



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2687

DATE FILMED 3/3/87 CAMERA NO. 3

CAMERAMAN AS

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## FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

9 August 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE RELIANCE GROUP HOLDINGS, INC.  
POLITICAL ACTION COMMITTEE (RELIANCE PAC)

This is a referral of the Reliance Group Holdings, Inc. Political Action Committee ("RELIANCE PAC") for failing to file the 1987 Year End Report within thirty (30) calendar days from the date of the Non-Filer Notice. According to the 1987-1988 RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

In addition, please note that RELIANCE PAC was sent a Non-Filer Notice on May 6, 1988, for failure to file the 1988 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 1988 to March 31, 1988 in a timely manner.

Please note that a Chronic Late Filer Notice was sent to RELIANCE PAC on May 20, 1988, for failing to file the 1987 Year End and 1988 April Quarterly Reports in a timely manner.

If you have any questions regarding this matter, please contact Tamara K. Kapper at 375-2480.

Attachment

8904075678

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 9 August 1988

ANALYST: Tamara K. Kapper

I. COMMITTEE: Reliance Group Holdings Inc. Political  
Action Committee (RELIANCE PAC)  
(C00157842)  
Philip S. Sherman, Treasurer  
Park Avenue Plaza  
55 East 52nd Street  
New York, NY 10055

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(B)

III. BACKGROUND:

Failure to Timely File the 1987 Year End Report

The Reliance Group Holdings, Inc. Political Action Committee ("RELIANCE PAC") failed to file the 1987 Year End Report of Receipts and Disbursements covering the period from October 1, 1987 to December 31, 1987 in a timely manner. RELIANCE PAC was notified on December 18, 1987 that the report was due on January 31, 1988 (Attachment 2). A Non-Filer Notice was sent to RELIANCE PAC on February 19, 1988 (Attachment 3).

The Reports Analysis Division ("RAD") analyst attempted several times between March 22 and March 25, 1988 to contact the treasurer, Mr. Philip Sherman, but he failed to return the analyst's telephone calls (Attachment 4).

On May 19, 1988, Ms. Cathy Taub, counsel for RELIANCE PAC contacted the RAD analyst after the receipt of the Non-Filer Notice for the failure to file the 1988 April Quarterly Report of Receipts and Disbursements. Ms. Taub stated that the 1987 Year End and 1988 April Quarterly Reports were timely filed, but would file copies of the reports as quickly as possible (Attachment 5).

The 1987 Year End Report was filed with the Commission on May 20, 1988 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 4/15/88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOC' ION	TYPE OF FILER
RELIANCE GROUP HOLDINGS INC POLITICAL ACTION COMMITTEE (RELIANCEPAD)							ID #000157848 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: RELIANCE GROUP HOLDINGS INC							
1987	APRIL QUARTERLY	13,578	0	1JAN87 -31MAR87	5	87FEC/466/4535	
	JULY QUARTERLY	16,839	2,220	1APR87 -30JUN87	11	87FEC/461/4299	
	JULY QUARTERLY - AMENDMENT			1APR87 -30JUN87	4	87FEC/493/5024	
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30JUN87	3	87FEC/466/3628	
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR87 -30JUN87	4	87FEC/492/3896	
	OCTOBER QUARTERLY	14,137	5,000	1JUL87 -30SEP87	16	87FEC/492/4448	
	OCTOBER QUARTERLY - AMENDMENT	14,137	5,000	1JUL87 -30SEP87	24	87FEC/495/2003	
	OCTOBER QUARTERLY - AMENDMENT			1JUL87 -30SEP87	2	87FEC/497/2714	
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -30SEP87	3	87FEC/493/1758	
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -30SEP87	1	87FEC/495/2461	
	YEAR-END	20,925	1,300	1OCT87 -31DEC87	19	88FEC/526/2405	
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/512/2918	
1988	MISCELLANEOUS NOTICE FROM FEC			20MAY88	1	88FEC/526/2873	
	APRIL QUARTERLY	14,182	11,220	1JAN88 -31MAR88	7	88FEC/526/2424	
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1	88FEC/524/4868	
	JULY QUARTERLY	14,217	9,800	1APR88 -30JUN88	11	88FEC/534/5207	
	TOTAL	93,978	28,300		14	TOTAL PAGES	

All reports have been reviewed.

Cash on hand as of 6/30/88 = \$109,273.

Debts owed by the committee as of 6/30/88 = \$0

Debts owed to the committee as of 6/30/88 = \$0

87040703590

# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

### PARTIES AND PACS

December 18, 1987

#### WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

#### REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

#### WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

#### WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

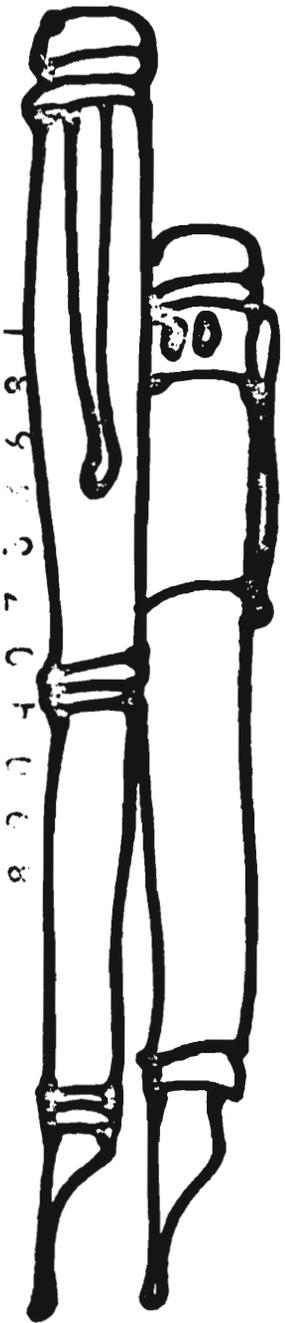
#### CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

#### COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports 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  
202/376-3120 or 800/424-9530





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

EQ-7

February 19, 1988

Philip S. Sherman, Treasurer  
Reliance Group Holdings Inc.  
Political Action Committee  
(RELIANCEPAC)  
Park Avenue Plaza/55 East 52nd Street  
New York, NY 10035

Identification Number: C00157842

Reference: Year End Report (through 12/31/87)

Dear Mr. Sherman:

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

The Commission notes that your committee has filed a partial report. It is necessary to submit a report covering the entire reporting period for your filing to be considered complete.

It is important that you file this report 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). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

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

If you have any questions regarding this matter, please contact Tammy Rollins 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

3 8 7 3 5 1 0 2 9 1 8

TELECOM

ANALYST: TAMARA K. KAPPA

COMMITTEE: RELIANCE GROUP HOLDINGS INC. POLITICAL ACTION COMMITTEE

DATE: SEVERAL OCCASIONS BETWEEN 3/23/88 & 3/25/88

SUBJECT: FAILURE TO FILE THE 1987 YEAR END REPORT

I attempted to contact Mr. Phillip Sherman, Treasurer, several times by telephone but he failed to return my calls.

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TELECON

ANALYST: TAMARA K. KAPPER

CONVERSATION WITH: MS. CATHY TAUB, COUNSEL FOR RELIANCEPAC

COMMITTEE: RELIANCE GROUP HOLDINGS, INC. POLITICAL ACTION COMMITTEE

DATE: MAY 19, 1988

SUBJECT(S): FAILURE TO FILE THE 1987 YEAR END AND 1988 APRIL QUARTERLY REPORTS

Ms. Taub stated that the 1987 Year End and 1988 April Quarterly Reports were filed on time and she did not understand why the Commission had not received them. I asked Ms. Taub if the committee had sent the reports by certified mail like the previous reports. She stated that she was not sure because she did not mail them. I stated that as of today the Commission had not received the reports in question. She stated that she would file copies of the reports as quickly as possible.

9304073634



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

REC'D  
FEB 20 AM 10:24

USE FEC MAILING LABEL OR PRINT

1 NAME OF COMMITTEE (in full)  
**Reliance Group Holdings, Inc. Political Action Committee**  
 ("Reliance PAC")  
 ADDRESS (number and street)  Check if different than previously reported  
**55 East 52nd Street**  
**Park Avenue Plaza**  
 CITY, STATE and ZIP CODE  
**New York, NY 10055**

2 FEC IDENTIFICATION NUMBER  
**C00157842**

3 The committee qualified as a multicandidate committee DURING THIS Reporting Period on \_\_\_\_\_ (date)

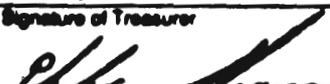
## 4. TYPE OF REPORT

- (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)  
 Termination Report
- Monthly Report Due On  
 February 20     June 20     October 20  
 March 20     July 20     November 20  
 April 20     August 20     December 20  
 May 20     September 20     January 31
- 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 \_\_\_\_\_
- (b) Is this Report an Amendment?     YES     NO

SUMMARY		COLUMN A	COLUMN B
5. Covering Period <u>October 1, 1987</u> through <u>December 31, 1987</u>		This Period	Calendar Year-to-Date
6. (a)	Cash on Hand January 1, 19____		\$ 43,592.91
(b)	Cash on Hand at Beginning of Reporting Period	\$ 81,248.11	
(c)	Total Receipts (from Line 18)	\$ 20,925.09	\$ 65,580.29
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 102,173.20	\$ 109,173.20
7.	Total Disbursements (from Line 28)	\$ 1,300.00	\$ 8,300.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 100,873.20	\$ 100,873.20
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 800 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/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.

Type or Print Name of Treasurer  
**Phillip S. Sherman**

Signature of Treasurer:  Date: **1/29/88**

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

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**FEC FORM 3X**  
(revised 4/87)

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

88 AUG 31 PM 12:57

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 88NF-37  
STAFF MEMBER: Ivonne Cotto

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: Reliance Group Holdings, Inc. Political  
Action Committee  
Philip S. Sherman, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iv)  
11 C.F.R. § 104.5(c)(2)(i)(B)

INTERNAL REPORTS  
CHECKED: Referral Materials

FEDERAL AGENCIES  
CHECKED: None

**CONFIDENTIAL**

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Reliance Group Holdings, Inc. Political Action Committee ("the Committee") to the Office of the General Counsel on August 9, 1988. The basis for the attached referral is the Committee's failure to file the 1987 Year End Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all political committees other than authorized committees of a candidate shall file, in a calendar year without a regularly scheduled general election, a report covering the period beginning July 1, 1987 and ending December 31, 1987, which shall be filed no later than January 31, 1988. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee did not file the 1987 Year End Report by January 31, 1988.

