FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3512

DATE FILMED 8-7-92 CAMERA NO. 4

CAMERAMAN E.E.S.

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 29 August 1991

ANALYST: Kelly Huff

I. COMMITTEE: Bruno's Good Government League
(C00235077)
Glenn Griffin, Treasurer
300 Research Parkway
Birmingham, AL 35211

II. RELEVANT STATUTE: 2 U.S.C. §433(a) and 11 CFR §102.1(c)
2 U.S.C. §434(a)(4)(A)
2 U.S.C. §441a(f)
2 U.S.C. §441b(a)

III. BACKGROUND:

This is a referral of Bruno's Good Government League ("the Committee") for registering late with the Commission; failing to timely file reports for calendar year 1982 through 1989 and for the 1990 April, July and October Quarterly reporting periods; making two (2) apparent excessive contributions to two (2) federal candidate committees totalling $2500 in 1987 and 1988; receiving three (3) apparent excessive contributions from two (2) individuals totalling $15,000 in 1986; and receiving a contribution from its connected organization, totalling $1000 in 1985.

On January 9, 1989, the Committee filed its Statement of Organization with the Commission (Attachment 2), but failed to file reports of receipts and disbursements.

The Committee was sent prior notice for the following reports on the following dates: 1989 Mid-Year sent on June 26, 1989; 1989 Year End sent on December 27, 1989; 1990 April Quarterly sent on March 22, 1990; 1990 July Quarterly sent on June 21, 1990; and 1990 October Quarterly sent on September 21, 1990 (Attachment 3).

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On November 27, 1990, the Committee filed its 30 Day Post-General Election Report in a timely manner, the first report the Committee filed since registration (Attachment 4).

On December 21, 1990, the Committee filed comprehensive Year End Reports covering calendar years 1982 through 1988, special election reports covering calendar year 1989[1/], and reports covering calendar year 1990 prior to the 30 Day Post-General Election Report (Attachments 5 through 20). The comprehensive Year End Reports for 1982 through 1986 disclose that the Committee engaged in federal activity prior to its registration date of January 9, 1989 and failed to register with the Commission within ten (10) days of its establishment by its connected organization.

The Committee's 1987 Year End Report disclosed an undesignated $2500 contribution to the Richard Shelby Campaign ("the Shelby Committee") on February 17, 1987 (Attachment 21).

On February 20, 1991, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI notified the Committee that the Act precluded a political committee, other than a multi-candidate committee, from making a contribution to a federal candidate in excess of $1000 per election. The RFAI recommended the Committee refund and/or redesignate the excessive amount (Attachment 22).

On February 27, 1991, the Reports Analysis Division ("RAD") analyst spoke with Phyllis Coggin, a representative for the Committee. Ms. Coggin and the RAD analyst discussed all the letters that were sent to the Committee. Ms. Coggin said she would file amended reports as soon as possible. During the conversation Ms. Coggin mentioned she had filed comprehensive Year End Reports for calendar years 1982 through 1986. The RAD analyst explained that there was no record of these reports and recommended she file copies of the reports.[2/] Ms. Coggin said she would file the reports again and a copy of the December 21, 1990 certified mail receipt (Attachment 23).

1/ It appears that two (2) of the "special election" reports are the 1989 Mid-Year and Year End Reports.

2/ Comprehensive Year End Reports for calendar years 1982 through 1986 were filed on December 21, 1990 but not entered into the database. Because the documents covered calendar years prior to the Committee's registration of January 9, 1989, they could not be entered into their respective databases. Therefore, the RAD analyst was not aware these documents existed at the time of the conversation with Ms. Coggins.

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On March 5, 1991, the Committee sent its amended 1987 Year End Report to the Commission. The Committee stated that a $1500 refund was requested from the Shelby Committee (Attachment 24).

The Committee's 1985 Year End Report disclosed a contribution received from the Committee's connected organization, totalling $1000 on August 20, 1985 (Attachment 25).

On May 15, 1991, an RFAI was sent to the Committee referencing the 1985 Year End Report. The RFAI notified the Committee that a contribution from a corporation was impermissible and recommended the Committee refund and/or transfer out the funds (Attachment 26).

The Committee's 1986 Year End Report disclosed three (3) excessive contributions received from two (2) individuals, totalling $15,000. One excessive contribution for $5000 was received from one (1) individual on June 13, 1986. The two (2) other excessive contributions for $5000 each were received from the other individual on June 16, 1986 and June 25, 1986 (Attachment 27).

On May 15, 1991, an RFAI was sent to the Committee referencing the 1986 Year End Report. The RFAI notified the Committee that an individual was limited to a $5000 annual contribution limit. The RFAI recommended the Committee refund and/or reattribute any contribution(s) that were excessive (Attachment 28).

On May 29, 1991, Ms. Coggin called the RAD analyst and said that the contribution from the corporation reported on the 1985 Year End Report had already been refunded and reported on the 1990 30 Day Post-General Election Report. She also stated that the receipt of excessive contributions from the individuals would be refunded (Attachment 29).

The Committee's 1990 30 Day Post-General Report disclosed a $1000 refund to the Committee's connected organization on November 19, 1990 (Attachment 30).

The Committee's 1988 Year End Report disclosed an undesignated contribution, totalling $2000 to the Ronnie Flippo Committee on September 8, 1988 (Attachment 31).

The Committee's 1989 12 Day Pre-Special Election Report disclosed a $1000 refund from the Ronnie Flippo Committee on January 17, 1989[3/] (Attachment 32).

3/ The date of the refund is reported as January 17, 1990; however, the report covered January 1 through March 15, 1989. It appears, therefore, that the refund was received January 17, 1989.

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On August 2, 1991, an Informational Notice ("IN") was sent to the Committee referencing the 1989 12 Day Pre-Special Election Report. The IN notified the Committee that the Commission had noted the refund to the excessive contribution from the Ronnie Flippo Committee (Attachment 33).

The Committee's 1991 Mid-Year Report disclosed on Schedule D a $5000 and a $10,000 debt owed to the two (2) individuals for the excessive portion of the contributions they made to the Committee (Attachment 34). An accompanying statement noted that the two (2) individuals "have agreed upon a schedule of repayment". The Committee's report also disclosed on Schedule A a $1500 "reimbursement" from the Shelby Committee, received on April 2, 1991.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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REPORT OF RECEIPTS AND DISBURSEMENTS
REPORTING HISTORY

YEAR/REPORT	COVERAGE DATES	DUE DATE	FILING DATE
1982			
April Quarterly	1/1/82-3/31/82	4/15/82	12/21/90
July Quarterly	4/1/82-6/30/82	7/15/82	12/21/90
October Quarterly	7/1/82-9/30/82	10/15/82	12/21/90
30 Day Post-General	10/01/82-11/26/82	12/2/82	12/21/90
Year End*	11/27/82-12/31/82	1/31/83	12/21/90
1983			
Mid Year	1/1/83-6/30/83	7/31/83	12/21/90
Year End*	7/1/83-12/31/83	1/31/84	12/21/90
1984			
April Quarterly	1/1/84-3/31/84	4/15/84	12/21/90
July Quarterly	4/1/84-6/30/84	7/15/84	12/21/90
October Quarterly	7/1/84-9/30/84	10/15/84	12/21/90
12 Day Pre-General	10/1/84-10/17/84	10/25/84	12/21/90
30 Day Post-General	10/18/84-11/26/84	12/6/84	12/21/90
Year End*	11/27/84-12/31/84	1/31/85	12/21/90
1985			
Mid Year	1/1/85-6/30/85	7/31/85	12/21/90
Year End*	7/1/85-12/31/85	1/31/86	12/21/90
1986			
April Quarterly	1/1/86-3/31/86	4/15/86	12/21/90
July Quarterly	4/1/86-6/30/86	7/15/86	12/21/90
October Quarterly	7/1/86-9/30/86	10/15/86	12/21/90
30 Day Post-General	10/01/86-11/24/86	12/4/86	12/21/90
Year End*	11/25/86-12/31/86	1/31/87	12/21/90
1987			
Mid Year	1/1/87-6/30/87	7/31/87	12/21/90
Year End*	7/1/87-12/31/87	1/31/88	12/21/90
1988			
April Quarterly	1/1/88-3/31/88	4/15/88	12/21/90
July Quarterly	4/1/88-6/30/88	7/15/88	12/21/90
October Quarterly	7/1/88-9/30/88	10/15/88	12/21/90
30 Day Post-General	10/01/88-11/28/88	12/8/88	12/21/90
Year End*	11/29/88-12/31/88	1/31/89	12/21/90
1989			
12 Day Pre-Special	1/1/89-3/15/89	3/23/89	12/21/90
30 Day Post-Special	3/16/89-4/24/89	5/4/89	12/21/90
30 Day Post-Special **	4/25/89-7/30/89	7/31/89	12/21/90
30 Day Post-Special **	7/30/89-12/31/89	1/31/90	12/21/90
1990			
April Quarterly	1/1/90-3/31/90	4/15/90	12/21/90
July Quarterly	4/1/90-6/30/90	7/15/90	12/21/90
October Quarterly	7/1/90-9/30/90	10/15/90	12/21/90
12 Day Pre-General	10/1/90-10/17/90	10/25/90	12/21/90
30 Day Post-General	10/18/90-11/26/90	12/6/90	11/27/90
Year End	11/27/90-12/31/90	1/31/91	1/23/91

*The Committee filed only comprehensive reports covering the entire calendar year.
**The Committee called these the 30 Day Post Special Reports; however, they appear to be the Mid-Year and Year-End Reports.

COMPREHENSIVE AMENDED YEAR-END REPORTS FILED JUNE 12, 1991 BY BRUNO'S GOOD GOVERNMENT LEAGUE COMMITTEE

COVERAGE DATES	BEG. CASH-ON-HAND	RECEIPTS	DISBURSEMENTS	ENDING CASH-ON-HAND	DEBTS OWED TO/BY
1/1/82-12/31/82	$ 386	$ 9,625	$ 9,925	$ 86	$0
1/1/83-12/31/83	$ 86	$ 5,000	$ 4,900	$ 186	$0
1/1/84-12/31/84	$ 186	$10,200	$ 3,500	$ 6,886	$0
1/1/85-12/31/85	$ 6,886	$ 9,900	$ 4,250	$12,536	$0
1/1/86-12/31/86	$12,536	$29,000	$30,650	$10,286	$0

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

DATE 29JUL91

COMMITTEE DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES / TYPE OF FILER	# OF PAGES	MICROFILM LOCATION
BRUND'S GOOD GOVERNMENT LEAGUE			ID #C00235077 NON-PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION:					
1987 YEAR-END	7,700	5,700	1JAN87 -31DEC87	8	91FEC/679/3342
YEAR-END - AMENDMENT	7,700	5,700	1JAN87 -31DEC87	10	91FEC/689/4524
REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31DEC87	3	91FEC/688/2302
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -31DEC87	1	91FEC/690/0676
1988 YEAR-END	11,500	19,250	1JAN88 -31DEC88	8	91FEC/679/3350
YEAR-END - AMENDMENT	11,500	19,250	1JAN88 -31DEC88	8	91FEC/689/4534
REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31DEC88	1	91FEC/688/2306
TOTAL	19,200 0	24,950 0		39	TOTAL PAGES

All reports listed have been reviewed.

Ending cash-on-hand as of 12/31/88: $4536.00

Debts and obligations owed to the committee as of 12/31/88: $0.00

Debts and obligations owed by the committee as of 12/31/88: $0.00

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FEDERAL ELECTION COMMISSION
1989-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 14AUG91
PAGE 1

COMMITTEE / DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			TYPE OF FILER		
BRUND'S GOOD GOVERNMENT LEAGUE			ID C00235077	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: BRUND'S					
1989 STATEMENT OF ORGANIZATION			9JAN89	3	89FEC/576/3893
REQUEST FOR ADDITIONAL INFORMATION			1FEB89	1	89FEC/582/1371
STATEMENT OF ORGANIZATION - AMENDMENT			14FEB89	3	89FEC/585/2141
PRE-SPECIAL	1,000	2,250	1JAN89 -15MAR89	6	91FEC/679/3358
PRE-SPECIAL - AMENDMENT	1,000	2,250	1JAN89 -15MAR89	7	91FEC/689/0230
1'ST LETTER INFORMATIONAL NOTICE			1JAN89 -15MAR89	1	91FEC/687/5072
1'ST LETTER INFORMATIONAL NOTICE			1JAN89 -15MAR89	2	91FEC/707/0693
POST-SPECIAL	0	500	16MAR89 -24APR89	4	91FEC/679/3364
POST-SPECIAL - AMENDMENT	0	500	16MAR89 -24APR89	4	91FEC/689/0237
POST-SPECIAL	0	0	25APR89 -30JUL89	3	91FEC/679/3368
POST-SPECIAL - AMENDMENT	0	0	25APR89 -30JUL89	3	91FEC/689/0241
POST-SPECIAL	13,109	6,450	30JUL89 -31DEC89	9	91FEC/679/3371
POST-SPECIAL - AMENDMENT	13,109	6,450	30JUL89 -31DEC89	9	91FEC/689/0244
POST-SPECIAL - AMENDMENT	13,109	6,450	30JUL89 -31DEC89	10	91FEC/689/4542
REQUEST FOR ADDITIONAL INFORMATION			30JUL89 -31DEC89	1	91FEC/688/2298
1990 MISCELLANEOUS REPORT TO FEC			21DEC90	33	91FEC/679/3309
APRIL QUARTERLY	0	3,500	1JAN90 -31MAR90	5	91FEC/679/3380
JULY QUARTERLY	1,000	6,700	1APR90 -30JUN90	6	91FEC/679/3385
JULY QUARTERLY - AMENDMENT	1,000	6,700	1APR90 -30JUN90	6	91FEC/689/4552
REQUEST FOR ADDITIONAL INFORMATION			1APR90 -30JUN90	1	91FEC/688/2300
OCTOBER QUARTERLY	15,800	2,250	1JUL90 -30SEP90	7	91FEC/679/3391
OCTOBER QUARTERLY - AMENDMENT	15,800	2,250	1JUL90 -30SEP90	8	91FEC/689/4558
REQUEST FOR ADDITIONAL INFORMATION			1JUL90 -30SEP90	1	91FEC/688/2293
PRE-GENERAL	0	400	10CT90 -17OCT90	5	91FEC/687/1999
POST-GENERAL	0	1,100	18OCT90 -26NOV90	5	90FEC/675/1384
POST-GENERAL - AMENDMENT	0	1,100	18OCT90 -26NOV90	5	91FEC/689/4566
REQUEST FOR ADDITIONAL INFORMATION			18OCT90 -26NOV90	2	91FEC/688/2295
YEAR-END	0	6,250	26NOV90 -31DEC90	5	91FEC/683/0503
1991 MISCELLANEOUS REPORT TO FEC			27FEB91	39	91FEC/689/5343
MISCELLANEOUS REPORT TO FEC			12JUN91	39	91FEC/698/2032
TOTAL	30,909 0	29,400 0		233	TOTAL PAGES

All reports listed have been reviewed.
Ending cash-on-hand as of 12/31/90: $6045.44
Debts and obligations owed by/to the Committee as of 12/31/90: $0

The reports reflecting financial activity from 1982 through 1986 are indexed as "Miscellaneous Reports" (see bracketed reports above).

