-	-0-	-0-	-0-	
16	-0-	37,885.00	-0-	-0-	
17	-0-	-0-	-0-	-0-	
18	-0-	-0-	-0-	-0-	
19	350.00	2,500.00	-0-	-0-	
20	-0-	-0-	-0-	-0-	
21	-0-	-0-	-0-	-0-	
22	-0-	-0-	-0-	-0-	
23	-0-	-0-	-0-	-0-	
24	7,450.00	2,000.00	-0-	-0-	
25	-0-	-0-	-0-	-0-	
26	-0-	-0-	-0-	-0-	
27	-0-	-0-	-0-	-0-	
28	-0-	-0-	-0-	-0-	
29	-0-	-0-	-0-	-0-	
30	-0-	-0-	-0-	-0-	
<b>Total:</b>	<b>\$13,960.00</b>	<b>\$43,223.73</b>			

STATE ACCOUNT  
#59-2884-7

90040782420

ILLINOIS DEMOCRATIC PARTY  
LIFO ANALYSIS OF CASH RECEIPTS  
OCTOBER, 1986

<u>Date</u>	<u>Deposits</u>		<u>Disbursements</u>		<u>Bank Balance</u>
	<u>Federal</u>	<u>Non-Federal</u>	<u>Federal</u>	<u>Non-Federal</u>	
1	2,651.00	16,846.00	-0-	3,672.84	36,982.60
2	-0-	-0-	-0-	267.59	36,715.01
3	721.00	17,262.50	-0-	-0-	54,698.51
4	-0-	-0-	-0-	-0-	-0-
5	-0-	-0-	-0-	-0-	-0-
6	-0-	-0-	-0-	-0-	-0-
7	2,500.00	16,500.00	-0-	6,001.84	67,696.67
8	-0-	-0-	-0-	-0-	-0-
9	-0-	-0-	-0-	60.00	67,636.67
10	856.85	35,837.50	-0-	788.00	103,543.02
11	-0-	-0-	-0-	-0-	-0-
12	-0-	-0-	-0-	-0-	-0-
13	-0-	-0-	-0-	-0-	-0-
14	366.00	15,517.00	-0-	16,054.12	103,371.90
15	1,000.00	-0-	115.26	32,958.93	71,297.71
16	1,596.48	42,924.70	-0-	7.00	115,811.89
17	-0-	-0-	5,922.86	7,892.75	101,996.28
18	-0-	-0-	-0-	-0-	-0-
19	-0-	-0-	-0-	-0-	-0-
20	-0-	31,040.00	16,000.00	48,757.04	68,279.24
21	5,225.00	22,343.00	-0-	1,582.79	94,264.45
22	700.00	2,615.00	-0-	41,231.53	56,347.92
23	150.00	20,406.48	-0-	373.97	76,530.43
24	-0-	-0-	-0-	984.48	75,545.45
25	-0-	-0-	-0-	-0-	-0-
26	-0-	-0-	-0-	-0-	-0-
27	6,710.40	35,483.44	-0-	12,994.96	104,744.33
28	5.00	1,693.67	-0-	4,208.75	102,234.25
29	5,870.00	4,600.00	-0-	71,325.85	41,378.40
30	-0-	-0-	-0-	4,300.35	37,078.05
31	5,463.50	16,723.59	-0-	5,100.00	54,165.14
Total:	\$33,815.23	279,792.88	22,038.12		

STATE ACCOUNT  
#59-2884-7

9004082421

STATEMENT

21

ILLINOIS DEMOCRATIC PARTY  
ATTN GLEN WHERFEL  
C/O LUSSENHOP & WHERFEL  
104 MAIN ST  
PARK RIDGE IL 60068

80

59-2884-7

10/31/86

PAGE 1

CHECKING BALANCE SUMMARY.....

PRIOR STATEMENT 09/30/86	21,158.44
DEPOSITS AND OTHER CREDITS	313,608.11
CHECKS AND OTHER DEBITS	280,601.41
ENDING BALANCE 10/31/86	54,165.14

CHECKS.....

CHECK #	DATE	AMOUNT	CHECK #	DATE	AMOUNT
1072	10/01/86	2,500.00	1123	10/21/86	287.67
1074	10/07/86	2,500.00	1124	10/22/86	412.30
1077	10/02/86	267.59	1125	10/17/86	144.43
1083	10/01/86	17.00	1126	10/30/86	271.68
1084	10/22/86	9,000.00	1128	10/22/86	32.15
1085	10/30/86	250.00	1129	10/22/86	569.59
1086	10/27/86	2,488.24	1130	10/23/86	187.00
1087	10/29/86	4.05	1131	10/24/86	57.00
1088	10/01/86	1,075.84	1132	10/20/86	3,200.00
1089	10/07/86	1,000.00	1134	10/22/86	1,333.40
1090	10/07/86	814.94	1135	10/23/86	120.97
1091	10/22/86	474.17	1136	10/29/86	117.57
1092	10/01/86	86.00	1137	10/21/86	695.12
1093	10/10/86	390.00	1139	10/20/86	31,040.00
1095	10/14/86	7,000.00	1140	10/27/86	120.00
1096	10/14/86	4,000.00	1141	10/28/86	40.00
1097	10/14/86	3,000.00	1142	10/31/86	600.00
1098	10/20/86	1,394.5	1143	10/26/86	695.11
1099	10/15/86	700.00	1144	10/27/86	950.00
1100	10/18/86	198.00	1145	10/27/86	2,368.50
1101	10/09/86	60.00	1146	10/29/86	2,191.86
1103	10/14/86	22.00	1147	10/27/86	8,743.95
1104	10/21/86	600.00	1148	10/22/86	30.00
1105	10/17/86	372.00	1149	10/27/86	29.24
1106	10/17/86	198.76	1150	10/27/86	106.93
1107	10/17/86	88.39	1151	10/23/86	66.00
1108	10/22/86	603.11	1152	10/27/86	12.00
1109	10/22/86	370.64	1153	10/24/86	232.87
1110	10/15/86	1,097.40	1155	10/27/86	159.70
1111	10/17/86	7,500.00	1157	10/27/86	3,016.38
1112	10/16/86	7.00	1158	10/29/86	358.87
1113	10/15/86	80.00	1160	10/29/86	33,387.00
1114	10/22/86	882.00	1161	10/29/86	35,000.00
1115	10/20/86	267.59	1162	10/29/86	154.00
1116	10/17/86	1,075.84	1163	10/30/86	335.00
1117	10/17/86	614.94	1164	10/30/86	3,443.67
1118	10/17/86	1,000.00	1165	10/31/86	4,500.00
1119	10/22/86	474.17	1166	10/28/86	4,168.75
1120	10/22/86	27,008.00	1168	10/29/86	32.50
1122	10/20/86	3,500.00	1176	10/29/86	80.00

CHECKING DEBITS AND CREDITS.....

DATE	DESCRIPTION	DEBIT	CREDIT
10/01/86	DEPOSIT		19,497.00
10/03/86	DEPOSIT		17,983.50
10/07/86	DEPOSIT		19,000.00
10/07/86	WIRE TRANSFER TO FED	1,886.90	
10/10/86	DEPOSIT		13,694.35
10/10/86	DEPOSIT		25,000.00
10/14/86	DEPOSIT		15,883.00
10/14/86	WIRE TRANSFER TO FED	2,032.12	
10/15/86	DEPOSIT		1,000.00
10/15/86	WIRE TRANSFER TO FED	1,596.49	
10/15/86	WIRE TRANSFER TO FED	2,924.70	

For more information, call your local branch or write to the National Office, LaSalle National Bank, 1000 North Dearborn Street, Chicago, Illinois 60610. If you have any questions about your statement, please call 443-2210.

9004072422



STATE ACCOUNT #59-2884-7

STATEMENT

21

ILLINOIS DEMOCRATIC PARTY  
 ATTN GLEN UHERFEL  
 C/O LUSSENHOP & UHERFEL  
 104 MAIN ST  
 PARK RIDGE IL 60068

88

59-2884-7

10/31/86

PAGE 2

CHECKING DEBITS AND CREDITS.....

DATE	DESCRIPTION	DEBIT	CREDIT
10/15/86	WIRE TRANSFER TO FED	X26,676.00	
10/16/86	DEPOSIT		X44,521.18
10/17/86	WIRE TRANSFER TO FED	X1,198.35	
10/17/86	WIRE TRANSFER TO FED	X1,670.90	
10/20/86	DEPOSIT		X31,040.00
10/20/86	WIRE TRANSFER TO FED	X26,724.00	
10/21/86	DEPOSIT		X11,500.00
10/21/86	DEPOSIT		X16,068.00
10/22/86	DEPOSIT		X3,315.00
10/23/86	DEPOSIT		X20,556.48
10/27/86	DEPOSIT		-1,900.00
10/27/86	MONY TRANSFER FROM CHECKING		-44,420.00
10/27/86	DEPOSIT		-10,875.84
10/27/86	FOR WIRE RECEIVED FROM FED <i>Springfield</i>		25,000.00
10/28/86	DEPOSIT		1,698.67
10/29/86	DEPOSIT		X10,470.00
10/31/86	DEPOSIT		7,187.09
10/31/86	FOR WIRE RECEIVED FROM FED <i>Springfield</i>		15,000.00

DAILY CHECKING BALANCE SUMMARY.....

DATE	TOTAL DEBITS	TOTAL CREDITS	BALANCE
09/30/86			21,158.44
10/01/86	31672.86	19,497.00	36,982.60
10/02/86	267.59		36,715.01
10/03/86		17,983.50	34,698.51
10/07/86	6,001.84	19,000.00	47,696.67
10/09/86	60.00		47,636.67
10/10/86	788.00	36,694.35	103,543.02
10/14/86	16,054.12	15,883.00	103,371.90
10/15/86	33,074.19	1,000.00	71,297.71
10/16/86	7.00	44,521.18	115,811.89
10/17/86	13,815.61		101,996.28
10/20/86	64,757.04	31,040.00	68,279.24
10/21/86	1,582.79	27,568.00	94,264.45
10/22/86	41,231.53	3,315.00	56,347.92
10/23/86	375.97	20,556.48	76,530.43
10/24/86	984.98		75,545.45
10/27/86	12,994.96	42,193.84	104,744.33
10/28/86	4,208.75	1,698.67	102,234.25
10/29/86	71,325.85	10,470.00	41,378.40
10/30/86	4,300.35		37,078.05
10/31/86	5,100.00	22,187.09	54,165.14

9004072423

See reverse side for Account Financing Section.  
 If you have moved since receiving your last statement,  
 please notify the Bank of your new address.  
 If you have any questions about your statement,  
 please call 443-2210.

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET OCT 1 1986  
DATE \_\_\_\_\_

(TAPE)

0. \*

0. \*

#100186.  
100.00 +  
88.00 +  
346.00 +  
34.00 +  
139.00 +  
90.00 +  
3500.00 +  
8000.00 +  
2200.00 +  
5000.00 +  
19497.00 \*

FEDERAL CONTRIBUTIONS 2651.00

STATE CONTRIBUTIONS 16846.00 ✓

TOTAL 19497.00

NOTES:

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9004072424



STATE ACCOUNT  
#59-2884-7



New County

9 0 0 4 0 7 2-4 2 6

Stamps  
ORDER

Kind of  
Bundled  
with  
order



REMITTER (Cass County #5427 Gummed Labels)  
Michael Kirchner

PAY TO THE ORDER OF Illinois Democratic Party

16674  
September 29 19 86  
70-832  
711

\$88.00

STATE BANK OF ASHLAND ILL. 88 DOLLARS 00 CTS

DOLLARS

AUTHORIZED SIGNATURE

*Robert Berg*

CASHIER'S CHECK

⑆071108326⑆ 002 062 1⑆

Fish = 20  
COOKS =  
CASH =  
KOP =  
Semi =  
PR. = 5/10/COOKS

mail

Christian County

9004072427

DEMOCRATIC CENTRAL COMMITTEE  
OF CHRISTIAN COUNTY

211

9/30/82

70-378  
711

PAY TO THE ORDER OF Democratic Party

Three hundred forty six & 10/100

\$ 346 <sup>10</sup>/<sub>100</sub>

DOLLARS



First Trust Bank  
First Trust and Savings Bank of Springfield  
Springfield, Illinois 62764

C. F. Bertram

FOR

⑆000211⑆ ⑆071103787⑆ 100996⑆7⑆

9004072428

*Purcell  
Monticello, Ill*



Bank of St. Louis  
215 and Olive  
St. Louis, Missouri 63106  
A General Reinsurance Bank



Gibson Federal

MT 03865

VOID AFTER 60 DAYS

4-125/810

SEP 20 1966

PAY

TO THE  
ORDER  
OF

GIBSON FEDERAL 3401'S0000's

\$34.00

Illinois Democratic Party

GIBSON FEDERAL SAVINGS AND LOAN ASSOCIATION  
MONTICELLO, ILLINOIS 61866

+

Remitter: Elmer J. Purcell



⑆00003865⑆ ⑆081001251⑆

1032550⑆

*Gay Com.*

0004072429

1525

JERSEY CO. DEMOCRAT CENTRAL COMMITTEE  
JERSEYVILLE, ILL.