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The Committee did not file its 1987 Year End Report until May 20, 1988, one hundred ten (110) days late. Accordingly, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv).

**III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY**

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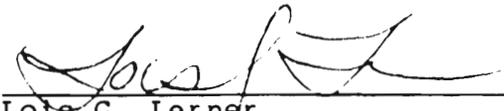
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**IV. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that Reliance Group Holdings Inc. Political Action Committee and Philip S. Sherman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble  
General Counsel

8/31/88  
Date

By:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Referral Materials
2. Proposed Conciliation Agreement
3. Letter and Factual and Legal Analysis

Staff Person: Ivonne Cotto

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 2687)

In the Matter of )  
 )  
 Reliance Group Holdings, Inc. Political ) RAD REFERRAL: 88NF-37  
 Action Committee )  
 Philip S. Sherman, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 1, 1988, the Commission decided by a vote of 6-0 to take the following actions in Rad Referral: 88NF-37:

1. Open a MUR.
2. Find reason to believe that Reliance Group Holdings Inc. Political Action Committee and Philip S. Sherman, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the First General Counsel's Report signed August 31, 1988.

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

Attest:

9-2-88

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	8-31-88,	12:57
Circulated on 48 hour tally basis:	Wed.,	8-31-88,	4:00
Deadline for vote:	Fri.,	9-02-88,	4:00

cj

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7/11/88



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 8, 1988

Philip S. Sherman, Treasurer  
Reliance Group Holdings, Inc.  
Political Action Committee  
Park Avenue Plaza  
55 East 52nd Street  
New York, N.Y. 10055

RE: MUR 2687

Dear Mr. Sherman:

On September 1, 1988, the Federal Election Commission found that there is reason to believe Reliance Group Holdings, Inc. Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign

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Philip S. Sherman, Treasurer  
Page 2

and return the agreement, 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.

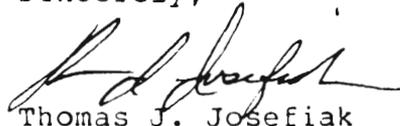
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

This matter will remain 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 Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

- Factual and Legal Analysis
- Procedures
- Designation of Counsel Form
- Conciliation Agreement

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OGCA 544

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

88 SEP 27 PM 1:34

**HAND DELIVERED**

 **Reliance Group Holdings**

RELIANCE GROUP HOLDINGS, INC.  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909 1100

BLAIR C. FENSTERSTOCK  
VICE PRESIDENT  
ASSOCIATE GENERAL COUNSEL  
AND ASSISTANT SECRETARY  
212 909 1200

September 26, 1988

BY HAND

Ms. Yvonne Cotto  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2687

Dear Ms. Cotto:

We appreciate your, and Anne Weissenborn's, setting aside the time to meet with us today to review the facts regarding the above-captioned matter. As we mentioned in our meeting this morning, if there ever has been an appropriate case for your recommending to the Federal Election Commission ("FEC") that the pending matter be dismissed, this is the case.

What is not in issue here is either a willful or wanton act or even a negligent one. What is in issue here is the efficacy of the United States Postal Service. Pivotal to your recommendation of dismissal should be the credibility of the witnesses whose affidavits are attached and the seriousness with which they have undertaken to refute the erroneous findings of the FEC. As I offered at our meeting and I proffer again, I would be delighted to have each one of our witnesses meet with you in person so that you too can be convinced of the facts that are related in the accompanying affidavits.

As these affidavits prove, I believe that we have sustained our burden that the Reliance Group Holdings, Inc. Political Action Committee ("Reliance PAC") sent to the FEC, in a timely manner, the 1987 Year End Report ("Year End Report") on January 29, 1988 by first-class mail. The affidavits

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88 SEP 29 PM 4:16

FEDERAL ELECTION COMMISSION

Ms. Yvonne Cotto  
Federal Election Commission  
September 26, 1988  
Page -2-

indicate that each of the affiants support the factual predicate that the Year End Report was mailed on January 29, 1988 and buttress the inescapable conclusion that the Reliance PAC and its treasurer, Philip S. Sherman, complied with the "best efforts" rule enunciated in 2 U.S.C. 432 (i) and the Regulations promulgated pursuant thereto.

As we discussed, and as the attached affidavits indicate, there have been other instances in which correspondence between the Reliance PAC and the FEC has not been received by one party or the other. It appears from this history that all that can be said is that there is some problem with the United States Postal Service. With respect to future communications from the Reliance PAC to the FEC, however, as I assured you this morning, the Reliance PAC has taken steps to ensure that they will be made either by certified or registered mail or by hand, and will be timely.

Lastly, as we discussed in our meeting, Paragraph "4" of the proposed Conciliation Agreement contains what we believe to be an erroneous number with respect to the total amount of financial activity for the Reliance PAC during 1987.

I appreciate your having granted us an extension of 15 days in which to make any further submissions. After you have had the opportunity to review the attachments hereto, I am convinced that it will be your best judgment to recommend dismissal of this matter. Should you have any further questions or should you desire any further information to support this conclusion, please feel free to call me or Cathy Taub (212-909-1803) and we will promptly forward to you any appropriate materials.

Again, I thank you both for spending the time with Cathy Taub and me this morning and we look forward to your decision to recommend dismissal of this matter.

Sincerely yours,



Blair C. Fensterstock

BCF:ds  
Attachments  
CC: Anne A. Weissenborn, Esq.  
Senior Attorney  
Federal Election Commission

99090705695



erroneous conclusion that the Reliance PAC did not file its Year End Report by January 31, 1988.

3. As indicated by the attached affidavits of Perry J. Perlmutter (attached hereto as Exhibit "A"), Philip S. Sherman (attached hereto as Exhibit "B"), JoAnne A. Ventresca (attached hereto as Exhibit "C"), Cathy E. Taub (attached hereto as Exhibit "D"), Quintin J. Johnson (attached hereto as Exhibit "E") and Marshall L. Kemp (attached hereto as Exhibit "F") and all attachments thereto, the Reliance PAC timely sent to the FEC by first-class mail the Year End Report prior to January 31, 1988.

4. I understand that the FEC maintains that it did not receive the Year End Report by January 31, 1988 even though the attached affidavits indicate that the report was duly sent.

5. I have been informed that there have been other occasions in which correspondence between the FEC and the Reliance PAC was not received. On one such occasion, the Reliance PAC did not receive a letter dated October 7, 1987 which apparently was sent to the Reliance PAC from the FEC on or about October 7, 1987. The Reliance PAC learned of the October 7, 1987 letter only after it received such letter as an attachment

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to a letter from the FEC dated October 29, 1987. Such letter dated October 29, 1987, with its attachment is attached hereto as Exhibit "1".

6. It is respectfully submitted that the Respondents in this proceeding used their best efforts to obtain, maintain, and submit the information required by the Federal Election Campaign Act of 1971, as amended (the "Act"). At most, they can be accused of not being ultra-cautious in their filings since they did not file the Year End Report by certified or registered mail. However, it is respectfully submitted that Respondents did not violate either the spirit or the provisions of the Act.

7. Under these circumstances, it is respectfully submitted that the Reliance PAC should not be treated in a punitive manner as a consequence of the failure of the United States Postal system. Neither the Act, the Code of Federal Regulations, nor the legislative history of the FEC suggest that a PAC should be punished for the exercise of its best efforts.

8. As indicated in the attached affidavits, new procedures have been implemented by the Reliance PAC to ensure full and complete compliance with the Act in the future.

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WHEREFORE, IT IS RESPECTFULLY REQUESTED, that  
the General Counsel of the FEC recommend dismissal of this  
proceeding.

Blair C. Fensterstock  
Blair C. Fensterstock

Sworn to before me this  
22nd day of September, 1988.

Bonnie Bagley  
Notary Public

BONNIE BAGLEY  
Notary Public, State of New York  
No. 24-5143355

Qualified in Kings County  
Commission Expires 12/31/88

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3365L/1-4

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BEFORE THE FEDERAL ELECTION COMMISSION

-----X

In the Matter of Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as Treasurer : MUR 2687  
: AFFIDAVIT OF  
PERRY J.  
: PERLMUTTER

-----X

STATE OF NEW YORK )  
: ss.:  
COUNTY OF NEW YORK )

PERRY J. PERLMUTTER, being duly sworn, deposes and says:

1. I am the Manager, Corporate Accounting, of Reliance Group Holdings, Inc. ("Reliance") and report to Philip S. Sherman, treasurer of the Reliance Group Holdings Inc. Political Action Committee (the "Reliance PAC"). Among other duties, it is and has been since February 1, 1987, my responsibility to prepare and file the reports of receipts and disbursements of the Reliance PAC, which are reviewed and signed by Mr. Sherman.

2. I submit this Affidavit on behalf of the Respondents and in opposition to the Factual and Legal Analysis of the Federal Election Commission (the "FEC") relating to the allegedly late filing by the Reliance PAC of its 1987 Year End Report (the "Year End Report"). I have direct and personal knowledge of the facts set forth

EXHIBIT A

37040703701

in this Affidavit and declare, under penalty of perjury, that the statements made herein are true and correct.

3. On January 29, 1988, after preparing the Year End Report for the Reliance PAC, I gave it to Mr. Sherman for his review and signature. Mr. Sherman read and signed the Year End Report and I, on that date, gave the Year End Report to my secretary, JoAnne A. Ventresca. A copy of the Year End Report is attached hereto as Exhibit 1.

4. I recall Ms. Ventresca typing an address label for the envelope containing the Year End Report, and recall that she placed the envelope in her "out" box, the contents of which are collected by a mail clerk from the Reliance mailroom on a regular basis throughout the day. This is my ordinary course of doing business and the manner by which Ms. Ventresca mails all of my correspondence. At the end of the day, a Reliance mail clerk places the stamped outgoing correspondence in a bag for pick-up by the mail service.