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FEDERAL ELECTION COMMISSION
1991-1992
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 14AUG91
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER		
BRUNO'S GOOD GOVERNMENT LEAGUE						ID #C00235077	NON-PARTY	NON-QUALIFIED
CONNECTED ORGANIZATION: BRUNO'S								
	1991 MID-YEAR REPORT	1,500		1,600		1JAN91 -30JUN91	12	91FEC/708/4958
	TOTAL	1,500	0	1,600	0		12	TOTAL PAGES

All reports have been reviewed.
Ending cash-on-hand as of 6/30/91: $5945
Outstanding debts owed by the Committee as of 6/30/91: $15000
Outstanding bebts owed to the Committee as of 6/30/91: $4000

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ATTACHMENT 2

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

RECEIVED FEDERAL ELECTION COMMISSION

1 (a) NAME OF COMMITTEE IN FULL — (Check if name is changed)
Bruno's Good Government League

2 DATE

(b) Number and Street Address — ☐ (Check if address is changed)
300 Research Parkway

3 FEC IDENTIFICATION NUMBER

88 MAY -4 AM 9:24

(c) City, State and ZIP Code
Birmingham, Alabama 35211

4 IS THIS STATEMENT AN AMENDMENT? ☐ YES ☒ NO

5 TYPE OF COMMITTEE (Check one)

☐ (a) This committee is a principal campaign committee (Complete the candidate information below.)

☐ (b) This committee is an authorized committee and is NOT a principal campaign committee (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State District

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party

☒ (e) This committee is a separate segregated fund

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Bruno's	P. O. Box 2486 Birmingham, AL 35201	Administrator

Type of Connected Organization
☒ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7 Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Glenn J. Griffin 205/940-9400	P. O. Box 2486 Birmingham, AL 35201	Treasurer

8 Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Glenn J. Griffin	P. O. Box 2486	Treasurer
Evelyn Tetshrany	P. O. Box 2486	Assistant Treasurer

9 Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
AmSouth Bank N.A.	1900 Fifth Averue, North Birmingham, AL 35203

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

TYPE OR PRINT NAME OF TREASURER — SIGNATURE OF TREASURER — DATE

Glenn J. Griffin — 2/22/88

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact: Federal Election Commission, Washington, D.C. 20463

FEC FORM 1 (revised 4/88)

SEMI-ANNUAL

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS — June 26, 1989

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
Mid-Year	01/01/89**-06/30/89	07/31/89	07/31/89

WHO MUST FILE
PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) which normally file on a quarterly basis must file a Mid-Year Report in July.

WHAT MUST BE REPORTED
All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS
Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE
Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

COMPLIANCE
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS OR UNAPPROVED SCHEDULES WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.
**Or from the close of books of the last report filed. If no previous reports filed, the date of the committee's first activity.

FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

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YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1989

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WHO MUST FILE
PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year-End Report in January.

REPORTING DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD[1]	REG./CERT. MAILING DATE[2]	FILING DATE
Year-End	07/01/89-12/31/89	01/31/90	01/31/90

The Year-End Report is due January 31, 1990, and must disclose financial activity that occurred from July 1 through December 31, 1989. Committees which have previously filed 1989 reports should only report activity from the closing date of the last report filed.

II. Monthly Filers

REPORT	REPORTING PERIOD[1]	REG./CERT. MAILING DATE[2]	FILING DATE
Year-End	12/01/89-12/31/89	01/31/90	01/31/90

Committees that chose to file on a monthly basis must file the Year-End Report due January 31, 1990. The report must disclose financial activity from December 1 through December 31, 1989. 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
All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS
Use Form 3X (enclosed) for all reports.

WHERE TO FILE
Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

1/ The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

2/ Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class must be received by the filing date.

(over)

LABEL
Affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

COMPLIANCE
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS OR UNAPPROVED SCHEDULES WILL BE REQUIRED TO REFILE.

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.

1990 REPORTING
PARTIES AND PACs
Committees should refer to the January 1990 Record for primary election dates and further reporting information.

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QUARTERLY

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
April Quarterly	01/01/90**-03/31/90	04/15/90	04/15/90

WHO MUST FILE
PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a Quarterly Report in April.

WHAT MUST BE REPORTED
Disclose all financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS
Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE
Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING
Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES
Committees which make an independent expenditure of $1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

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*The mailing date is a holiday; nevertheless, the report must be received by the filing date. Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class must be received by the filing date.

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

(over)

COMPLIANCE
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

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FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

QUARTERLY

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
July Quarterly	04/01/90**-06/30/90	07/15/90	07/15/90

WHO MUST FILE
PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a quarterly report in July.

WHAT MUST BE REPORTED
Disclose all financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS
Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE
Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING
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LAST-MINUTE INDEPENDENT EXPENDITURES
Committees which make an independent expenditure of $1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class must be received by the filing date.
**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

FOR INFORMATION, call (202)376-3120 or 1(800)424-9530

9204091432 2

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1990

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
October Quarterly	07/01/90**-09/30/90	10/15/90	10/15/90

WHO MUST FILE
PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a Quarterly Report in October.

WHAT MUST BE REPORTED
Disclose all financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS
Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE
Consult the instructions on the back of the Summary Page of Form 3X. Note State filing requirements also.

LABEL
Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING
Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES
Committees which make an independent expenditure of $1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

---

*Reports sent by registered or certified mail will be considered filed on the date of the U.S. postmark. Reports hand delivered or mailed first class must be received by the filing date.

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

(over)

'92040914323

PARTIES AND PACS OCTOBER QUARTERLY

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

9204091432 4

FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

Bruno's
INC.
P.O. BOX 2186 BIRMINGHAM, AL 35201

320 RESEARCH PARKWAY
BIRMINGHAM, ALABAMA 35211
(205) 940 9000

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 DEC -8 AM 10: 16

November 26, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

P 979 137 332

Federal Election Commission
999 E Street, N.E.
Washington, D.C. 10473

Re: Bruno's,Inc. Good Government League

Dear Sir:

Enclosed you will find the Post Election Report of Receipts and Disbursements for the period covering October 18 through November 26, 1990.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Glenn J. Griffin
Treasurer

GJG/et
Enclosures

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
90 DEC -8 AM 10:14

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ 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 Nov. 6 in the State of AL

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 10/18/90 through 11/26/90		
6	(a) Cash on Hand January 1, 19 90		$ 9,445.44
	(b) Cash on Hand at Beginning of Reporting Period	$ 13,395.44	
	(c) Total Receipts (from Line 18)	$ -0-	$ 16,800.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ -0-	$ 26,245.44
7	Total Disbursements (from Line 28)	$ 1,100.00	$ 13,950.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 12,295.44	$ 12,295.44
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY 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

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
Glenn Griffin, Treasurer

Signature of Treasurer

Date
11-27-90

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)

9204097 4326
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BROTE & PERMUTT, P.C.

CERTIFIED

P 479 137 332

MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. 10463

2002 -6 AM 10:

ATTACHMENT 4
Page 3 of 3

Bruno's
INC.
P O BOX 24[illegible] - BIRMINGHAM, AL 35[illegible]

300 RESEARCH PARKWAY
BIRMINGHAM, ALABAMA 35211
(205) 940 9400

FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
91 JAN -2 PM 1:26

December 14, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: Bruno's, Inc. Good Government League

Dear Sir:

Enclosed you will find the Reports of Receipts and Disbursements for the periods covering the years 1982 through 1989 and the Preelection Report for the year 1990. We have filed a Post Election Report. It has recently come to our attention that we had not been filing certain reports and we wish to do what we can to correct this situation.

Our formal statement of Organization was filed on January 9, 1989, however it is now our understanding that any contributions given to a Federal candidate before that time would make us a Federal PAC for disclosure purposes. We have checked our records and find that in 1982 we gave to Federal candidates so we have enclosed year end disclosure reports of Receipts and Disbursements for the years 1982 through 1988.

If you have any questions or if I need to file further reports, please do not hesitate to contact me.

Sincerely,

Glenn J. Griffith
Treasurer

GJG/et
Enclosures

2 1 0 3 6 7 9 3 3 0 0

(Summary Page)

91 JAN -2 PM 1:26

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ 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

5. Covering Period 1/1/82 through 12/31/82

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 82		$ 386.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 386.00	
	(c) Total Receipts (from Line 18)	$ 9,625.00	$ 9,625.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 10,011.00	$ 10,011.00
7.	Total Disbursements (from Line 28)	$ 9,925.00	$ 9,925.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 86.00	$ 86.00
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ - 0 -	
10.	Debts and Obligations Owed BY 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

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
Glenn Griffin

Signature of Treasurer

Date 12/14/90

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)

92034097439 39

OFFICES OF
& PERMUTT, P.C.
TON AVENUE NORTH
FICE BOX 55727
AM ALABAMA 35205

MAIL

12/21/96 (47)

ALA

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~10473~~
20473

91 JAN -2 PM 1:26

OFFICE SERVICES BRANCH

ATTACHMENT 5
Page 3 of 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF PUBLIC RECORDS

91 JAN -2 PM 1:26

USE FEC ENVELOPE LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

2 FEC IDENTIFICATION NUMBER
C00235077

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

3 ☐ 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 ☐ March 20 ☐ April 20 ☐ May 20 ☐ June 20 ☐ July 20 ☐ August 20 ☐ September 20 ☐ October 20 ☐ November 20 ☐ December 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 01/01/83 through 12/31/83		
6 (a) Cash on Hand January 1, 19 83		$ 86.00
(b) Cash on Hand at Beginning of Reporting Period	$ 86.00	
(c) Total Receipts (from Line 16)	$ 5,000.00	$ 5,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 5,086.00	$ 5,086.00
7 Total Disbursements (from Line 28)	$ 4,900.00	$ 4,900.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 186.00	$ 186.00
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
Glenn Griffin, Treasurer

Signature of Treasurer
Date 12/14/90

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

FEC FORM 3X
(Revised 4/87)

91U367933 17

OFFICES OF
& PERNUTT, P.C.
GTON AVENUE SOUTH
OFFICE BOX 98727
AM, ALABAMA 35255

MAIL

FIRST CLASS MAIL

[redacted]

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20473~~
20473

ATTACHMENT 6
Page 2 of 2

91 JUN -2 PM 1:26

ATTACHMENT 7

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

OFFICE OF THE SECRETARY, FEDERAL ELECTION COMMISSION
PUBLIC SERVICES BRANCH

91 JUL -2 PM 1:26

1. NAME OF COMMITTEE (IN FULL)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has changed since last report filed
300 Research Parkway

2. FEC IDENTIFICATION NUMBER
C00235077

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

3. ☐ 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 Sub Ctr
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelve day report following the General Election on _____ in the State of _____.