70-445  
819

Sept 29 1986

PAY TO THE ORDER OF *Allison Democrat Party* \$ *139.00*

*One Hundred Thirty Nine and 00/100* DOLLARS



JERSEY CO. DEMOCRAT CENTRAL COMMITTEE

*Gene Albert*

⑆0819⑉0445⑆10768 9⑈

Mo Card

0004072430

1281

W. C. OR WILMAH MCCORD  
 WITH RIGHTS OF SURVIVORSHIP  
 BOX 274, 843-2864  
 ARTHUR, LA 70113

6/29/86 1986 70-06711

Pay to the order of *Arthur Wilmah McCord* \$90.00

*Arthur Wilmah McCord*

State Bank of Louisiana  
 ARTHUR, LOUISIANA

*Arthur Wilmah McCord*

100 Dollars

⑆076108452⑆ ⑆ 44⑆604⑆⑆ 1281

+

000407 243

ILLINOIS HOUSE DEMOCRATIC MAJORITY  
P O BOX 118  
SPRINGFIELD, ILLINOIS 62705  
Michael J. Madigan, Chairman

EXPLANATION	AMOUNT

70-25  
711

3033

PAY AMOUNT OF Three thousand five hundred and no/100 DOLLARS

DATE	TO THE ORDER OF	GROSS	S.S.	F.T.	S.T.	CHECK NUMBER
9/25/86	Ill Democratic State Central Comm.					3033
	<i>Signer salary to the State Dem. Party - district contribution</i>					

CHECK AMOUNT \$ 3500.00

ILLINOIS HOUSE DEMOCRATIC MAJORITY  
*Ray J. Pille*  
AUTHORIZED SIGNATURE

**Marine Bank**  
Member FDIC

⑆003033⑆ ⑆07100269⑆ ⑆083070⑆



**FRIENDS OF MICHAEL J. MADIGAN**  
3 FIRST NATIONAL PLAZA - SUITE 3800  
CHICAGO, ILLINOIS 60602  
(312) 641-2600

2-15  
710

1425

PAY Eight thousand and no/100 DOLLARS

CHECK NO.	DATE	PURPOSE OR CODE NUMBER	BENEFICIARY	CHECK AMOUNT
1425	9/25/86		<i>Myers salary to the State Dem Party - district contribution</i>	8000.00

FRIENDS OF MICHAEL J. MADIGAN  
*Ray J. Pille*  
AUTHORIZED SIGNATURE

**The Northern Trust Company**  
Chicago, Illinois

⑆001425⑆ ⑆071000152⑆ ⑆000317713⑆

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET OCT 3 1986  
DATE \_\_\_\_\_

(TAPE)

#100386•

5,000.00+  
1,000.00+  
50.00+  
50.00+  
100.00+  
600.00+  
1,000.00+  
900.00+  
50.00+  
48.50+  
136.00+  
266.00+  
71.00+  
377.00+  
335.00+  
500.00+  
5,000.00+  
2,500.00+  
17,983.50+

FEDERAL CONTRIBUTIONS 721.00

STATE CONTRIBUTIONS 17262.50 ✓

TOTAL 17983.50

NOTES:

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000407018  
2432

EXHIBIT  
GROUP  
3-3

STATE ACCOUNT  
#59-2884-7

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY ENDORSED. LIST EACH CHECK SEPARATELY.

CHECKS (SEE BACK)	DOLLARS	CENTS
RTWV	5000	25 ✓
FINROON	1000	25 ✓
B: HENRY BENNYON		
EVELYN CAMP	50	00 ✓
39KARD DEMO	50	00 ✓
JORANNE ALLEN	100	00 ✓
U. STEELWORKERS DIST #31	600	00 ✓
U. STEELWORKERS DIST. #4	1000	00 ✓
U. STEELWORKERS DIST. #2	900	00 ✓
JOHN A. N'00	50	00 ✓
KNOX COUNTY	48	50 ✓
MAURICE TRILLA	136	00 ✓
WILLIAMSON COUNTY	266	00 ✓
SHELBY COUNTY	71	00 ✓
14 MISS VALLEY CREDIT UNION	377	00 ✓
GANDY WALKER	335	00 ✓
SHEPHERD DEMO CORK CO. #4	500	00 ✓
DEMO CORK CO. #4	5000	00 ✓
DEMO CORK CO. #4	2500	00 ✓
<b>TOTAL CHECKS</b>	<b>17,943.</b>	<b>50</b>

ENTER TOTAL ON OTHER SIDE

*mailing*

- TOM HYNES  
- Platform Comm  
- Platform Comm  
- GEN. FUNDS

DEPOSIT TICKET

VOTER FILE ORDER

*mailing*  
*mailing*  
*mailing*

0.78

5000.00 ✓  
7000.00 ✓  
50.00 ✓  
50.00 ✓  
100.00 ✓  
600.00 ✓  
7000.00 ✓  
900.00 ✓  
50.00 ✓  
48.50 ✓  
136.00 ✓  
266.00 ✓  
71.00 ✓  
377.00 ✓  
335.00 ✓  
500.00 ✓  
5000.00 ✓  
2500.00 ✓  
17,983.50 T

0 0 0 0 2 4 3 3

**LaSalle National Bank**  
135 South LaSalle Street  
Chicago, Illinois 60690  
Member FDIC  
**CUSTOMER TRANSACTION RECEIPT**

The institution for which this receipt is issued is not a depository institution of the Federal Reserve System. The receipt is not a negotiable instrument. The bank office location, transaction type, letter number, account number, date, transaction number and amount of your transaction are shown below.



10/3

*Amalgamated Clothing*

000407 2434

AMALGAMATED CLOTHING AND TEXTILE  
WORKERS UNION  
CHICAGO AND CENTRAL STATES  
POLITICAL EDUCATION COMMITTEE  
333 S. ABINGDON AVE., CHICAGO, IL 60607

546

2-98778

15 9/10 1986

PAY TO THE  
ORDER OF

ILLINOIS DEMOCRATIC PARTY

PAY EXACTLY **5,000.00**

\$ 5,000.00

DOLLARS



Amalgamated  
Trust Bank  
CHICAGO, ILL. 60601

*John J. Stomach*  
*John J. Stomach*

⑆000546⑆ • 1:0710

*State Wide  
mailing*

*State Wide  
mailing*

*Stomach*

9 0 0 4 0 7 2 4 3 5

1604

JOHN A. NUDO  
R.F.D. 6, FREY SUBDIVISION  
OLD JACKSONVILLE RD.  
SPRINGFIELD, IL 62707

PAY TO THE ORDER OF *Democratic State Central Com.* *Sept 30 1986*  
*THE SUM OF FIFTY DOLLARS* *50.00* DOLLARS

**TNB**  
Illinois National Bank  
SPRINGFIELD, ILLINOIS 62701  
Member Midwest Financial Group Inc.

*John A. Nudo*

FOR *482F*  
⑆001604⑆⑆071100324⑆0035⑆482F⑆

*Voter Fund  
Order*



KNOX COUNTY DEMOCRATIC  
CENTRAL COMMITTEE  
GALESBURG, IL 61401

2867

70-131  
711

Pay to the  
order of

*Democratic State Central Committee*

\$ 48.00

*Forty-eight and no/100*

Dollars



THE FARMERS AND MECHANICS BANK  
61 EAST MAIN STREET - GALESBURG, ILLINOIS 61401

*David Morrison*

For

⑆002867⑆ ⑆071101310⑆

⑆292128⑆

0004072436

*Knox County*

PERSONAL MONEY ORDER

78069

DAY TO THE ORDER OF

DATE 10-1 1986

ILL. DEMO. PARTY

NOT VALID OVER \$500.00

FIRST NAT'L BANK **EID** 136 AND 00CTS

First National Bank of Vandalia  
Box 40, Vandalia, Illinois 62471

*Thomas J. [Signature]*  
SIGNATURE OF REMITTER  
RR 3 Box 964  
ADDRESS  
Vandalia Ill. 62471  
CITY & STATE

FOR GUMMED LABELS

+1:081205112: #01213462#90 966

9004072437

*LIC. [Signature]*  
Vandalia, Ill.



0004072438

WILLIAMSON COUNTY  
DEMOCRATIC ORGANIZATION 4-82  
JOHN H. MC NEILL, CHAIRMAN  
RON MITCHELL, TREASURER  
RT. 3, BOX 178 985-2551  
CARTERVILLE, IL 62918

522

70-492  
812

9-29-1986

PAY TO THE ORDER OF Mc. Democratic Party \$ 266.00 DOLLARS

Two hundred and sixty six and no/100

Johnston City State Bank  
Johnston City, Illinois 62951

John H. McNeill  
Ron Mitchell

FOR DEPOSIT ONLY

⑆08⑆20492⑆⑆20⑆608⑆3⑆

+



0004072439



24039

September 30 19 86 79-469  
711

REMITTER  
Shelby County Democratic Central Committee

PAY TO THE ORDER OF Illinois Democratic Party \$ 71.00

SHelBY COUNTY STATE BANK 71 DOLLARS

CASHIER'S CHECK

AUTHORIZED SIGNATURE

*Stephen J. ...*

#024039# 00711046920

83

Valid for order



9 0 0 4 0 7 2 4 4 0



Mississippi Valley Credit Union

17th Avenue & Kohnsey Drive / East Moline, Ill. 61224

BRANCHES

The Credit Union Place / Southpark Mall / Moline  
Northpark Mall Office / Davenport, Ia. 52008  
118 5th Street, P.O. Box 7 / Silvis, Ill. 61282  
200 7th Ave., P.O. Box 1122 / Rock Island, Ill. 61201

PAY TO THE ORDER OF

JAMES A. REYNOLDS & ILL. DEMOCRATIC PARTY

15312-9200-13710500015 DATE

OCT 01, 1986

AMOUNT \*\*\* 377.00

*Beverly Robinson*  
AUTHORIZED SIGNATURE

⑆09190148019840895042077⑆

504207  
ZELR  
916

MID STATES CORPORATE FEDERAL CREDIT UNION  
PAYABLE THROUGH FIRST BANK (N.A.) NORTHFIELD, MINN.

*Harvey Winson*  
*Garner, Ill.*

9 0 0 4 0 7 2 4 4 1

THE ELIZABETH STATE BANK 20562

70-149  
711

ELIZABETH, ILL. October 1 19 86

PAY TO THE ORDER OF Illinois Democratic Party \$ 335.00

THE ELIZABETH STATE BANK - 335 DOLLS 00 CTS

DOLLARS

STATE BANK - PREPORN

*Randy Culbert*

⑈020562⑈ ⑆071101491⑆ 485 248 7⑈

X  
*Wts: full  
paid*



Alton Park Cook County

0004072443

DEMOCRATIC PARTY OF COOK COUNTY  
CANDIDATES COMMITTEE-1986  
134 NORTH LA SALLE ST.  
CHICAGO, IL 60602

1019

PAY TO THE ORDER OF

2-20-78

10/3 10/6

ILLINOIS DEMOCRATIC STATE PARTY

\$ 5,000.00

FIVE THOUSAND AND NO/100

Amalgamated  
Trust Bank  
CHICAGO, ILLINOIS 60602

DOLLARS

Edmund J. Rosenthal  
Margaret Bryan Bell

FOR

Statewide mailing

⑆001019⑆ ⑆078003405⑆ ⑆064565400⑆

Mailing

W  
North

Bio

9 0 0 4 0 7 2 4 4 4

COMMITTEE TO RE-ELECT  
ROLAND W. BURRIS STATE COMPTROLLER  
134 N. LA SALLE, SUITE 1928  
CHICAGO, IL 60602

1243

Pay to the  
Order of

10-3 1986

2-3778

IL Democratic Party  
Twenty Five Hundred & 00/100

Dollars



CONTINENTAL BANK

*Richard J. Green*

*Seawide money*

#001243#-10710000391

71997934

*In Party Mailbox*

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 7 1986

(TAPE)

#100786•

2,500.00+  
3,000.00+  
5,500.00+  
1,500.00+  
2,500.00+  
1,000.00+  
3,000.00+

007

19,000.00+

FEDERAL CONTRIBUTIONS 2500.00

STATE CONTRIBUTIONS 16500.00

TOTAL 19000.00

NOTES:

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90040782445



STATE ACCOUNT  
#59-2884-7



*Wolff for Ill*

0 0 4 0 7 2 4 4 7



**CONTINENTAL BANK**

CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO  
231 SOUTH LA SALLE STREET, CHICAGO, ILLINOIS 60687

CR 671409

DATE 10/6/86

$\frac{2-3}{710}$

PAY  
TO THE  
ORDER  
OF

ILLINOIS DEMOCRATIC PARTY #####

\$ 2,500.00

The sum of 2,500 dol's 00 cts DOLLARS

**CASHIER'S CHECK**  
On ~~order~~ **WOLFF FOR ILLINOIS**  
**SAVE PAY FUNDS**

AUTHORIZED SIGNATURE

23

⑆671409⑆ ⑆071000039⑆ 47⑆00619⑆

*Received from  
Chas. Wolff 10/7/86  
for state wide mailing*

*Dunne*

9 0 0 4 0 7 2 4 4 8

CITIZENS' COMMITTEE TO ELECT GEORGE W. DUNNE

1350

2-340  
710

PAY  
TO THE  
ORDER OF

*Democratic Party*

\$ 700.00

*Thurs. Third*

DOLLARS

**Amalgamated**  
Trust & Savings Bank  
CHICAGO, ILLINOIS 60602

FOR



⑈001350⑈ • ⑆071003405⑆ ⑈062549100⑈

*Received for  
State wide mailing*

Americas Leaders Fund

00407 2449

AMERICA'S LEADERS FUND  
NON-FEDERAL ACCOUNT

3006

4633 S. Racine Avenue; Chicago, IL 60609

October 6, 1986 2-414  
710

PAY TO THE ORDER OF Illinois Democratic Party

\$ 5,500.00

Five thousand five hundred and no/00-----DOLLARS



The National Security Bank Chicago

FOR Donation

*Alan K. Dukowski*

⑆003006⑆ ⑆071004145⑆ 00510⑆6005⑆02

10/7  
Received from for  
State while mailing



ARTHUR E. COIA, Treasurer  
JACK CURRAN, Director

# Laborers' Political League

905 Sixteenth St., N.W., Washington, D.C. 20006 • Phone 202-638-5753

Administrative Committee

October 2, 1986

- WILBUR W. FRETAG
- MICHAEL LORELLO
- MASON M. WARREN
- R. P. VINALL
- HERBERT LOBDELL
- THOMAS J. ARCONTI
- HOWARD I. HENSON
- JACK WILKINSON
- JOSEPH UCASTRO
- JOSEPH M. MAZZA

"Democratic Party of Illinois"

Gentlemen:

Enclosed you will find check, in the amount of \$1,500.00, made payable to "Democratic Party of Illinois" from Laborers' Political League Education Fund.