5. Shortly after February 19, 1988, Mr. Sherman gave me a copy of a letter dated February 19, 1988 (the "February 19th letter") from the FEC stating that the FEC had not received the Year End Report. A copy of the February 19th letter is attached hereto as Exhibit 2. Since I was surprised by the contents of the February 19th

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letter, I called Ms. Tammy Rollins at the FEC. Ms. Rollins was not available and I spoke with another woman, whose name I cannot recall. I informed her that the Year End Report had in fact been sent but since for some reason the FEC did not receive it, I would immediately mail another copy. I immediately mailed another copy of the Year End Report in the same manner that I had previously sent the Year End Report on January 29th. At no point in my conversation with the FEC was I informed that mailing the Year End Report by first class mail would not be adequate.

6. On April 15, 1988, Mr. Sherman signed and reviewed the April Quarterly Report. I gave a completed package to Ms. Ventresca who typed an address label for the envelope and placed the envelope with the April Quarterly Report in her "out" box for mailing on April 15th. A copy of the April Quarterly Report is attached hereto as Exhibit 3.

7. Shortly after May 6, 1988, Mr. Sherman gave me a copy of a letter dated May 6, 1988 (the "May 6th letter") from the FEC stating that the FEC had not received a copy of the April Quarterly Report. The letter stated that the FEC had previously notified Mr. Sherman of the due date of the April Quarterly Report. A copy of the

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May 6th letter is attached hereto as Exhibit 4. Actually, the FEC's previous letter, which was the February 19th letter, had referenced the Year End Report; we had had no previous notification that the FEC had not received the April Quarterly Report. Moreover, the May 6th letter omitted any reference to the FEC's not having received the Year End Report. I had every reason to believe that the FEC had received the Year End Report, since I mailed it twice.

8. I referred this matter, together with copies of all correspondence to Cathy E. Taub, an attorney in the Reliance Legal Department. It is my understanding that Ms. Taub spoke with Ms. Tammy Rollins at the FEC, explained the above events and sent another envelope containing a third copy of the Year End Report as well as the April Quarterly Report, which envelope was delivered by hand to the FEC on May 20, 1988. A copy of Ms. Taub's letter is attached hereto as Exhibit 5.

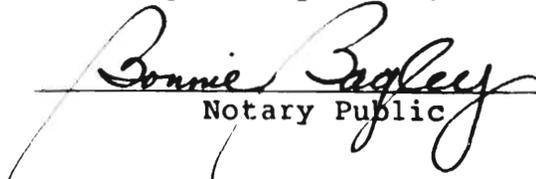
9. Moreover, at the direction of the Reliance Legal Department, to prevent any problems with future filings, the Reliance PAC was directed and will deliver all future filings with the FEC by hand or by certified mail, return receipt requested. In addition, the Reliance

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PAC has been instructed to immediately refer to the  
Reliance Legal Department any correspondence it receives  
from the FEC.

  
PERRY J. PERLMUTTER

Sworn to before me this  
23rd day of September, 1988.

  
Notary Public

DONNIE BAGLEY  
Notary Public, State of New York  
No. 24-6143005  
Qualified in Kings County  
Commission Expires 12/31/88

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EXHIBIT "1"

# REPORT OF RECEIPTS AND DISBURSEMENTS

Other Than An Authorized Committee  
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full) <b>Reliance Group Holdings, Inc. Political Action Committee ("Reliance PAC")</b>	2 FEC IDENTIFICATION NUMBER <b>C00157842</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>55 East 52nd Street Park Avenue Plaza</b>	3 <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)
CITY, STATE and ZIP CODE <b>New York, NY 10055</b>	

### 4. TYPE OF REPORT

- (a)  April 15 Quarterly Report      Monthly Report Due On:
- February 20     June 20       October 20  
 July 15 Quarterly Report       March 20     July 20       November 20  
 October 15 Quarterly Report     April 20      August 20     December 20  
 January 31 Year End Report       May 20       September 20  January 31
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- 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 \_\_\_\_\_
- (b) Is this Report an Amendment?     YES     NO

### SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>October 1, 1987</u> through <u>December 31, 1987</u>		
6. (a) Cash on Hand January 1, 19____		\$ 43,592.91
(b) Cash on Hand at Beginning of Reporting Period	\$ 81,248.11	
(c) Total Receipts (from Line 18)	\$ 20,925.09	\$ 65,580.29
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 102,173.20	\$ 109,173.20
7. Total Disbursements (from Line 28)	\$ 1,300.00	\$ 8,300.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 100,873.20	\$ 100,873.20
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/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.

Type or Print Name of Treasurer  
**Phillip S. Sherman**

Signature of Treasurer: Date: **1/29/88**

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

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# DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period	
<b>Reliance PAC</b>	From: <b>October 1, 1987</b> to <b>December 31, 1987</b>	
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	15,632.86	52,012.39
(ii) Unitemized	292.23	8,667.90
(iii) Total of contributions from individuals	15,925.09	60,580.29
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	15,925.09	60,580.29
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>	-0-	-0-
<b>13. ALL LOANS RECEIVED</b>	-0-	-0-
<b>14. LOAN REPAYMENTS RECEIVED</b>	-0-	-0-
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>	-0-	-0-
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	5,000.00	5,000.00
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		
<b>18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)</b>	20,925.09	65,580.29
II. DISBURSEMENTS		
<b>19. OPERATING EXPENDITURES</b>	-0-	-0-
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>	-0-	-0-
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	1,300.00	8,300.00
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>	-0-	-0-
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)</b>	-0-	-0-
<b>24. LOAN REPAYMENTS MADE</b>	-0-	-0-
<b>25. LOANS MADE</b>	-0-	-0-
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
<b>27. OTHER DISBURSEMENTS</b>	-0-	-0-
<b>28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	1,300.00	8,300.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
<b>29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))</b>	15,925.09	60,580.29
<b>30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))</b>	-0-	-0-
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)</b>	15,925.09	60,580.29
<b>32. TOTAL OPERATING EXPENDITURES (from Line 19)</b>	-0-	-0-
<b>33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)</b>	-0-	-0-
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)</b>	-0-	-0-

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11(a)  
11(a)  
11(a)  
11(b)  
11(c)  
11(d)  
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26(a)  
26(b)  
26(c)  
26(d)  
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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

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

NAME OF COMMITTEE (in Full)  
 Reliance PAC

3 7 0 7 3 6 7 0 9

A. Full Name, Mailing Address and ZIP Code <b>Dole for President Committee</b>	Name of Employer  Occupation	Date (month, day, year) <b>12/23/87</b>	Amount of Each Receipt this Period <b>\$4,000.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Refund of Contribution</b>		Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code <b>Senator Lloyd Bentsen Election Committee</b> P.O. Box 1990 Washington, DC 20013-1990	Name of Employer  Occupation	Date (month, day, year) <b>11/19/87</b>	Amount of Each Receipt this Period <b>\$1,000.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Refund of Contribution</b>		Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	

TOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) ..... **\$5,000.00**

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A F COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code George E. Bello 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Executive Vice President & Controller	Date (month, day, year) \$96.15 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$576.90
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 2,499.90			
B. Full Name, Mailing Address and ZIP Code Martin J. Brill 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Vice President	Date (month, day, year) \$19.23 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$115.38
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 634.59			
C. Full Name, Mailing Address and ZIP Code Lowell C. Freiberg 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Senior Vice President	Date (month, day, year) \$76.92 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$461.52
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 1,673.01			
D. Full Name, Mailing Address and ZIP Code Edward J. Hammel 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Vice President	Date (month, day, year) \$20.00(3 per.) \$22.40(3 per.) (Bi-weekly)	Amount of Each Receipt this Period \$127.20
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 527.20			
E. Full Name, Mailing Address and ZIP Code Dennis J. O'Leary 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Senior Vice President	Date (month, day, year) \$32.69 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$196.14
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 844.17			
F. Full Name, Mailing Address and ZIP Code Philip S. Sherman 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Group Holdings Inc. Occupation: Senior Vice President	Date (month, day, year) \$20.00 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$120.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 520.00			
G. Full Name, Mailing Address and ZIP Code Henry R. Silverman 55 East 52nd Street New York, NY 10055	Name of Employer Reliance Capital Corporation Occupation: President	Date (month, day, year) \$57.69 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period \$346.14
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 1,499.94			
TOTAL of Receipts This Page (optional)			1,943.28
TOTAL This Period (last page this line number only)			

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OF COMMITTEE (in Full)  
Reliance PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Howard E. Steinberg 55 East 52nd Street New York, NY 10055	Reliance Group Holdings Inc.	\$38.50 (Bi-weekly) (6 periods)	\$231.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Senior Vice President	Aggregate Year-to-Date > \$ 1,001.00	
Robert H. Steinberg 55 East 52nd Street New York, NY 10055	Reliance Group Holdings Inc.	\$192.31 (Bi-weekly) (6 periods)	\$1,153.86
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	President & CEO	Aggregate Year-to-Date > \$ 5,000.06	
Saul P. Steinberg 55 East 52nd Street New York, NY 10055	Reliance Group Holdings Inc.	\$192.31 (Bi-weekly) (6 periods)	\$1,153.86
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Chairman & CEO	Aggregate Year-to-Date > \$ 5,000.06	
William H. Bull One General Drive Sun Prairie, WI 53596	General Casualty Companies	\$17.12 (Bi-weekly) (7 periods)	\$119.84
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Vice President	Aggregate Year-to-Date > \$ 454.54	
Dean H. Case One General Drive Sun Prairie, WI 53596	General Casualty Companies	\$57.69 (Bi-weekly) (7 periods)	\$403.83
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	President & CEO	Aggregate Year-to-Date > \$ 1,557.63	
Jerry A. Faulkner One General Drive Sun Prairie, WI 53596	General Casualty Companies	\$16.73 (Bi-weekly) (7 periods)	\$117.11
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Vice President	Aggregate Year-to-Date > \$ 431.46	
Raymond L. Gilmore One General Drive Sun Prairie, WI 53596	General Casualty Companies	\$16.15 (Bi-weekly) (7 periods)	\$113.05
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Vice President	Aggregate Year-to-Date > \$ 428.40	