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY Covering Period 01/01/89 through 12/31/89	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19 89		$ 86.00
(b) Cash on Hand at Beginning of Reporting Period	$ 86.00	
(c) Total Receipts (from Line 18)	$ 5,000.00	$ 5,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 5,086.00	$ 5,086.00
7. Total Disbursements (from Line 28)	$ 4,900.00	$ 4,900.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 186.00	$ 186.00
9. Debts and Obligations Owed TO the Committee (Names 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 (Names 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
Glenn Griffin, Treasurer

Signature of Treasurer
[signature]

Date 12/14/90

NOTE: Submission of false, conflicting, 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)

9103679331 7

8 2 0 4 0 8 1 4 3 3 4

J 2344 549 303 3

MAIL

OFFICES OF
PERMUTT, P.C.
ON AVENUE SOUTH
ICE BOX 58727
ALABAMA 35255

BIRMINGHAM AL 12/21/90

U.S. POSTAGE 34 55

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20473~~
20473

ATTACHMENT 7
Page 2 of 2

OFFICE OF GENERAL COUNSEL
91 JAN -2 PM 1:26

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than All Authorized Committees
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
91 JAN -2 PM 1:26

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235677

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

USE BLACK INK ONLY

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

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelve day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 01/01/84 through 12/31/84

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
	(a) Cash on Hand January 1, 19 84		$ 186.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 186.00	
	(c) Total Receipts (from Line 18)	$ 10,200.00	$ 10,200.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 10,386.00	$ 10,386.00
7.	Total Disbursements (from Line 29)	$ 3,500.00	$ 3,500.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 6,886.00	$ 6,886.00
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10.	Debts and Obligations Owed BY 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

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
Glenn Griffin, Treasurer

Signature of Treasurer
Glenn Griffin

Date 12/14/90

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)

9103679332 2

0 3 6 7 9 3 3

P 494 549 203

MAIL

OFFICES OF
PERMUTT, P.C.
TON AVENUE SOUTH
ICE BOX 55727
, ALABAMA 35255

FIRST CLASS MAIL

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.N.
Washington, D.C. 20473

20473

OFFICE SERVICES BRANCH

91 JUN -2 PM 11:26

ATTACHMENT B
Page 2 of 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
DATA SERVICES BRANCH
91 JAN -2 PM 1:26

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has changed since last report
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☒ This committee qualified as a multicandidate committee DURING THIS Reporting Period on 5-22-85 (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

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelve day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 01/01/85 through 12/31/85

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 85		$ 6,886.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 6,886.00	
	(c) Total Receipts (from Line 18)	$ 9,900.00	$ 9,900.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 16,786.00	$ 16,786.00
7.	Total Disbursements (from Line 28)	$ 4,250.00	$ 4,250.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 12,536.00	$ 12,536.00
9.	Debts and Obligations Owed TO the Committee (Names all on Schedule C and/or Schedule D)	$ -0-	
10.	Debts and Obligations Owed BY the Committee (Names 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

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
Glenn Griffin, Treasurer

Signature of Treasurer

Date 12/14/90

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)

21036793329

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349 303

MAIL

OFFICES OF
PERRUTT, P.C.
TON AVENUE SOUTH
ICE BOX 88727
, ALABAMA 35208

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
20473

91 JUN -2 PM 1:26

ATTACHMENT 9
Page 2 of 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF PUBLIC SERVICES BRANCH
'90 JAN -2 PM 1:26

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has previously reported
300 Research Parkway

2. FEC IDENTIFICATION NUMBER
C00235077

CITY, STATE and ZIP CODE
Birmingham, Alabama 35213

3. ☐ 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

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirty day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 01/01/86 through 12/31/86

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19 86		$ 12,536.00
(b) Cash on Hand at Beginning of Reporting Period	$ 12,536.00	
(c) Total Receipts (from Line 18)	$ 29,000.00	$ 29,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 41,536.00	$ 41,536.00
7. Total Disbursements (from Line 32)	$ 30,650.00	$ 30,650.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 10,886.00	$ 10,886.00
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY 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

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
Glenn Griffin, Treasurer

Signature of Treasurer
Glenn Griffin

Date
10/14/90

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

FEC FORM 3X
(Revised 4/87)

92080897A33369

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MAIL

OFFICES OF
PERRUTT, P.C.
ON AVENUE SOUTH
OX BOX 59787
ALABAMA 35259

FIRST CLASS MAIL

CERTIFIED MAIL - [redacted]

Federal Election Commission
999 E Street, N.E.
Washington, D.C. 20473

20473

91 JUN -2 PM 1:26

OFFICE OF GENERAL COUNSEL

ATTACHMENT 10
Page 2 of 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF RECORDS MANAGEMENT
91 JAN -2 PM 1:26

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ CHECK if address has changed since previously reported
100 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235877

3. ☐ This committee qualified as a multicandidate committee during the 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

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirty day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 01/01/87 through 12/31/87

		COLUMN A This Period	COLUMN B Calendar Year-to-date
6	(a) Cash on Hand January 1, 19 87		$ 10,286.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 10,286.00	
	(c) Total Receipts (from Line 19)	$ 7,700.00	$ 7,700.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 17,986.00	$ 17,986.00
7	Total Disbursements (from Line 28)	$ 5,700.00	$ 5,700.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 12,286.00	$ 12,286.00
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY 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

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
Glenn J. Griffin

Signature of Treasurer

Date 12/14/90

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

FEC FORM 3X
(revised 4/87)

21036793342

92040914342

0 3446 349303 3

MAIL

OFFICES OF
PERRUTT, P.C.
[illegible] AVENUE SOUTH
[illegible] 35757
ALABAMA 35205

FIRST CLASS MAIL

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

20463

92 JUN -2 PM 4:26

MAIL SERVICES BRANCH

ATTACHMENT 11
Page 2 of 2

ATTACHMENT 12

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF SERVICES BRANCH

91 JAN -2 PM 1:26

1. NAME OF COMMITTEE (IN FULL)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has changed since previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, AL 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period as of _____ (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 20

☐ Twelve day report preceding _____ (type of Election) election on _____ in the State of _____

☐ Thirty 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 01/01/88 through 12/31/88		
6. (a) Cash on Hand January 1, 19 88		$ 12,286.00
(b) Cash on Hand at Beginning of Reporting Period	$ 12,286.00	
(c) Total Receipts (from Line 19)	$ 11,500.00	$ 11,500.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 23,786.00	$ 23,786.00
7. Total Disbursements (from Line 28)	$ 19,250.00	$ 19,250.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 4,536.00	$ 4,536.00
9. Debts and Obligations Owed TO the Committee (Names all on Schedule C and/or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Names 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

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

Typed or Print Name of Treasurer
Glenn J. Griffin

Signature of Treasurer

Date 1/14/90

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

FEC FORM 3X
(Revised 4/87)

9218434097134354603

9204091414

0 3446 7933

MAIL

OFFICES OF
PERMUTT, P.C.
[illegible] AVENUE SOUTH
[illegible]
[illegible], ALABAMA 35205

U.S. POSTAGE
$4.15

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20475~~
20473

91 JUN -2 PM 1:26

OFFICE SERVICES BRANCH

ATTACHMENT 12
Page 2 of 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JAN -2 PM 1:27

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2 FEC IDENTIFICATION NUMBER
C00235077

3 ☐ 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 ☐ March 20 ☐ April 20 ☐ May 20 ☐ June 20 ☐ July 20 ☐ August 20 ☐ September 20 ☐ October 20 ☐ November 20 ☐ December 20 ☐ January 31

☒ Twelfth day report preceding Special (Type of Election) election on April 4 in the State of Alabama

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5 Covering Period 1-1-89 through 3/15/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)	Cash on Hand January 1, 19 89		$ 4,536.00
6(b)	Cash on Hand at Beginning of Reporting Period	$ 4,536.00	
6(c)	Total Receipts (from Line 18)	$ 1,000.00	$ 1,000.00
6(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 5,536.00	$ 5,536.00
7	Total Disbursements (from Line 28)	$ 2,250.00	$ 2,250.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 3,286.00	$ 3,286.00
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY 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

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
Glenn J. Griffin, Treasurer

Signature of Treasurer

Date 12/14/90

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)

2103679335 8

OFFICES OF
PERMUTT, P.C.
ON AVENUE SOUTH
ICE BOX 58727
ALABAMA 35255

P 367933
494 549 303
MAIL

BIRMINGHAM ALA.
U.S. POSTAGE
$4.95

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20475~~
20473

Attachment 13
Page 2 of 2

OFFICE SERVICES BRANCH
91 JAN -2 PM 1:26

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

91 JAN -2 PM 1:27

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different than previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ 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 ☐ March 20 ☐ April 20 ☐ May 20 ☐ June 20 ☐ July 20 ☐ August 20 ☐ September 20 ☐ October 20 ☐ November 20 ☐ December 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Twelfth day report following the Special Election on April 4 in the State of Alabama

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5 Covering Period 3/16/89 through 4/24/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)	Cash on Hand January 1, 19 89		$ 4,536.00
(b)	Cash on Hand at Beginning of Reporting Period	$ 3,286.00	
(c)	Total Receipts (from Line 18)	$ -0-	$ 1,000.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,286.00	$ 5,536.00
7	Total Disbursements (from Line 28)	$ 500.00	$ 2,750.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,786.00	$ 2,786.00
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY 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

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
Glenn J. Griffin

Signature of Treasurer

Date 12/14/90

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)

9204091434347
3679335364

0 3 6 7 9 3 3

MAIL

OFFICES OF
FERNUTT, P.C.
ON AVENUE SOUTH
ICE BOX 98727
ALABAMA 35255

BIRMINGHAM ALA

U.S. POSTAGE

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Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20473~~
20473

91 JAN -2 PM 1:26

OFFICE SERVICES BRANCH

ATTACHMENT 14
Page 2 of 2

ATTACHMENT 15

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEC MAIL PROCESSING
OFFICE SERVICES BRANCH

91 JAN -2 PM 1:26

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)

Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different from previously reported

300 Research Parkway

CITY, STATE and ZIP CODE

Birmingham, Al 35211

2 FEC IDENTIFICATION NUMBER

C00235077

3 ☐ 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 _____

☒ Twelfth day report following the Special Election on April 4 in the State of Alabama

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5 Covering Period 4/25/89 through 7/30/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
(a)	Cash on Hand January 1, 1989		$ 4,536.00
(b)	Cash on Hand at Beginning of Reporting Period	$ 2,786.00	
(c)	Total Receipts (from Line 18)	$ -0-	$ 1,000.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 2,786.00	$ 5,536.00
7	Total Disbursements (from Line 28)	$ -0-	$ 2,750.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,786.00	$ 2,786.00
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY 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

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

Glenn J. Griffin

Signature of Treasurer

Date 12/14/90

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)

91U36793369

92040914350

0 3449 549 303 4

MAIL

OFFICES OF
PERMUTT, P.C.
ON AVENUE SOUTH
ICE BOX 98727
ALABAMA 35255

BIRMINGHAM ALA. 0751005

U.S. POSTAGE 4 15

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~40473~~
20473

ATTACHMENT 15
Page 2 of 2

OFFICE SERVICES BRANCH
91 JAN -2 PM 1:26

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF PUBLIC RECORDS
91 JAN -2 PM 1:27

1. NAME OF COMMITTEE (IN FULL)
Bruno's Good Government League

ADDRESS (number and street) ☐ CHECK IF ADDRESS HAS CHANGED SINCE PREVIOUSLY REPORTED
300 Research Parkway

2. FEC IDENTIFICATION NUMBER
C00233077

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

3. ☐ This committee qualified as a multicandidate committee through 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 20

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Twelve day report following the Special Election on April 4 in the State of Alabama

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 7/30/89 through 12/31/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 89		$ 4,536.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 2,786.00	
	(c) Total Receipts (from Line 16)	$ 13,109.44	$ 14,109.44
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 15,895.44	$ 18,645.44
7.	Total Disbursements (from Line 28)	$ 6,450.00	$ 9,200.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 9,445.44	$ 9,445.44
9.	Debts and Obligations Owed TO the Committee (Names all on Schedule C and/or Schedule D)	$ -0-	
10.	Debts and Obligations Owed BY the Committee (Names all on Schedule C and/or Schedule E)	$ -0-	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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
Glenn Griffin

Signature of Treasurer

Date 12/14/90

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)

9912030460946861

9204091435 2

0 3 4 7 9 3 3

MAIL

OFFICES OF
FERNUTT, P.C.
YON AVENUE SOUTH
ICE BOX 55727
, ALABAMA 35255

U.S. POSTAGE
$4.95

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Federal Election Commission
999 E Street, N.E.
Washington, D.C. 20473

20473

ATTACHMENT 16
Page 2 of 2

91 JUN -2 PM 1:26

OFFICE SERVICES BRANCH

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
SYSTEM SERVICES BRANCH
91 JAN -2 PM 1:27

1. NAME OF COMMITTEE (IN FULL)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if different from previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ This committee filed as a multicandidate committee during the 1990 Reporting Period as _____ (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

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelve 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 01/01/90 through 03/31/90		
	(a) Cash on Hand January 1, 19 90		$ 9,443.44
	(b) Cash on Hand at Beginning of Reporting Period	$ 9,443.44	
	(c) Total Receipts (from Line 19)	$ -0-	$ -0-
	(d) Subtotal (add Lines 5(b) and 5(c) for Column A and Lines 5(a) and 5(c) for Column B)	$ 9,443.44	$ 9,443.44
7.	Total Disbursements (from Line 30)	$ 3,500.00	$ 3,500.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 5(d))	$ 5,943.44	$ 5,943.44
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10.	Debts and Obligations Owed BY 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

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
Glenn Griffin, Treasurer

Signature of Treasurer
Date 12/14/90

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)

9103679380

9 2 0 4 0 9 1 4 3 5 4

0 3 4 4 3 4 9 3 0 3 3

MAIL

OFFICES OF
PERRUTT, P.C.
TON AVENUE SOUTH
TOX BOX 69727
, ALABAMA 35205

FIRST CLASS MAIL

RECEIVED MAIL - MAIL SERVICE BRANCH

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

20473

MAIL SERVICES BRANCH
91 JUN -2 PM 1:26

ATTACHMENT 17
Page 2 of 2

ATTACHMENT 18

REPORT OF RECEIPTS AND DISBURSEMENTS

For Gain or Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF WAYS & MEANS BRANCH
91 JAN -2 PM 1:27

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has changed since previous report
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ This committee qualified as a multicandidate committee [illegible] 1980. Reporting Period [illegible]

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 ☐ March 20 ☐ April 20 ☐ May 20 ☐ June 20 ☐ July 20 ☐ August 20 ☐ September 20 ☐ October 20 ☐ November 20 ☐ December 20 ☐ January 31

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twenty 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 06/01/90 through 06/30/90		
6. (a) Cash on Hand January 1, 19__		$ 9,445.44
(b) Cash on Hand at Beginning of Reporting Period	$ 9,945.44	
(c) Total Receipts (from Line 18)	$ 1,000.00	$ 1,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 6,945.44	$ 10,445.44
7. Total Disbursements (from Line 29)	$ 6,700.00	$ 10,200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 245.44	$ 245.44
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY 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