These are education monies and may not be used in federal campaigns.

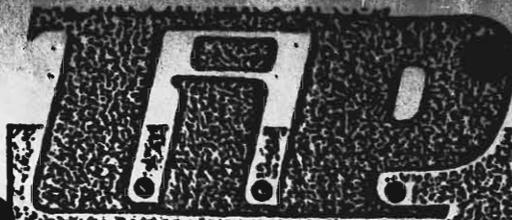
With all best wishes, I am

Sincerely yours,

*Jack Curran*

Laborers' Political League, Ed. Fund

LABORERS' POLITICAL LEAGUE		391
EDUCATIONAL FUND		
905 - 16TH ST., N.W.		154
WASHINGTON, D.C. 20006		640
		0/2 19 86
PAY TO THE ORDER OF	"Democratic Party of Illinois"	\$ 1,500.00
One Thousand Five Hundred and no/100		DOLLARS
1st AMERICAN FIRST AMERICAN BANK, N.A. WASHINGTON, DC		
FOR STATE ACCOUNT	<i>Angelo Fazio</i> <i>Arthur S. [unclear]</i>	
⑆00039⑆ ⑆054000043⑆ 208 102 629⑆		



POLITICAL ACTION FOR THE:

HOTEL EMPLOYEES AND RESTAURANT  
EMPLOYEES INTERNATIONAL UNION

1219 28TH STREET, N.W. • WASHINGTON, D.C. 20007 • (202) 393-4373

October 1, 1986

Illinois State Democratic Party  
30 West Washington St.  
Suite 615  
Chicago, IL 60602

Dear Sirs:

Enclosed please find Check No. 2276 in the amount of <sup>2,500.00</sup> ~~\$5,000.00~~. This check represents a contribution from our T.I.P. Educational Fund to the Illinois State Democratic Party.

If any reporting is required of this organization according to state law, please notify this office as soon as possible.

Cordially,

*Herman Leavitt*  
Herman Leavitt  
Treasurer, TIP

00407245100

T.I.P. EDUCATIONAL FUND-HOTEL EMPLOYEES AND RESTAURANT EMPLOYEES INTERNATIONAL UNION  
1219 - 28TH STREET, N.W.  
WASHINGTON, DC 20007

2276

10/1/86

15-3/540

1 October 19 86

PAY TO THE ORDER OF Illinois State Democratic Party

Two thousand five hundred dollars and no cents \$ 2,500.00 DOLLARS

The RIGGS NATIONAL BANK  
of WASHINGTON D.C.  
FARMERS & MECHANICS OFFICE  
1300 CONN. AVE. N.W. & 11 ST. N.W.

OR State Account

*Herman Leavitt*

⑆002276⑆ ⑆054000030⑆ 06⑆08430275⑆

ROBERT A. GEORGINE, President  
JOSEPH F. MALONEY, Secretary-Treasurer

CHARLES H. PILLARD, 1st Vice President  
ANGELO FOSCO, 2nd Vice President  
ANDREW T. HAAS, 3rd Vice President  
JOHN T. JOYCE, 4th Vice President  
EVERETT A. TREADWAY, 5th Vice President  
EDWARD J. CARLOUGH, 6th Vice President



MELVIN F. ...  
MARVIN J. SOEDE, 8th Vice President  
PATRICK J. CAMPBELL, 9th Vice President  
CHARLES W. JONES, 10th Vice President  
WILLIAM A. DUVAL, 11th Vice President  
GERALD D. BOMBASSARO, 12th Vice President  
EARL J. KRUSE, 13th Vice President  
LARRY L. DUGAN, JR., 14th Vice President  
JUEL D. DRAKE, 15th Vice President

## Building and Construction Trades Department

AMERICAN FEDERATION OF LABOR — CONGRESS OF INDUSTRIAL ORGANIZATIONS  
815 SIXTEENTH ST., N.W., Suite 603 • WASHINGTON, D. C. 20006-4189

(202) 347-1461



OCT 2 1986

October 2, 1986

Honorable Frank Annunzio  
U. S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D. C. 20515

Dear Congressman Annunzio:

Enclosed is a check in the amount of \$1,000.00 paid to the order of the Democratic Party of Illinois to be used for mailings.

Best wishes!

Sincerely,

*Robert A. Georgine*  
Robert A. Georgine  
President

*Joe C. Zerretti*  
Joe C. Zerretti

90049  
Building & Construction Trades 2

POLITICAL EDUCATIONAL FUND OF THE BUILDING & CONSTRUCTION TRADES DEPT. 815 - 16TH STREET, N.W., ROOM 603 WASHINGTON, D.C. 20006		3016
		15-55-540
PAY TO THE ORDER OF Democratic Party of Illinois		October 2 1986
EXACTLY \$ 1,000.00		\$ 1,000.00
AMERICAN SECURITY BANK, N.A. 1614 STREET, N.W. WASHINGTON, D.C.		DOLLARS
FOR Mailing - State Account		PRES.
⑆003016⑆ ⑆054000551⑆ ⑆13⑆ 871 67 8		SECT. TREAS.

9 0 0 4 0 7 8 2 4 5 3

*Rosewell*

6562

FRIENDS OF EDWARD J. ROSEWELL

8-3407710

October 7 19 86

PAY TO THE ORDER OF Illinois State Democratic Party \$ 3,000.00

Three thousand and no/100 DOLLARS

Amalgamated Trust Bank  
CHICAGO, ILLINOIS 60604

*John R. Kausal*  
*L. S. Lambert*

FOR #006562# + #071003405# #092352100#

*State*  
*Illinois*  
*Post Office*

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 10 1986

(TAPE)

#101086•

- 20,000.00+
- 3,000.00+
- 3,000.00+
- 1,000.00+
- 2,500.00+
- 1,000.00+
- 5,000.00+
- 717.85+
- 150.00+
- 122.00+
- 119.00+
- 20.00+
- 35.50+
- 30.00+

FEDERAL CONTRIBUTIONS 856.85

STATE CONTRIBUTIONS 35837.50 ✓

TOTAL 36694.35

36,694.35+

NOTES:

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9004072014  
2454



STATE ACCOUNT  
#59-2884-7





9 0 0 4 0 7 2 4 5 7

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE 1072  
 SOFT LABOR ACCOUNT  
 400 N. CAPITOL ST., NW, SUITE 319  
 WASHINGTON, D.C. 20001  
 October 8 19 86  
 Dollars \$ 20,000.00  
 Twenty thousand and 00/100  
 PAY TO THE ORDER OF  
 Illinois State Democratic Party  
 88 West Washington Street  
 Chicago, IL 60602  
 Transfer  
 #00001072# 01054001204#  
 #2680742#  
 CAME  
 Martin A. Frank

State of Illinois

9 0 0 4 0 7 2 4 5 8

*Alvin*

IN PAYMENT FOR		2340 710	5148	DOLLARS
CITIZENS FOR HYNES 127 NORTH DEARBORN CHICAGO, ILL. 60602		THREE THOUSAND DOLLARS AND NO CENTS		
CHECK NO. 5148	TO THE ORDER OF ILLINOIS DEMOCRATIC PARTY	DATE 10-10-86	DESCRIPTION mailing	CHECK AMOUNT 3,000.00
30 West Washington, Ste 615 Chicago, Illinois 60602		<i>Alvin Keyes</i>		
AMALGAMATED TRUST & SAVINGS BANK CHICAGO, ILL. 60603				

⑆005148⑆ ⑆071003405⑆ ⑆060960100⑆

*For mailing*



1/24/66

9004072460

FRIENDS OF STANLEY T. KUSPER, JR.  
SUITE 2400  
315 N. LA SALLE ST.  
CHICAGO, ILLINOIS 60602

STANLEY T. KUSPER

2-50  
710

1151

THE SALLE NATIONAL BANK

PAY

CHECK NO.

TO THE ORDER OF

Illinois Democratic Party

DATE

10-9-66

DESCRIPTION

Campaign mailing

FRIENDS OF STANLEY T. KUSPER, JR.

*Stanley T. Kusper*

LaSalle National Bank  
CHICAGO • ILLINOIS 60602

DOLLARS

CHECK AMOUNT

1000.00

⑆001151⑆ ⑆0710⑉0050⑆ 59⑉0275⑉5⑆

0-9 407 2461

1252

COMMITTEE TO RE-ELECT  
ROLAND W. BURRIS STATE COMPTROLLER  
1941 N. LA SALLE, SUITE 1928  
CHICAGO, IL 60602

10-9-86

Pay to the  
Order of

IL Democratic Party - Direct Mail Fund \$2,500.<sup>00</sup>

Two thousand five hundred

Dollars

*James Lee Swan*



CONTINENTAL BANK

*James Lee Swan*

⑆00⑆252⑆⑆10⑆0000⑆9⑆

710979346

Allen

9 0 0 4 0 7 2 4 6 2

For Voter  
mailing

No. 994

Citizen for Judith Ann Calder  
 750 W. Bitterroot  
 Chicago, Ill. 60613

8-20710  
 Oct 7 1986

PAY TO THE ORDER OF Democratic Party of Illinois \$ 1,500 DOLLARS

One thousand no/100

**HARRIS BANK**  
 Harris Trust and Savings Bank  
 Chicago, Illinois 60690

FOR Donation Judith Ann Calder

⑆071000288⑆ 2201158⑈01⑆



ASDC/DEMOCRATIC VICTORY FUND  
430 SOUTH CAPITAL STREET, S.E.  
WASHINGTON, D.C. 20003

1230

PAY TO THE ORDER OF

Illinois Democratic Party

Oct. 30 1986

10-128

Seven Hundred Thirty-Seven and 34/100

\$737.34

DOLLARS

DC National Bank

DISTRICT OF COLUMBIA NATIONAL BANK  
1100 F Street, N.W.  
Washington, D.C. 20004

by *John C. White*

*Anna F. Johnson*

FOR

⑆00001230⑆ ⑆054001204⑆

⑆267928 0⑆

0004072464

Democratic Victory Fund

157

P. NO. CROSS ELECTION COMMITTEE 6-85

133

**CERTIFIED**

*Oct. 3 1986*

70-1113/812

PAY PAYABLE ONLY AS ORIGINALLY ISSUED  
ORDINARY WHEN PROPERLY ENDORSED

*Chicago Democrat Party* \$ **150.00**

On DATE *10-3-86*  
BOATMEN'S BANK OF MT. ILLINOIS *One Hundred and no/100* DOLLARS

SECURITY BANK  
MEMPHIS, TENNESSEE

**CERTIFIED CHECK**

AUTHORIZED SIGNATURE  
*Alice Harris*

DO NOT DESTROY

**CERTIFIED CHECK**

⑆081211135⑆

90040782465

VOTER FILE ORDERS

+

90040782466

505

FULTON COUNTY DEMOCRATIC  
CENTRAL COMMITTEE

10-3-56 70-851  
711

For Order of Illinois Democratic Party \$ 122.00

One Hundred & Twenty Two Dollars

COMMUNITY BANK AND TRUST COMPANY  
200 NORTH MAIN GAITHER, IL 62520

Albina Legich

Label # 170-046 0505 Treasurer

⑆07⑆⑆085⑆7⑆

VOTER FILE ORDERS

x

RAYMOND D. OR CHARLES WOODS 12-82  
BOX 237 618-775-9888  
COON, IL 62878

815

10/02 1986 78-7087/2818

PAY TO THE ORDER OF ILLINOIS DEMOCRATIC PARTY \$ 119 <sup>00</sup>/<sub>100</sub>

One Hundred Nineteen and <sup>00</sup>/<sub>100</sub> DOLLARS



MEMO for Greened Labels

Raymond Woods

⑆ 28 19708781 ⑆ 01000096002 ⑆ 0815

9004082467

VOTER FILE ORDERS

X

DENNIS L. OR PATRICK K. POTTHAST  
P.O. 3, BOX # 2544-2515  
GREENWICH, N.Y. 12446

7247

10/3 1986

70-302/818

PAY TO THE  
ORDER OF

Democratic Party of Ill.  
Twenty 100

\$ 20.<sup>00</sup>/<sub>100</sub>  
DOLLARS

MEMO SUMMED LABELS  
1st  
Greenwich, N.Y. 12446  
Dennis L. Potthast

+1:08 1905027:7247 30351266#01

90040782468

VOTER FILE ORDERS

Y



THE CITIZENS NATIONAL BANK

OF THE  
STATE OF ILLINOIS  
FARM, HOME AND SAVINGS

77246

REMITTER

Edgar County Democrats

October 3, 1986

70-283  
711

PAY TO THE  
ORDER OF

Illinois Democratic Party

\$ 35.50

CITIZENS NAT'L BANK OF ILLINOIS  
35 and 50/100

DOLLARS

CASHIER'S CHECK

AUTHORIZED SIGNATURE

*Dorothy Jean Adams*

⑆077246⑆ ⑆071102830⑆

0004018246

VOTER FILE ORDERS

X

MACON COUNTY DEMOCRAT CENTRAL COMMITTEE  
DECATUR, ILLINOIS

816

70-2264/711

10/2 1986

PAY TO THE ORDER OF

ILLINOIS DEMOCRATIC PARTY

\$ 3000

THIRTY AND 00/100

DOLLARS



SBY CAPITAL BANK AND TRUST COMPANY  
1901 EAST MADISON STREET  
CHICAGO, ILLINOIS 60604

FOR

COUNTY AUDIT

*John A. McGlynn*  
Chairman

⑆000816⑆ ⑆071122645⑆ ⑆0042523⑆

0004082470

VOTER FILE ORDERS

X

ILLINOIS DEMOCRATIC PARTY

DEPOSIT DOCKET

DATE

OCT 14 1986

(TAPE)

#1C1486•

85.00+

35.00+

110.00+

34.00+

7,500.00+

102.00+

17.00+

8,000.00+

008

15,883.00+

FEDERAL CONTRIBUTIONS

366.00

STATE CONTRIBUTIONS

15517.00 ✓

TOTAL

15883.00

NOTES:

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0004072471



STATE ACCOUNT  
#59-2884-7

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY ENDORSED. LIST EACH CHECK SEPARATELY.

