



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3217

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

21040324014

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE:** 7 November 1990

**ANALYST:** Donald Averett

**I. COMMITTEE:** Illinois Federation for Right to  
Life PAC (C00141341)  
George Belock, Treasurer  
412 Langdon  
Alton, IL 62002

**II. RELEVANT STATUTE:** 11 CFR §102.5(a)(1)(i)  
2 U.S.C. §441a(f)

**III. BACKGROUND:**

Receipt of Apparent Impermissible and Excessive Funds from an Unregistered Organization and Apparent Impermissible Funds from an Apparent Non-Federal Account of a Federally Registered Committee

The Illinois Federation for Right to Life PAC ("the PAC") disclosed the receipt of apparent prohibited funds totalling \$21,335.05 during 1990 from an unregistered organization. Of this amount, \$16,335.05 is also apparently excessive. In addition, the PAC also accepted during 1990 \$5,000 in apparent prohibited funds from an apparent non-federal account of a federally registered committee. The PAC transferred \$10,854.54 into its non-federal account and disclosed the remaining \$15,480.90 as owed to the non-federal account.

The 1990 April Quarterly Report filed by the PAC disclosed \$21,335.05 in contributions from Steven Baer Republican for Governor on February 8, 1990 and a \$5,000 contribution from the National Right to Life PAC-State Fund on February 20, 1990 (Attachment 2). A Request for Additional Information ("RFAI") was sent on May 23, 1990.

The RFAI requested that the PAC clarify whether or not the contributions received were permissible under 11 CFR

21040324015

§102.5(a) and 2 U.S.C. §441a(f). If the contributions were not permissible, then the Commission recommended that the PAC refund the contributions or transfer the funds, with the donors' consent, to an account not used to influence federal elections. The RFAI further advised that the Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 per calendar year (Attachment 3).

On June 1, 1990, Ms. Felicia Goeken, a representative of the PAC, telephoned the Reports Analysis Division ("RAD") analyst in response to the RFAI. Ms. Goeken stated that the PAC had received contributions from unregistered organizations and that those funds had been used for the PAC's operations in the state of Illinois. Ms. Goeken stated that the PAC had been advised by an attorney that these actions were permissible. The RAD analyst advised Ms. Goeken to refund or transfer-out all impermissible contributions and to provide a written response to the RFAI. Ms. Goeken stated that the PAC did not have sufficient funds to refund or transfer-out the contributions (Attachment 4).

On June 14, 1990, a Second Notice was sent to the PAC for failure to respond in writing to the May 23, 1990 RFAI (Attachment 5).

On June 25, 1990, the Commission received a response from the PAC (Attachment 6). The response indicated that the PAC had previously responded to the original RFAI on June 1, 1990 (the Commission has no record of receiving this response from the PAC). The response explained that the contributions and expenditures disclosed on the PAC's report were received from and disbursed to state PACs and state candidates. The response further stated that the PAC had believed that these actions were permissible and that the PAC did not have sufficient funds to refund or transfer-out the contributions.

On July 2, 1990, the Commission received a letter from James Bopp, Jr., General Counsel for the National Right to Life Committee, Inc. Mr. Bopp stated in the letter that the National Right to Life-State Fund is a separate segregated fund of the National Right to Life Committee, Inc. which exclusively involves itself in state and local elections and that the contribution to the PAC was intended for this purpose (Attachment 7).

The RAD analyst called the PAC on July 20, 1990 and spoke to Ms. Goeken. The RAD analyst advised Ms. Goeken to establish a separate account for non-federal activity and to disclose the required transfers as debts to the non-federal account or to the original contributors. Ms. Goeken stated

91040324016

that the treasurer had been advised to establish a separate account but that the PAC still lacked sufficient funds to complete the transfer (Attachment 8).

The RAD analyst called Ms. Goeken on July 30, 1990. Ms. Goeken stated that a non-federal account had been established, but that the PAC was awaiting approval from the State of Illinois before transferring any funds. The RAD analyst advised the PAC to transfer-out the full amount as soon as possible (Attachment 9).

On August 3, 1990, the Commission received a letter from the PAC. The letter was a copy of a memorandum from Ms. Goeken to the officers of the PAC, National Right to Life, Inc. and the Steven Baer Campaign Committee (Attachment 10).

On October 2, 1990, the RAD analyst telephoned Mr. George Belock, the treasurer. Mr. Belock was not available, however, the RAD analyst spoke to Ms. Kathleen McCusker, the president. Ms. McCusker stated that she would have Mr. Belock send written confirmation that all available funds had been transferred-out to the non-federal account (Attachment 11).

Mr. Belock called the RAD analyst on October 3, 1990. Mr. Belock stated that the non-federal account had been established as of August 31, 1990 and that the PAC had transferred-out \$10,855 (Attachment 12).

On October 15, 1990, the Commission received documentation verifying the establishment of a non-federal account and the transfer of \$10,854.15 into this account on September 24, 1990. The PAC disclosed the remaining \$15,480.90 as owed to their non-federal account on Schedule C of the 1990 October Quarterly Report (Attachment 13).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

21040324017

FEDERAL ELECTION COMMISSION  
1989-1990

Attachment 1  
Page 1 of 1

DATE 7NOV90

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
ILLINOIS FEDERATION FOR RIGHT TO LIFE PAC				ID #C00141341 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: RIGHT TO LIFE INC; ILLINOIS FED FOR						
1989	MID-YEAR REPORT	211	1,577	1JAN89 -30JUN89	7	89FEC/600/3404 *
	YEAR-END	309	470	1JUL89 -31DEC89	5	90FEC/620/4563 *
1990	MISCELLANEOUS REPORT TO FEC			3AUG90	3	90FEC/651/2520
	MISCELLANEOUS REPORT TO FEC			6AUG90	2	90FEC/651/3431
	APRIL QUARTERLY	38,814	30,411	1JAN90 -31MAR90	16	90FEC/636/2283 *
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN90 -31MAR90	9	90FEC/644/0752 *
	REQUEST FOR ADDITIONAL INFORMATION			1JAN90 -31MAR90	4	90FEC/641/1475
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN90 -31MAR90	5	90FEC/642/3062
	JULY QUARTERLY	2,059	1,027	1APR90 -30JUN90	8	90FEC/648/2924 *
	OCTOBER QUARTERLY	1,684	11,390	1JUL90 -30SEP90	9	90FEC/661/4114
	PRE-GENERAL	0	0	1OCT90 -17OCT90	4	90FEC/669/3603
	TOTAL	43,077	0 44,875		72	TOTAL PAGES