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
Ellen Griffin, Treasurer

Signature of Treasurer

Date 12/14/90

NOTE: Submission of false, erroneous, or misleading information may subject the person signing this Report to the penalties of 2 U.S.C. [illegible]

FEC FORM 3X
(Revised 4/87)

9120034609943855

9 2 0 4 0 9 1 4 3 5 6

0 3 6 7 9 3 3

0 4 4 5 4 9 3 0 3

MAIL

OFFICES OF
PERRUTT, P.C.
[illegible] AVENUE SOUTH
[illegible] BOX 98727
[illegible] ALABAMA 35209

U.S. POSTAGE
$4.95

FIRST CLASS MAIL

[redacted]

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20463~~
20473

91 JUN -2 PM 1:26

OFFICE SECRETARY COMMISSION

ATTACHMENT 10
Page 2 of 2

ATTACHMENT 19

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF SERVICES BRANCH
91 JAN -2 PM 1:27

FOR FEC USE ONLY

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has previously reported
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period as of _____ (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 20

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelve day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 07/01/90 through 09/30/90

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 90		$ 9,445.44
	(b) Cash on Hand at Beginning of Reporting Period	$ 245.44	
	(c) Total Receipts (from Line 10)	$ 15,800.00	$ 16,800.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 16,045.44	$ 26,245.44
7.	Total Disbursements (from Line 22)	$ 2,250.00	$ 12,450.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 13,795.44	$ 13,795.44
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
Glenn Griffin, Treasurer

Signature of Treasurer

Date 12/14/90

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)

9103679339 1

0 3449 549303 3

MAIL

OFFICES OF
PENNUTT, P.C.
[illegible] AVENUE SOUTH
POST OFFICE BOX 98727
[illegible], ALABAMA 35295

U.S. POSTAGE
$4.15

FIRST CLASS MAIL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Federal Election Commission
999 E Street, N.E.
Washington, D.C. ~~20475~~
20473

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OFFICE SERVICES BRANCH

ATTACHMENT 19
Page 2 of 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF RECORDS BRANCH
91 JAN -2 PM 1:27

1. NAME OF COMMITTEE (in full)
Bruno's Good Government League

ADDRESS (number and street) ☐ Check if address has changed since last report
300 Research Parkway

CITY, STATE and ZIP CODE
Birmingham, Alabama 35211

2. FEC IDENTIFICATION NUMBER
C00235077

3. ☐ 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

☒ Twelve day report preceding (Name of Election) election on Nov. 6 in the State of AL

☐ Thirty day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period 10/01/90 through 10/17/90

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 19 90		$ 9,445.44
	(b) Cash on Hand at Beginning of Reporting Period	$13,795.44	
	(c) Total Receipts (from Line 16)	$ -0-	$ 16,800.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$13,795.44	$ 26,245.44
7.	Total Disbursements (from Line 28)	$ 400.00	$ 12,850.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$13,395.44	$ 13,395.44
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10.	Debts and Obligations Owed BY 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

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
Glenn Griffin, Treasurer

Signature of Treasurer

Date 12/14/90

NOTE: Submission of false statements, 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)

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MAIL

OFFICES OF
PERMUTT, P.C.
[illegible] AVENUE SOUTH
POST OFFICE BOX [illegible]
[illegible], ALABAMA [illegible]

U.S. POSTAGE
24 1 5 3

FIRST CLASS MAIL

[redacted]

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20473

20473

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OFFICE SERVICES BRANCH

ATTACHMENT 20
Page 2 of 2

ATTACHMENT 21

SCHEDULE B — PERSONAL SUPPORTED DISBURSEMENTS

1987 Year End Report

	Date Incurred (Mo., Day, Year)	Amount of Each Disbursement This Period
Ben Erdreich for Congress P. O. Box 117 Mt. Vernon, Al 32121 Purpose of Disbursement: Defray Campaign Expenses	03/22/87	$ 500.00
Friends of Tom Bevill P. O. Box 1433 Jasper, Al 35501 Purpose of Disbursement: Defray Campaign Expenses	0/19/87	$ 250.00
Friends of Guy Hunt Straughan, Al Purpose of Disbursement: Defray Campaign Expenses	8/31/87	$ 250.00
Fischer Shelby Campaign Tuscaloosa, Al Purpose of Disbursement: Defray Campaign Expenses	02/17/87	$2,500.00
SUBTOTAL of Disbursements This Page (optional)		$3,500.00
TOTAL This Period (last page this line number only)		$3,500.00

Bruno's Good Government League

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 20 1991

Glenn J. Griffin, Treasurer
Bruno's Good Government League
300 Research Parkway
Birmingham, AL 35211

Identification Number: C00235077

Reference: Year End Report (1/1/87-12/31/87)

Dear Mr. Griffin:

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:

-Political committees which have cash on hand at the time of registration must disclose the source of the funds. The balance is assumed to be composed of those contributions most recently received by the committee prior to registration. Please identify the source of these contributions on a memo Schedule A. 11 CFR §104.12

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in 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 the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with a clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the amount in excess of $1,000 and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and

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redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal steps regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) 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,

Kelly A. Huff

Kelly A. Huff
Reports Analyst
Reports Analysis Division

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ATTACHMENT 23

TELECON

ANALYST: Kelly Huff

CONVERSATION WITH: Phyllis Coggin (Representative for Bruno's Good Gov't League)

COMMITTEE: Bruno's Good Government League

DATE: February 27, 1991

SUBJECT(S):

Phyllis Coggin called me representing Bruno's Good Government League. She wanted to discuss the RFAI's that I sent referencing reports that covered the years 1987 through 1990. We went through each letter and she found everything fairly easy to amend.

During our discussion of all the letters, Phyllis mentioned filing reports that the Commission did not seem to have. One of the RFAI's questions the cash on hand of the 1987 Year End Report. Phyllis stated that this was the ending cash on hand of the 1986 Year End Report. Phyllis explained that she sent in reports covering years of 1982 through 1990. I explained that the only reports I knew of were 1987 through 1990. I stated she should make copies of those reports in question and a copy of the certified mail receipt and send them to me again. She said she would send them to me as soon as possible.

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EXHIBIT "B"

We have been in touch with the Campaign Headquarters of Richard Shelby and have made arrangements for that Committee to return to us a check in the amount of $1,500.00. The proper disclosure will be made in the Semi-Annual Report as soon as we receive their check.

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ATTACHMENT 25

SCHEDULE A

ITEMIZED RECEIPTS

1985 Year End Report

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

Page 1 of 2

FOR LINE NUMBER 11(a)(i)

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)
Bruno's Good Government League

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. John Julian 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Bruno's, Inc. Occupation: Management Aggregate Year-to-Date > $	08/20/85	$200.00
B. Frank Olivito 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Bruno's, Inc. Occupation: Management Aggregate Year-to-Date > $	08/20/85	$200.00
C. Randy Page 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Bruno's, Inc. Occupation: Management Aggregate Year-to-Date > $	08/20/85	$200.00
D. Sam Vacarella 300 Research Parkwa, Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Bruno's, Inc. Occupation: Management Aggregate Year-to-Date > $	08/20/85	$200.00
E. Bruno's, Inc. 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Management Aggregate Year-to-Date > $	08/20/85	$1,000.00
F. Paul Garrison 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Bruno's, Inc. Occupation: Management Aggregate Year-to-Date > $	08/17/85	$500.00
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ 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)			$2,300.00
TOTAL This Period (last page this line number only)			

9,21 10,43 06 97,19 85 3 06 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 15 1991

Glenn J. Griffin, Treasurer
Bruno's Good Government League
300 Research Parkway
Birmingham, AL 35211

Identification Number: C00235077

Reference: Year End Report (1/1/85-12/31/85)

Dear Mr. Griffin:

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

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, 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. In the best interests of the committee, all refunds and transfers-out should be made within thirty (30) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). 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.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

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Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Please amend your report by providing the address for the Presidential Gala itemized on Schedule B supporting Line 21.

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

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,

Kelly A. Huff

Kelly A. Huff
Reports Analyst
Reports Analysis Division

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ATTACHMENT 27

SCHEDULE A — ITEMIZED RECEIPTS

1986 Year End Report

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

PAGE 3 OF 1

FOR LINE NUMBER 11(a)(i)

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)
Bruno's Good Government League

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Angelo Bruno 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Bruno's, Inc. Management Aggregate Year-to-Date > $	02/19/86 06/13/86	$5,000.00 $5,000.00
B. Lee Bruno 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Bruno's, Inc. Management Aggregate Year-to-Date > $	02/19/86 06/16/86 06/25/86	$5,000.00 $5,000.00 $5,000.00
C. Joe Bruno 300 Research Parkway Birmingham, Alabama 35211 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Bruno's, Inc. Management Aggregate Year-to-Date > $	03/18/86	$4,000.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ 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: ☐ Primary ☐ General ☐ 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: ☐ Primary ☐ General ☐ 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: ☐ Primary ☐ General ☐ 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) > $29,000.00

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-2

MAY 15 1991

Glenn Griffin, Treasurer
Bruno's Good Government League
300 Research Parkway
Birmingham, AL 35211

Identification Number: C00235077

Reference: Year End Report (1/1/86-12/31/86)

Dear Mr. Griffin:

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 (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or person in excess of $5,000 per calendar year. (2 U.S.C. §441a(f) and 11 CFR §110.1(d))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of $5,000 or, if appropriate, seek reattribution of the contribution pursuant to 11 CFR §110.1(k). Alternatively, 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. (11 CFR §§103.3(b) and 110.1(k))

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds, reattributions and transfers-out should be made within sixty (60) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the

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period during which they are made. Reattributions are reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), prompt action by you to refund, seek reattribution and/or transfer-out the excessive amount will be taken into consideration.

L.T.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in 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 the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with a clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the amount in excess of $1,000 and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal steps regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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

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

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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,

Kelly A. Huff

Kelly A. Huff
Reports Analyst
Reports Analysis Division

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TELECON

ANALYST: Kelly Huff

CONVERSATION WITH: Phyllis Coggin

COMMITTEE: Bruno's Good Government League

DATE: May 29, 1991

SUBJECT(S):

Phyllis Coggin called me in regards to the RFAI's that I sent which referenced the 1982 through 1986 Year End Reports. We discussed each letter throughly and there seemed to be only minor discrepancies that could be easily amended.

The 1985 Year End Report showed a contribution from their connected organization which Phyllis explained had already been refunded during 1990 and shown on the 1990 30 Day Post General Election Report.

The 1986 Year End Report disclosed the committee receiving excessive contributions and making excessive contributions. Phyllis explained they would refund the individual contributions and request a refund of their excessive contributions. She said this would be shown on the next report.

Phyllis then asked if there would be any more letters sent from the Commission. I stated that all the reports filed between 1982 and 1990 had been reviewed and unless the amended reports showed discrepancies, there would not be any more RFAI's sent by the Commission. Phyllis then asked if there would be a penalty. I stated that it was not a decision that I made.

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ATTACHMENT 30

SCHEDULE B

ITEMIZED DISBURSEMENTS
1990 30 Day Post-General

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

PAGE 1 OF 1

FOR LINE NUMBER 26(a)

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)
Bruno's Good Government League

	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Bruno's, Incorporated 300 Research Parkway Birmingham, Alabama 35211	Refund of contribution from 1985	11/19/90	$1,000.00
B. Full Name, Mailing Address and ZIP Code			
C. Full Name, Mailing Address and ZIP Code			
D. Full Name, Mailing Address and ZIP Code			
E. Full Name, Mailing Address and ZIP Code			
F. Full Name, Mailing Address and ZIP Code			
G. Full Name, Mailing Address and ZIP Code			
H. Full Name, Mailing Address and ZIP Code			
I. Full Name, Mailing Address and ZIP Code			

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	$1,000.00

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ATTACHMENT 31

SCHEDULE B

ITEMIZED DISBURSEMENTS

1988 Year End Report

Use separate schedules for each category of the Detailed Summary Page

PAGE 2 OF 4

FOR LINE NUMBER 27

Any income or assets from such Report and Statement may not be used 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)

Bruno's Good Government League

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Fisher Barfoot Campaign 3302 Loop Road Vidalia, GA 30474	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	06/29/88	$ 500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Larry Langford Campaign 7437 Parkwood Rd. Fairfield, Al 35064	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	06/01/88	$ 250.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pat Colson Campaign 810 Valley View Dr. S.E. Huntsville, AL 35801	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/03/88	$ 200.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Leland C. Adams, Jr. Campaign P. O. Box 309 Adamsville, AL 35005	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/03/88	$ 200.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bobby Hayes Campaign 9[illegible] Frontier Drive Pelham, AL 35124	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/04/88	$ 250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Spinner Reelection [illegible] [illegible], AL 35[illegible]	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/16/88	$ 250.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Battle for Mayor 8[illegible] Watts Avenue Huntsville, AL 35801	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/17/88	$ 500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. C. Sonny Hornsby Campaign P. O. Box 1636 Tallassee, AL 36078	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	08/24/88	$ 500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ronnie Flippo Committee P. O. Box [illegible] Birmingham, AL 35255	Defray Campaign Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	09/06/88	$2,000.00

SUBTOTAL of Disbursements This Page (optional) $4,600.00

TOTAL This Period (last page this line number only) $7,400.00

9 2 0 4 0 9 1 4 3 7 5

ATTACHMENT 32

SCHEDULE A

ITEMIZED RECEIPTS
1989 Pre-Special Election Report

Page 1 of 1

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)

Bonnie's Good Government League

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Bonnie Pippo Committee P. O. Box 245 Florence, AL 35631	Candidate	01/17/90	1,000.00
Receipt For: Primary / General / X Other (specify): Refund from Candidate	Aggregate Year-to-Date > $		
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: Primary / General / Other (specify)	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: Primary / General / 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: Primary / General / 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: Primary / General / 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: Primary / General / 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: Primary / General / Other (specify)	Aggregate Year-to-Date > $		