CHECKS	DOLLARS	CENTS
PURDEY	85	25
ALLEN	35	00
BROWN Co.	110	00
GOODE	34	00
FRIENDS OF MICHAEL J. MADIGAN	7,500	00
DOVE County	102	00
DEMOCRATIC CENTRAL COMMITTEE	19	00
THE COMMITTEE TO RE-ELECT THE DEMOCRATIC SENATE	8,000	00
<b>TOTAL CHECKS</b>	<b>15,883</b>	<b>00</b>

DEPOSIT TICKET

ORDERS

ORDER

MASTING

*Deposited 10/14*

65.00  
 35.00  
 110.00  
 34.00  
 7,500.00  
 102.00  
 19.00  
 17.00  
 8,000.00  
 15,883.00

00040722472

ENTER TOTAL

**LaSalle National Bank**

135 South LaSalle Street  
 Chicago, Illinois 60690  
 Member FDIC

**CUSTOMER TRANSACTION RECEIPT**

The transaction for which this receipt is issued is accepted subject to the provisions of the Illinois Uniform Commercial Code and the conditions appearing on the signature cards. Total subject to item verification.

The bank office location, transaction type, later number, account number, time, date, transaction number and amount of your transaction are shown below.

Always Obtain a Registered Receipt When Making a Transaction

LB, DPCK 0037 854-2034-7 115 01 41 10/14/86 01263 15883.00



Allen

47

DICK ALLEN FOR  
STATES ATTORNEY 10-2  
2945 MADISON AVE  
GRANITE CITY, IL 62040

No. 617

10-8-86

Illinois Democratic Party

\$ 35.00

Thirty five and 00/100

(1ST) National Bank in Madison  
MADISON, ILLINOIS 62060

Jan 21 1987

⑆08 100404 ⑆ 0 1598 240617

FARMERS STATE BANK & TRUST CO. 13028

MT. STERLING, ILLINOIS 62353

REMITTER Brown Co. Democrat Committee

ADDRESS \_\_\_\_\_

MT. STERLING, ILL. Oct. 1 1986 70-1853  
812

PAY TO THE ORDER OF Illinois Democratic Party

FARMERS STATE BANK & TRUST CO.

110 DOLLARS

\$ 110.00

DOLLAR

Cashier's Check

*Jennifer Sullivan*

⑆081218536⑆ 14 590 8⑆

BROWN COUNTY

000407247

THE PURCHASE OF AN INSURANCE POLICY WILL BE  
REQUIRED BEFORE ANY CASHIER'S CHECK ON THIS  
BANK WILL BE REISSUED OR REFUNDED IN THE EVENT  
IT IS LOST, MISPLACED, OR STOLEN.  
CASHIER'S CHECK

THE CARROLLTON BANK AND TRUST COMPANY

033081

P.O. BOX 232

315 WEST PUBLIC SQUARE  
CARROLLTON, ILLINOIS 62016

REMITTER

Ben Goode

Oct 9 19 86

70-601  
819

The sum of \$34 and 00/100

DOLLARS \$ 34.00

PAY  
TO THE ORDER

Illinois Democratic Party  
1020 South Fifth Street Suite B  
Springfield, Il 62703

CASHIER'S CHECK  
THE CARROLLTON BANK AND TRUST COMPANY  
AUTHORIZED SIGNATURE

*Warpes Wade Post-Boxer*

⑆033081⑆ ⑆081906013⑆ ⑆9255009⑆

*For Order*

00040724



**FRIENDS OF MICHAEL J. MADIGAN**  
 3 FIRST NATIONAL PLAZA - SUITE 3800  
 CHICAGO, ILLINOIS 60602  
 (312) 641-2600

REMITTANCE ADVICE

*DIRECT CONTRIBUTION FOR VOTER  
 EDUCATION PACKAGE.*

2-15  
710

1437

PAY *Seven Thousand Five Hundred and 00/100* DOLLARS

CHECK NO.	TO THE ORDER OF	DATE	PURPOSE OR CODE NUMBER	BENEFICIARY	CHECK AMOUNT
1437	DEMOCRATIC STATE CENTRAL COMM OF ILLINOIS	11/13/86		DIRECT CONTRIBUTION - VOTER ED.	\$ 7,500. <sup>00</sup>

The Northern Trust Company  
Chicago, Illinois

FRIENDS OF MICHAEL J. MADIGAN

*Gary J. Pille*  
AUTHORIZED SIGNATURE

⑆00 1437⑆ ⑆07 1000 152⑆ 00003 177 13⑆

90040732477

*Madigan*

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND - NOT A WHITE BACKGROUND



UNITED BANK of Bevidere  
130 South State  
Bevidere, IL 62008

No. 064749

REMITTER

Boone County Democratic Party

Oct 23 1986

PAY TO THE ORDER OF

Illinois Democratic Party

\$102.00

UNITED BANK AND TRUST CO. OF ILL.

CASHIER'S CHECK

*Handwritten signature: Ashley Gray*

⑆064749⑆ ⑆071903039⑆ ⑆900⑆080⑆3⑆

000400

*Handwritten scribbles and signature*

150045

**BANK MONEY ORDER**

15908

REMITTER

*Democratic Central Committee*

*Oct 6 1986*

70-849  
711

PAY TO THE  
ORDER OF

*Illinois Democratic Party*

\$ *17*<sup>00</sup>

BRADFORD  
BANKING CO.

*17 DOLLARS*

DOLLARS

**BRADFORD**  
BANKING COMPANY  
BRADFORD ILL.

AUTHORIZED SIGNATURE

*Loismary Holland*

⑆071109493⑆ ⑈800⑈007⑈



9 0 0 4 0 7 8 2 4

THE COMMITTEE TO RE-ELECT  
THE DEMOCRATIC SENATE

P.O. BOX 5026  
SPRINGFIELD, IL 62705

1429

109 86

10-28/71

PAY  
TO THE  
ORDER OF

Illinois Democratic Party

\$ 8000<sup>00</sup>

EIGHT THOUSAND & 00/100

DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capital Plaza Springfield, Illinois 62701

0285

FOR CONTRIBUTION

*Richard D. Keil*

⑆001429⑆ ⑆107100269⑆ 2003805⑆

0004082490

*Ill. State Party  
Springfield*

*Illinois Senate*





ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 16 1986

(TAPE)

#101686•

5,000.00+

35,000.00+

2,924.70+

1,596.48+

004

44,521.18\*

FEDERAL CONTRIBUTIONS 1596.48

STATE CONTRIBUTIONS 42924.70 ✓

TOTAL 44521.18

NOTES:

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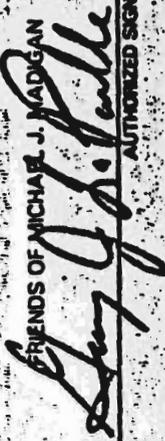
9  
0  
0  
4  
0  
7  
2  
4  
8  
3



STATE ACCOUNT  
#59-2884-7



9 0 0 4 0 7 2 4 8 5

		<b>FRIENDS OF MICHAEL J. MADIGAN</b> 3 FIRST NATIONAL PLAZA - SUITE 3800 CHICAGO, ILLINOIS 60602 (312) 641-2600		REMITTANCE ADVISE		215 710	1442
PAY <i>Thirty-five thousand and 10/100</i>		TO THE ORDER OF		DATE	PURPOSE OR CODE NUMBER	BENEFICIARY	
CHECK NO. 1442	<i>Illinois Administrative State Central Committee</i>		10/15/86	<i>direct contribution</i>	<i>FRIENDS OF MICHAEL J. MADIGAN</i>		
The Northern Trust Company Chicago, Illinois		AUTHORIZED SIGNATURE 		DOLLARS		CHECK AMOUNT 35 000 00	

⑆001442⑆ ⑆071000152⑆ 0000317713⑆

9 0 0 4 0 7 2 4 8 6

*Madigan*

ILLINOIS HOUSE DEMOCRATIC MAJORITY  
P. O. BOX 118  
SPRINGFIELD, ILLINOIS 62705  
Michael J. Madigan, Chairman

EXPLANATION	AMOUNT

70-26  
711

3124

PAY AMOUNT OF

*Five thousand and NO/100*

DOLLARS

DATE	TO THE ORDER OF	GROSS	S.S.	F.T.	S.T.	CHECK NUMBER	CHECK AMOUNT
10/15/86	Illinois Democratic State Central Committee					3124	\$ 5000.00
	<i>direct contribution</i>						

\$ 5000.00

ILLINOIS HOUSE DEMOCRATIC MAJORITY  
*Sam J. LaPelle*  
AUTHORIZED SIGNATURE

Marine Bank

⑆003 24⑆ ⑆07 100269⑆ 1083070⑆



9 0 0 4 0 7 2 4 8 7

1323

SENATOR VINCE DEMUZIO  
COMMITTEE 6-82  
4 VALLEY LANE  
CARLINVILLE, IL 62828

10-15-1986 70-487  
819

Democratic Party \$2924.70

PAY TO THE ORDER OF *Five thousand nine hundred twenty four and 70/100 DOLLARS*

*Marlene Hege*

Farmers & Merchants  
National Bank  
of Carlinville  
Carlinville, Illinois 62828

MEMO  
⑈081904675⑈0000404⑈519⑈1323



ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 20 1986

(TAPE)

#102066•

28,240.00+

2,800.00+

002

31,040.00+

FEDERAL CONTRIBUTIONS 0

STATE CONTRIBUTIONS 31,040.00 ✓

TOTAL 31,040.00

NOTES:

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9  
0  
0  
4  
0  
8  
2  
4  
8  
9



STATE ACCOUNT  
#59-2884-7



0004082491

2-15 710

1276

REMITTANCE ADVICE

277713

DOLLARS

CHECK AMOUNT

277240 00

FRIENDS OF MICHAEL J. MADIGAN  
3 FIRST NATIONAL PLAZA SUITE 3900  
CHICAGO, ILLINOIS 60602  
(312) 641-2600

PAY TO THE ORDER OF

THE SUM OF \$28,240.00 DOLLARS

CONTRIBUTION FOR VOTER EDUCATION T.V. PACKAGE

DATE 10-30-86

PURPOSE OR CODE NUMBER

BENEFICIARY

FRIENDS OF MICHAEL J. MADIGAN

AUTHORIZED SIGNATURE

Michael J. Madigan

1001276 10000052 000031282855

DO NOT REMOVE THIS LABEL

2-15 710

1277

REMITTANCE ADVICE

277713

DOLLARS

CHECK AMOUNT

2800 00

FRIENDS OF MICHAEL J. MADIGAN  
3 FIRST NATIONAL PLAZA SUITE 3900  
CHICAGO, ILLINOIS 60602  
(312) 641-2600

PAY TO THE ORDER OF

THE SUM OF \$2,800.00 DOLLARS

CONTRIBUTION FOR VOTER EDUCATION T.V. PACKAGE

DATE 10-30-86

PURPOSE OR CODE NUMBER

BENEFICIARY

FRIENDS OF MICHAEL J. MADIGAN

AUTHORIZED SIGNATURE

Michael J. Madigan

1001276 10000052 000031282855

DO NOT REMOVE THIS LABEL

ILLINOIS DEMOCRATIC PARTY

DEPOSIT DOCKET

DATE

OCT 21 1986

(TAPE)

#102186•

950.00+  
 882.00+  
 25.00+  
 2,000.00+  
 511.00+  
 3,700.00+  
 8,000.00+  
 11,500.00+

008

27,568.00\*

FEDERAL CONTRIBUTIONS 5225.00

STATE CONTRIBUTIONS 22343.00 ✓

TOTAL 27568.00

NOTES:

① \$10,000 - DEMOCRATIC CONGRESSIONAL  
 CAMPAIGN COMM. - SOFT LAZOR  
 AGENT.

② \$1,500 - KEN BRUCE FOR CONGRESS -  
 PERMISSIBLE FEDERAL FUNDS.

9004072492



STATE ACCOUNT  
 #59-2884-7

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY ENDORSED. LIST EACH CHECK SEPARATELY.

CHECKS	DOLLARS	CENTS
Allen for State Atty	950	00
4300 Ward	882	00
James Costello	25	00
DERGIN for Cong. Comm.	2000	00
CANNON FOR STATE SENATOR	511	00
ASDC	3700	00
FRIEND OF Michael Morrison	8000	00

Voter ORDERS

OPERATIONS

ORDERS

DIRECT MAILING

POSTAGE FOR POSTCARDS FOR POST CARDS

FUNDS Received FROM DNC

DEPOSIT TICKET

Allyant - cum?

San National Bank

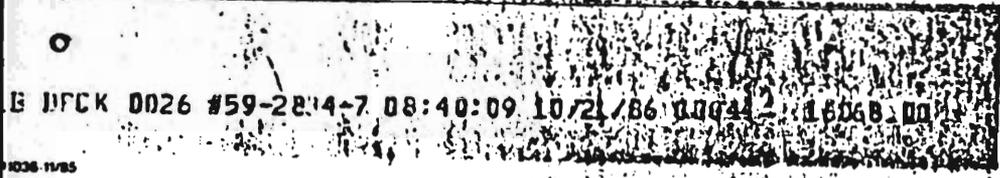
South LaSalle Street  
Chicago, Illinois 60690  
Member FDIC

CUSTOMER TRANSACTION RECEIPT

This receipt is issued subject to the provisions of the Illinois Uniform Commercial Code and the conditions appearing on the signature cards. Total subject to item verification.

Location, transaction type, teller number, account number, time, date, transaction number and amount of your transaction are shown below.