SUBTOTAL of Receipts This Page (optional) ..... 3,292.55

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



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NAME OF COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
Frederick A. Tomblin 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$15.87 (Bi-weekly) (8 periods)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Senior Vice President	
		Aggregate Year-to-Date > \$ 380.88	\$126.96
B. Full Name, Mailing Address and ZIP Code	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
James C. Miller 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$22.00 (Bi-weekly) (8 periods)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation President & CEO	\$176.00
		Aggregate Year-to-Date > \$ 528.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
Norman W. Horgan 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$20.00 (Bi-weekly) (8 periods)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Vice President	\$160.00
		Aggregate Year-to-Date > \$ 480.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer Hagler, Bailly & Company	Date (month, day, year)	Amount of Each Receipt this Period
Henri-Claude Bailly 2301 H. Street N.W. Washington, D.C. 20037	Hagler, Bailly & Company	\$26.00 (Bi-weekly) (6 periods)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation President	\$156.00
		Aggregate Year-to-Date > \$ 572.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer Reliance Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
Jerome H. Carr Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$25.00 (Bi-weekly) (7 periods)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Senior Vice President & CEO	\$175.00
		Aggregate Year-to-Date > \$ 625.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer Reliance Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
Bruce Farbman Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$21.92(6 per.) \$26.31(1 per.) (Bi-weekly)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Senior Vice President	\$157.83
		Aggregate Year-to-Date > \$ 552.39	
G. Full Name, Mailing Address and ZIP Code	Name of Employer Reliance Insurance Company	Date (month, day, year)	Amount of Each Receipt this Period
Thomas K. Flanagan Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	-0-	-0-
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation Vice President	
		Aggregate Year-to-Date > \$ 263.48	

SUBTOTAL of Receipts This Page (optional) ..... 951.79

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

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E OF COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code Wilbur Friedson Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$19.04(4 per.) \$21.35(3 per.) (Bi-weekly)	Amount of Each Receipt this Period \$140.21
	Occupation Vice President  Aggregate Year-to-Date > \$ 482.93		
B. Full Name, Mailing Address and ZIP Code Raymond E. Hafner Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$17.88 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period \$125.16
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 435.10		
C. Full Name, Mailing Address and ZIP Code George T. Holbrook Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$40.38 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period \$282.66
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 1,009.50		
D. Full Name, Mailing Address and ZIP Code Robert Krisowaty Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$18.27(3 per.) \$22.12(4 per.) Bi-weekly	Amount of Each Receipt this Period \$143.29
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 470.23		
E. Full Name, Mailing Address and ZIP Code Albert J. Marino Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$21.54 (3 per.) \$23.91 (4 per.) Bi-weekly	Amount of Each Receipt this Period \$160.26
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 547.98		
F. Full Name, Mailing Address and ZIP Code Arthur J. Mella Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$25.19 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period \$176.33
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 593.88		
G. Full Name, Mailing Address and ZIP Code John H. Pankratz Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company	Date (month, day, year) \$33.85 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period \$236.95
	Occupation Vice President  Aggregate Year-to-Date > \$ 831.61		

TOTAL of Receipts This Page (optional) ..... 1,264.86

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

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OF COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stephen M. Peck Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$67.31 (Bi-weekly) (7 periods)	\$471.17
	Occupation: Senior Vice President Aggregate Year-to-Date > \$ 1,682.75		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
George H. Roberts Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$40.38 (Bi-weekly) (7 periods)	\$282.66
	Occupation: Reinsurance Aggregate Year-to-Date > \$ 963.42		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Paul H. Snyder Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$14.40 (1 per.) \$20.58 (3 per.) \$24.04 (3 per.) (Bi-weekly)	\$148.26
	Occupation: Senior Vice President Aggregate Year-to-Date > \$ 496.21		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Jane C. Taylor Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$19.38 (5 per.) \$21.35 (2 per.) (Bi-weekly)	\$139.60
	Occupation: Actuary Aggregate Year-to-Date > \$ 488.44		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Russel C. Tibbetts Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$19.23 (6 per.) \$25.00 (1 per.) (Bi-weekly)	\$140.38
	Occupation: Vice President Aggregate Year-to-Date > \$ 486.52		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Vincent Vaccarello Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$31.73 (Bi-weekly) (7 periods)	\$222.11
	Occupation: Senior Vice President Aggregate Year-to-Date > \$ 793.25		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Henry A. Walsh Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$27.69 (Bi-weekly) (7 periods)	\$193.83
	Occupation: Senior Vice President Aggregate Year-to-Date > \$ 651.37		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

TOTAL of Receipts This Page (optional) ..... 1,598.01

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

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NAME OF COMMITTEE (in Full)  
Reliance PAC

A. Full Name, Mailing Address and ZIP Code David C. Woodward Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company  Occupation President & COO Aggregate Year-to-Date > \$ 1,719.21	Date (month, day, year) \$69.23 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period   \$484.61
B. Full Name, Mailing Address and ZIP Code Arthur A. Allen 33405 8th Avenue Federal Way, WA 98003  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer United Pacific Insurance  Occupation Senior Vice President Aggregate Year-to-Date > \$ 452.50	Date (month, day, year) \$18.50 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period   \$129.50
C. Full Name, Mailing Address and ZIP Code Roger L. Hillman 33405 8th Avenue Federal Way, WA 98003  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer United Pacific Insurance  Occupation Senior Vice President Aggregate Year-to-Date > \$ 735.65	Date (month, day, year) \$28.85(4 per.) \$33.65(3 per.) (Bi-weekly)	Amount of Each Receipt this Period   \$216.35
D. Full Name, Mailing Address and ZIP Code Robert Joyce 33405 8th Avenue Federal Way, WA 98003  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer United Pacific Insurance  Occupation Senior Vice President Aggregate Year-to-Date > \$ 562.47	Date (month, day, year) \$22.08(4 per.) \$28.85(3 per.) (Bi-weekly)	Amount of Each Receipt this Period   \$174.87
E. Full Name, Mailing Address and ZIP Code Harry L. Richter Jr. 33405 8th Avenue Federal Way, WA 98003  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer United Pacific Insurance  Occupation President Aggregate Year-to-Date > \$ 1,378.83	Date (month, day, year) \$66.35 (Bi-weekly) (5 periods)	Amount of Each Receipt this Period   \$331.75
F. Full Name, Mailing Address and ZIP Code Terry L. Kendall 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Life Companies  Occupation President & CEO Aggregate Year-to-Date > \$ 988.42	Date (month, day, year) \$38.46(3 per.) \$45.19(4 per.) (Bi-weekly)	Amount of Each Receipt this Period   \$296.14
G. Full Name, Mailing Address and ZIP Code Robert C. Olsman Four Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Insurance Company  Occupation Vice President Aggregate Year-to-Date > \$ 380.00	Date (month, day, year) \$19.00 (Bi-weekly) (7 periods)	Amount of Each Receipt this Period   \$133.00
NET Total of Receipts This Page (optional) .....			1,766.22
TOTAL This Period (last page this line number only) .....			

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NAME OF COMMITTEE (in Full)  
Reliance PAC

A. Full Name, Mailing Address and ZIP Code Blair C. Fensterstock 55 East 52nd Street New York, NY 10055  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Group Holdings Inc.	Date (month, day, year) \$15.00 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period  \$90.00
	Occupation Vice President  Aggregate Year-to-Date > \$ 390.00		
B. Full Name, Mailing Address and ZIP Code Frederick H. Schriever 55 East 52nd Street New York, NY 10055  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Reliance Group Holdings Inc.	Date (month, day, year) \$43.27 (Bi-weekly) (6 periods)	Amount of Each Receipt this Period  \$259.62
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 1,125.02		
C. Full Name, Mailing Address and ZIP Code James P. Kozel 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year) \$14.04 (Bi-weekly) (8 periods)	Amount of Each Receipt this Period  \$112.32
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 335.23		
D. Full Name, Mailing Address and ZIP Code Warren A. Kennedy 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year) \$13.27 (Bi-weekly) (8 periods)	Amount of Each Receipt this Period  \$106.16
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 318.48		
E. Full Name, Mailing Address and ZIP Code Robert F. McLackin 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year) \$13.27 (Bi-weekly) (8 periods)	Amount of Each Receipt this Period  \$106.16
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 318.48		
F. Full Name, Mailing Address and ZIP Code Wayne J. Levins 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year) \$14.42 (Bi-weekly) (8 periods)	Amount of Each Receipt this Period  \$115.36
	Occupation Vice President  Aggregate Year-to-Date > \$ 346.08		
G. Full Name, Mailing Address and ZIP Code Leroy F. King 8 Penn Center Philadelphia, PA 19103  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Commonwealth Land Title Insurance Company	Date (month, day, year) \$12.50 (Bi-weekly) (8 periods)	Amount of Each Receipt this Period  \$100.00
	Occupation Senior Vice President  Aggregate Year-to-Date > \$ 300.00		

TOTAL of Receipts This Page (optional) .....	889.62
TOTAL This Period (last page this line number only) .....	889.62

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A. OF COMMITTEE (in Full)

Finance PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Charles Barr Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	-0-	-0-
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President		-0-
		Aggregate Year-to-Date > \$ 216.25	
B. Full Name, Mailing Address and ZIP Code David Bell Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$ 14.42(6 per.) \$ 13.46(1 per.)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Bi-weekly	\$ 99.98
		Aggregate Year-to-Date > \$ 342.26	
C. Full Name, Mailing Address and ZIP Code Robert Bruns Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$14.88 (Bi-weekly)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	(8 periods)	\$119.04
		Aggregate Year-to-Date > \$ 377.64	
D. Full Name, Mailing Address and ZIP Code William Haines Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$16.92(6 per.) \$15.00(1 per.)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	(Bi-weekly)	\$116.52
		Aggregate Year-to-Date > \$ 386.52	
E. Full Name, Mailing Address and ZIP Code Robert Mars Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$15.00 (Bi-weekly)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	(7 periods)	\$105.00
		Aggregate Year-to-Date > \$ 375.00	
F. Full Name, Mailing Address and ZIP Code Brian Moore Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$17.88 (Bi-weekly)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	(7 periods)	\$125.16
		Aggregate Year-to-Date > \$ 427.11	
G. Full Name, Mailing Address and ZIP Code Joseph Morris, Jr. Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$16.35 (Bi-weekly)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	(7 periods)	\$114.45
		Aggregate Year-to-Date > \$ 402.97	
TOTAL of Receipts This Page (optional) .....			680.15
TOTAL This Period (last page this line number only) .....			