TOTAL of Receipts This Page (optional) > $ 1,000.00

Grand Total (last page this line number only) >

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ATTACHMENT 33

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-5

APR 2 1991

Glenn J. Griffin, Treasurer
Bruno's Good Government League
300 Research Parkway
Birmingham, AL 35211

Identification Number: C00235077

Reference: 12 Day Pre-Special Report (1/1/89-3/15/89)

Dear Mr. Griffin:

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 (pertinent portion(s) attached) discloses a refund(s) of an excessive contribution(s) made to a federal candidate(s). The Act precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of $1,000 per election. 2 U.S.C. §441a(a)

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

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Kelly A. Huff

Kelly A. Huff
Reports Analyst
Reports Analysis Division

2 4 0 7 1 4 3 7 7

[illegible] DEBTS AND OBLIGATIONS
Including Loans
1991 MID-YEAR REPORT

Name of Committee (In Full): Bruno's Good Government League	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Angelo Bruno 300 Research Parkway Birmingham, AL 35211	$5,000.00	-0-	-0-	$5,000.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Lee Bruno 300 Research Parkway Birmingham, AL 35211	$10,000.00	-0-	-0-	$10,000.00
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (attach)				
2) TOTAL This Period Each page (this line only)				$15,000.00
3) TOTAL OUTSTANDING LOANS from Schedule C Each page only)				-0-
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page Last page only)				$15,000.00

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[redacted]

[redacted]

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Shelby for U.S. Senate PO Box 1691 Tuscaloosa, AL 35402		6/1/91	$1,500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify): Volunteer Expenses			
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$1,500.00

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F.E.C.
SECRETARIAT

92 APR -7 PM 3:21

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

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

RAD Referral #91L-80
Staff Member: Veronica Gillespie

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Bruno's Good Government League and Glenn J. Griffin, as treasurer

RELEVANT STATUTE:
2 U.S.C. § 433(a)
2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(ii)
2 U.S.C. § 434(a)(4)(A)(iii)
2 U.S.C. § 434(a)(4)(A)(iv)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b(a)
11 C.F.R. § 102.1(c)
11 C.F.R. § 103.3(b)(3)

INTERNAL REPORTS CHECKED: Referral Materials
Year End Reports, 1982-1989
FEC Indexes

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by a referral of Bruno's Good Government League ("the Committee" or "BGGL") from the Reports Analysis Division ("RAD"). Attachment 1. The bases for the referral of the Committee are for registering late with the Commission; failing to timely file reports for calendar years 1982 through 1989 and for the 1990 April, July and October quarterly reporting periods; making two (2) excessive contributions to two (2) federal candidate committees totalling $2,500 in 1987 and 1988; accepting three (3) excessive

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contributions from two (2) individuals totalling $15,000 in 1986; and accepting a contribution from its connected organization, totalling $1000 in 1985.

II. FACTUAL AND LEGAL ANALYSIS

1. Late Filing of Statement of Organization

Pursuant to Section 431(4)(B) of the Federal Election Campaign Act of 1971, as amended (the "Act"), a separate segregated fund of a corporation or labor union is considered to be a "political committee." The Act requires that separate segregated funds established under the provisions of 2 U.S.C. § 441b(b) file a statement of organization no later than 10 days after establishment. See also 11 C.F.R. § 102.1(c) (providing illustrations of events which would constitute "establishment" so as to trigger the 10 day registration requirement).

According to the referral, Bruno's Good Government League ("BGGL"), is the separate segregated fund of Bruno's, Inc. ("Bruno's), the Committee's corporate connected organization.[1] The Committee filed a statement of organization on January 9, 1989. However, according to reports filed by BGGL in December 1990, it appears that the Committee engaged in federal activity

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1. Bruno's Inc. is a publicly held corporation which was incorporated under the laws of the state of Alabama on 4/1/59. It is in the business of supermarket chains and drug stores and had an annual sales volume of over $2.39 billion dollars in 1991. See Standard and Poor's Register, 1992, page 422.

as early as 1982.[2] Thus, it appears that the Committee engaged in federal activity nearly seven (7) years before it filed its statement of organization with the Commission, well beyond the ten day period provided under the Act.

Based on the foregoing, this Office recommends that the Commission find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 433(a) by failing to file a statement of organization with the Commission no later than 10 days after establishment.

2. Late Filing of Periodic Reports

The Act requires treasurers of unauthorized political committees to file periodic reports of receipts and disbursements on a quarterly or monthly basis during calendar years in which a regularly scheduled election is held. 2 U.S.C. § 434(a)(4). Committees opting to file on a quarterly basis are required to file quarterly reports on or before the 15th day after the last day of each calendar quarter, except the last report for the year, which is due on or before January 31st of the following year. 2 U.S.C. § 434(a)(4)(A)(i). Additionally, committees must file a pre-election report no later than the 12th day before (or posted by registered mail or certified mail no later than the 15th day before) any election in which the

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2. In a letter dated December 14, 1990, the treasurer stated that it had recently come to his attention that the committee "had not been filing certain reports and we wish to do what we can to correct this situation." In checking the records, he found that "in 1982 we gave to Federal candidates so we have enclosed year end reports of receipts and disbursements for the years 1982 through 1988." See Referral at Attachment 5, page 1.

committee makes a contribution to, or expenditure on behalf of, a candidate in such election, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). Moreover, along with quarterly reports, the Act requires that unauthorized political committees file a post-general election report no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). Finally, in any other calendar year, unauthorized political committees shall file a Mid-Year and a Year-End Report. 2 U.S.C. § 434(a)(4)(A)(iv).

As noted previously, the Committee registered on January 9, 1989 and elected to file its reports on a quarterly basis. The Commission notified the Committee in writing of the requirement to file quarterly reports and sent the appropriate prior notices beginning with the 1989 Mid-Year notice, which was sent on June 26, 1989. However, the Committee did not file any of its reports until November 27, 1990, when the Committee timely filed its 30 Day Post-General Election Report. Subsequently on December 21, 1990, the Committee filed Year End Reports covering calendar years 1982-1988; special election reports covering calendar year 1989[3]; and reports covering calendar year 1990 prior to the 30 Day Post-General Election Report.

Although the Committee filed the above-referenced reports, they were not timely filed. In some instances, the reports were filed six (6) years later than required under the Act.

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3. It appears that the two reports titled "special election" reports by the Committee are in fact the 1989 Mid-Year and Year End Reports.

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Therefore, due to the Committee's failure to file required reports in a timely manner, this Office recommends that the Commission find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

3. Excessive Contributions Made In 1987 and 1988

The Act precludes a political committee, other than a multicandidate political committee, from making contributions to a federal candidate and his authorized committees, which in the aggregate exceed $1000 per election. 2 U.S.C. § 441a(a). Section 441a(a)(4) defines a multicandidate political committee to mean "a political committee which has been registered under section 433 of this title for a period of not less than 6 months, which has received contributions from more than 50 persons, and except for any State political party organization, has made contributions to 5 or more candidates for Federal office." Under the Commission's regulations, the recipient of an excessive contribution must either notify the contributor and refund the amount in excess of the $1000 limit and/or notify the contributor in writing, and request a reattribution or redesignation of the contribution. All such refunds, reattribtions, and redesignations must be made within sixty (60) days of the treasurer's receipt of the contribution. 11 C.F.R.

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§ 103.3(b)(3).[4] Based on the referral materials, it appears that the Committee made two excessive contributions to two federal candidate committees totalling $2,500 in 1987 and 1988.

First, the Committee's 1987 Year End Report discloses an undesignated $2,500 contribution to the Shelby Committee made on February 17, 1987. The Commission sent a Request for Additional Information (RFAI) notifying the Committee that the Act precluded such contributions and recommended that the Committee either refund and/or redesignate the excessive amount. As a response to the RFAI, the Committee's 1991 Mid-Year Report to the Commission discloses a $1,500 "reimbursement" from the Shelby Committee, received on April 2, 1991.

Second, the Committee's 1988 Year End Report discloses an undesignated $2,000 contribution to the Ronnie Flippo Committee made on September 8, 1988. Again, as a response to the RFAI, the Committee's 1989 12 Day Pre-Special Election Report discloses a $1000 refund from the Ronnie Flippo Committee on January 17, 1989.

Although the Committee is now a qualified multicandidate political committee, it was not so qualified in 1987 and 1988 at the time the two contributions were made.[5] Therefore, the

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4. Before April, 1987, Commission regulations governing the return of excessive contributions simply required that refunds be made within a "reasonable time". Although some of the contributions at issue here would be governed by these earlier regulations, the outcome remains the same given the amount of time that elapsed before corrective action was taken.

5. According to internal FEC indexes, Bruno's Good Government League qualified as a multicandidate political committee on July 30, 1990.

Committee was limited to the $1000 contribution limit per candidate, per election in 1987 and 1988. Accordingly, the Committee made two excessive contributions to two federal candidate committees, totalling $2,500 in 1987 and 1988. Although the Committee received $2,500 in refunds from the two federal candidate committees, neither of the refunds was made within the sixty (60) day period prescribed under Commission regulations. Based on the foregoing, this Office recommends that the Commission find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 441a(a) by making two excessive contributions to two federal candidate committees, totalling $2,500 during calendar years 1987 and 1988.[6]

4. Excessive Contributions Received In 1986

Pursuant to 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution in violation of the provisions of 2 U.S.C. § 441a. Furthermore, 2 U.S.C. § 441a(a)(1)(C) limits the contributions a person may make to a political committee, other than a candidate committee or a national party committee, to $5,000 per calendar year.

Commission regulations provide that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited

6. Although it appears that the recipient candidate committees knowingly accepted excessive contributions in violation of 2 U.S.C. § 441a(f), neither met the threshold for referral to this Office. Thus, the General Counsel makes no recommendation concerning the recipient committees.

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into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor. Id. If the reattribution or redesignation is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor. Id.

On December 21, 1990, the Committee filed a 1986 Year End Report disclosing three excessive contributions from two individuals, totalling $15,000. First, Angelo Bruno made a contribution of $5,000 on February 19, 1986, and another $5,000 contribution on June 13, 1986, for a total of $10,000. Thus, it appears that Angelo Bruno made a $5,000 excessive contribution to the Committee. Second, Lee Bruno also made a contribution of $5,000 on February 19, 1986, another $5,000 contribution on June 16, 1986, and a third $5,000 contribution on June 25, 1986, for a total of $15,000. Thus, Lee Bruno appears to have made a $10,000 excessive contribution to the Committee.

RAD sent an RFAI notifying the Committee that under the Act, an individual is limited to a $5,000 annual contribution and recommending that the Committee refund and/or reattribute the excessive portions of the contributions. As a response to the RFAI, the Committee's 1991 Mid-Year Report disclosed a $5,000 debt and a $10,000 debt owed to Angelo Bruno and Lee Bruno for the excessive portions of the three contributions they made to the Committee, respectively.

While this corrective action may be considered mitigating

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circumstances, the fact remains that the Committee received a total of $15,000 in excessive contributions from the two individuals which was not refunded, redesignated or reattributed within the time frame established by 11 C.F.R. § 103.3(b)(3). Based on the foregoing analysis, this Office recommends that the Commission find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from two individual contributors totalling $15,000.

Under the Commission's established practice, this Office would make recommendations against the contributors and pursue the matter where the amount in excess exceeds twice the individual's limit. However, Angelo and Lee Bruno both were killed in a plane crash on December 11, 1991. See Birmingham Post Herald, December 12, 1991. Accordingly, this Office makes no recommendation with respect to either of them.

5. Contribution from Connected Organization

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any political committee to knowingly accept or receive any contribution containing corporate funds. The Committee's 1985 Year End Report discloses a $1000 contribution from Bruno's, Inc. ("Bruno's"), the Committee's corporate connected organization, on August 20, 1985.

The Commission sent an RFAI notifying the Committee that the Act precluded the making and knowing acceptance of corporate contributions and accordingly, recommended the Committee refund

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and/or transfer out the funds. As a response to the RFAI, the Committee's 1990 30 Day Post-General Report discloses a $1000 refund to Bruno's, made on November 19, 1990.

Bruno's is listed as a "corporate connected organization" on BGGL's "Statement of Organization." Bruno's is a "connected organization" within the meaning of 2 U.S.C. § 431(7). Under 11 C.F.R. § 104.5(b)(3), a corporate connected organization may reimburse its separate segregated fund for solicitation or other administrative costs provided such reimbursement is made no later than 30 days after the expense was paid by the separate segregated fund. In this instance, there is no information available regarding the timing or purpose of the receipt of funds from Bruno's. Thus, the contribution from Bruno's to the Committee appears to be a prohibited corporate contribution which was not timely refunded. Based on the foregoing, this Office recommends that the Commission find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 441b(a) by accepting a prohibited corporate contribution from Bruno's totalling $1000 in 1985. Furthermore, this Office recommends that the Commission also find reason to believe that Bruno's, Inc. violated 2 U.S.C. § 441b(a) by making a prohibited corporate contribution to Bruno's Good Government League totalling $1000 in 1985.

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III. DISCUSSION OF CONCILIATION AGREEMENTS AND CIVIL PENALTIES

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Moreover, this Office recommends that the Commission also offer to enter into conciliation with Bruno's, Inc. prior to a finding of probable cause to believe that Bruno's violated 2 U.S.C. § 441b(a) by making a prohibited corporate contribution to Bruno's Good Government League totalling $1000 in 1985.

IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), (ii), (iii), and (iv), 441a(a), 441a(f), and 441b(a).