All reports asterisked have been reviewed,  
Cash-on-hand balance as of 10/17/90--\$0  
Debts owed by the committee as of 10/17/90--\$15,480.90  
Debts owed to the committee as of 10/17/90--\$0

21040324018

*Steven Baer Republican for Governor*

LEA

ITEMIZED RECEIPTS

1990 April Quarterly Report

Use this schedule (a) for each category of the Detailed Summary Page	PAGE	OF
	1	1
FOR LINE NUMBER		
118		

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) *Illinois Federation - For Right to Life, Inc., - PAC* Attachment 2 Page 1 of 2

<p>A. Full Name, Mailing Address and ZIP Code <i>Steven Baer Republican for Governor</i> <i>P.O. Box 5012</i> <i>Oak Brook, Ill 60522</i></p>	<p>Name of Employer <i>Political Committee</i></p> <p>Occupation</p>	<p>Date (month, day, year) <i>2/8/90</i></p>	<p>Amount of Each Receipt this Period <i>\$6,000.00</i></p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>B. Full Name, Mailing Address and ZIP Code <i>Steven Baer Republican for Governor</i> <i>P.O. Box 5012</i> <i>Oak Brook, Ill 60522</i></p>	<p>Name of Employer <i>Political Committee</i></p> <p>Occupation</p>	<p>Date (month, day, year) <i>2/8/90</i></p>	<p>Amount of Each Receipt this Period <i>\$335.05</i></p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>C. Full Name, Mailing Address and ZIP Code <i>Steven Baer Republican for Governor</i> <i>P.O. Box 5012</i> <i>Oak Brook, Ill 60522</i></p>	<p>Name of Employer <i>Political Committee</i></p> <p>Occupation</p>	<p>Date (month, day, year) <i>2/8/90</i></p>	<p>Amount of Each Receipt this Period <i>\$15,000.00</i></p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Aggregate Year-to-Date &gt; \$</p>		

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

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

*\$21,335.05*

LEA

STATE - PAC  
ITEMIZED RECEIPTS  
1990 April Quaterly Report

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 committees.

NAME OF COMMITTEE (in Full)

Illinois Federation For Right To Life, Inc., - PAC

Attachment 2  
Page 2 of 2

A. Full Name, Mailing Address and ZIP Code National Right to Life PAC-State Fund Suite 500-419 7th Street N.W. Washington, D.C. 20004	Name of Employer PAC-State Fund	Date (month, day, year) 2/20/90	Amount of Each Receipt this Period \$ 5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year)	

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

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

\$ 5,000.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

George Belock, Treasurer  
Illinois Federation for Right  
to Life PAC  
412 Langdon  
Alton, IL 62002

MAY 23 1990

Identification Number: C00141341

Reference: April Quarterly Report (1/1/90-3/31/90)

Dear Mr. Belock:

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

-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. The Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. (2 U.S.C. §441a(f)) Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. (11 CFR §102.5(b))

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

91040324021

In order to be in compliance with the act, your committee must:

- 1) refund to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000; and
- 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

If you choose to transfer the funds to an account not used to influence federal elections, the commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Should you choose to refund or transfer-out the funds, the commission will presume the funds were impermissible, absent a statement from your committee to the contrary. Refunds and transfers-out should be disclosed on a supporting schedule b for line 26 or 20 of the report covering the period during which they are made.

Although the commission may take further legal steps concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

a written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the federal election commission within fifteen (15) days of the date of this letter. if you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. my local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

91040324022

\$ TYPE DLA.;13

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Felicia Goeken, former chairman

COMMITTEE: Illinois Federation for Right to Life PAC  
(C00141341)

DATE: 6/1/90

SUBJECT: Contributions Received From Unregistered Organizations

Ms. Felicia Goeken telephoned me in response to the Request for Additional Information. Ms. Goeken informed me that she was the chairman of the committee at the time that the committee set up its operating procedures. She further stated that the committee had been advised that they could establish a single account from which to manage their federal and non-federal activity. I informed Ms. Goeken that this was correct, but that all of the funds which entered such an account would be subject to the restrictions of the Act. I advised her that the receipts from Steven Baer Republican for Governor and the National Right to Life PAC-State Fund appeared to be impermissible. Ms. Goeken stated that both contributions were permissible under the laws of the state of Illinois and that the funds had not been used to influence any federal election. I advised Ms. Goeken to refund any contributions which were not permissible under the Act. I told her that alternatively the committee could establish a non-federal account and transfer the funds into that account, but that the committee would have to secure the permission of the contributors before it made that transfer. Ms. Goeken indicated that the committee did not presently have sufficient funds to refund or transfer-out the contributions. I advised her to provide a written response to the Request for Additional Information as soon as possible and to include an explanation of the receipt and use of the contributions in question.



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

RQ-3

June 14, 1990

George Belock, Treasurer  
Illinois Federation for Right  
to Life PAC  
412 Langdon  
Alton, IL 62002

Identification Number: C00141341

Reference: April Quarterly Report (1/1/90-3/31/90)

Dear Mr. Belock:

This letter is to inform you that as of June 13, 1990, the Commission has not received your response to our request for additional information, dated May 23, 1990. 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 Donald Averett 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

21040324024

90 JUN 25 AM 11:19



**POLITICAL ACTION COMMITTEE**

June 20, 1990

Federal Election Commission  
attention: Donald L. Averett  
Reports Analyst  
999 E. St. NW  
Washington, D.C. 20463

Dear Mr. Averett,

On June 19th I received the attached letter from John D. Gibson. I immediately called FEC and neither you nor Mr. Gibson were expected back in the office.