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NAME OF COMMITTEE (in Full)

Reliance PAC

3 2 7 4 0 7 5 7 1 9

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Horace Redditt Four Penn Center Philadelphia, PA 19103 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Reliance Insurance Company	\$17.21 (Bi-weekly) (4 periods)	\$68.84
	Occupation Vice President		
	Aggregate Year-to-Date > \$369.34		
George Benkie, Jr. 33405 8th Avenue Federal Way, WA 98003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	\$16.35 (Bi-weekly) (4 periods)	\$65.40
	Occupation Vice President		
	Aggregate Year-to-Date > \$359.70		
John A. Bushnell 33405 8th Avenue Federal Way, WA 93003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	-0-	-0-
	Occupation Senior Vice President		
	Aggregate Year-to-Date > \$297.72		
James Heath 33405 8th Avenue Federal Way, WA 98003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	\$13.46 (Bi-weekly) (7 periods)	\$94.22
	Occupation Vice President		
	Aggregate Year-to-Date > \$336.50		
Charles Kaessinger 33405 8th Avenue Federal Way, WA 98003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	\$12.59(6 per.) \$13.47(1 per.) (Bi-weekly)	\$89.01
	Occupation Vice President		
	Aggregate Year-to-Date > \$315.63		
James Mirois 33405 8th Avenue Federal Way, WA 98003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	\$13.65 (Bi-weekly) (4 periods)	\$54.60
	Occupation Vice President		
	Aggregate Year-to-Date > \$300.30		
James Montgomery 33405 8th Avenue Federal Way, WA 98003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	United Pacific Insurance	\$14.71 (Bi-weekly) (7 periods)	\$102.97
	Occupation Vice President		
	Aggregate Year-to-Date > \$346.50		

TOTAL of Receipts This Page (optional) .....	475.04
TOTAL This Period (last page this line number only) .....	

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NAME OF COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Vernon Myers 33405 8th Avenue Federal Way, WA 98003	United Pacific Insurance	\$12.12(2 per.) \$12.97(4 per.) \$14.26(1 per.) (Bi-weekly)	\$90.38
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$308.54	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard Root 33405 8th Avenue Federal Way, WA 98003	United Pacific Insurance	\$14.42(4 per.) \$16.35(3 per.) (Bi-weekly)	\$106.73
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$366.29	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
J. Sawyer 33405 8th Avenue Federal Way, WA 98003	United Pacific Insurance	\$15.79 (Bi-weekly) (7 periods)	\$110.53
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$394.75	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frank Swanson 33405 8th Avenue Federal Way, WA 98003	United Pacific Insurance	\$12.33 (Bi-weekly) (7 periods)	\$86.31
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$308.25	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
William Walters, Jr. 33405 8th Avenue Federal Way, WA 98003	United Pacific Insurance	\$14.87 (Bi-weekly) (7 periods)	\$104.09
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$368.55	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Barnett Chernow 8 Penn Center Philadelphia, PA 19103	Reliance Life Companies	\$15.83 (Bi-weekly) (7 periods)	\$110.81
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$386.27	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lawrence Daurette 8 Penn Center Philadelphia, PA 19103	Reliance Life Companies	\$13.85(3 per.) \$15.38(4 per.) (Bi-weekly)	\$103.07
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$352.37	

Si TOTAL of Receipts This Page (optional)

711.92

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 12 OF 13  
FOR LINE NUMBER 11A.

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NAME OF COMMITTEE (in Full)

Reliance PAC

9 9 0 4 0 7 5 3 7 2 1

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Robert R. Wright 5937 Broad Street Hall Pittsburg, PA 15206	Moody-Tottrup International Inc.	\$8.65 (Bi-weekly) (4 periods)	\$34.60
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive Vice President	Aggregate Year-to-Date > \$ 273.08	
Robert J. Fabrizio 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$12.00 (Bi-weekly) (8 periods)	\$96.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$ 288.00	
Eugene J. Whitaker 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$10.96 (Bi-weekly) (8 periods)	\$87.68
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$ 261.98	
Paul F. Fischer 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$10.96 (Bi-weekly) (8 periods)	\$87.68
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$ 261.89	
Andy R. Luczakowsky 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$10.00 (Bi-weekly) (8 periods)	\$80.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$ 240.00	
Edward P. Locher 8 Penn Center Philadelphia, PA 19103	Commonwealth Land Title Insurance Company	\$12.50 (Bi-weekly) (8 periods)	\$100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Senior Vice President	Aggregate Year-to-Date > \$298.75	
Robert N. Billings Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$10.40 (Bi-weekly) (7 periods)	\$72.80
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President	Aggregate Year-to-Date > \$260.00	

TOTAL of Receipts This Page (optional)	558.76
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the attached Summary Page

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NAME OF COMMITTEE (in Full)  
Reliance PAC

2  
2  
7  
5  
7  
3  
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3

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Donald P. Fisher Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$10.00 (Bi-weekly) (7 periods)	\$70.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President Aggregate Year-to-Date > \$ 250.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Francis W. McDonnell Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$10.00 (Bi-weekly) (7 periods)	\$70.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President Aggregate Year-to-Date > \$ 225.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stuart C. Bishop Four Penn Center Philadelphia, PA 19103	Reliance Insurance Company	\$15.14 (Bi-weekly) (7 periods)	\$105.98
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice President Aggregate Year-to-Date > \$ 227.10		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) ..... 15,632.86

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NAME OF COMMITTEE (in Full)

Reliance PAC

<p>A. Full Name, Mailing Address and ZIP Code Committee for Sam Gibbons</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11/17/87</p>	<p>Amount of Each Disbursement This Period \$1,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code People for Pete Domenici</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11/19/87</p>	<p>Amount of Each Disbursement This Period 100.00</p>
<p>C. Full Name, Mailing Address and ZIP Code The Humphrey Team</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11/19/87</p>	<p>Amount of Each Disbursement This Period 100.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Reelect Packwood Committee</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11/19/87</p>	<p>Amount of Each Disbursement This Period 100.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Reelect Packwood Committee</p>	<p>Purpose of Disbursement Contribution Returned</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period (100.00)</p>
<p>F. Full Name, Mailing Address and ZIP Code People for Boswitz</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11/19/87</p>	<p>Amount of Each Disbursement This Period 100.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>H. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>

<p>SUBTOTAL of Disbursements This Page (optional) .....</p>	
<p>TOTAL This Period (last page this line number only) .....</p>	<p>\$1,300.00</p>

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EXHIBIT "2"



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

February 19, 1988

Philip S. Sherman, Treasurer  
Reliance Group Holdings Inc.  
Political Action Committee  
(RELIANCEPAC)  
Park Avenue Plaza/55 East 52nd Street  
New York, NY 10055

Identification Number: C00157842

Reference: Year End Report (through 12/31/87)

Dear Mr. Sherman:

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

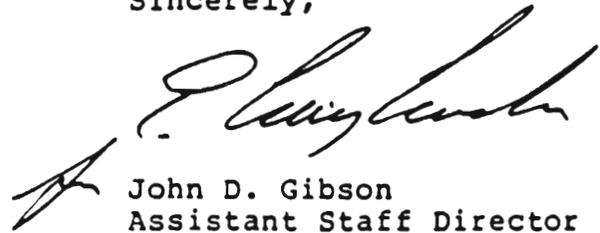
The Commission notes that your committee has filed a partial report. It is necessary to submit a report covering the entire reporting period for your filing to be considered complete.

It is important that you file this report 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). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

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

If you have any questions regarding this matter, please contact Tammy Rollins 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

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8 3 0 4 0 7 3 3 7 2 6

EXHIBIT "3"

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 uses, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Reliance PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Senator Lloyd Bentzen Election Committee	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	1/28/88	\$ 1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dole for President Committee	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	\$ 4000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
NAI PAC	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	\$ 5000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Ed Howard Congressional Committee	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/10/88	\$ 1000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

89040733727

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

L This Period (last page this line number only) .....

\$ 11,000.00

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

USE FEC MAILING LABEL TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Reliance Group Holdings, Inc. Political Action Committee</b> ("Reliance PAC")	2. FEC IDENTIFICATION NUMBER <b>C00157342</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>55 East 52nd Street</b> <b>Park Avenue Plaza</b>	3. <input type="checkbox"/> The committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE <b>New York, NY 10055</b>	

### 4. TYPE OF REPORT

- (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)
- Termination Report
- Monthly Report Due On:
- February 20     June 20     October 20
- March 20     July 20     November 20
- April 20     August 20     December 20
- May 20     September 20     January 31
- 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 \_\_\_\_\_
- (b) Is this Report an Amendment?     YES     NO

### SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>January 1, 1988</u> through <u>March 31, 1988</u>		
6. (a) Cash on Hand January 1, 1988	\$ 100,873.20	\$ 100,873.20
(b) Cash on Hand at Beginning of Reporting Period	\$ 100,873.20	\$ 100,873.20
(c) Total Receipts (from Line 18)	\$ 14,182.38	\$ 14,182.38
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 115,055.58	\$ 115,055.58
7. Total Disbursements (from Line 28)	\$ 11,000.00	\$ 11,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 104,055.58	\$ 104,055.58
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	

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

Type or Print Name of Treasurer <b>Phillip S. Sherman</b>	Date
Signature of Treasurer 	4/15/88

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

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**FEC FORM 3X**  
(revised 4/87)

89040736728

# DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period	
Reliance PAC	From: Jan 1, 1988	To: March 31, 1988
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	6986.27	6986.27
(ii) Unitemized	7196.11	7196.11
(iii) Total of contributions from individuals	14,182.38	14,182.38
(b) Political Party Committees	-	-
(c) Other Political Committees (such as PACs)	-	-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	14,182.38	14,182.38
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-	-
13. ALL LOANS RECEIVED	-	-
14. LOAN REPAYMENTS RECEIVED	-	-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-	-
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-	-
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	14,182.38	14,182.38
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-	-
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-	-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	11,000.00	11,000.00
22. INDEPENDENT EXPENDITURES (use Schedule E)	-	-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-	-
24. LOAN REPAYMENTS MADE	-	-
25. LOANS MADE	-	-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-	-
(b) Political Party Committees	-	-
(c) Other Political Committees (such as PACs)	-	-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-	-
27. OTHER DISBURSEMENTS	-	-
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	11,000.00	11,000.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	14,182.38	14,182.38
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-	-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	14,182.38	14,182.38
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-	-
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-	-
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-	-