3. Find reason to believe that Bruno's, Inc. violated 2 U.S.C. § 441b(a).

4. Enter into conciliation with Bruno's Good Government League and Glenn J. Griffin, as treasurer, and Bruno's, Inc. prior to a finding of probable cause to believe.

5. Approve the attached Factual and Legal Analyses, conciliation agreements, and the appropriate letters.

Lawrence M. Noble
General Counsel

4/7/92
Date

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
1. Referral Materials
2. Factual and Legal Analyses (2)
3. Proposed Conciliation Agreement/BGGL
4. Proposed Conciliation Agreement/Bruno's, Inc.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / DONNA ROACH DR
COMMISSION SECRETARY

DATE: APRIL 13, 1992

SUBJECT: RAD REFERRAL 91L-80 - FIRST GENERAL COUNSEL'S REPORT DATED APRIL 7, 1992

The above-captioned document was circulated to the Commission on Wednesday, April 8, 1992 at 4:00 p.m.

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

Commissioner Aikens	
Commissioner Elliott	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Potter	XXX
Commissioner Thomas	

This matter will be placed on the meeting agenda for TUESDAY, APRIL 21, 1992.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 3512)

In the Matter of	)	
	)	RAD Referral #91L-80
Bruno's Good Government League	)	
and Glenn J. Griffin, as treasurer.	)	

CERTIFICATION

I, Delores R. Harris, recording secretary for the Federal Election Commission executive session on April 21, 1992, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions with respect to RAD Referral #91L-80:

1. Open a MUR.

2. Find reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), (ii), (iii), and (iv), 441a(a), 441a(f), and 441b(a).

3. Find reason to believe that Bruno's, Inc. violated 2 U.S.C. § 441b(a).

4. Enter into conciliation with Bruno's Good Government League and Glenn J. Griffin, as treasurer, and Bruno's, Inc. prior to a finding of probable cause to believe.

(continued)

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5. Approve the Factual and Legal Analyses, conciliation agreements

and the appropriate letters, as recommended in the General Counsel's report dated April 7, 1992.

Commissioners McDonald, McGarry, Potter and Thomas voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

Attest:

April 27, 1992
Date

Delores R. Harris
Delores R. Harris
Administrative Assistant

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1992

Ronald G. Bruno, Chairman
Bruno's, Inc.
300 Research Parkway
Birmingham, Alabama 35211

RE: MUR 3512
Bruno's, Inc.

Dear Mr. Bruno:

On April 21, 1992, the Federal Election Commission found that there is reason to believe Bruno's, Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Bruno's, Inc. 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 Bruno's, 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 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.

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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 Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

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

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Bruno's, Inc. **MUR:** 3512

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any corporation to make a contribution or expenditure in connection with any federal election. Bruno's, Inc. ("Bruno's) is the "corporate connected organization" of Bruno's Good Government League ("the Committee"), within the meaning of 2 U.S.C. § 431(7).

The Committee's 1985 Year End Report discloses a $1000 contribution from Bruno's, the Committee's corporate connected organization, on August 20, 1985. The Commission sent an RFAI notifying the Committee that the Act precluded the making and knowing acceptance of corporate contributions and accordingly, recommended the Committee refund and/or transfer out the funds. As a response to the RFAI, the Committee's 1990 30 Day Post-General Report discloses a $1000 refund to Bruno's, made on November 19, 1990. Under 11 C.F.R. § 104.5(b)(3), a corporate connected organization may reimburse its separate segregated fund for solicitation or other administrative costs provided such reimbursement is made no later than 30 days after the

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expense was paid by the separate segregated fund. In this instance, there is no information available regarding the timing or purpose of the receipt of funds from Bruno's.

Based on the foregoing, the contribution from Bruno's, Inc. to Bruno's Good Government League appears to be a prohibited corporate contribution which was not timely refunded. Therefore, there is reason to believe that Bruno's, the corporate connected organization, violated 2 U.S.C. § 441b(a) by making a prohibited corporate contribution to Bruno's Good Government League totalling $1000 in 1985.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1992

Glenn J. Griffin, Treasurer
Bruno's Good Government League
300 Research Parkway
Birmingham, Alabama 35211

RE: MUR 3512
Bruno's Good Government League
and Glenn J. Griffin, as treasurer

Dear Mr. Griffin:

On April 21, 1992, the Federal Election Commission found that there is reason to believe Bruno's Good Government League ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 433(a); 434(a)(4)(A)(i), (ii), (iii) and (iv); 441a(a); 441a(f) and 441b(a); provisions 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 and

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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 Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

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

92040914401

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Bruno's Good Government League and Glenn J. Griffin, as treasurer **MUR:** 3512

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

1. Late Filing of Statement of Organization

Pursuant to Section 431(4)(B) of the Federal Election Campaign Act of 1971, as amended (the "Act"), a separate segregated fund of a corporation or labor union is considered to be a "political committee." The Act requires that separate segregated funds established under the provisions of 2 U.S.C. § 441b(b) file a statement of organization no later than 10 days after establishment. See also 11 C.F.R. § 102.1(c) (providing illustrations of events which would constitute "establishment" so as to trigger the 10 day registration requirement).

According to its statement of organization, which was filed on January 9, 1989, Bruno's Good Government League (the "Committee" or "BGGL"), is the separate segregated fund of Bruno's, Inc. However, according to reports filed by BGGL in December 1990, it appears that the Committee engaged in federal activity as early as 1982. Thus, it appears that the Committee engaged in federal activity nearly seven (7) years before it

9204091440 2

filed its statement of organization with the Commission, well beyond the ten day period provided under the Act.

Based on the evidence available at this time, there is reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 433(a) by failing to file a statement of organization with the Commission no later than 10 days after establishment.

2. Late Filing of Periodic Reports

The Act requires treasurers of unauthorized political committees to file periodic reports of receipts and disbursements on a quarterly or monthly basis during calendar years in which a regularly scheduled election is held. 2 U.S.C. § 434(a)(4). Committees opting to file on a quarterly basis are required to file quarterly reports on or before the 15th day after the last day of each calendar quarter, except the last report for the year, which is due on or before January 31st of the following year. 2 U.S.C. § 434(a)(4)(A)(i). Additionally, committees must file a pre-election report no later than the 12th day before (or posted by registered mail or certified mail no later than the 15th day before) any election in which the committee makes a contribution to, or expenditure on behalf of, a candidate in such election, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). Moreover, along with quarterly reports, the Act requires that unauthorized political committees file a post-general election report no later than the 30th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). Finally, in any other calendar

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year, unauthorized political committees shall file a Mid-Year and a Year-End Report. 2 U.S.C. § 434(a)(4)(A)(iv).

As noted previously, the Committee registered on January 9, 1989 and elected to file its reports on a quarterly basis. The Commission notified the Committee in writing of the requirement to file quarterly reports and sent the appropriate prior notices beginning with the 1989 Mid-Year notice, which was sent on June 26, 1989. However, the Committee did not file any of its reports until November 27, 1990, when the Committee timely filed its 30 Day Post-General Election Report. Subsequently on December 21, 1990, the Committee filed Year End Reports covering calendar years 1982-1988; special election reports covering calendar year 1989[1]; and reports covering calendar year 1990 prior to the 30 Day Post-General Election Report.

Although the Committee filed the above-referenced reports, they were not timely filed. In some instances, the reports were filed six (6) years later than required under the Act. Therefore, due to the Committee's apparent failure to file required reports in a timely manner, there is reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

3. Excessive Contributions Made In 1987 and 1988

The Act precludes a political committee, other than a

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1. It appears that the two reports titled "special election" reports by the Committee are in fact the 1989 Mid-Year and Year End Reports.

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multicandidate political committee, from making contributions to a federal candidate and his authorized committees, which in the aggregate exceed $1000 per election. 2 U.S.C. § 441a(a). Section 441a(a)(4) defines a multicandidate political committee to mean "a political committee which has been registered under section 433 of this title for a period of not less than 6 months, which has received contributions from more than 50 persons, and except for any State political party organization, has made contributions to 5 or more candidates for Federal office." Under the Commission's regulations, the recipient of an excessive contribution must either notify the contributor and refund the amount in excess of the $1000 limit and/or notify the contributor in writing, and request a reattribution or redesignation of the contribution. All such refunds, reattributions, and redesignations must be made within sixty (60) days of the treasurer's receipt of the contribution. 11 C.F.R. § 103.3(b)(3).[2] Based on the available evidence, it appears that the Committee made two excessive contributions to two federal candidate committees totalling $2,500 in 1987 and 1988.

First, the Committee's 1987 Year End Report discloses an undesignated $2,500 contribution to the Shelby Committee made on February 17, 1987. The Commission sent a Request for Additional

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2. Before April, 1987, Commission regulations governing the return of excessive contributions simply required that refunds be made within a "reasonable time". Although some of the contributions at issue here would be governed by these earlier regulations, the outcome remains the same given the amount of time that elapsed before corrective action was taken.

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Information (RFAI) notifying the Committee that the Act precluded such contributions and recommended that the Committee either refund and/or redesignate the excessive amount. As a response to the RFAI, the Committee's 1991 Mid-Year Report to the Commission discloses a $1,500 "reimbursement" from the Shelby Committee, received on April 2, 1991.

Second, the Committee's 1988 Year End Report discloses an undesignated $2,000 contribution to the Ronnie Flippo Committee made on September 8, 1988. Again, as a response to the RFAI, the Committee's 1989 12 Day Pre-Special Election Report discloses a $1000 refund from the Ronnie Flippo Committee on January 17, 1989.

Although the Committee is now a qualified multicandidate political committee, it was not so qualified in 1987 and 1988 at the time the two contributions were made.[3] Therefore, the Committee was limited to the $1000 contribution limit per candidate, per election in 1987 and 1988. Accordingly, it appears that the Committee made two excessive contributions to two federal candidate committees, totalling $2,500 in 1987 and 1988. Although the Committee received $2,500 in refunds from the two federal candidate committees, neither of the refunds was made within the sixty (60) day period prescribed under Commission regulations. Based on the foregoing, there is reason to believe that Bruno's Good Government League and Glenn J.

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3. According to the FEC, Bruno's Good Government League qualified as a multicandidate political committee on July 30, 1990.

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Griffin, as treasurer, violated 2 U.S.C. § 441a(a) by making two excessive contributions to two federal candidate committees, totalling $2,500 during calendar years 1987 and 1988.

4. Excessive Contributions Received In 1986

Pursuant to 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution in violation of the provisions of 2 U.S.C. § 441a. Furthermore, 2 U.S.C. § 441a(a)(1)(C) limits the contributions a person may make to a political committee, other than a candidate committee or a national party committee, to $5,000 per calendar year.

Commission regulations provide that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor. Id. If the reattribution or redesignation is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor. Id.

On December 21, 1990, the Committee filed a 1986 Year End Report disclosing three excessive contributions from two individuals, totalling $15,000. First, Angelo Bruno made a contribution of $5,000 on February 19, 1986, and another $5,000 contribution on June 13, 1986, for a total of $10,000. Thus, it appears that Angelo Bruno made a $5,000 excessive contribution to the Committee. Second, Lee Bruno also made a contribution of

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$5,000 on February 19, 1986, another $5,000 contribution on June 16, 1986, and a third $5,000 contribution on June 25, 1986, for a total of $15,000. Thus, Lee Bruno appears to have made a $10,000 excessive contribution to the Committee.

The Commission sent an RFAI notifying the Committee that under the Act, an individual is limited to a $5,000 annual contribution and recommending that the Committee refund and/or reattribute the excessive portions of the contributions. As a response to the RFAI, the Committee's 1991 Mid-Year Report disclosed a $5,000 debt and a $10,000 debt owed to Angelo Bruno and Lee Bruno for the excessive portions of the three contributions they made to the Committee, respectively.

Because it appears that the Committee accepted a total of $15,000 in excessive contributions from the two individuals which was not refunded, redesignated or reattributed within the time frame established by 11 C.F.R. § 103.3(b)(3), there is reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from two individual contributors totalling $15,000.

5. Contribution from Connected Organization

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any political committee to knowingly accept or receive any contribution containing corporate funds. The Committee's 1985 Year End Report discloses a $1000 contribution from Bruno's, Inc., the Committee's corporate connected organization, on August 20, 1985.

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The Commission sent an RFAI notifying the Committee that the Act precluded the making and knowing acceptance of corporate contributions and accordingly, recommended the Committee refund and/or transfer out the funds. As a response to the RFAI, the Committee's 1990 30 Day Post-General Report discloses a $1000 refund to Bruno's, made on November 19, 1990.

As previously noted, Bruno's, Inc. is listed as a "corporate connected organization" on BGGL's "Statement of Organization." Under 11 C.F.R. § 104.5(b)(3), a corporate connected organization may reimburse its separate segregated fund for solicitation or other administrative costs provided such reimbursement is made no later than 30 days after the expense was paid by the separate segregated fund. In this instance, there is no information available regarding the timing or purpose of the receipt of funds from Bruno's. Thus, the contribution from Bruno's to Bruno's Good Government League appears to be a prohibited corporate contribution which was not timely refunded. Therefore, there is reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, violated 2 U.S.C. § 441b(a) by accepting a prohibited contribution from Bruno's, Inc., its corporate connected organization, totalling $1000 in 1985.