A Mr. Robert Donato advised me to write this letter and attach all previous mailings, since he could find no record of my previous written response.

I am therefore copying all previous correspondence and along with this cover letter, will mail it registered receipt to insure a record of it having been sent.

As you can see, my original response in writing was on June 1, 1990, immediately following our telephone conversation.

Hopefully this will lead to a satisfactory solution to this situation.

Sincerely,  
*Felicia Cooken*  
Mrs. Felicia Cooken  
PAC Chairman

cc: George Belock, PAC Treasurer

9003641034925



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

BQ-3

June 14, 1990

George Belock, Treasurer  
Illinois Federation for Right  
to Life PAC  
412 Langdon  
Alton, IL 62002

Identification Number: C00141341

Reference: April Quarterly Report (1/1/90-3/31/90)

Dear Mr. Belock:

This letter is to inform you that as of June 13, 1990, the Commission has not received your response to our request for additional information, dated May 23, 1990. 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 Donald Averett on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

*[Signature]*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

*Called Averett  
June 14 -  
and requested letter 6/20/90  
to Gibson and Averett*

21040324026  
9003614073



**POLITICAL ACTION COMMITTEE**

June 1, 1990

Federal Election Commission  
Attention: Donald L. Averett  
Reports Analyst  
Reports Analysis Division  
Washington, D.C. 20463

Dear Mr. Averett,

As per our telephone conversation this a.m. I am responding to your letter of May 23, 1990.

The Illinois Federation for Right to Life, PAC is an internal PAC (separate segregated funds), that is our PAC has an account entirely separate from the organizational account, as well as its' own Treasurer.

From our conversation I gathered that we should also have a separation of State vs Federal funds within that segregated fund. We had been advised that the Illinois state law did not require separate reporting and/or a separate State PAC.

According to our conversation IF we had established a State Pac also, that PAC would not have been subject to Federal regulations. Is my interpretation correct?

I am enclosing a copy of our statement of organization that was filed with the FEC and the State of IL Board of elections. At the beginning of our PAC organization I was Chairman, so I am responding in the historical sense to our understanding of compliance with rules and regulations. However there was a time span from 1984 to 1988 when both Chairmanship and Treasurer was changing hands. Could it possibly be that there was change enacted during that time period?

As we discussed all reporting on the two sheets you included does not have anything to do with any Federal donations or receipts. They are all from State PACs and disbursed to State candidates. We had been advised that our reporting of both State and Federal candidates went to you, state information was sent for informational purposes.

We had also been advised that there were no limits on state donations and we had never been advised that state activities fell under the law of the FEC rules and regulations.

644003751027

Page :

It is my understanding of your letter that if we are held as noncompliant we would have the alternative of notifying both parties you have referred to that we would put the amount difference in a separate account (state account) to comply with Federal rules and regulations regardless of the fact that no funds were received or given to a Federal entity. Is that a correct interpretation.

I have a simple question. If we have, through a misunderstanding of interpretation been in error, is it possible to begin at this point in time, to establish a separate account between Federal and State. An in order to avoid further confusion do our donors (our membership have to be advised of which PAC they are donating to?) This division could be extremely burdensome. I guess I am asking to what extent this division, actual vs reporting is extended.

Since our Treasurer Mr. Belock has always reported both the state and Federal donations and expenditures to FEC and no comment has ever been made regarding the reporting of State to you, we reasonably presumed we had been advised correctly concerning the dual activities.

Since it is very clear that our activities for this reporting period had ONLY to do with State expenditures and receipts, is it possible for us to do the following?

As you can see from our Balance on Hand the funds are not available to fulfill your instructions, therefore can we beg relief on the basis that there was and never has been an intention of noncompliance. A misunderstanding based on misunderstanding and advice between state and federal PAC requirements has created this problem.

Any clarification by you on what should have been the proper procedure to do both State and Federal political activities in compliance will be acted upon immediately. That is separate bank accounts or any other separation required.

Would it satisfy the intent if we informed the donors you referred to by mail that all of our funds would be transferred into a State account? It is my understanding that the State does not require this but FEC does, correct?

In other words we have every intent to comply with necessary regulations and our understanding and advice received regards state and Federal activities was such that we thought we were in full compliance.

Would it be a correct understanding that when we separate the Federal from the State PAC (and as per the two forms enclosed we thought we had) in every manner we need not report state activities to the FEC anymore?

We will appreciate consideration of a solution to this problem and any clarification on correct procedure from this day forward.

Sincerely,

  
Felicia K. Goeken  
IFRL PAC

cc: George Belock, PAC treasurer

9 3 3 4 0 14307 2 4 0 2 8



ILLINOIS STATE BOARD OF ELECTIONS COMMISSION

*File in PAC*  
RO-2

Attachment 6  
Page 5 of 8

George Belock, Treasurer  
Illinois Federation for Right  
to Life PAC  
412 Langdon  
Alton, IL 62002

PA 73 W

Identification Number: C00141341

Reference: April Quarterly Report (1/1/90-3/31/90)

Dear Mr. Belock:

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

-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. The Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. (2 U.S.C. §441a(f)) Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. (11 CFR §102.5(b))

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

9 1 0 3 6 9 4 0 7 2 4 0 2 9

In order to be in compliance with the act, your committee must:

- 1) refund to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000; and
- 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

If you choose to transfer the funds to an account not used to influence federal elections, the commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Should you choose to refund or transfer-out the funds, the commission will presume the funds were impermissible, absent a statement from your committee to the contrary. Refunds and transfers-out should be disclosed on a supporting schedule b for line 26 or 20 of the report covering the period during which they are made.