9 9 0 4 0 7 5 6 7 2 9

11(a)  
11(a)  
11(a)  
11(b)  
11(c)  
11(d)  
12  
13  
14  
15  
16  
17  
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25  
26(a)  
26(b)  
26(c)  
26(d)  
27  
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33  
34

SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)

Reliance PAC

8904070330

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
George E Bello 55 East 52nd Street NY NY 10066	Reliance Group Holdings, Inc	\$96.15 Bi-weekly (6 periods)	\$576.90
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation & Executive Vice President + Controller Aggregate Year-to-Date > \$576.90		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lowell C Fraiberg 55 East 52nd Street NY NY 10066	Reliance Group Holdings, Inc	\$76.52 Bi-weekly (6 periods)	\$461.52
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Senior Vice President Aggregate Year-to-Date > \$461.52		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frederick M Schriever 55 East 52nd Street NY NY 10066	Reliance Group Holdings, Inc	\$43.27 Bi-weekly (6 periods)	\$259.62
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Senior Vice President Aggregate Year-to-Date > \$259.62		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Henry R Silverman 55 East 52nd Street NY NY 10066	Reliance Capital Corporation	\$57.69 Bi-weekly (6 periods)	\$346.14
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President Aggregate Year-to-Date > \$346.14		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Howard E Steinberg 55 East 52nd Street NY NY 10066	Reliance Group Holdings, Inc	\$38.50 Bi-weekly (6 periods)	\$231.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Senior Vice President Aggregate Year-to-Date > \$231.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Robert M Steinberg 55 East 52nd St NY NY 10066	Reliance Group Holdings, Inc	\$192.31 Bi-weekly (6 periods)	1153.86
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President + COO Aggregate Year-to-Date > \$1153.86		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sam P Steinberg 55 East 52nd St NY NY 10066	Reliance Group Holdings, Inc	\$192.31 Bi-weekly (6 periods)	1153.86
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Chairman + CEO Aggregate Year-to-Date > \$1153.86		

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEM RECEIPTS

Use separate schedule(s) in category of the Qualified Summary Page

PAGE 2 OF 13  
FOR LINE NUMBER 1A

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 uses, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Reliance PAC

870407031

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dean W Case 200 Concord Dr Sun Prairie, WI 53596	General Casualty Companies Occupation: President + CEO	\$57.69 Bi-weekly (6 periods)	\$346.14
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 346.14			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Walter W Wender 8 Penn Center Philadelphia, Pa 19103	Commerce and Title Insurance Company Occupation: Chairman + CEO	Bi-weekly 3-\$48.08 5-\$57.69	\$432.69
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 432.69			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joseph D Burke 8 Penn Center Philadelphia, Pa 19103	Commerce and Title Insurance Company Occupation: President + COO	Bi-weekly 3-\$23.08 5-\$26.92	\$203.84
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 203.84			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
George T Holbrook 4 Penn Center Philadelphia, Pa 19103	Reliance Insurance Company Occupation: Senior Vice President	\$40.38 Bi-weekly (6 periods)	\$242.28
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 242.28			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John H. Ancretz 4 Penn Center Philadelphia, Pa 19103	Reliance Insurance Company Occupation: Vice President	Bi-weekly 3-\$33.85 3-\$35.46	\$216.93
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 216.93			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stephen M Peck 4 Penn Center Philadelphia, Pa 19103	Reliance Insurance Company Occupation: Senior Vice President	Bi-weekly 3-\$67.31 3-\$76.92	\$432.69
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 432.69			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
George H Roberts 4 Penn Center Philadelphia, Pa 19103	Reliance Insurance Company Occupation: Insurance	\$40.38 Bi-weekly (6 periods)	\$242.28
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$ 242.28			

SUBTOTAL of Receipts This Page (optional) .....

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

SCHEDULE A

ITEMIZED RECEIPTS

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)

Reliance PAC

97040766732

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
David C Woodward 4 Penn Center Philadelphia Pa 19103 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Reliance Insurance Company Occupation: President + COO Aggregate Year-to-Date > \$ 415.38	\$ 69.23 Bi-weekly (6 periods)	\$ 415.38
Terry L Kendall 8 Penn Center Philadelphia Pa 19103 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Reliance Life Companies Occupation: President + CEO Aggregate Year-to-Date > \$ 271.14	\$ 45.19 Bi-weekly (6 periods)	271.14
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

6986.27

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EXHIBIT "4"



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

May 6, 1988

Philip S. Sherman, Treasurer  
Reliance Group Holdings, Inc.  
Political Action Committee  
(RELIANCEPAC)  
Park Avenue Plaza  
55 East 52nd Street  
New York, NY 10055

Identification Number: C00157842

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear Mr. Sherman:

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 Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report 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). A copy of the report 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, please contact Tammy Rollins 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

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EXHIBIT "5"

89 MAY 20 AM 10:24

 Reliance Group Holdings

RELIANCE GROUP HOLDINGS INC  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909-1100

CATHERINE E. TAUB  
STAFF COUNSEL  
212 909-1803

May 19, 1988

By Hand

Ms. Tammy Rollins  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

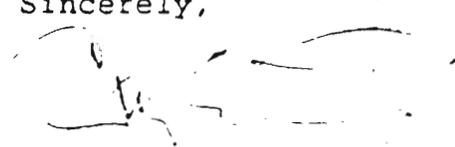
Re: Reliance PAC

Dear Ms. Rollins:

Pursuant to our telephone conversation this afternoon, I am enclosing herewith a copy of the Reliance PAC January 31 Year End Report for 1987 and the April 15 Quarterly Report. It has been represented to me that the Reliance PAC timely filed these reports. After being notified by your office that you did not receive the year-end report, the Reliance PAC promptly thereafter sent another such report to the Federal Election Commission. We do not know why your office has not received these reports, but intend to take appropriate steps in the future to ensure their receipt (such as transmitting all reports using certified or registered mail return receipt requested). Please call me if I can be of any further assistance.

Please indicate receipt of the above materials by stamping the enclosed copy of this letter and returning it to our messenger.

Sincerely,



enclosure

cc: John D. Gibson

CET/pp

3065L/10

89040733736

89040763737

Exhibit B

BEFORE THE FEDERAL ELECTION COMMISSION

-----X  
In the Matter of Reliance Group : MUR 2687  
Holdings, Inc. Political Action :  
Committee and Philip S. Sherman, : AFFIDAVIT OF  
as Treasurer : PHILIP S.  
: SHERMAN  
-----X

STATE OF NEW YORK )  
: ss.:  
COUNTY OF NEW YORK )

PHILIP S. SHERMAN, being duly sworn, deposes  
and says:

1. I am the Senior Vice President and Group  
Controller of Reliance Group Holdings, Inc. ("Reliance")  
and also serve as treasurer of the Reliance Group  
Holdings, Inc. Political Action Committee (the "Reliance  
PAC").

2. I submit this Affidavit on behalf of the  
Respondents and in opposition to the Factual and Legal  
Analysis of the Federal Election Commission (the "FEC")  
relating to the allegedly late filing by the Reliance PAC  
of its 1987 Year End Report (the "Year End Report"). I  
have direct and personal knowledge of the facts set forth  
in this Affidavit and declare, under penalty of perjury,  
that the statements made herein are true and correct.

3. On or about January 29, 1988, I reviewed and  
signed the Year End Report for the Reliance PAC which had  
been prepared and submitted to me by Perry J. Perlmutter,

89040733738

Manager, Corporate Accounting, of Reliance. Mr.

Perlmutter reports to me. Immediately after signing the Year End Report, I gave it to Mr. Perlmutter for him to take the appropriate steps to file it with the FEC. A copy of the Year End Report is attached to the Affidavit of Perry J. Perlmutter sworn to on September 23, 1988 (the "Perlmutter Affidavit") as Exhibit 1.

4. Shortly after February 19, 1988, I received a letter from the FEC (the "February 19th letter") stating that it had not received the Year End Report. A copy of the February 19th letter is attached to the Perlmutter Affidavit as Exhibit 2. I gave Mr. Perlmutter a copy of the February 19th letter and he told me that he had sent the Year End Report but would send another copy to the FEC immediately.

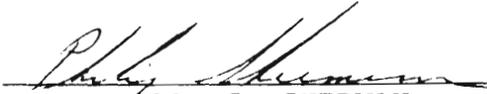
5. On or about April 15, 1988, I received and signed the April Quarterly Report for the Reliance PAC which had been prepared by Mr. Perlmutter. As was my custom, I immediately gave the report back to Mr. Perlmutter so that he could arrange for it to be filed promptly at the FEC. A copy of the April Quarterly Report is attached to the Perlmutter Affidavit as Exhibit 3.

6. Shortly after May 6, 1988, I received another letter from the FEC (the "May 6th letter") stating

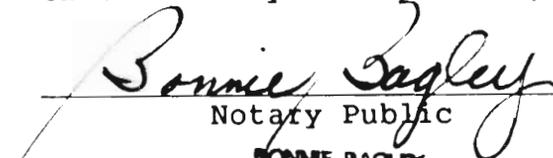
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that the FEC had not received the April Quarterly Report. A copy of the May 6th letter is attached to the Perlmutter Affidavit as Exhibit 4. I gave Mr. Perlmutter a copy of the May 6th letter and told him that, in the interest of caution, and to avoid any further misunderstandings with the FEC, he should consult with the Reliance Legal Department and have an attorney telephone the FEC in an attempt to understand why we had experienced problems with the mail, and to resolve for the future a more expeditious manner of handling the Reliance PAC filings.

7. I do not know why the above-described Reliance PAC filings were not received by the FEC. We have, however, taken steps to ensure that all future filings with the FEC will be sent by hand or by certified mail, return receipt requested. In addition, we have instituted a policy whereby any notifications or correspondence received by the Reliance PAC from the FEC will be referred immediately to the Reliance Legal Department.

  
PHILIP S. SHERMAN

Sworn to before me  
this 22nd day of September, 1988.