Deposit a Registered Receipt When Making a Transaction



BFCK 0026 #59-2814-7 08:40:09 10/21/86 00041 16068.00

1026-11/85

**TOTAL CHECKS** 16,068.00

ENTER TOTAL ON OTHER SIDE

10/21/86

O.K.

*Allen*

9 0 0 4 0 7 8 2 4 9 4


**DICK ALLEN FOR STATES ATTORNEY** 10-02  
 2945 MADISON AVE. GRANITE CITY, IL 62040

No. **620**      **10-16**      **86**      **70-01/110**

In the order of **Illinois Democratic Party** \$ **950.00**

**Nine hundred and fifty and 00/100 DOLLARS**

**First National Bank in Madison**  
 MADISON, ILLINOIS 62040

Pay to the order of **John Casey**

⑆08100104⑆⑆⑆01598 2⑆0620

*John Casey*

*PO BOX 1101*

*Allen*



DURBIN FOR  
CONGRESS COMMITTEE

3215

P.O. Box 1949, Springfield, IL 62705

10-15-86

BY THE ORDER OF

*Illinois Democratic State Central Committee*

\$ 2,000.00

*Two Thousand and no/100*

DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capital Plaza • Springfield, Illinois 62701

*Mary Beth Dewberry*

⑈003215⑈ ⑆071100369⑆ ⑆72980⑆ ⑆99200170⑆ ⑆51200⑆

9004072498

*Mailing*

*Corman*

00040702497

386

CAHMAN FOR STATE SENATOR COMM. 1-86  
413 NORTH FOURTH  
SPRINGFIELD, IL 62702

Oct. 15 1986

PAY TO THE ORDER OF *Democrat Party* \$ *511.00*

*Five hundred & eleven dollars & 00/100 DOLLARS*

GERMANIA,  
207 S. Main Street - Springfield, Ill. 62760

*Ernie Pulverstein*

⑆ 281070707⑆ 00130 6864 8⑆ 0386

*not to be paid*

9 0 0 4 0 7 2 4 9 8

2-15  
710

1465

DOLLARS

CHECK AMOUNT

8 000.00

REMITTANCE ADVISE

FRIENDS OF MICHAEL J. MADIGAN  
3 FIRST NATIONAL PLAZA - SUITE 3900  
CHICAGO, ILLINOIS 60602  
(312) 641-2800



Pay Eight thousand and no/100

PAY TO THE ORDER OF

Democratic State Central Comm

PURPOSE OR CODE NUMBER

Contribution for Union Education mailing

DATE

10/19/86

BENEFICIARY

FRIENDS OF MICHAEL J. MADIGAN

*Gay J. LaFille*  
AUTHORIZED SIGNATURE

The Northern Trust Company  
Chicago, Illinois

⑆001465⑆ ⑆071000152⑆ 0000317713⑆

*credited directly to mailing*

**LaSalle National Bank**

135 South LaSalle Street  
Chicago, Illinois 60690  
Member FDIC

**CUSTOMER TRANSACTION RECEIPT**

The transaction for which this receipt is issued is accepted subject to the provisions of the Illinois Uniform Commercial Code and the conditions appearing on the signature cards. Total subject to item verification.

The bank name, location, transaction type, letter number, account number, time, date, transaction number and amount of your transaction are shown below.

Always Obtain a Registered Receipt When Making a Transaction

2-4  
LE DPCK 0067 #59-2884-7 11-16-86 10/21/86 00823 21,500.00

Form #1038-11/85

000407

b-ccc

0004072500

~~( )~~

Mike Martin  
Account

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE  
 SOFT LABOR ACCOUNT  
 400 N. CAPITOL ST., NW., SUITE 319  
 WASHINGTON, D.C. 20001 1076

PAY TO THE ORDER OF  
 Ten thousand and 00/100  
 October 17 19 86

DOLLARS \$10,000.00

Illinois Democratic Party  
 1020 South Fifth Street, Suite B  
 Springfield, IL 62703

Bank of America  
 #00001076 @ 0540012041  
 #25807124

DC National District of Columbia National Bank

Carlo  
Martin

9 0 0 4 0 7 2 5 0 1

← credits to  
journalist

181

10-720/2011

Oct 21 1986

BRUCE FOR CONGRESS  
P.O. BOX 208  
OLNEY, IL 62450

\$ 1,500.00

DOLLARS

PAY TO THE ORDER OF Democratic Party of Illinois

One thousand five hundred and 00/100



James H. Sturgeon

MEMO

⑆271172398⑆ 57⑆405820⑆2⑆ 0181⑆

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 22 1986

(TAPE)

#102266•

50.00+  
15.00+  
2,600.00+  
650.00+

004

3,315.00+

FEDERAL CONTRIBUTIONS 700.00

STATE CONTRIBUTIONS 2615.00 ✓

TOTAL 3315.00

NOTES:

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

9004072502



STATE ACCOUNT  
#59-2684-7





9004072504

DAVID OR DIXIE DOBILL 9-75  
FT. 1, BOX 38 984-2335  
ROYALTON, IL 62863

5068

Oct 7 1986

70-281/012

PAY TO THE ORDER OF *Allison Service Party*

\$ 50.00

100/100 DOLLARS

*Fifty*



BOATMEN'S BANK OF ZECLE  
ZECLE, ILLINOIS 62899



*David Or Dixie Dobbill*

⑆1:08122051⑆ 2006928⑆ 5068

*Out*

9004072505

CITIZENS FOR ROBERT S. WRONSKI

1078

October 16 1986

3-314718

Pay to the Order of Democratic State Central Committee

\$ 2,600.00

Dollars

Two thousand six hundred and no/100

GN GLADSTONE NORWOOD TRUST & SAVINGS BANK CHICAGO, ILLINOIS 60606

William K. Schmidt

⑆001078⑆⑆071002147⑆⑆001026053⑆01⑆

Hayes

900407 2506

Tracy

1ST CONG. DIST. CHARLES A. HAYES 298  
 4859 S. WABASH 2-1227710  
 CHICAGO, IL 60615

October 20, 1986

Pay to the Order of Democratic Party of Illinois \$ 650.00 Dollars

Six Hundred and Fifty

Independence Bank of Chicago  
 7038 S. COTTAGE GROVE CHICAGO, ILL. 60619

Lynae Waterston  
Allen Wayfield

⑆000298⑆ ⑆⑆071001229⑆ 017154000⑆

9 0 0 4 0 7 2 5 0 7



SHELBY COUNTY DEMOCRATIC CENTRAL COMMITTEE

SHELBYVILLE, ILLINOIS 62365

October 16 1986

1297 70-469 711

PAY TO THE ORDER OF Illinois Democratic Party \$ 15.00

Fifteen and 00/100 --- DOLLARS

Computer lists/labels

SHELBY COUNTY STATE BANK

190-247-58

Shelby County

190-247-58

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 23 1966

(TAPES)

#102386•

2,352.73+  
3,553.75+  
6,000.00+  
25.00+  
125.00+  
6,000.00+  
2,500.00+

20,556.48+

FEDERAL CONTRIBUTIONS 150.00

STATE CONTRIBUTIONS 20406.48 ✓

TOTAL 20556.48

NOTES:

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007  
9004072508

EXHIBIT  
GROUP  
3-12

STATE ACCOUNT  
#59-2884-7



U.S. POSTMASTER  
CK. # 1145  
Demuzio


**SENATOR VINCE DEMUZIO**  
**COMMITTEE 8-82**  
 4 VALLEY LANE  
 CARLINVILLE, IL 62826

1331

10-22-86 70-487  
819

PAY TO THE ORDER OF Illinois Democratic Party \$ 2352.73

Two thousand three hundred fifty-two and 73/100 DOLLARS

**Farmers & Merchants  
 National Bank  
 of Carlinville  
 Carlinville, Illinois 62826**

Postage Marlene Heyer

⑆08190675⑆ 0000404⑆ 519⑆ 1331

9004072510

Almugro

Memorandum Victory Fund

9004072511

ASDC/DEMOCRATIC VICTORY FUND  
430 SOUTH CAPITAL STREET, S.E.  
WASHINGTON, D.C. 20003

1173

18-170  
140

Oct. 17 1986

PAY TO THE ORDER OF Illinois Democratic Party \$ 3,553.75  
Three Thousand Five Hundred Fifty-Three and 75/100 DOLLARS

DC NATIONAL DISTRICT OF COLUMBIA NATIONAL BANK  
BANK \*\*\*  
400 P. STREET, N.W.  
WASHINGTON, D.C. 20004

Ben Guly  
Ron Fishman

FOR

⑆00001173⑆ ⑆054001204⑆

⑆267928 0⑆

ions

40702512

11-2 2100  
10-31 1750  
10-31 1750

*[Handwritten signature]*

3270

10-20-71

DURBIN FOR CONGRESS COMMITTEE 6-82

Oct 22 1986

PAY TO THE ORDER OF Illinois Democratic State Central Committee \$6,000.00

Six thousand exactly DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capital Plaza • Springfield, Illinois 62701

Mary Beth Auerkamp

FOR #003270# 10711002691 1089273#

~~3~~

~~PRINTING~~

PRINTING 3743.95

U.S. POSTAL SERVICE

2191.86

5935.81

reimbursement  
for operation

9004072513

RICHARD E. BURGOYNE  
P.O. BOX 126 217-854-2273  
CARLINVILLE, IL 62626

713

70-082/119

Oct 20 19 80

PAY TO THE ORDER OF All Democratic Party \$ 25.00 DOLLARS  
Twenty five and 00/100



Carlinville  
NATIONAL BANK  
P.O. BOX 126  
CARLINVILLE, ILL. 62626

*Richard E. Burgoyne*

⑆081904662⑆ 005⑈811⑈

of r

Hannig

0004072514

599

GARY HANNIG 9-80  
700 N. HARD ROAD 217-835-2721  
BENLD, IL 62009

Oct 3 1986

70-0017-118

PAY TO THE ORDER OF

Ill. State Dem Party

\$ 125.00

One Hundred Twenty Five and 00/100 DOLLARS

The FIRST NATIONAL BANK  
OF STANTON, ILLINOIS

Gary Hannig

⑆081904015⑆ ⑆26 494 6⑆

POC KATIM 7

9004072515



**ILLINOIS TRIAL LAWYERS ASSOCIATION**

POLITICAL ACTION COMMITTEE  
110 WEST EDWARDS 217-789-0807  
P.O. BOX 5000  
SPRINGFIELD, ILLINOIS 62704

2466

10/21 19 88

70-2  
711

PAY TO THE ORDER OF STATE CENTRAL DEMOCRATIC COMMITTEE \$ 2,500.00

Two thousand five hundred dollars and 00/100 DOLLARS

TREASURER  
*Richard D. Loya*

**INB** Illinois National Bank  
ONE OLD CAPITOL PLAZA NORTH  
SPRINGFIELD ILLINOIS 62701

⑆002466⑆⑆⑆071100324⑆00066478⑆

DELIVER CHECK PRINTERS

*Spencer*

Alamo. Senate

9 0 0 4 0 7 2 5 1 6

1496

70-28711

10-22-86

1496

THE COMMITTEE TO RE-ELECT  
THE DEMOCRATIC SENATE  
P.O. BOX 5028  
SPRINGFIELD, IL 62705

PAY TO THE ORDER OF Illinois Democratic Party \$ 6000<sup>00</sup>

SIX thousand & 00/100

MARINE BANK OF SPRINGFIELD  
East Old State Capital Plaza • Springfield, Illinois 62761

FOR Contribution Philip J. Reel

⑆001496⑆ ⑆1071100269⑆ 2003805⑆

DOLLARS

200<sup>00</sup> POSTAGE  
paid

0 = Primary  
COST  
STICK  
WELCH

3





9004082519

*Henry County*

337 70-1004 711

HENRY COUNTY DEMOCRATIC CENTRAL COMMITTEE 10-24-86

Democratic Party of Ill. \$401.17

Five hundred one and 17/100 dollars

State Bank of Orion  
ORION, ILLINOIS 61375

Postage *J. Reynolds*

071100421 04 6879 7# 0337

POSTAGE Pd  
Printing to be paid





9004072522


 DICK ALLEN FOR  
 STATES ATTORNEY 10-82  
 2945 MADISON AVE.  
 GRANITE CITY, IL 62040

No. 626  
 10-24-86  
 10-82

Illinois Democratic Party \$41.17  
 Party one and 17/100

(151) National Bank in Madison  
 MADISON, ILLINOIS 62040

JAMES CASEY

10810040411 0 1598 250626

1  
 Re: Party  
 James Casey

0004072523

11/10/97



SENATOR VINCE DEMUZIO  
COMMITTEE 6-82  
4 VALLEY LANE  
CARLINVILLE, IL 62626

1333

10-24-86 70-467  
619

PAY TO THE ORDER OF Illinois Democratic Party \$ 301.97

Three hundred one and 97/100 DOLLARS

Farmers & Merchants  
National Bank  
of Carlinville  
Carlinville, Illinois 62626

Maureen Dye

MEMO

⑆081904675⑆0000404⑆519⑆1333

P. E. Cross

9 0 0 4 0 7 2 5 2 4

P. E. CROSS ELECTION COMMITTEE 6-28  
 ALICE HARRIS, TREASURER

PAY TO THE ORDER OF *Theresa McDonald* *Oct 20 1986* 137

*1500* DOLLARS

SECURITY BANK & TRUST CO.  
 100 SOUTH MAIN STREET, ST. PETERS, MISSOURI 65357

⑆081211135⑆ ⑆147 015 4⑆

*Alice Harris*

*Dick Allen*

9 0 0 4 0 7 2 5 2 5


 DICK ALLEN FOR  
 STATES ATTORNEY 10-82  
 2945 MADISON AVE.  
 GRANITE CITY, IL 62040

No. 624  
 10-22-86 78-04/100

Pay to the order of *Illinois Democratic Party* \$ 15.78

*Fifteen and 78/100*


 National Bank in Madison  
 MADISON, ILLINOIS 62040

JAN CASEY

⑆081004041⑆ 0 1598 2⑆ 0824

*Jan Casey*

Memorandum, etc

900407 2526

142

7-10/78

Democratic Commissioners  
For Suburban Cook County  
Attn: Ron Eslick  
208 S. La Salle St., Suite 1254  
Chicago, Ill. 60604