Although the commission may take further legal steps concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

a written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the federal election commission within fifteen (15) days of the date of this letter. if you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. my local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

9 3 0 1 3 9 4 0 8 2 4 0 3 0



12-A

# ITEMIZED RECEIPTS

Use this form to report receipts for each category of the Detailed Summary Page

FOR LINE NUMBER 11c

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial gain, and that giving the name and address of any donor is not intended to solicit contributions from such contributors.

NAME OF COMMITTEE (or P.O.): *Illinois Federation For Right & Life, Inc. - DAC*

Attachment 6  
Page 8 of 8

HA

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
<i>National Right &amp; Life PAC-State Fund Suite 500 - 419 7th Street NW Washington, DC 20001</i>	<i>PAC-State Fund</i>	<i>2/20/00</i>	<i>6,000.00</i>
Receipt For: <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	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"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	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"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	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"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date	
TOTAL of Receipts This Page (attach)			

All receipts are (or were) this tax number and

ARNOLD H. BRAMES  
B. MICHAEL MCCORMICK  
JAMES BOPP, JR.  
ERIC M. ABEL  
RHONDA D. OLDHAM  
RICHARD E. COLESON  
BARRY A. BOSTROM

BRAMES, MCCORMICK, BOPP & ABEL  
ATTORNEYS AT LAW  
THE TUDOR HOUSE  
181 HARDING AVENUE  
P.O. BOX 410  
TERRE HAUTE, INDIANA 47808-0410

90 JUL -2 10:41

TELEPHONE  
(812) 238-2421  
TELECOPIER  
(812) 232-2840

June 29, 1990

Attachment 7  
Page 1 of 1

Donald L. Averett  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

RE: National Right to Life PAC-State Fund  
Reference Number MS-F

Dear Mr. Averett,

As General Counsel for the National Right to Life Committee,  
the above has been referred to me for response.

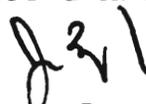
The National Right to Life PAC-State Fund is a separate  
segregated fund of the National Right to Life Committee, Inc.,  
which is involved exclusively in state and local elections. None  
of the funds of the state fund is used for federal candidates. The  
February 20, 1990, contribution to the Illinois Federation for  
Right to Life was to its PAC's state fund, for use exclusively for  
state candidates. This contribution was expended exclusively for  
state candidates by the Illinois Federation for Right to Life PAC.

Thus, the National Right to Life PAC-State fund is not  
required to register with the Federal Election Commission nor is it  
governed by the Federal Election Campaign Act.

If you require additional assistance regarding this matter,  
please advise.

Sincerely,

BRAMES, MCCORMICK,  
BOPP & ABEL

  
James Bopp, Jr.

JB/rd

21040324033

by SIG-30  
ANALYST; Donald L. Averett

CONVERSATION WITH: Felicia Goeken, former chairman

COMMITTEE: Illinois Federation for Right to Life PAC  
(000141341)

Attachment 8  
Page 1 of 1

DATE: 7/20/90

SUBJECT: Contributions Received From Unregistered Organizations

I telephoned the committee and spoke to Ms. Goeken.

requested a current telephone number for the Steven Baer Republican for Governor committee. Ms. Goeken gave me a number where she believed Mr. Steven Baer could be contacted.

I advised Ms. Goeken that if the committee wished to continue to accept contributions that were permissible at the state and local level, but impermissible at the federal level, that they should establish a separate account for their non-federal activity. Ms. Goeken indicated that the treasurer, Mr. George Belock, had been advised to establish a separate account, but that the committee did not have enough cash on hand to refund or transfer-out the contributions. I advised her to report the amount of the contributions as a debt to the contributors to the non-federal account until they had been refunded or transferred-

3  
240  
3  
4  
6  
9  
21

ANALYST: Donald L. Averett

CONVERSATION WITH: Felicia Goeken, former chairman,

COMMITTEE: Illinois Federation for Right to Life PAC  
(C00141341)

DATE: 7/30/90

SUBJECT: Contributions Received From Unregistered Organizations

5  
3  
0  
4  
I called the committee and spoke with Ms. Goeken. She informed me that the treasurer, Mr. Belock, had opened a separate account for non-federal transactions, but that the committee was awaiting approval from the state of Illinois before transferring funds to that account. Ms. Goeken also stated that the committee only had approximately \$7000 in its account.

2  
3  
I advised Ms. Goeken to transfer out the full amount of funds available on the account.

91040324035



90 AUG -3 AMID:39

July 30, 1990

## POLITICAL ACTION COMMITTEE

Attachment 10  
Page 1 of 2

**MEMO:** Kathleen McCusker, Pres. IFRL  
Patricia Abson, Chairman, IFRL PAC  
George Belock, Treasurer IFRL PAC  
Sandra Faucher, Chairman NRLC PAC  
James Bopp, General Counsel NRLC  
Stephen Baer Campaign Committee

After a few months of correspondence, I received a telephone call this a.m. from Donald Averett of the Federal Election Commission.

Briefly, the problem has been that IFRL, PAC was working under a presumption from advice received, that, according to Mr. Averett stated was not actually erroneous, but didn't extend far enough to include both State and Federal regulations.

In other words, we had been advised that we did not need both State and Federal PAC's and indeed only needed to file one report with state and federal.

Mr. Averett has clarified that what we should do, and are proceeding to do at this time is establish a State Pac, and a separate account for the PAC.

To rectify the action we have taken, we must do the following.

1. Immediately for a State PAC - IFRL and open a separate bank account. George may, and hopefully will continue to handle both the State and Federal.
2. We received \$5,000.00 from NRLC PAC and \$21,335.05 from the Stephen Baer Campaign Committee.

IFRL must give both of these entities an option to request that these amounts be paid back. If both parties do not exercise that option for repayment it is agreeable to the FEC, and IFRL PAC must then pay that amount into the State PAC Fund. Mr. Averett stated that if we do not have that amount (and we do not), we must then show these amounts as a debt due to our new IFRL STATE PAC.