  
Notary Public  
BONNIE BAGLEY  
Notary Public, State of New York  
No. 24-5143000

3358L Qualified In Kings County  
Commission Expires 12/31/88 - 3 -

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Exhibit C

BEFORE THE FEDERAL ELECTION COMMISSION  
-----X

In the Matter of Reliance Group : MUR 2687  
Holdings, Inc. Political Action :  
Committee and Philip S. Sherman, : AFFIDAVIT OF  
as Treasurer : JOANNE A.  
: VENTRESCA

-----X

STATE OF NEW YORK )  
: ss.:  
COUNTY OF NEW YORK )

JOANNE A. VENTRESCA, being duly sworn, deposes  
and says:

1. I am employed as a secretary at Reliance Group Holdings, Inc. ("Reliance") and work for, among others, Mr. Perry J. Perlmutter, Manager, Corporate Accounting. I work on the 28th floor at Reliance. I make this Affidavit upon personal knowledge and declare, under penalty of perjury, that the statements made herein are true and correct.

2. On a daily basis, I type and prepare for mailing many letters for Mr. Perlmutter. My normal and customary course of preparing such letters for mailing is to address the envelope, place the information to be mailed in my "out" box, and at regular intervals throughout the workday, personnel from the Reliance mailroom empty my "out" box. The mail is then brought to

EXHIBIT C

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the Reliance mailroom, stamped and placed in a bag for pick-up by the mail service.

3. Included among the packages I mail for Mr. Perlmutter are all packages sent to the Federal Election Commission (the "FEC"). The address I type on all correspondence to the FEC is: Federal Election Commission, 999 E Street N.W., Washington, D.C. 20463.

4. I have read the Affidavit of Perry J. Perlmutter sworn to on September 23, 1988 and have no reason to believe that anything contained therein is in any way not true or correct.

*Joanne A. Ventresca*  
JOANNE A. VENTRESCA

Sworn to before me  
this 23rd day of September, 1988.

*Bonnie Bagley*  
Notary Public  
BONNIE BAGLEY  
Notary Public, State of New York  
No. 24-5143366  
Qualified in Kings County  
Commission Expires 12/31/88

3357L

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BEFORE THE FEDERAL ELECTION COMMISSION

-----X

In the Matter of Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, Treasurer : MUR 2687 : AFFIDAVIT OF CATHY E. TAUB : :

-----X

STATE OF NEW YORK ) : ss.: COUNTY OF NEW YORK )

CATHY E. TAUB, being duly sworn deposes and says:

1. I am Staff Counsel of Reliance Group Holdings, Inc. ("Reliance") and am an attorney admitted to practice law in the State of New York. I am fully knowledgeable of all the facts contained herein. I submit this Affidavit in opposition to the Factual and Legal Analysis of the Federal Election Commission (the "FEC") relating to the allegedly late filing by the Reliance Group Holdings, Inc. Political Action Committee (the "Reliance PAC") of its 1987 Year End Report (the "Year End Report").

2. On May 19, 1988, I telephoned Ms. Tammy Rollins of the FEC to discuss certain problems the Reliance PAC appeared to be having in connection with the receipt of certain filings by the FEC. Such problems were

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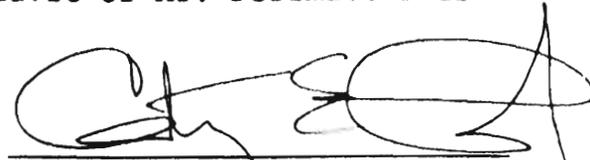
brought to my attention by Perry J. Perlmutter, Manager, Corporate Accounting, at Reliance.

3. It appeared from the FEC's letter dated May 6, 1988 that the FEC had not received the Reliance PAC's 1988 April Quarterly Report. A copy of such letter is attached to the Affidavit of Mr. Perlmutter sworn to on September 23, 1988 as Exhibit 4. Ms. Rollins informed me, however, that the FEC also had not received Reliance PAC's 1987 Year End Report (the "Year End Report"). I told Ms. Rollins that to my knowledge, the Year End Report had been mailed twice previously and that the Reliance PAC had no reason to believe that the FEC had not received the Year End Report after it was sent to the FEC in response to the FEC's letter dated February 19, 1988.

4. At no point in my conversation with Ms. Rollins was I informed that mailing the Year End Report by first class mail was not adequate. I recall her suggesting that sending materials by certified mail, return receipt requested was advisable. To avoid any future problems, I told Ms. Rollins that the Reliance PAC would send the Year End Report and the 1988 April Quarterly Report by hand and that the procedures taken by the Reliance PAC would be changed to ensure receipt by the FEC of the Reliance PAC filings and to avoid any future problems. A copy of the letter I sent to Ms. Rollins

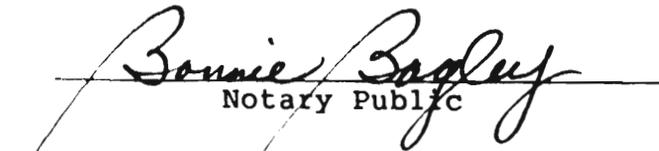
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enclosing the Year End Report and the 1988 April Quarterly Report is attached to the Affidavit of Mr. Perlmutter as Exhibit 5.



CATHY E. TAUB

Sworn to before me this  
23rd day of September, 1988.



Notary Public

BONNIE BACLEY  
Notary Public, State of New York  
No. 24-6143365  
Qualified in Kings County  
Commission Expires 12/31/88

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the stamped mail in the mailbag which is given to the J & M Mail Service at the end of every day for delivery to the local United States Post Office.

4. On January 29, 1988, I was assigned the 28th floor at Reliance for delivery and collection of mail. Among other Reliance employees, Ms. JoAnne A. Ventresca works on the 28th floor of Reliance and on January 29th, on approximately five occasions, I emptied mail from Ms. Ventresca's "out" box and deposited mail into Ms. Ventresca's "in" box. After each time I completed my work on the 28th floor, I returned to the mailroom and sorted the mail in the same manner as I described in the preceding paragraph.

*Quentin J. Johnson*  
QUINTIN J. JOHNSON

Sworn to before me this  
22nd day of September, 1988.

*Bonnie Bagley*  
Notary Public

BONNIE BAGLEY  
Notary Public, State of New York  
No. 24-5143

Qualified in Kings County  
Commission Expires 12/31/88

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BEFORE THE FEDERAL ELECTION COMMISSION

-----X

In the Matter of Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as Treasurer : MUR 2687  
: AFFIDAVIT OF  
: MARSHALL L. KEMP  
:

-----X

STATE OF NEW YORK )  
: ss.:  
COUNTY OF NEW YORK )

MARSHALL L. KEMP, being duly sworn, deposes

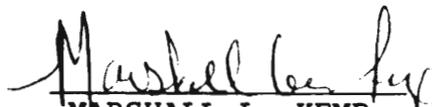
and says:

1. I am employed as the mailroom supervisor at Reliance Group Holdings, Inc. ("Reliance"). I make this Affidavit upon personal knowledge and declare, under penalty of perjury, that the statements made herein are true and correct.

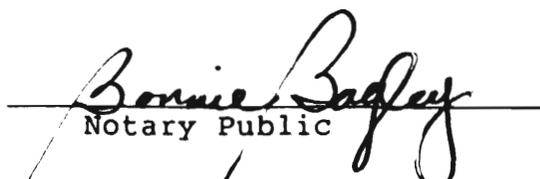
2. On a daily basis at approximately 5:30 p.m., I take the mailbag from the Reliance mailroom, which bag contains the stamped mail from that day, and place it in front of the elevator, where it is picked-up by J & M Mail Service, who then delivers the mail to the local United States Post Office.

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3. On January 29, 1988, I placed the mailbag in front of the elevator at approximately 5:30 p.m., where it was picked-up that day, as usual.

  
MARSHALL L. KEMP

Sworn to before me this  
22nd day of September, 1988.

  
Notary Public

BONNIE BAGLEY  
Notary Public, State of New York  
No. 24-6148356  
Qualified in Kings County  
Commission Expires 12/31/88

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Exhibit "1"



FEDERAL ELECTION COMMISSION

RQ-3

WASHINGTON, D.C. 20463

October 29, 1987

Philip S. Sherman, Treasurer  
Reliance Group Holdings, Inc.  
Political Action Committee  
(RELIANCE PAC)  
Park Avenue Plaza/55 East 52nd Street  
New York, NY 10055

Identification Number: C00157842

Reference: 1987 July Quarterly Report (4/1/87-6/30/87)

Dear Mr. Sherman:

This letter is to inform you that as of October 28, 1987, the Commission has not received your response to our request for additional information, dated October 6, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Tammy Rollins on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

OCT 7 1987

Philip S. Sherman, Treasurer  
Reliance Group Holdings, Inc.  
Political Action Committee  
(RELIANCE PAC)  
Park Avenue Plaza/55 East 52nd Street  
New York, NY 10055

Identification Number: C00157842

Reference: 1987 July Quarterly Report (4/1/87-6/30/87)

Dear Mr. Sherman:

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

*Tammy Rollins*

Tammy Rollins  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 21

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)

**Reliance PAC**

A. Full Name, Mailing Address and ZIP Code  
**Senator Lloyd Bentsen Election Committee**  
**P.O. Box 1990**  
**Washington, D.C. 20013-1990**

Purpose of Disbursement  
**Contribution in Support of Senator Bentsen's Campaign**

Date (month, day, year)  
**5/21/87**

Amount of Each Disbursement This Period  
**\$2,000.00**

Disbursement for:  Primary  General  
 Other (specify)

B. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

C. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

D. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month, day, year)

Amount of Each Disbursement This Period

Disbursement for:  Primary  General  
 Other (specify)

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

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

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 29, 1988

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Blair C. Fensterstock, Esquire  
Reliance Group Holdings, Inc.  
Political Action Committee  
Park Avenue Plaza  
55 East 52nd Street  
New York, N.Y. 10055

RE: MUR 2687  
Reliance Group Holdings,  
Inc. Political Action  
Committee and Phillip S.  
Sherman, as treasurer

Dear Mr. Fensterstock:

This is in response to your letter dated September 20, 1988, which we received on September 21, 1988, requesting an extension of 14 days to respond to the Commission's letter dated September 8, 1988. 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 October 11, 1988.