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A PROFESSIONAL CORPORATION

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DANIEL J. [illegible]
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MAYER U. NEWFIELD
OF COUNSEL IN BIRMINGHAM

FRANCES HEDT
OF COUNSEL IN BIRMINGHAM

PROF. JOSEPH W. BLACKBURN
SCHOLAR IN RESIDENCE

WILLIAM G. WEST, JR.
1922-1970

May 20, 1992

VIA FEDERAL EXPRESS
and REGULAR MAIL

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92 MAY 21 PM 3:10

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Ms. Veronica M. Gillespie
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3512

Dear Ms. Gillespie:

Our firm represents Bruno's, Inc., and the Bruno's Good Government League (the "Committee"). Enclosed is the original Statement of Designation of Counsel form, executed by Ronald G. Bruno, the Chief Executive Officer of Bruno's, Inc. (previously sent to you by telecopier). On May 8, 1992, our client received correspondence from the Federal Election Commission (dated May 5, 1992) concerning MUR3512, stating that there is reason to believe that Bruno's Good Government League violated numerous provisions of the Federal Election Campaign Act of 1971, as amended. The letter also contained a lengthy Factual and Legal Analysis and a Proposed Conciliation Agreement.

Our client is very interested in resolving this matter by conciliation and wishes to cooperate fully with the Federal Election Commission. In fact, the subject matter of the MUR consists entirely of facts that were voluntarily brought to the attention of the Federal Election Commission by our client, when it first consulted with legal counsel about the Committee.

Our client, however, will require additional time within which to respond fully to the allegations contained in the FEC correspondence, and to address the Proposed Conciliation Agreement.

As you know, two of the executives who were instrumental in the formation and operation of the Committee were killed recently in a tragic plane crash. Mr. Glen Griffin, Treasurer of the Committee, has been out-of-town and will not be available to meet with us until next week. Other executives of the corporation who are knowledgeable about the Committee, including the Chief Executive Officer of Bruno's, Inc., are also out-of-town. Accordingly, we will need at least two (2) weeks in order to respond fully to the FEC correspondence.

We respectfully request an extension of two (2) weeks from today, within which to respond to the Factual and Legal Analysis and Proposed Conciliation Agreement. If you have any questions please do not hesitate to contact me at the above telephone number. We appreciate your consideration of this matter and look forward to a prompt and fair resolution.

Sincerely,

KIM E. ROSENFIELD
For the Firm

DJB/pms
cc: Mr. Ronald G. Bruno
Mr. Glen Griffin
Ms. Katherine Byrd

rosen.ltr

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3512

NAME OF COUNSEL: Kim Rosenfield

ADDRESS: Sirote & Permutt, P. C.
2222 Arlington Avenue South
Birmingham, Alabama 35205

TELEPHONE: (205) 930-5161

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

May 19, 1992
Date

Ronald G. Bruno
Signature

RESPONDENT'S NAME: Bruno's, Inc.

ADDRESS: 300 Research Parkway
Birmingham, Alabama 35211

HOME PHONE:

BUSINESS PHONE: (205) 940-9400

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 22, 1992

Ms. Kim E. Rosenfield, Esq.
Sirote & Permutt
2222 Arlington Avenue South
P.O. Box 55727
Birmingham, Alabama 35255-5727

RE: MUR 3512
Bruno's Good Government League
and Glenn J. Griffin, as treasurer
Bruno's Inc.

Dear Ms. Rosenfield:

This is in response to your letter dated May 20, 1992, which we received by fax on May 21, 1992, requesting an extension of fourteen (14) days to respond to the reason to believe notification letters in the above-referenced matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on June 4, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Veronica M. Gillespie

Veronica M. Gillespie
Attorney

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WRITER'S DIRECT DIAL NUMBER:
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930-5161

June 3, 1992

VIA EXPRESS MAIL

Veronica M. Gillespie, Esq.
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3512 Bruno's Good Government League and Glenn J. Griffin, as Treasurer; Bruno's, Inc.

Dear Ms. Gillespie:

On behalf of Bruno's, Inc. and the Bruno's Good Government League we appreciate the extension of time that has been granted for a response to the Factual and Legal Analysis and Proposed Conciliation Agreement, in the above matter. We intend to send to you, by telefax, a full response on June 3. I have been concerned, however, that you also must receive an original signed response (not merely by telefax) on June 3.

The supporting materials, including affidavits and Brief, will be sent to you by telefax on June 3, with originals to follow by express mail.

We wish to reiterate our clients' willingness to cooperate fully in your investigation and resolution of this matter. As demonstrated by their actions from the very date that they realized that federal laws were implicated, they have had nothing but good intentions. If there are additional materials or information

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that would assist you in your consideration of this matter, please do not hesitate to call. Thank you for your consideration.

Very truly yours,

Kim E. Rosenfield
FOR THE FIRM

cc: Glenn J. Griffin

Ref: KER/26548

9204091441 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3S12
Bruno's, Inc.,	)	
The Bruno's Good Government League,	)	
and Glenn J. Griffin, as Treasurer.	)	

INITIAL RESPONSE

The above matter initiated by the Federal Election Commission ("Commission"), led to initial findings that there was reason to believe that Bruno's, Inc. ("Bruno's") and the Bruno's Good Government League ("the Committee") (collectively, "Respondents") violated various provisions of the Federal Election Campaign Act of 1971, as amended (the "Act").

All of the alleged violations were disclosed in full to the Commission by the Respondents in December 1990, immediately after Respondents first became aware of the disclosure requirements of the Act. During December 1989, Respondents performed their own investigation of the facts and the law relating to the establishment of the Committee, its receipts and expenditures, and all its activities. As a result of its legal and factual analysis, the Committee filed a statement of organization and the requisite disclosure reports, requested and received refunds of overpayments made to candidates, repaid contributions that were in excess of the

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limitations on such contributions, and took all steps necessary to comply fully with the Act. All of the steps were taken prior to investigation by the Commission and prior to any contact from the Commission, with the exception of a single notice relating to one violation, which in fact was the circumstance that made the Respondents aware that the Act applied in any form to the Committee's activities.

The evidence shows that Respondents acted innocently and in good faith, with no intention to violate or circumvent the Act. The evidence further demonstrates that, while certain violations occurred, they did not include substantial sums of money or large numbers of individuals. The nature of the violations and the conduct of the Respondents demonstrate that the violations were de minimis in effect, unintentional, and resulted in no undue influence, damage, or harm.

The Act, of course, was designed to govern the creation and conduct of political committees. It aims "to promote fair practices in the conduct of election campaigns" (Senate Report No. 92-96), by providing control over and disclosure of campaign contributions and expenditures. In this case, the Respondents have disclosed completely all of their activities and have aggressively brought themselves to compliance with the limitation provisions. By providing favorable treatment to an innocent infringer of the law who voluntarily complies, the Commission will encourage this type of self-regulation. By contrast, if the Commission treats an

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innocent defender harshly, it sends a message that those who make mistakes should seek to hide their transgressions.

Further, substantial penalties in this case will serve to deter unsophisticated and apolitical citizens from becoming involved in the electoral process. Unless a company is already well-versed in the nuances of election law and the regulatory process, and unless it has the benefit of a full-blown administrative, legal and public affairs staff, it should not become involved in political campaigns. The Respondent company and its leadership believed in the openness of the political system. They shared the old-fashioned beliefs that politics is a form of community service and political contributions a type of charitable contribution. This is the type of public citizen that should remain involved, and not be discouraged or deterred from participation.

The proper message for the Commission to send in this instance, would be that self-

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investigation and voluntary compliance should lead to positive reinforcement, and not punishment. The penalty should be de minimis or there should be no penalty at all, but, rather, praise and appreciation designed to encourage other innocent offenders to comply fully with the Act.

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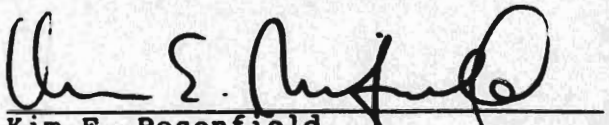
Respectfully submitted,



Kim E. Rosenfield
Attorney for
Bruno's Good Government League
and Glenn J. Griffin, as
Treasurer; Bruno's, Inc.

OF COUNSEL:
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NIN E. ROSENFIELD
STEVEN L. NICHOLAS
GREGORY D. HYDE
ROY F. KING
LENORA W. PATE
BARRY A. RAISDALE
DONALD M. WRIGHT
DANIEL J. BURNICK
JOHN M. RANDOLPH
RODNEY E. NOLEN
JOHNNIE F. VANN
ROBERT R. BAUGH
JOHN P. BURBACH
J. RUSHTON McCLESS
CHRISTINE SAMPSON HINSON
MICHAEL A. YOUNGPETER
R. DAVID PROCTOR
WILLIAM J. GIBBONS, JR.
THOMAS A. ANSLEY
JAMES S. ROBERTS, JR.
BRADLEY J. SILAR
ANTHONY C. WILLOUGHBY
THOMAS G. TUTTEN, JR.
PETER L. LOWE, JR.
C. RANDAL JOHNSON
JEFFREY H. WERTHEIM
W. McCOLLUM HALCOMB
H. FREDRICK SIMPLER, JR.
DONNA K. BOWLING
CANDACE L. HEMPHILL
STEPHEN B. PORTERFIELD
ANNETTE M. CARME
AMY L. HERRING
DAVID W. LONG
NANETTE SIMS
GREGG L. SMITH
JUNE WANG
ROBERT W. RUTH
FRED L. COFFEY, JR.
J. JEFFERY RICH
ALBERT L. VREELAND, II
JAMES S. WILLIAMS
MAYER U. NEWFIELD
OF COUNSEL IN BIRMINGHAM
FRANCES HEDDT
OF COUNSEL IN BIRMINGHAM
PROF. JOSEPH W. BLACKBURN
SCHOLAR IN RESIDENCE
WILLIAM G. WEST, JR.

June 8, 1992

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VIA FEDERAL EXPRESS

Veronica M. Gillespie, Esq.
General Counsel's Office
Federal Election Commission
Room 657
999 E Street NW
Washington, D.C. 20463

Re: MUR 3512

Dear Ms. Gillespie:

Due to circumstances beyond our control, we were unable to provide until today this follow-up to the initial response (provided to you on June 4, 1992) to the Commission's Factual and Legal Analysis and Proposed Conciliation Agreements in the above matter. Enclosed for your consideration are the following:

1. Respondent's Brief
2. Affidavit of Ronald Bruno
3. Affidavit of Glenn Griffin

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Also attached are the additional Statement of Designation of Counsel forms which you requested.

We appreciate the opportunity to supplement the Initial Response of Bruno's, Inc. and the Bruno's Good Government League, previously sent to you by overnight mail on June 3, 1992. We also appreciate the opportunity to discuss this matter with you further and enter into an appropriate conciliation agreement, that will serve the purposes of justice and further the goals of the Federal Election Campaign Act.

Please do not hesitate to call if you have further questions or wish to discuss these matters further.

Very truly yours,

Kim E. Rosenfield

Kim E. Rosenfield

cc: Ronald Bruno
Glenn Griffin

Ref: KER/26558A

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bl cc: Richard Cohn, Esq.
Phyllis Coggin
Valerie Young

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3512
Bruno's, Inc.,	)	
The Bruno's Good Government League,	)	
and Glenn J. Griffin, as Treasurer.	)	

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RESPONDENT'S BRIEF

Introduction

The above matter is based upon initial findings by the Federal Election Commission ("Commission"), of reason to believe that Bruno's, Inc. and the Bruno's Good Government League (collectively, "Respondents") have violated various provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Commission alleges that Bruno's Good Government League (the "Committee") violated the Act by failing to timely file its statement of organization and other reports, by making two excessive contributions (totaling $2,500) to two federal candidate committees, by accepting excessive contributions (totaling $15,000) from two individual contributors and by accepting a prohibited contribution totaling $1,000 in 1985 from Bruno's, Inc., its corporate connected organization. The latter contribution forms the basis for the Commission's finding reason to believe that Bruno's, Inc. violated the Act.

The evidence shows that all of these alleged violations and the surrounding facts, with the sole exception of the failure to timely file a statement of organization,

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were brought to the Commission's attention by the Respondents themselves. It is indisputable that the Respondents undertook their own investigation and voluntarily brought themselves into compliance with the disclosure requirements and contribution limitations of the Act.

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Statement of the Facts

During the Depression, Joe Bruno, grandfather of the current Chief Executive Officer of Bruno's, Inc., invested his family's life savings of Six Hundred Dollars ($600) in a small grocery store in Birmingham, Alabama, which he solely operated until he was later joined by his brothers Sam, Lee, and Angelo. (Ronald Bruno Aff. at 1.) Because of its innovative marketing approach and philosophy, Bruno's, Inc. became one of the fastest growing food chains in the state of Alabama, and, later, the nation. (Id.) By 1970 the Corporation had expanded to the Huntsville and Tuscaloosa areas of the state and operated a total of 29 supermarkets. (Id.) As a response to their company's rapid growth and in an effort to raise additional working capital, the brothers decided to offer Bruno's, Inc.'s stock to the public in 1971. (Id.)

During the establishment of their grocery business, the Bruno brothers distinguished themselves as upstanding citizens of their local community and strove to promote their "belief in the good of people, their love of family and community, and their ideals" by supporting various religious, educational, and community organizations. (Id.) The brothers adhered firmly to their belief that it was their duty to improve the world for their families and community by becoming actively involved in local affairs. (Ronald Bruno Aff. at 1-2.)

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In the early 1980's the Bruno brothers became aware that many of the community programs which they supported, and in particular, education, required stronger leadership in local and state government. (Id. at 2.) Consequently, the three brothers, along with five other executives and administrators of Bruno's, Inc., donated Three Hundred Eighty-Six Dollars ($386) to a "kitty for candidates" to establish an informal fund to support local political candidates committed to improving the local community and state. (Id.)

A review of Bruno's, Inc.'s records (consisting of only a checkbook and bank statements), reveals that the group opened a bank account at a local bank and supported, with relatively small contributions, "local candidates whom they felt would further the philosophy of good leadership in government." (Id.) Between the years 1982 and 1985, a total of approximately twenty-four executive or administrative personnel contributed small amounts to the fund. During this period the group contributed to 26 state candidates and seven local candidates who ran as the hometown representative in Congress. (Id. at 2).