Mr. Averett has been very considerate. Some of you have received the large amount of paper as the ongoing communication took place, some of you have not. Tried to keep this explanation brief. I will be providing copies of this letter to all concerned as above and would request the following:

If NRLC PAC and the Stephen Baer Campaign Committee will notify us of their option by mailing a written reply to IFRL PAC, c/o Felicia Goeken, 412 Langdon St., Alton, IL 62002 and that option will be to allow us to transfer the debt to IFRL State PAC by August 15, 1990, I can then forward those letters to Mr. Averett at the FEC office.

If Patricia Abson, our new IFRL PAC Chairman, will immediately request our state General Counsel to file for our State PAC (following Board approval), and George Belock

412 Langdon Avenue • Alton, Illinois 62002 • (618) 465-7886

A copy of our report is filed with the State Election Board and is available for purchase from the State Election Board, Springfield, IL

Page 2

to establish a separate bank account for that State PAC I do believe  
our situation is in hand.

Sincerely,

*Felicia Cooken*

Mrs. Felicia Cooken  
Past-Chairman IFRL-PAC

cc: *Donald S. Averett*  
*Reports Accepted*  
*Federal Election Commission*  
*Washington, D.C. 20463*

1004038242331

ANALYST: Donald L. Averett

CONVERSATION WITH: Kathleen McCusker, president

COMMITTEE: Illinois Federation for Right to Life PAC  
(C00141341)

DATE: 10/2/90

SUBJECT: Contributions Received From Unregistered Organizations

Ms. McCusker informed me that she was somewhat familiar with the matter of the contributions received from the unregistered organizations. She stated that the committee did not have sufficient funds to transfer out the full amount of the contributions, but that all available funds had been transferred to the non-federal account. Ms. McCusker said that she would have Mr. George Belock, the treasurer, send written confirmation of that transfer as soon as possible.

8  
3  
4  
0  
2  
3  
3  
4  
0  
4  
0  
3  
2  
1  
9

ANALYST: Donald L. Averett

CONVERSATION WITH: George Belock, treasurer

COMMITTEE: Illinois Federation for Right to Life PAC  
(COG141341)

DATE: 10/3/90

SUBJECT: Contributions Received From Unregistered Organizations

Mr. George Belock returned my telephone call. Mr. Belock informed me that the Illinois Federation for Right to Life had established a non-federal committee with a separate account on August 31, 1990. He also stated that there were insufficient funds available in the federal account to refund or transfer-out those contributions received from unregistered organizations, but that all funds remaining in the federal account had been transferred to the non-federal account. Mr. Belock stated that of the \$24,333.05 in funds received, a total of \$10,655 had been transferred to the non-federal account. He also stated that it would be unlikely that the committee would soon receive enough contributions to meet the amount which is required to be transferred.

I advised Mr. Belock to provide the Commission with written documentation of these transfers as soon as possible. I also explained to him that the federal committee could accept contributions and use them to pay off the remainder of the transfer to the non-federal committee.

90 OCT 15 PM 4:34

Attachment 13  
3757 W. 216th Street Page 1 of 8  
Matteson, IL 60443  
October 4, 1990

Don L. Averett  
Federal Election Commission  
999 East Street, N.W.  
Washington, D.C. 20463

Dear Mr. Averett:

Pursuant to our telephone conversation of Wednesday, October 3, transmitted herewith is our October 15 quarterly report. Also enclosed is a letter from the State of Illinois which shows that we have established a state PAC as of August 31, 1990 and a letter from Financial Federal verifying the establishment of a checking account and transfer of all monies from the federal PAC to the state PAC. A letter from the Steven Baer Committee authorizing the transfer of monies is also enclosed. Please note that on FEC Form 3X we have established the fact that the federal PAC owes the state PAC \$15,480.90.

Thank you for your help and support in resolving this problem. If we have not completely followed your instructions, would you please give me a call?

Sincerely,



George L. Belock  
Illinois Federation for Right to Life-PAC  
Treasurer

Enclosures  
cjc

91040324040

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Attachment 13  
Page 2 of 8

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>ILLINOIS FEDERATION FOR RIGHT TO LIFE - PAC</b>	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>412 LANGDON</b>	2. FEC IDENTIFICATION NUMBER <b>C00 141-341</b>
CITY, STATE and ZIP CODE <b>ALTON, IL 62002</b>	3. <input type="checkbox"/> This 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 This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>July 1, 1990</u> through <u>SEP 30, 1990</u>		
6. (a) Cash on Hand January 1, 19 <u>90</u>		\$ 270.27
(b) Cash on Hand at Beginning of Reporting Period	\$ 9,705.96	
(c) Total Receipts (from Line 18)	\$ 1,684.59	\$ 42,559.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 11,390.55	\$ 42,829.27
7. Total Disbursements (from Line 28)	\$ 11,390.55	\$ 42,829.27
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ - 0 -	\$ - 0 -
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)	\$ 15,480.90	

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>GEORGE L. BELOCK</b>	
Signature of Treasurer <i>George L. Belock</i>	Date <b>Oct 3, 1990</b>

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

--	--	--	--	--	--	--	--	--	--

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

21040324041

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

Attachment 13  
Page 3 of 8

31040324042

Name of Committee (in full)	Report Covering the Period	
<i>Illinois Federation for Right to Life, Inc. PAC</i>	From: <i>July 1, 1990</i>	To: <i>SEP 30, 1990</i>
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)	-	950.00
(ii) Unitemized	1,584.00	14,813.06
(iii) Total of contributions from individuals	1,584.00	15,763.06
(b) Political Party Committees	-	21,335.05
(c) Other Political Committees (such as PACs)	-	5,000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	1,584.00	42,098.11
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.)	100.59	460.89
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	1,684.59	42,559.00
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	386.40	532.21
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	10,854.15	10,854.15
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-	-
22. INDEPENDENT EXPENDITURES (use Schedule E)	-	4,298.13
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	150.00	27,144.78
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	11,390.55	42,827.27
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	1,584.00	42,098.11
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-	-
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	1,584.00	42,098.11
32. TOTAL OPERATING EXPENDITURES (from Line 19)	386.40	532.21
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-	-
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	386.40	532.21