Oct. 24 1986

PAY TO THE ORDER OF Democratic Party of Illinois

\$ 4168.75

Four thousand one hundred sixty eight & 75/100 DOLLARS

OAK PARK TRUST & SAVINGS BANK  
VILLAGE MALL PLAZA  
OAK PARK, ILLINOIS 60001

Donald F. Eslick

⑆0719014261⑆ 0275 282⑆ 0142

Remitted In Atto. 7 2 5 2 7

THE COMMITTEE TO RE-ELECT  
THE DEMOCRATIC SENATE

P.O. BOX 5028  
SPRINGFIELD, IL 62705

1500

70-28711

10-23-86

Pay to the order of Illinois Democratic Party

\$225.00

Two hundred twenty five 00/100

DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capital Plaza • Springfield, Illinois 62761

*Philip J. Reed*

0285

FOR

⑆001500⑆+⑆071100269⑆ 2003805⑆



*Crowe*

9 0 0 4 0 7 2 5 2 9

BRIAN L. CROWE 11-87 2819 W. EASTWOOD CHICAGO, ILL. 60625	2166
10/17 19 86	2-15/78
PAY TO THE ORDER OF <i>Chicago Democratic Central Committee</i> \$ <u>100.00</u>	DOLLARS
<i>Brian L. Crowe</i>	
The Northern Trust Company Chicago, Illinois	
<i>Brian L. Crowe</i>	
+1:071000152:01072041#	2166 74

Rakowski

9 0 0 4 0 8 2 5 3 0

203

THOMAS RAKOWSKI 9-72

PAY TO THE ORDER OF

2-354  
710

10-20-86

St. Ignace Central Co. 1000  
One Thousand & 00/100

100-00

DOLLARS

**Beverly Bank**  
1137 West 104th Street  
Chicago, IL 60643

*[Handwritten Signature]*

FOR

⑆071003544⑆ 735147000⑆ 0203

11/1/80

Whitaker

9 0 0 4 0 7 8 2 5 3 1

3655 3-291718

CLAUDE E. WHITAKER  
ROXIE-A. WHITAKER

10/21/82

State Democratic Central Com. \$ 100.00

PAY TO THE ORDER OF One Hundred and No DOLLARS

UNIVERSITY NATIONAL BANK  
156 LAKE ST  
CHICAGO, ILL. 60601

CLAUDE WHITAKER

FOR #1:071002914: 352122100# 3655

Marsalek

00040782532

186

EDWARD H. OR ANN MARSALEK 4-04  
1108 W. WELLINGTON AVE.  
CHICAGO, ILL. 60657

10/16 1984 2-7/78

PAY TO THE ORDER OF State Democratic Central Committee ONE HUNDRED + 10/100 DOLLARS

American National Bank  
and Trust Company of Chicago - Chicago, Illinois 60690

Edward H. Marsalek

⑆071000770⑆ 11 544 724R 0186

Alumni

9 0 0 4 0 7 8 2 5 3 3

ARTHUR L. DUNNE 960 ELM ST. WINNETKA, IL 60093	1023
PAY TO THE ORDER OF <u>State Democratic Center</u>	<u>710</u> DOLLARS
FOR <u>Arthur L. Dunne</u>	1023


**FIRST CHICAGO**  
 The Creative & Professional Banking Center  
 Chicago, Illinois 60676

9 0 0 4 0 7 8 2 5 3 4

DANIEL J. WHITE RETENTION COMMITTEE  
6558 S. TRIPP ST.  
CHICAGO, ILL 60629

103

October 17 19 86 2-02/78

PAY TO THE ORDER OF State Democratic Central Committee \$ 100.00

One-Hundred Dollars & no/cents DOLLARS

MARQUETTE NATIONAL BANK

6216 SOUTH WESTERN AVENUE  
CHICAGO, ILLINOIS 60638

*Bruce J. White*

⑆071004284⑆ ⑆906⑆167 ⑆0103

Cohen

9 0 0 4 0 7 8 2 5 3 5

*Postage & Printing Costs*

4745

2-77710

*Oct 21 1986*

JUDGE IRWIN COHEN  
CIRCUIT COURT, COOK COUNTY

PAY TO THE  
ORDER OF *Illinois Democratic Central Committee* \$100.00

*One Hundred and no/100* DOLLARS

American National Bank  
and Trust Company of Chicago - Chicago, Illinois 60600

*Irwin Cohen*

⑆071000770⑆ 00 472 743⑈ 4745

BANK NUMBER ACCOUNT NUMBER CHECK NUMBER

*Grupp*

90040782536

CHARLES J. GRUPP  
 BARBARA A. GRUPP  
 944 HIGHLAND DR.  
 CHICAGO HEIGHTS, ILL. 60411

4224

10-20 1986

Pay to the order of *State Democrat Central Committee* \$ 100.00

*One hundred and no/100*

Heritage Olympic Bank  
 180 Ontario Street  
 Chicago, Illinois 60611  
 Telephone: (312) 467-1400

*Postage and mailing*

4224

1-75

4224

*Norman*

9 0 0 4 0 7 8 2 5 3 7

IRVING R. NORMAN 1-71  
SOPHIE NORMAN  
5701 N. SHERIDAN RD.  
CHICAGO, ILL. 60660

4677

10-18-1986 2-18/78

PAY TO THE ORDER OF *State Democratic Central Com. \$100.00*

*One Hundred and no/100* DOLLARS

THE CHICAGO - TOKYO BANK  
40 N. DEARBORN STREET  
CHICAGO, ILLINOIS 60608

*Irving R. Norman*

⑆0710011061⑆ 638 242⑈ 5084 4677

*Gilberto*

9 0 0 4 0 7 3 2 5 3 8

LOUIS J. GILBERTO 3-08  
PHYLLIS D. GILBERTO  
6250 N. LE ROY  
CHICAGO, ILL. 60646

345

10-30-19 86

8-7114789

PAY TO THE  
ORDER OF

*State Representative Central Office \$100.00*

DOLLARS

**N** NORWOOD FEDERAL SAVINGS  
AND LOAN ASSOCIATION  
CHICAGO, ILLINOIS 60604

*Louis J. Gilbert*

+1 2710711431 01800274874 0345

90040782539

JOHN M. ROGERS  
4800 S. LAKE SHORE DR. 1407H  
CHICAGO, IL 60615

3398

Oct. 20, 1986 ~~710~~

\$100.00

*State Democratic Central*  
*One hundred dollars*



FIRST CHICAGO  
The First National Bank of Chicago  
Chicago, Illinois 60610

DOLLARS

*[Signature]*

FOR

⑆071000013⑆ 63 45433⑆ 3398

*Rogers*

Venue

000407 2540

Commissioner to Return John V. Virgilio  
 Judge of the Circuit Court of Cook County  
 State Democratic Central Committee  
 PAY TO THE ORDER OF  
 One hundred 2 DOLLARS  
 \$100.00  
 70-728/1718  
 JUL 16 19 96  
 MEMO  
 Land of Lincoln SAVINGS AND LOAN  
 A member of the Land of Lincoln Financial Services Group  
 600 W. CENTRAL ROAD • DEERFIELD, IL 60015  
 +1 827 197 2284 • 18 655246 1R  
 Virgilio  
 Shirley M. Lee

Nov 1986

00040702541

COMMITTEE TO RETAIN JUDGE NOVOSELSKY 9-8  
70 W. MONROE ST., RM. 822  
CHICAGO, ILL. 60603

116

October 16, 1986

78-7871/1278

PAY TO THE ORDER OF SAFE DEMOCRATIC CENTRAL COMMITTEE \$ 100.00

One Hundred and No/100 DOLLARS



Clyde Federal Savings  
And Loan Association

1111 N. LAUREL ST. CHICAGO, ILL. 60642

POSTAGE + PRINTING

⑆ 271972776⑆ 106016745⑆ 0118

*George J. Antkowiak*

9 0 0 4 0 7 2 5 4 2

*Alurham*

**PATHWAY FINANCIAL**  
A Federal Association

Money order <sup>2450</sup><sub>710</sub>  
224438

62

\* 100 \* D L R S A N D 0 0 C N T S      200CT86      \* 100.00

Pay to the order of: STATE DEMOCRATIC CENTRAL COMMITTEE

*Charles J. Durkin*  
Paper Signature

Drawn on: FEDERAL HOME LOAN BANK • Chicago, Illinois

Payee address

⑆00224438⑆ ⑆071004501⑆ 303⑆53106⑆





9 0 0 4 0 7 2 5 4 5

193

10/20 1986 NO.

CHICAGO, ILL. CONTINENTAL BANK



CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO

PAY TO THE ORDER OF STATE DEMOCRATIC CENTRAL COMMITTEE \$ 100.00

23 710

One Hundred + 00/100

DOLLARS

COMMITTEE TO ELECT JEROME T. BURKE

Dany W Bozich

⑆000193⑆⑉10710⑉0003⑉ 78⑈4326⑈⑈

0004072546

Zimmerman

3007

CHICAGO, ILL. October 20, 1986 NO.

**CONTINENTAL BANK**  
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO



PAY TO THE ORDER OF DEMOCRATIC STATE CENTRAL COMMITTEE \$ 100.00

ONE HUNDRED AND NO/100THS DOLLARS

GEORGE J. ZIMMERMAN  
ANNE ZIMMERMAN

⑆003007⑆⑆071000039⑆ 89⑈79472⑈

2-3  
710



ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 28 1986

(TAPE)

#102866•

1,693.67+

5.00+

002

1,698.67+

9  
0  
0  
4  
0  
7  
2  
5  
4  
8

FEDERAL CONTRIBUTIONS 5.00

STATE CONTRIBUTIONS 1693.67

TOTAL 1698.67

NOTES:

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STATE ACCOUNT  
#59-2884-7



9 0 0 4 0 7 2 5 5 0

1259-

2-340710

Oct. 28, 19 86

\$ 1,693.67

SHERIFF RICHARD J. ELROD  
RE-ELECTION COMMITTEE  
30 W. WASHINGTON  
CHICAGO, IL 60602

PAY TO THE ORDER OF ILLINOIS DEMOCRATIC CENTRAL COMMITTEE

One thousand six hundred ninety three and 67/100----- DOLLARS

Amalgamated  
Trust Bank  
CHICAGO, ILLINOIS

*[Handwritten Signature]*

FOR Postage - Mailing #001259# 110710034051 #064447100#

000407 2551

gma

LEOHA A. JONES 12-74  
 SSN 351-44-6710 LIC. J520-8218-0280  
 PHONE 837-9323 OR 837-4851  
 2736 CRANBROOK  
 KANKAKEE, ILL. 60901

1797  
 10-19-19 *SL* 70-18  
 718

PAY TO THE ORDER OF *Five and 00/100* \$ *5.00*

*Leola A. Jones*

FIRST TRUST  
 & SAVINGS BANK OF KANKAKEE  
 MEMBER AMERICAN FINANCIAL GROUP  
 ONE BANKING CENTER, 200 W. W. WALKER, KANKAKEE, ILL. 60901

NEW OUTLOOKS CLUB

MI NO  
 +0719018821 #000012700#01





Machinists Non-Partisan 90040702554

rel. 11-0  
202-857-5295  
←→  
12/1/86  
11/1/86

**MACHINISTS NON-PARTISAN  
POLITICAL LEAGUE**  
1300 CONNECTICUT AVE., N.W.  
WASHINGTON, D.C. 20004

205

October 16, 1986

PAY TO THE ORDER OF Illinois Democratic Party

\$ 5,000.00

THE SUM OF FIVE THOUSAND DOLLARS

DOLLARS

**1st AMERICAN**  
FIRST AMERICAN BANK OF MARYLAND

Chairman  
Secretary-Treasurer

FOR #000205# 4:0540000431: 3 333 698#

9 0 0 4 0 7 2 5 5 5

309-  
752-  
6123

COMMITTEE ON LETTER CARRIERS POLITICAL EDUCATION  
 100 INDIANA AVE., N.W.  
 WASHINGTON, D.C. 20001  
 NS&T BANK  
 WASHINGTON, D.C.  
 1547  
 240  
 NO 003941  
 DATE 10/16/86  
 AMOUNT \$1,500.00  
 PAY TO THE ORDER OF  
 ONE THOUSAND FIVE HUNDRED AND 00/100ths DOLLARS  
 Illinois State Democratic Party  
 134 North LaSalle, Suite 2126  
 Chicago, IL 60601  
 NATIONAL SECRETARY, TREASURER OR MEMBER  
 #00394 1# :054000522: 024#522864#

53  
916 5  
\$125  
15 P

McCurrie

9 0 0 4 0 7 2 5 5 6

NON-PARTISAN COMMITTEE		104
TO RE-ELECT JUDGE		
LESTER D. MCCURRIE		
PAY TO THE ORDER OF STATE DEMO. CENTRAL COM.		10/23/86 70-2321 78
ONE HUNDRED AND NO/100		\$ 100.00
WORTH BANK AND TRUST		
6525 West 11th Street, Worth, Illinois 60482		
219th & Madison Avenue, Park Heights, Illinois 60463		
FOR JAMES B. MCCURRIE		
⑈0719232131⑈ NO 5669767⑈ 0704		

MAK AND P 3

Schneider

9 0 0 4 0 7 2 5 5 7

JOSEPH SCHNEIDER 0183  
359 BELDEN AVE  
CHICAGO ILL 60616

10253578

0123 10/27 19 86 70

PAY TO THE  
ORDER OF

State Democratic Central Committee

\$100.00

One hundred and no/100

FIRST CHICAGO

The First National Bank of Chicago  
Chicago Illinois 60670

MEMO

Joseph Schneider

⑆000123⑆ ⑆0710000131⑆ ⑆0253578⑆

DOLLARS

Barrow Trans

9004072558

American National Bank  
and Trust Company of Chicago

PAY TO THE  
ORDER OF

OCT 23 1986<sup>19</sup>

377  
710

341

State Democratic Central Comm.