If you have any questions, please contact Ivonne Cotto, 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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*plm*

OGC # 416



# Reliance Group Holdings

RELIANCE GROUP HOLDINGS INC  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909 1100

BLAIR C FENSTERSTOCK  
VICE PRESIDENT  
ASSOCIATE GENERAL COUNSEL  
AND ASSISTANT SECRETARY  
212 909 1206

October 6, 1988

BY HAND

Ms. Yvonne Cotto  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2687

Dear Ms. Cotto:

This will confirm our telephone conversation today in which we agreed to enter into pre-probable cause conciliation in the above-captioned matter.

Sincerely,

Blair C. Fensterstock

BCF/fm

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# Reliance Group Holdings

RELIANCE GROUP HOLDINGS  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909 1100

JUN 1988

January

Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Reliance Group Holdings, Inc.  
Political Action Committee  
FEC Form 3X

Gentlemen:

On behalf of Reliance Group Holdings, Inc. Political Action Committee,  
enclosed herewith is a copy of our Year-End Form 3X covering the  
period November 29, 1988 to December 31, 1988.

Kindly acknowledge the enclosure 3X by  
returning a copy of this letter 3X and  
by delivery.

T: 15 111

BEFORE THE FEDERAL ELECTION COMMISSION

89 JAN 27 AM 11:58

In the Matter of )  
 ) MUR 2687  
 Reliance Group Holdings, Inc. )  
 Political Action Committee and )  
 Philip S. Sherman, as treasurer )  
 )

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which was signed by Blair C. Fensterstock, the attorney for Reliance Group Holdings, Inc. Political Action Committee.

On September 1, 1988, the Commission found reason to believe that Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv), by failing to file the 1987 Year End Report in a timely manner. Attached to the letter, the Office of the General Counsel sent a conciliation agreement approved by the Commission.

In a letter dated September 20, 1988, Respondents requested a meeting and an extension of fourteen (14) days to respond to the Commission's letter dated September 8, 1988. In the meeting with representatives of this Office on September 26, 1988, Respondents stated that they had filed the 1987 Year End Report in a timely manner and presented affidavits of the individuals responsible for filing the report.

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This Office received a letter from Respondents on September 26, 1988. (Attachment 1). Respondents argued that the report was filed in a timely manner on January 29, 1988, by first-class mail. In support of this argument, Respondents included affidavits from all the individuals involved with the preparation and mailing of the report. These affidavits set forth Respondents' procedures for filing all reports and the recollection of these procedures by personnel responsible for the filing of the report in question. Although these affidavits set forth in detail the procedures followed by Respondents, they do not, however, offset the fact that the report in question was not received by the Commission on the date due. In essence, Respondents did not produce any direct evidence that the 1987 Year End Report was filed within the prescribed time.

On October 6, 1988, this Office received another letter from Respondents requesting to enter into pre-probable cause conciliation.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

1/26/89  
Date

By:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Letter from Respondents dated September 26, 1988
2. Letter from Respondents agreeing to enter into pre-probable cause conciliation
3. Conciliation Agreement
4. Letter to Respondents

Staff Assigned: Ivonne Cotto

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reliance Group Holdings, Inc.	)	MUR 2687
Political Action Committee and	)	
Philip S. Sherman, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 1, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2687:

1. Accept the conciliation agreement with Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as treasurer, as recommended in the General Counsel's report signed January 26, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed January 26, 1989.

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

Attest:

2/1/89

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	1-27-89,	11:58
Circulated on 48 hour tally basis:	Mon.,	1-30-89,	11:00
Deadline for vote:	Wed.,	2-01-89,	11:00

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rlm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 7, 1989

Blair C. Fensterstock, Esquire  
Reliance Group Holdings, Inc.  
Political Action Committee  
Park Avenue Plaza  
55 East 52nd Street  
New York, New York 10055

RE: MUR 2687  
Reliance Group Holdings, Inc.  
Political Action Committee and  
Philip S. Sherman, as treasurer

Dear Mr. Fensterstock:

On February 1, 1989, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Reliance Group Holdings, Inc. Political Action Committee and Philip S. Sherman, as treasurer. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

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Blair C. Fensterstock  
Page 2

questions, please contact Ivonne Cotto, 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Reliance Group Holdings, Inc. ) MUR 2687  
Political Action Committee and )  
Philip S. Sherman, 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 the Reliance Group Holdings, Inc. Political Action Committee ("Reliance PAC") and Philip S. Sherman, as treasurer (together, "Respondents") violated 2 U.S.C. §434(a)(4)(A)(iv).

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

I. The Commission has jurisdiction over Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into 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. Reliance PAC is a political committee within the meaning of 2 U.S.C. §431(4).

2. Philip S. Sherman is the treasurer of Reliance PAC.

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3. Section 434(a)(4)(A)(iv) of Title 2 provides that all political committees other than authorized committees of a candidate shall file, in a calendar year without a regularly scheduled general election, a report covering the period beginning July 1, 1987 and ending December 31, 1987, which shall be filed no later than January 31, 1988.

4. Respondents were required to file the 1987 Year End Report by January 31, 1988. Respondents contend that the 1987 Year End Report was timely submitted by regular mail in accordance with Respondents' normal procedures. According to the Commission's records, the 1987 Year End Report was not timely received by the Commission. At the request of the Commission, Respondents submitted a copy of the 1987 Year End Report on May 20, 1988. The total amount of financial activity disclosed for the period of October 1, 1987 to December 1, 1987 was \$22,225.

V. Respondents' 1987 Year End Report was not on file with the Commission until May 20, 1988, in violation of 2 U.S.C. §434(a)(4)(A)(iv).

VI. Respondents will pay a civil penalty to the Commission in the amount of Eight Hundred Fifty dollars (\$850.00), 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 provision hereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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VIII. This agreement shall become effective as of the date that all parties hereto have executed the 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.

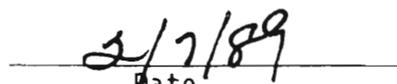
X. This agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

\_\_\_\_\_  
Lawrence M. Noble  
General Counsel

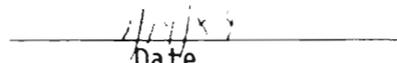
  
\_\_\_\_\_  
Lois G. Lerner  
Associate General Counsel

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Date

FOR THE RESPONDENTS:

  
\_\_\_\_\_  
Blair C. Fensterstock, Esq.  
Attorney for Respondents

  
\_\_\_\_\_  
Date

1847

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE

89 FEB 15 AM 10:59



# Reliance Group Holdings

RELIANCE GROUP HOLDINGS, INC.  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909 1100

CATHERINE E. TAUB  
STAFF COUNSEL  
212 909-1803

# CLOSED

February 14, 1989

BY HAND

Ms. Ivonne Cotto  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: Mur 2687

Dear Ms. Cotto:

Please be advised that in connection with the above-referenced matter, we hereby request that the materials sent to you under cover of letter from Mr. Blair C. Fensterstock dated September 26, 1988 and filed with the Federal Election Commission on September 27, 1988, together with the Conciliation Agreement become a part of the public record in this matter.

I would appreciate your confirmation in writing of this request.

Sincerely,

CET/st

cc: Blair C. Fensterstock, Esq.

3421/31

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 27, 1989

Catherine E. Taub, Esq.  
Staff Counsel  
Reliance Group Holdings, Inc.  
Park Avenue Plaza  
New York, New York 10055

Dear Ms. Taub:

This responds to the February 14, 1989, letter by which you requested that Ivonne Cotto of this office ensure that certain materials be included in the Commission's public file in Matter Under Review (MUR) 2687. Specifically, you requested that materials submitted under a cover letter from Blair C. Fensterstock, together with the Conciliation Agreement in the matter, be made part of the public record.

Those materials routinely would have been made part of the public record even without your request. I should advise you, though, that the third paragraph on page two of Mr. Fensterstock's letter cited a figure which was different from that ultimately reflected in Paragraph IV of the Conciliation Agreement. We have deleted from the public file the sentence containing that figure.

Please contact me at 202-376-5690 if you have any questions.

Sincerely,

*Vincent J. Convery, Jr.*  
Vincent J. Convery, Jr.  
Assistant General Counsel

97740738773



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2687

DATE FILMED 3/3/87 CAMERA NO. 3

CAMERAMAN AS

9 3 0 4 0 7 6 3 7 7 4

- 4/4/89



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2687

8 3 0 4 0 7 4 : 2 1 7



# Reliance Group Holdings

RELIANCE GROUP HOLDINGS, INC.  
PARK AVENUE PLAZA  
NEW YORK, N.Y. 10055  
212 909 1100

CATHERINE E. TAUB  
STAFF COUNSEL  
212 909-1803

February 27, 1989

BY HAND

Ms. Ivonne Cotto  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Mur 2687

Dear Ms. Cotto:

In connection with the above-referenced matter, enclosed is a check from the Reliance Group Holdings, Inc. Political Action Committee in the amount of Eight Hundred Fifty Dollars (\$850.00), which amount represents the civil penalty agreed to be paid by Respondents in the above-referenced matter in accordance with the conciliation agreement entered in connection therewith, and pursuant to 2 U.S.C. §437g (a)(5)(A).

I still await confirmation from the Federal Election Committee as to the items we requested to become part of the public record in this matter as stated in my letter dated February 14, 1989. It is my understanding that MUR 2687 is now settled.

Very truly yours,

cc: Blair C. Fensterstock, Esq.

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09 FEB 20 AM 10:20

09 FEB 20 AM 10:40

**CLOSED**

RELiance GROUP HOLDINGS INC.  
POLITICAL ACTION COMMITTEE

PARK AVENUE PLAZA  
NEW YORK, NY 10055

102

1-2  
210 910

2/27 19 89

PAY  
TO THE  
ORDER OF

Federal Election Commission

\$ 850.00

THE SUM OF \$ 850.00

DOLLARS



The Chase Manhattan Bank, N.A.  
1 Chase Manhattan Plaza  
New York, NY 10081

*Phyllis Sherman*  
*Paul W. Zell*

FOR

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060 000

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MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 102 [ A COPY OF WHICH IS ATTACHED ] RELATING TO

MUR 2687 AND NAME Reliance Group Holdings, Inc. Political  
(Cotto) Action Committee

WAS RECEIVED ON 3/1/89. 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 3/2/89