SCHEDULE B

ITEMIZED DISBURSEMENTS  
OTHER DISBURSEMENTS  
NON-FEDERAL

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

PAGE 1 OF 1  
FOR LINE NUMBER 27

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)

Attachment 13  
Page 4 of 8

ILLINOIS FEDERATION FOR RIGHT TO LIFE, INC. - PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LINDA BEHNKEN 912 Indian Spring Road O. FALLON, IL 62269	AZEND DINNER FOR RON STEPHEN Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/17/90	150.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

150.00

TOTAL This Period (last page this line number only)

91040324043

Name of Committee (in Full) <b>Illinois Federation For Right To Life, - INC., - PAC</b>		Attachment 13 Page 5 of 8	
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>Illinois Federation for Right to Life STATE-PAC 412 LANGDON ALTON, IL</b>		Original Amount of Loan <b>26,335.05</b>	Cumulative Payment To Date <b>10,854.15</b>
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period <b>15,480.90</b>	
Terms: Date Incurred <b>2/20/90</b> Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

21040324044

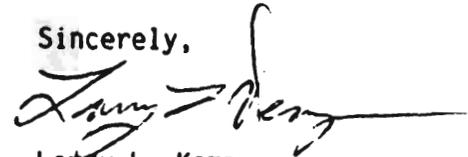
**FINANCIAL FEDERAL  
Trust & Savings Bank**

September 24, 1990

To Mr. Donald Averett of the FEC:

This is to verify that the funds available to the ILLINOIS FEDERATION RIGHT TO LIFE PAC on September 24, 1990 was \$10,854.15. These funds were transferred to a new checking account entitled, ILLINOIS FEDERATION FOR RIGHT TO LIFE STATE PAC, as of todays date.

Sincerely,



Larry L. Kemp  
Savings Counselor

21040324045

**Olympia Fields**  
21110 S Western Ave  
60461  
708 747-2000

**Calumet City**  
1901 E Sibley Blvd.  
60409  
708 868-4400

**Joliet**  
1401 N Larkin Ave.  
60435  
815 744-5110

**Chicago Ridge**  
6415 W. 95th St  
60415  
708-424-5480

**Hazel Crest**  
3601 W. 183rd St.  
60429  
708 957-9000

**Orland Park**  
48 Orland Square Dr.  
60462  
708 460-9220

*Copys: Kachui  
Pat  
Kanga  
F.G.*

ILLINOIS FED FOR RIGHT TO LIFE,  
STATE PAC  
412 LANGDON  
ALTON, IL 62002

STATE OF ILLINOIS  
STATE BOARD OF ELECTIONS  
PUBLIC DISCLOSURE DIVISION

1020 SOUTH SPRING STREET  
P.O. BOX 4187  
SPRINGFIELD, ILLINOIS 62708  
77/782-4141

100 WEST RANDOLPH STREET  
SUITE 14-100  
CHICAGO, ILLINOIS 60601  
312/814-6440

RETAIN THIS RECEIPT FOR YOUR RECORDS.

If this information is incorrect, please notify our office at once.

S04937-10  
ILLINOIS FED FOR RIGHT TO LIFE,  
STATE PAC  
412 LANGDON  
ALTON, IL 62002

DOCUMENTS RECEIVED

08/31/90 in Springfield: D-1 Statement of Organization

9104032

# Steven Baer

## Republican for Governor

Attachment 13  
Page 8 of 8

Jim O'Brien  
Chairman

**Steering Committee**

John Henry Altoffer  
Robert J. Buford  
Robert J. Chovanec  
William C. Croft  
Raymond E. Cross  
Robert D. Genetski  
Dietrich M. Gross  
Warren K. Hayes  
Harold Knaphelde III  
Lawrence A. Kohls  
Anne McCracken  
Thomas C. Noddings  
Henry Regnery  
William Regnery  
Jack Roeser  
Carolyn T. Rogers  
J. Patrick Rooney  
Phyllis Schlafly  
Barre Seid  
Charles L. Strobeck  
Kathleen Sullivan  
Jerome A. Urbik  
Fred G. Wacker, Jr.  
Thomas C. Willis  
Charles T. Wilt  
Kenneth T. Wright

August 1, 1990

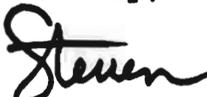
Felicia Goeken  
Illinois Federation for  
Right to Life P.A.C.  
412 Langdon  
Alton, IL 62002

Dear Felicia:

This letter is to inform you of our wish that you transfer all monies paid to you by the Steven Baer for Governor committee to any non-Federal Political Action Committee of your choosing.

Thank you.

Sincerely,

  
Steven Baer

cc: Donald Averett  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

91 JAN -9 AM 11:11

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

**FIRST GENERAL COUNSEL'S REPORT**

**RAD Referral 90L-55A**  
**STAFF MEMBER: George F. Rishel**  
**Jeffrey D. Long**

**SOURCE: INTERNALLY GENERATED**

**RESPONDENTS: Illinois Federation for Right to Life PAC and George Belock, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 441a**  
**2 U.S.C. § 441b**  
**11 C.F.R. § 102.5**

**INTERNAL REPORTS CHECKED: Disclosure Reports**

**FEDERAL AGENCIES CHECKED: None**

**I. GENERATION OF MATTER**

This matter was referred to the Office of the General Counsel on November 7, 1990. The referral noted that the Illinois Federation for Right to Life PAC and George Belock, as treasurer, ("Respondents") had apparently accepted impermissible and excessive funds from one unregistered organization and impermissible funds from a nonfederal account of a registered PAC. Attachment 1.