\$ 100.00

THE SUM IN WORDS IS ONE HUNDRED DOLLARS

CITIZENS COMMITTEE TO ELECT  
FRANK W. LAIBARO, JUDGE

DOLLARS



CHECK NUMBER

160539

160539

ACCOUNT NUMBER

160539

E-101

0 0 4 0 7 2 5 5 9

HON. SOPHIA H. HALL  
CHICAGO, ILL. 60615

2763

OCT 20 1956 2-7770

PAY TO THE  
ORDER OF

State Democratic Central Comm \$ 100.00

One hundred no/100 DOLLARS



American National Bank  
and Trust Company of Chicago • Chicago, Illinois 60690

*Sophia H. Hall*

⑆071000770⑆ 00 595 187⑆ 2763

Strayhorn

9 0 0 4 0 7 2 5 6 0

EARL E. STRAYHORN  
LYGIA E. STRAYHORN  
2725 S. MICHIGAN  
CHICAGO, ILL. 60616

Oct 21 1966 5082

Pay to the  
order of

State Democratic Central Comm  
One hundred and 00/100

\$ 100.00

Dollars

2-1  
7/8

 **FIRST CHICAGO**  
The First National Bank of Chicago  
Chicago, Illinois 60670  
The Executive & Professional  
Banking Center

*Earl E. Strayhorn*

⑆071000013⑆ 68 216 20 5082

S Schiller

000407 2561

STEPHEN A. SCHILLER

210 E. PEARSON  
CHICAGO, IL 60611

4135

October 21 1986

2-18/710

PAY TO THE  
ORDER OF

State Democratic Central Committee

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

One Hundred & <sup>00</sup>/<sub>100</sub>

DOLLARS

The Northern Trust Company  
Chicago, Illinois

FOR

⑆071000152⑆0362212⑆ 4135174

Hett

000407 2562

ROBERTA F. HETT  
THOMAS A. HETT  
2861 ASHTON CT. 562-2340  
WESTCHESTER, ILL. 60153

4517

10-18-86

70-225/718

PAY TO THE  
ORDER OF

State Democratic Central Comm.

\$ 100<sup>00</sup>

One Hundred and <sup>00</sup>/<sub>100</sub>

DOLLARS



COMMERCIAL NATIONAL BANK  
OF BERWYN  
BERWYN, ILLINOIS 60402

Thomas A. Hett

MEMO

+1:071922256: #044458900# 4517

Berkos

00407 2563

CHRISTY S. BERKOS

Oct 17, 1986 70-1778/710

PAY TO THE ORDER OF

STATE DEMOCRATIC CENTRAL COMMITTEE

100.00

ONE HUNDRED and no/100 ----- DOLLARS

*Western National Bank*

Member of the Affiliated Group  
5901 West Colfax Road  
Clerk's Office 62802

Retention

*McN...*

⑆071917782⑆ ⑆221 533 7⑆06

Raddatz

9 0 0 4 0 7 2 5 6 4



LINDA RADDATZ  
7815 S. KEDVALE  
CHICAGO, IL 60652

Oct. 21, 19 86 952

50-147/219

PAY TO

THE ORDER OF

Illinois Democratic Party, Vice  
Chair's Fund

\$

70.00

Seventy dollars and no/100-----

DOLLARS

Park Employees Credit Union  
CHICAGO, ILLINOIS 60608  
Contribution Linda Raddatz

⑆021909678⑆ ⑆700085035397⑆ ⑆0952⑆

*Western Illinois Democratic Days*

P.O. Box 1045

Quincy, Ill. 62306

000407 2565

7

WESTERN ILLINOIS DEMOCRATIC DAYS		338
		70-54 812
		10/14/86
PAY TO THE ORDER OF	State Democratic Central Committee	\$ 100.00
THE SUM OF ONE HUNDRED DOLLARS		
ILLINOIS STATE BANK		
FOR	donation	<i>Allen H. ...</i>
⑆000338⑆ ⑆08⑆ 200544⑆ ⑆1028782⑆		Treasurer

ILLINOIS DEMOCRATIC PARTY  
DEPOSIT DOCKET  
DATE OCT 31 1988

(TAPE)

G.\*

#103186.

125.00+  
1,750.00+  
4,500.00+  
333.59+  
15.00+  
200.00+  
263.50+

007

7,187.090

FEDERAL CONTRIBUTIONS 5463.50

STATE CONTRIBUTIONS 16723.59 ✓

TOTAL 22,187.09

Wire Transfer 15,000.00 ✓  
008  
22,187.09+

NOTES:

① CURRIN FOR CONGRESS 4500  
175  
LTD - LIMIT 2000 16 FC

② 15000 WIRE TRANSFER - FROM FRIENDS OF  
MIKE RIZZIGAN - NON-FEDERAL  
PERMISSIBLE

0004072566



STATE ACCOUNT  
#59-2884-7



DURBIN FOR  
CONGRESS COMMITTEE 6-82  
P.O. BOX 1949  
SPRINGFIELD, IL 62705

3318

70-26/711

10/28 19 86

PAY TO THE ORDER OF Illinois Democratic State Central Committee \$ 1,750.00

One thousand seven hundred fifty and <sup>no</sup>/<sub>100</sub> DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capitol Plaza • Springfield, Illinois 62701

Mary Beth Averhag

FOR \_\_\_\_\_  
⑈003318⑈ ⑆071100269⑆ 1089273⑈

7  
2  
5  
6  
8

Illinois

DURBIN FOR  
CONGRESS COMMITTEE 6-82  
P.O. BOX 1949  
SPRINGFIELD, IL 62705

3326

70-26/711

10/29 19 86

PAY TO THE ORDER OF Illinois Democrat State Central Committee \$ 4,500.00

Four thousand five hundred and <sup>no</sup>/<sub>100</sub> DOLLARS



MARINE BANK OF SPRINGFIELD  
East Old State Capitol Plaza • Springfield, Illinois 62701

Mary Beth Averhag

FOR \_\_\_\_\_  
⑈003326⑈ ⑆071100269⑆ 1089273⑈

JERSEY CO. DEMOCRAT CENTRAL COMMITTEE  
JERSEYVILLE, ILL.

1532

PAY TO THE ORDER OF

Illinois Democrat Party

Oct. 27 1986

70-445  
819

\$ 333.59

Three Hundred Thirty Three and 59/100

DOLLARS

THE  
STATE  
BANK  
OF JERSEYVILLE



JERSEYVILLE, ILLINOIS 62602

JERSEY CO. DEMOCRAT CENTRAL COMMITTEE

Gene Abbott

⑆0819⑉0445⑆ 10 768 9⑈

Jersey County

6  
9  
5  
7

JERSEY CO. DEMOCRAT CENTRAL COMMITTEE  
JERSEYVILLE, ILL.

1531

PAY TO THE ORDER OF

Illinois Democrat Party

Oct. 27 1986

70-445  
819

\$ 15.00

Fifteen and 00/100

DOLLARS

THE  
STATE  
BANK  
OF JERSEYVILLE



JERSEYVILLE, ILLINOIS 62602

JERSEY CO. DEMOCRAT CENTRAL COMMITTEE

Gene Abbott

⑆0819⑉0445⑆ 10 768 9⑈

9004072570

ANTON RUSCH

12149 HAMLIN  
ALSIP, IL 60558

1135

1/21 1986

70-884  
719

PAY TO THE  
ORDER OF

Democratic Party of Springfield, Ills 200<sup>00</sup>

Two hundred <sup>00</sup>/<sub>100</sub> DOLLARS

Alsip Bank and Trust  
The Community Bank  
ALSIP, ILLINOIS 60558

FOR Donation

of Rusch

⑆071908843⑆ 774444100⑈ 1135

Counsell

90040702571

816 70-2388/719

ROBERT COUNSELL, JR.  
7734 BROOKHAVEN DR.  
DARIEN, ILL. 60559

Oct 31 1986

PAY TO THE ORDER OF Illinois Democratic Party \$ 263.50

Two hundred sixty three and 50/100 DOLLARS

MEMO: Robert Counsell Jr

WEST SUBURBAN BANK OF DARIEN  
8001 CASS AVE. DARIEN ILLINOIS 60559

⑆071923967⑆ 672501⑈04⑈ 0816

**Coffield Ongaretti Harris & Slavin**

3500 Three First National Plaza, Chicago, Illinois 60602  
Telephone: 312/977-4400 Telecopier: 312/977-4405  
Cable: CUHSLAW, Telex: 270286

600#122

RECEIVED  
FEDERAL ELECTION COMMISSION

88 AUG 15 AM 10: 21

August 11, 1988

Ms. Deborah Curry  
Federal Election Commission  
999 E. Street N.W.  
Washington, D.C. 20463

Re: Federal Election Commission - MUR 2548

Dear Ms. Curry:

Enclosed you will find a signed Verification attendant to the Illinois State Democratic Party's ("Respondent") Answer to Supplemental Interrogatories and Request for Documents relating to the above-referenced matter. Please be advised that Mr. Warren Ribley is authorized, as the Special Assistant to the Chairman of the Illinois State Democratic Party, to sign on behalf of the Party.

If you have any questions regarding this matter please do not hesitate to contact me.

Very truly yours,



John F. Kennedy

JFK:rmg  
Enclosure

cc: J. Timothy Eaton

90040782572

88 AUG 15 PM 3: 11

RECEIVED  
FEDERAL ELECTION COMMISSION

VERIFICATION

I, Warren Ribley, do hereby state on oath on behalf of Joseph Griffin, Treasurer of the Illinois State Democratic Party, that the foregoing Answer to the Supplemental Interrogatories and Document Request for Federal Election Commission MUR 2548 is true and correct.

Warren Ribley  
Warren Ribley on behalf  
of Joseph Griffin, Treasurer of the  
Illinois State Democratic Party

Subscribed and Sworn to before  
me this 9th day of August, 1988.

Charles M. Porter  
Notary Public  
My Commission Expires: Oct. 13, 1991

9004072573

BEFORE THE FEDERAL ELECTION COMMISSION 4 AM 11:17

In the Matter of	)	
	)	
Illinois Democratic Party	)	MUR 2548
(Federal Account) and	)	
Joseph Griffin, as treasurer;	)	
Illinois Democratic Party	)	
(Non-Federal Account) and	)	
Joseph Griffin, as treasurer	)	

**SENSITIVE**  
**EXECUTIVE SESSION**  
**JUN 27 1989**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by the Reports Analysis Division after a review of the disclosure reports of the Illinois Democratic Party ("Federal Account"). The RAD review revealed that the non-federal account ("Non-Federal Account") had paid \$22,038.08 for apparent coordinated party expenditures during calendar year 1986. The Federal Account reported the \$22,038.08 payment for apparent coordinated expenditures as a debt owed by the Federal Account to the Non-Federal Account.

On November 18, 1987, the Commission found reason to believe Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, (all "Respondents") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by making prohibited expenditures from its Non-Federal Account. Subsequently, on May 11, 1988, the Commission declined to enter into conciliation prior to a finding of probable cause to believe with Respondents and instead approved interrogatories and a request for documents. Respondents requested and were granted an extension of time to respond to the Commission's request. On August 10, 1988,

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Respondents submitted answers to the interrogatories and request for documents. (Attachment 1, pages 1-219). A signed verification relating to the interrogatories and documents was received on August 15, 1988. (Attachment 2, pages 220-221). Since that time, numerous telephone discussions about the submission have taken place between counsel and staff of this Office.

## II. ANALYSIS

The purpose of the Commission's interrogatories and request for documents was to provide information so that it could be determined whether the Non-Federal Account contained monies prohibited by the Act on the dates that the Non-Federal Account made expenditures for federal activities. Additionally, the interrogatories explored how "federally permissible funds," as characterized by Respondents, were "mistakenly" deposited in the Non-Federal Account. In this regard, Respondents submit dates, amounts, account balances, the source of funds constituting the account balances,<sup>1/</sup> monthly bank statements and numerous source documents. (Attachment 1, pages 4-219).

According to the Respondents, the three expenditures totalled \$22,030.08 and were made to: Illinois Bell on October 15, 1986, in the amount of \$115.26; Satellite Communications, Inc. on October 17, 1986, in the amount of

<sup>1/</sup> The analysis of the monies in the account was based on when checks cleared the account rather than the date the check was issued. (Attachment 1, page 1).

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\$5,922.82; and Conotab on October 20, in the amount of \$16,000.<sup>2/</sup> Examination of the materials submitted by Respondents, particularly the analysis of receipts and disbursements in the Non-Federal Account on page 56 of Attachment 1, indicates that on the transaction dates noted, the funds constituting the account balance included funds prohibited by the Act.

Respondents' purported LIFO analysis of receipts and disbursements is based on the faulty premise of looking at only the "federally permissible funds." Therefore, this Office was required to examine and analyze the materials submitted to determine the composition of the monies in the Non-Federal Account on the dates federal expenditures were made. After reconciling the bank statements and bank balances for mathematical accuracy, this Office looked at receipts and disbursements for the day in question and expensed the disbursements against receipts in the Non-Federal Account on the dates the federal expenditures were made.

<sup>2/</sup> As noted, the dates indicated for the checks in question are the dates the checks cleared the Non-Federal Account. According to materials submitted and telephone conversations with Respondents, the coordinated expenditures in question were allocable portions of checks or wire transfers that the Non-Federal Account made to the cited entities. In other words, the coordinated expenditures are represented by documents that also include non-federal activity. The allocation of these checks is as follows: the \$115.26 Illinois Bell expenditure for Voter Education/Toll Free "800" number represents the federal portion of check #1099 (Attachment 1, pages 22-23); the \$5,922.82 Satellite Communications, Inc. expenditure for Voter Education/TV Ads represents the federal portion of checks #1111 and 1139 (Attachment 1, pages 21-23); and the \$16,000 Conotab expenditure for mailings to twenty-one federal candidates represents the federal portion of two wire transfers on October 15 and 20, 1986. (Attachment 1, pages 23-24).