**II. FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make contributions that aggregate more than \$5,000 per calendar year to any political committee that is not an authorized committee or a national party committee. 2 U.S.C. § 441a(a)(1)(C). No such political committee may knowingly accept contributions in excess of this

21040324048

limitation. 2 U.S.C. § 441a(f). The Act also prohibits any corporation whatever or labor organization from making contributions or expenditures in connection with any federal election and prohibits any political committee from knowingly accepting such prohibited contributions or expenditures. 2 U.S.C § 441b. Illinois permits unlimited corporate and union contributions in state and local elections.

Commission regulations provide that organizations financing both federal and nonfederal election activities may opt to establish separate federal and nonfederal accounts. 11 C.F.R. § 102.5(a). The federal account becomes the federal political committee for purposes of the Act. Only funds subject to the limitations and prohibitions of the Act may be deposited into the federal account. 11 C.F.R. § 102.5(a)(1)(i). If the organization uses only one account for both federal and nonfederal purposes, only funds permissible under the Act may be deposited into such account. 11 C.F.R. § 102.5(a)(1)(ii). Commission regulations also provide a time frame for refunding impermissible contributions in order to negate their acceptance. 11 C.F.R. § 103.3(b).

The 1990 April Quarterly report filed by the Respondents disclosed a \$21,335.05 receipt from the Steven Baer Republican for Governor committee ("Baer Committee") on February 8, 1990, and a \$5,000 receipt from the National Right to Life PAC-State Fund on February 20, 1990. A letter from counsel for the National Right to Live PAC-State Fund stated that its contribution was intended for use in state and local elections.

91040324049

A representative of the Baer Committee told Commission staff that the committee had assumed the Illinois Federation for Right to Life PAC was a nonfederal organization and had intended its contribution for nonfederal purposes.<sup>1</sup> See, RAD Referral 90L-55B. The Baer Committee asked the Respondents to transfer its contributions to a nonfederal account.

In conversations and correspondence with Commission staff, the Respondents stated that they were under the impression that it could finance both federal and nonfederal election activity from a single account with no limits on donations for state purposes. Nevertheless, in response to Commission letters, on August 31, 1990, the Respondents registered a nonfederal account with the Illinois State Board of Elections. The respondents transferred \$10,854.15 to the nonfederal account on September 24, 1990. In its 1990 October Quarterly, the Respondents reported a debt of \$15,480.90 owed to the nonfederal account. This amount represented the balance of the allegedly impermissible and excessive receipts from the Baer Committee and the National Right to Life PAC-State Fund.

Through the 1990 Pre-General Election Report, the Respondents reported receipts of approximately \$43,077 and disbursements of approximately \$44,875 for the 1990 election cycle. They reported no cash on hand as of October 17, 1990, no debts owed to the

---

1. Steven Baer was a candidate in the 1990 Illinois Republican gubernatorial primary. He lost to Secretary of State Jim Edgar, who eventually won the general election. Abortion and taxes were two of the principal issues on which Baer challenged Edgar in the primary.

91040324050

committee, and the \$15,480.90 debt owed to their nonfederal account. A review of the reports filed by the Respondents indicates that most, if not all, of their financial activity in 1990 related to state and local elections. The Respondents reported \$532.21 in operating expenses, the \$10,854.15 transfers to their nonfederal account, \$4,298.13 in independent expenditures, and \$27,144.78 in other disbursements. The \$4,298.15 in independent expenditures were all on behalf of candidates for state and local offices. The \$27,144.78 in other disbursements were for expenses in connection with the 1990 Illinois primary. In that they are reported as "other disbursements," these payments apparently related to state and local offices, particularly the Respondents' support of Steven Baer for the gubernatorial nomination. No disbursements are reported as made on behalf of federal candidates or committees, and none can be identified as such.

Nevertheless, the Respondents are a federally registered political committee that operated with a single account at the time they received the contributions from the Baer Committee and the National Right to Life PAC-State Fund. Both contributions came from funds that were not subject to the limitations and prohibitions of the Act. Furthermore, the contribution from the Baer Committee exceeded the Act's limitations by \$16,335.05. Therefore, this Office recommends that the Commission find reason to believe the Respondents have violated 2 U.S.C. §§ 441a(f) and 441b and 11 C.F.R. § 102.5(a).

21040324051

**III. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that the Illinois Federal for Right to Life PAC and George Belock, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441b and 11 C.F.R. § 102.5(a).
3. Approve the appropriate letter and Factual and Legal Analysis.

Lawrence M. Noble  
General Counsel

1/7/91  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

- Attachments:
1. Referral Materials
  2. Factual and Legal Analysis

91040324052



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *SH*  
COMMISSION SECRETARY

DATE: JANUARY 11, 1991

SUBJECT: RAD REFERRAL 90L-55A - 1ST GENERAL COUNSEL'S  
REPORT DATED JANUARY 7,  
1990.

The above-captioned document was circulated to the Commission on Wed., January 9, 1991 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	<u>          </u>
Commissioner McGarry	<u>          </u>
Commissioner Thomas	<u>          </u>

This matter will be placed on the meeting agenda for TUESDAY, JANUARY 15, 1991.

Please notify us who will represent your Division before the Commission on this matter.

91040324053

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Illinois Federation for Right to )  
Life PAC and George Belock, as )  
treasurer. )

RAD Referral  
#90L-55A

(MUR)  
3217)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 17, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referral #90L-55A:

1. Open a MUR.
2. Find reason to believe that the Illinois Federal for Right to Life PAC and George Belock, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441b and 11 C.F.R. § 102.5(a)
3. Close the file.
4. Approve the Factual and Legal Analysis as recommended in the General Counsel's report signed January 7, 1991.
5. Direct the General Counsel to send a letter pursuant to the discussion held in the meeting.

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

Attest:

Jan. 23, 1991  
Date

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

21040324054



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CLOSED**

January 30, 1991

George Belock, Treasurer  
Illinois Federation for  
Right to Life PAC  
412 Langdon  
Alton, Illinois 62002

RE: MUR 3217  
Illinois Federation for  
Right to Life PAC and George  
Belock, as treasurer

Dear Mr. Belock:

On January 17, 1991, the Federal Election Commission found reason to believe that the Illinois Federation for Right to Life PAC ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b, and 11 C.F.R. § 102.5(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that the Act prohibits you from knowingly accepting contributions in excess of the limitations as provided for at 2 U.S.C. § 441a(a)(1)(C). The Act also prohibits you from knowingly accepting prohibited contributions as defined at 2 U.S.C. § 441b. You are also reminded that organizations financing both federal and nonfederal election activities may establish separate federal and nonfederal accounts to insure that funds impermissible under the Act are not commingled with funds to be used in federal election activities. You should use the federal account solely for federal activity and the nonfederal account for state and local activity. You should take immediate steps to insure that such violations do not occur in the future.

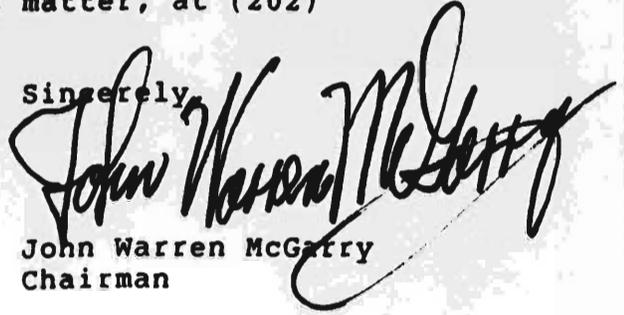
The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

21040324055

George Belock, Treasurer  
Page 2

If you have any questions, please direct them to Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



John Warren McGarry  
Chairman

Enclosure  
Factual and Legal Analysis

21040324056

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS:** Illinois Federation for Right to Life PAC and George Belock, as treasurer **MUR 3217**

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make contributions that aggregate more than \$5,000 per calendar year to any political committee that is not an authorized committee or a national party committee. 2 U.S.C. § 441a(a)(1)(C). No such political committee may knowingly accept contributions in excess of this limitation. 2 U.S.C. § 441a(f). The Act also prohibits any corporation whatever or labor organization from making contributions or expenditures in connection with any federal election and prohibits any political committee from knowingly accepting such prohibited contributions or expenditures. 2 U.S.C. § 441b. Illinois permits unlimited corporate and union contributions in state and local elections.

Commission regulations provide that organizations financing both federal and nonfederal election activities may opt to establish separate federal and nonfederal accounts. 11 C.F.R. § 102.5(a). The federal account becomes the federal political committee for purposes of the Act. Only funds subject to the limitations and prohibitions of the Act may be deposited into the federal account. 11 C.F.R. § 102.5(a)(1)(i). If the organization uses only one account for both federal and nonfederal purposes, only funds permissible under the Act may be deposited into such account. 11 C.F.R. § 102.5(a)(1)(ii).

91040324057

Commission regulations also provide a time frame for refunding impermissible contributions in order to negate their acceptance. 11 C.F.R. § 103.3(b).

The 1990 April Quarterly report filed by the Respondents disclosed a \$21,335.05 receipt from the Steven Baer Republican for Governor committee ("Baer Committee") on February 8, 1990, and a \$5,000 receipt from the National Right to Life PAC-State Fund on February 20, 1990. A letter from counsel for the National Right to Live PAC-State Fund stated that its contribution was intended for use in state and local elections. A representative of the Baer Committee told Commission staff that the committee had assumed the Illinois Federation for Right to Life PAC was a nonfederal organization and had intended its contribution for nonfederal purposes.<sup>1</sup> The Baer Committee asked the Respondents to transfer its contributions to a nonfederal account.

In conversations and correspondence with Commission staff, the Respondents stated that they were under the impression that it could finance both federal and nonfederal election activity from a single account with no limits on donations for state purposes. Nevertheless, in response to Commission letters, on August 31, 1990, the Respondents registered a nonfederal account with the Illinois State Board of Elections. The respondents

---

1. Steven Baer was a candidate in the 1990 Illinois Republican gubernatorial primary. He lost to Secretary of State Jim Edgar, who eventually won the general election. Abortion and taxes were two of the principal issues on which Baer challenged Edgar in the primary.

91040824058

transferred \$10,854.15 to the nonfederal account on September 24, 1990. In its 1990 October Quarterly, the Respondents reported a debt of \$15,480.90 owed to the nonfederal account. This amount represented the balance of the allegedly impermissible and excessive receipts from the Baer Committee and the National Right to Life PAC-State Fund.

Through the 1990 Pre-General Election Report, the Respondents reported receipts of approximately \$43,077 and disbursements of approximately \$44,875 for the 1990 election cycle. They reported no cash on hand as of October 17, 1990, no debts owed to the committee, and the \$15,480.90 debt owed to their nonfederal account. A review of the reports filed by the Respondents indicates that most, if not all, of their financial activity in 1990 related to state and local elections. The Respondents reported \$532.21 in operating expenses, the \$10,854.15 transfers to their nonfederal account, \$4,298.13 in independent expenditures, and \$27,144.78 in other disbursements. The \$4,298.15 in independent expenditures were all on behalf of candidates for state and local offices. The \$27,144.78 in other disbursements were for expenses in connection with the 1990 Illinois primary. In that they are reported as "other disbursements," these payments apparently related to state and local offices, particularly the Respondents' support of Steven Baer for the gubernatorial nomination. No disbursements are reported as made on behalf of federal candidates or committees, and none can be identified as such.

Nevertheless, the Respondents are a federally registered

91040824059

political committee that operated with a single account at the time they received the contributions from the Baer Committee and the National Right to Life PAC-State Fund. Both contributions came from funds that were not subject to the limitations and prohibitions of the Act. Furthermore, the contribution from the Baer Committee exceeded the Act's limitations by \$16,335.05. Therefore, there is reason to believe the Respondents have violated 2 U.S.C. §§ 441a(f) and 441b and 11 C.F.R. § 102.5(a).

P 1 0 4 0 3 2 4 0 5 0



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3217

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

21040324061