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Using three different methods (receipts analysis, receipts and disbursements analysis on transaction dates, and receipts and disbursement analysis from the last transaction to the first transaction date) to analyze the material submitted, it is clear that on the date federal expenditures were made, the account balance of the Non-Federal Account contained contributions impermissible under the Act. Thus, a violation of 2 U.S.C. § 441b has occurred with respect to the federal expenditures made by the Non-Federal Account.

Respondents' submission does not dispute that the payment of \$22,038.08 for coordinated party expenditures by the Non-Federal Account violates 11 C.F.R. § 102.5(a). Respondents contend, however, that no 2 U.S.C. § 441b violation has occurred with respect to the coordinated party expenditures at issue. (Attachment 1, pages 1-5 and 16.)

The thrust of Respondents' argument is that on the transaction dates in question "the available balance of federally permissible funds in the Non-Federal Account exceeded the expenditures." (Attachment 1, page 3). Thus, according to Respondents, no prohibited monies were used for these expenditures. (Attachment 1, page 3). Respondents cite to an analysis of the federally permissible receipts received by the Non-Federal Account during October which when added to the previous month's federally permissible receipts brings the account balance in the Non-Federal Account above the federal expenditures on the transaction dates in question. (Attachment 1, pages 3-4).

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Respondents' conclusion that no violation of 2 U.S.C. § 441b has occurred is incorrect because it is not in accord with the requirements of 2 U.S.C. § 441b. Respondents assume erroneously that 2 U.S.C. § 441b only requires that there be sufficient "federal permissible funds" in the account to make the federal expenditures. Moreover, Respondents assume that when federal expenditures are made from the Non-Federal Account, these federal expenditures are only made from the federally permissible funds in the account.

9 0 0 4 0 7 8 2 5 7 8  
Title 2 U.S.C. § 441b makes unlawful contributions or expenditures by national banks, corporations and labor unions in connection with federal elections. Thus, the focus of 2 U.S.C. § 441b is on the prohibited funds in the Non-Federal Account rather than the permissible funds in the Non-Federal Account. Here, the federal expenditures were made on dates when the Non-Federal Account contained funds that were not subject to the prohibitions of the Act. The fact that there are federally permissible funds in the Non-Federal Account at the time federal expenditures are made does not vitiate the 2 U.S.C. § 441b violation.

. In any event, this Office's analysis of the balances in the Non-Federal Account on the dates in question show that with the possible exception of the expenditure for \$115.26 to Illinois Bell, "federally permissible funds" did not exceed the federal expenditures made by the Non-Federal Account.

Even if Respondents' focus on federally permissible funds was consistent with 2 U.S.C. § 441b, Respondents' analysis of the "federally permissible receipts" and federal expenditures as an isolated and separate activity of the Non-Federal Account (see, Attachment 1, page 5) tends to distort reality. In reality, all monies received by the Non-Federal Account went into one account. Federally permissible funds are commingled with the funds not subject to the prohibitions of the Act in the one account. Similarly, all expenditures (federal and non-federal) are made from the total pool of receipts (federal and non-federal).

As noted, supra, Respondents' submission indicates that the Non-Federal Account's balance on the dates the coordinated expenditures were made included funds not subject to the prohibitions and limitations of the Act. (See Attachment 1, pages 8-11 and 56). Therefore, the coordinated party expenditures made by the Non-Federal Account violated 2 U.S.C. § 441b. Moreover, Respondents indicate that the "federally permissible receipts" did not comply with the requirements of 11 C.F.R. § 102.5(a)(2) and it does not otherwise appear that these funds were mistakenly deposited in the Non-Federal Account. (Attachment 1, pages 17-18). The debt owed the Non-Federal Account was fully repaid by the Federal Account on July 23, 1987.

### III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

Illinois Democratic Party (Federal and Non-Federal Accounts) has requested conciliation prior to a finding of probable cause

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to believe.

**IV. RECOMMENDATIONS**

1. Enter into conciliation with Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Lawrence M. Noble  
General Counsel

6/13/89  
Date

By:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Response of Committee
2. Verification
3. Conciliation Agreement and Letter

Staff Person: Deborah Curry

90040782580

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Illinois Democratic Party )  
 (Federal Account) and )  
 Joseph Griffin, as treasurer; ) MUR 2548  
Illinois Democratic Party )  
 (Non-Federal Account) and )  
 Joseph Griffin, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 27, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2548:

1. Enter into conciliation with Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated June 13, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

6-29-89

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

00040782581



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 5, 1989

John F. Kennedy, Esquire  
Coffield, Ungaretti, Harris & Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60602

RE: MUR 2548  
Illinois Democratic Party  
(Federal and Non-Federal Accounts)  
and Joseph Griffin, as treasurer

Dear Mr. Kennedy:

On November 23, 1987, the Federal Election Commission found reason to believe that Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). At your request, on , 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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John F. Kennedy, Esquire  
Page 2

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

90040782583



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 13, 1989

John F. Kennedy, Esquire  
Coffield, Ungaretti, Harris & Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60620

Re: MUR 2548  
Illinois Democratic Party  
(Federal Account) and  
Joseph Griffin, as treasurer;  
Illinois Democratic Party  
(Non-Federal Account) and  
Joseph Griffin, as treasurer

Dear Mr. Kennedy:

On November 23, 1987, the Federal Election Commission found reason to believe that Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). At your request, on June 27, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Pursuant to your telephone conversation with Deborah Curry, enclosed please find a proposed conciliation agreement. If your clients agree with the provisions of the enclosed agreement, please sign and return it to the Commission within five days of your receipt of the agreement.

Please note that the proposed conciliation agreement has not been approved by the Commission. The proposed conciliation agreement, however, will be recommended by this Office to the Commission to resolve the matter. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

00040782594

**Coffield Ungaretti Harris & Slavin**

3500 Three First National Plaza, Chicago, Illinois 60602  
Telephone: 312/977-4400 Telecopier: 312/977-4405  
Cable: CUHSLAW, Telex: 270286

**HAND DELIVERED**  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

0004842

**89 DEC -5 AM 10:31**

**RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
89 DEC 12 PM 3:38**

**BY AIRBORNE EXPRESS**

December 4, 1989

Ms. Deborah Curry  
Federal Election Commission  
999 East Street, N.W.  
Washington, D.C. 20463

Re: MUR 2548, Illinois Democratic Party  
and Joseph Griffin, As Treasurer

Dear Ms. Curry:

Enclosed you will find an executed original copy of the proposed Conciliation Agreement relating to the above-referenced matter and a check from the Illinois Democratic Party Federal Account paid to the order of the Federal Election Commission in the amount of \$2,000.00. Please note that the enclosed check covers both the amount due in November and December, 1989.

It is our understanding that the Conciliation Agreement is subject to final approval by the Commission. Please advise as to the final disposition of this matter.

If you have any questions regarding the foregoing, please do not hesitate to contact us.

Very truly yours,



John F. Kennedy

JFK:dk

cc: Joseph A. Cari, Jr., Esq.  
J. Timothy Eaton, Esq.

90040782585

ILLINOIS DEMOCRATIC PARTY  
FEDERAL ACCOUNT

1050

11-29 1989 <sup>2-50</sup>/<sub>710</sub>

PAY TO THE ORDER OF

Fiducial Election Commission

\$ 2,000.00

THE SUM 2000 DOLS 00 CTS

DOLLARS

LaSalle National Bank

Chicago, Illinois 60680

FOR MUR 2548

Warren Kibler

⑈001050⑈ ⑆071000505⑆ 59⑈3032⑈1⑈

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 1050

{ A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2548

AND NAME

Illinois Democratic Party (Federal Account) and Joseph Griffin, as treasurer, Illinois Democratic Party (Non-Federal Account)

WAS RECEIVED ON 12/13/89

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95FB75.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

SIGNATURE

Debra A. Trimiew

DATE

12/13/89



ILLINOIS DEMOCRATIC PARTY  
FEDERAL ACCOUNT

1054

PAY  
TO THE  
ORDER OF

Federal Election Commission

1-10 1990

2-50  
710

\$ 1,000.00

THE SUM OF 1000 DOLLARS AND 00 CENTS

DOLLARS

LaSalle National Bank

Chicago, Illinois 60690

FOR Penalty - MUR 2548

Warner Ribley

⑈001054⑈ ⑆071000505⑆ 593032⑈1⑈

90040700

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: Cheryl Fleming-Williams  
~~DEBRA A. TRIMIEW~~

CHECK NO. 1054 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2548 AND NAME Illinois Democratic Party  
(Carry)  
WAS RECEIVED ON 1-18-90. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

REGISTRATION

M. A. Williams

DATE 1-19-90

90 JAN 15 AM 9:31

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Illinois Democratic Party )  
(Federal and Non-Federal )  
Accounts), and )  
Joseph Griffin, as treasurer )

MUR 2548

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

. The attached conciliation agreement has been signed by John F. Kennedy, counsel for the Respondents. The

The Office of the General Counsel recommends the Commission approve this agreement in settlement of this matter.

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. A check for the first two installments of the \$4,000 civil penalty (\$2,000) has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Illinois Democratic Party (Federal and Non-Federal Accounts) and

Joseph Griffin, as treasurer.

2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

1/12/90  
Date

BY:



Lois G. Lerner  
Associate General Counsel

**Attachments**

- 1.
2. Signed Conciliation Agreement
3. Photocopy of Civil Penalty CHECK
4. Letter To Respondent

**STAFF ASSIGNED: DEBBY CURRY**

90040782591

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Illinois Democratic Party ) MUR 2548  
(Federal and Non-Federal )  
Accounts), and )  
Joseph Griffin, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 19, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2548:

1. Accept the conciliation agreement with Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, as recommended in the General Counsel's Report dated January 12, 1990.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated January 12, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

Jan. 22, 1990  
Date

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

Received in the Secretariat: Tues., January 16, 1990 9:31 a.m.  
Circulated to the Commission: Tues., January 16, 1990 11:00 a.m.  
Deadline for vote: Thurs., January 18, 1990 11:00 a.m.

00040782592



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 25, 1990

John F. Kennedy, Esquire  
Coffield, Ungaretti, Harris & Slavin  
3500 Three First National Plaza  
Chicago, Illinois 60602

RE: MUR 2548  
Illinois Democratic Party  
(Federal and Non-Federal Accounts)  
and Joseph Griffin, as treasurer

Dear Mr. Kennedy:

On January 19, 1990, the Federal Election Commission accepted the signed Conciliation Agreement and the first two payments of the civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5, provisions of the Federal Election Campaign Act of 1971, as amended, and Commission 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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

00040782593

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Illinois Democratic Party	)	MUR 2548
(Federal Account) and	)	
Joseph Griffin, as treasurer;	)	
Illinois Democratic Party	)	
(Non-Federal Account) and	)	
Joseph Griffin, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b by making prohibited expenditures from its Non-Federal Account.

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Illinois Democratic Party ("Federal Account") is a

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political committee within the meaning of 2 U.S.C. § 431(4).

2. Illinois Democratic Party ("Non-Federal Account") is the state committee.

3. Joseph Griffin is the treasurer of the Federal and Non-Federal Accounts.

4. 11 C.F.R. § 102.5 permits organizations that intend to finance both federal and non-federal activity to set up a separate federal account.

5. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), only funds subject to the prohibitions and limitations of the Act may be deposited into the federal account and all disbursements, contributions, expenditures and transfers by such committee in connection with federal elections must be made by the federal account.

6. Pursuant to 2 U.S.C. § 441b(a), contributions or expenditures by national banks, corporations, and labor organizations in connection with federal elections are expressly prohibited.

7. The Non-Federal Account made three expenditures (totalling \$22,038.08) for political activities in connection with federal elections.

8. The Non-Federal Account disbursed funds to: Illinois Bell on October 15, 1986 in the amount of \$115.26; Satellite Communications, Inc. on October 17, 1986, in the amount of \$5,922.82; and Conotab on October 20, 1986, in the amount of \$16,000.

9. These federal expenditures were reported by the

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Federal Account as coordinated party expenditures on its amended 1986 30-Day Post General Election Report, dated February 5, 1987, as a debt owed to the Non-Federal Account.

10. These expenditures by the Non-Federal Account for federal election activity were not made in accordance with 11 C.F.R. § 102.5(a).

11. Additionally, these expenditures by the Non-Federal Account for federal activities were made at times when the Non-Federal Account contained funds prohibited by the Act.

12. The Federal Account made three repayments totalling \$22,038.08 to retire the debt owed the Non-Federal Account. The debt owed the Non-Federal Account was fully repaid by the Federal Account on July 23, 1987.

13. Respondents contend that, although there were violations of the subject Act and regulations, such violations were not knowing and willful.

14. Respondents contend that remedial measures necessary to cure the harm resulting from the violations have been taken, including but not limited to, a full refund to the Non-Federal Account from the Federal Account for the impermissible subject expenditures and the implementation of corrective accounting procedures to insure future compliance with Commission rules and regulations.

V. Illinois Democratic Party (Federal and Non-Federal Accounts) and Joseph Griffin, as treasurer, paid for coordinated party expenditures with funds from the Non-Federal Account, in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).

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VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Four Thousand Dollars (\$4,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$1,000 due on November 15, 1989;

2. Thereafter, beginning on December 1, 1989, three consecutive monthly installment payments of \$1,000 each;

3. Each such installment shall be paid on the first day of the month in which it becomes due;

4. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VII. 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.

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

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approved the entire agreement.

IX. Respondents shall have no more than 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.

X. 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:

Lawrence M. Noble  
General Counsel

BY:

  
Lois G. Lerner  
Associate General Counsel

Date

1-24-90

FOR THE RESPONDENTS:

  
John F. Kennedy  
Counsel

Date

December 1, 1989

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