As the reputation for community service of the Bruno's company and its executives grew, from 1985 onward more candidates, their campaign managers, and other local businessmen solicited and received larger contributions from the group. (Ronald Bruno Aff. at 2.) Still, at its highest level, the Fund never contained more than Twenty-four Thousand

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Dollars ($24,000), except for one year, 1986, when a very hotly contested gubernatorial race sparked unprecedented political controversy in Alabama. According to the Committee's records, during 1986 the Committee supported ten local and state candidates and no federal candidates. (Id.)

In 1985, when funds became insufficient to support a candidate who requested a campaign contribution, the Committee--believing the support of local candidates to be a civic obligation in the nature of a charitable contribution--had the corporation, Bruno's, Inc., write a check in the amount of One Thousand Dollars ($1,000). (Griffin Aff. at 2.) No one involved in the Committee knew that corporate contributions were prohibited until three years later, when the Committee engaged counsel. Upon its realization that such a contribution violated the Act, the Committee voluntarily refunded it to Bruno's, Inc. (Id.)

According to the records of the Committee, during 1986 the bank account was nearing depletion; (Id.) therefore, at various times throughout the year, Angelo Bruno and Lee Bruno, two of the chief executive officers of Bruno's, Inc., deposited personal funds totaling Ten Thousand Dollars ($10,000) and Fifteen Thousand Dollars ($15,000), respectively. (Id.) Neither Bruno's nor the other people involved in the Committee knew of the Act's limitations on individual contributions until counsel were consulted in 1989. As soon as they learned that they were in violation, however,

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Committee voluntarily and without any Commission action, decided to remedy this. These amounts were reallocated as loans to the Committee, and a repayment plan was formed, since the Committee had inadequate funds to repay the contributions all at once. (Id.)

The bank records further indicate that in 1987 and 1988 the Committee made contributions that exceeded the contribution limit of $1,000 per candidate, per election to two federal candidate Committees: a $2,500 contribution to the Richard Shelby Committee and a $2,000 contribution to the Ronnie Flippo Committee. In order to come into compliance, the Committee requested and received $2,500 in reimbursements from these candidates. (Griffin Aff. at 2.) These actions also were taken without any Commission request or order.

In fact, the Committee received no correspondence or notices or information from the Commission until January 1, 1989, when a letter written by a report analyst of the Federal Election Commission, Mr. Donald L. Averett, requested Bruno's, Inc. to file a Statement of Organization because of certain contributions made to the State Democratic Executive Committee of Alabama. The Bruno's executive officer receiving this letter immediately took it to local counsel for advice. (Griffin Aff. at 1.) Because of the policy of the Bruno family and Bruno's, Inc. to be completely honest and above reproach, the Committee voluntarily turned over its checkbook, deposit slips, and bank statements to counsel and made an

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extensive, good-faith, unsolicited effort to come into compliance with all laws and requirements of the Federal Election Commission, even retroactively. Since the Committee and Bruno's, Inc. became aware of the requirements of the Federal Election Act in December 1990, they have fully complied in every respect and no violations have been noted.

Argument

As far as the participants were concerned, they were fulfilling civic obligations in supporting local candidates--even in supporting congressional candidates whom they felt would best represent the local community in Washington. The group did not realize that its activities gave rise to a political action committee, required by law to register and file reports with the Federal Election Commission. At no time did the group consciously attempt to

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evade the law, for the group was unaware that any laws regarding political committees applied to their actions. As evidenced by its subsequent actions, if the Committee had known that such laws did apply, then it certainly would have taken all necessary steps to comply with the law.

The fact that the only documents relating to the Committee were a checkbook, bank statements, and deposit slips listing those executives who contributed to the "campaign kitty" evidences the group's unsophisticated method of managing the Committee. The group never involved lawyers or other professional advisors in their giving, because they considered it to be merely a matter of civic responsibility. All activities of the fund were limited to family members and executives of the company and never included people outside of this group. At no time did any of the candidates, their campaign managers, or any other person requesting contributions inform or make any indication to the Committee that either legal limitations on contributions for candidates or legal disclosure requirements existed, even when, in 1987 and 1988, the Committee made two contributions that exceeded the contribution limit of $1,000 per candidate, per election to two federal candidate Committees. (Ronald Bruno Aff. at 2.)

Further, it was the Committee's own initiative that led the Federal Election Commission to pursue this matter to its current status. All of the alleged violations were

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disclosed in full to the Commission by the Respondents in December 1990, immediately after Respondents first became aware of the disclosure requirements of the Act. During December 1989, Respondents performed their own investigation of the facts and the law relating to the establishment of the Committee, its receipts and expenditures, and all its activities. As a result of its self-motivated legal and factual analysis, the Committee filed a statement of organization and the requisite disclosure reports, requested and received refunds of overpayments made to candidates, repaid contributions that were in excess of the limitations on such contributions, and took all steps necessary to comply fully with the Act. All of the steps were taken prior to investigation by the Commission and prior to any contact from the Commission, with the exception of a single notice relating to one violation, which in fact was the circumstance that made the Respondents aware that the Act applied in any form to the Committee's activities.

As a result of the Bruno family's and Bruno's, Inc.'s policy to take all steps necessary to investigate and correct fully its errors, the Commission was saved the expense, time and other resources necessary to bring the Committee into compliance with all laws and requirements of the Federal Election Commission, even retroactively. (Ronald Bruno Aff. at 3.) A substantial amount of time, effort, and money was spent by the Respondents to recreate records from

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the very beginning of the formation of the Committee. Although it resulted in a great deal of embarrassment to the Bruno family and the Bruno corporation, the Committee requested and received all reimbursements from candidates, both locally and at the federal level, necessary to come into compliance.

Punishment of this degree, given these facts, will deter self-regulation and voluntary compliance with the Act. The proper message for the Commission to send in this instance, would be that self-investigation and voluntary compliance should lead to positive reinforcement, and not punishment. The penalty should be de minimis or there should be no penalty at all; but, rather, praise and appreciation designed to encourage other innocent offenders to comply fully with the Act.

By providing favorable treatment to an innocent infringer of the law who voluntarily complies, the Commission will encourage this type of self-regulation. By contrast, if the Commission treats an innocent offender harshly, it sends a message that those who make mistakes may as well take their chances that they will not be apprehended or, worse, should hide their transgressions.

Further, substantial penalties in this case will deter unsophisticated and apolitical citizens from becoming involved in the electoral process. Unless a company is already well-versed in the nuances of election law and the

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regulatory process, and unless it has the resources to employ administrative, legal and public affairs assistance, it had better not become involved in political campaigns. The Respondent company and its leadership believed in the openness of the political system. They shared the old-fashioned beliefs that politics is a form of community service and political contributions a type of charitable contribution. This is the type of public citizen that should remain involved, and not be discouraged or deterred from participation.

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STATE OF ALABAMA)

JEFFERSON COUNTY)

AFFIDAVIT

Before me, the undersigned Notary Public, in and for the County and State aforesaid, personally appeared the undersigned (hereinafter referred to as "Affiant"), who is known to me and, being by me first duly sworn, deposes and says:

Affiant, a resident of the City of Birmingham, County of Jefferson, State of Alabama, is the Chairman of the Board and Chief Executive Officer of Bruno's, Inc., a corporation organized and existing under the laws of the State of Alabama, (the "Corporation");

At the height of the Great Depression, my grandfather Joe Bruno invested his family's life savings of Six Hundred Dollars ($600) in a small 20 by 40 foot grocery store on the North side of Birmingham, Alabama which he operated alone until he was joined in the operation of the grocery store by his brothers Sam, Lee and Angelo.

By 1970, Bruno's, Inc., had grown to 29 supermarkets operating in the Birmingham, Huntsville and Tuscaloosa areas of the state of Alabama. The basic philosophy of the supermarkets was to maintain everyday low prices with no specials and to promote a happy "work family" atmosphere among the people who worked in their supermarkets and for their customers.

Because of its marketing approach, Bruno's, Inc. became one of the most innovative and fastest growing food chains in the nation. A need arose during 1971 to raise additional working capital and the brothers's decided to make Bruno's, Inc.'s first public stock offering.

During the time of establishing the grocery business, the Bruno brothers distinguished themselves as good citizens of their community and became increasingly active in civic and religious organizations. They became known for their deep religious faith, their belief in the good of people, their love of family and community, and their ideals. The Bruno brothers felt strongly the only way to make the world a better place for their families would be to return to

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the community a portion of what had been given to them by becoming very involved in religious, school and community affairs; and

In approximately 1981 the Bruno brothers realized that many of the projects that they believed so heartily in, such as education, needed better leadership in the local and state government and would require the active support of local people in political office. This resulted in the brothers donating Three Hundred Eighty Six Dollars ($386) to a "kitty for candidates" and approaching a few of key management personnel in their organization to set up an informal group to support candidates that would improve the local community and state with good leadership. They also provided support to people from the community whom they felt would be good representatives in Congress. The Bruno brothers thought of these individuals as representatives of those back home and therefore to them they were local candidates, as well.

The group opened a banking account with their local bank and supported, with relatively small contributions, local candidates who ran for political office whom they felt would further the philosophy of good leadership in government. The thought never occurred to the Bruno brothers or any of the group that there were restrictions or laws relative to the amounts grocery store executives in the small group could give to candidates or receive from contributors. They viewed support of local and state candidates as a civic and charitable type of activity.

During the next several years campaign managers and other local business men approached the Bruno group requesting support of certain candidates. None of the people requesting contributions told or indicated to anyone associated with the group that there were limitations on contributions that could be given to candidates or disclosure requirements. Because of their generous nature and belief that good people should serve in government offices, the group responded by giving their support to a number of local candidates, and a few federal committees, when asked.

On January 1, 1989 a letter written by a report analyst of the Federal Election Commission, Mr. Donald L. Averett, requested Bruno's, Inc to file a Statement of Organization because of certain contributions made to the State Democratic Executive Committee of Alabama. The executive officer receiving such letter immediately took it to local counsel for advice. This was the first time anyone in the group which had contributed to the "kitty for candidates" knew that such laws existed and applied to their

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activities. They never thought of their group as a "PAC". They had never involved lawyers or other such advisors in their giving, which they considered to be merely a matter of social responsibility. The activity was limited to the group of family members and friends who were the upper-echelon executives of the company.

Because of the policy of the Bruno family and Bruno's, Inc. to be completely honest and above reproach, it was decided to turn over their checkbook and bank statements to counsel, have counsel help them to make a good faith effort to come into compliance with al laws and requirements of the Federal Election Commission, even retroactively.

Because of the informal way of managing the group, the only items available were deposit slips listing those executives contributing to the "campaign kitty", the checkbook, and bank statements. Nevertheless, a substantial amount of time, effort, and money was spent to recreate records from the very beginning of the political group. When counsel explained that the laws required not only full and retroactive disclosure, but also refund of excessive contributions, the corporation instructed its lawyers to track down every such candidate. There was also a great deal of embarrassment to the Bruno corporation and to the Bruno brothers personally to have to request reimbursements from candidates, locally and at the federal level, but these efforts were made in order to come into compliance. The leadership of the corporation offered to disband the group and cease making contributions, for they would rather have done that than to be in violation of the laws or even seem to be violating the law.

At all times during the matters described above, there has been nothing but innocent, good faith and honorable intentions. There has been no intent at any time to violate the law or to circumvent any requirements of the Federal Election Commission, as demonstrated by the corporation's self-motivated efforts to investigate all possible violations and come into compliance.

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That the information contained in this Affidavit is true and correct to Affiant's best knowledge.

Dated this 4th day of June, 1992.

Ronald Bruno

Ronald Bruno,
Affiant

Sworn to and subscribed before me on this the 4th day of June, 1992.

Notary Public

Ref: PBC/2545336

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STATE OF ALABAMA)

JEFFERSON COUNTY)

FEDERAL ELECTION COMMISSION
92 JUN -9

A F F I D A V I T

Before me, the undersigned Notary Public, in and for the County and State aforesaid, personally appeared the undersigned, Glenn Griffin, (hereinafter referred to as "Affiant"), who is known to me and, being by me first duly sworn, deposes and says:

Affiant, a resident of the City of Birmingham, County of Jefferson, State of Alabama, is an executive of Bruno's, Inc. and the Treasurer of the Bruno's Good Government League, a Separate Segregated Funds political action committee (the "Committee");

On January 1, 1989 I received a letter written by a report analyst of the Federal Election Commission, Mr. Donald L. Averett. This letter requested Bruno's, Inc. to file a Statement of Organization because of certain contributions made to the State Democratic Executive Committee of Alabama. Until this time neither I, nor any individual contributing to the Committee, was aware that the activities of Bruno's executives involving political contributions were subject to any federal laws or that a political action committee as defined by the Federal Election Commission had actually been formed. In my capacity as an executive officer of Bruno's, Inc. I immediately took the letter to our local counsel for advice.

Counsel explained that the laws required not only a statement of organization and full disclosure of all contributions and expenditures, but also refunds of contributions that were over the limits established by law. Neither I nor any of the other participants in the so-called "kitty for candidates" was aware of these disclosure requirements or limitations on contributions. Of all the many candidates, committees, and fund raisers who solicited us individually and in our business, and who accepted our contributions, not one had ever mentioned any such requirements or limitations. The leadership of Bruno's, Inc. seriously considered terminating all these activities or disbanding and refraining from making any political contributions; however, it was decided that they could better demonstrate their good intentions by making a full and retroactive disclosure, correcting their past errors and establishing a record of compliance in the future. Therefore, I turned over all the records to counsel and instructed them to do all that was necessary to help Bruno's, Inc. and the

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Committee to come into compliance with all of the laws and requirements of the Federal Election Commission, even retroactively. Furthermore, we asked them to educate us on all the rules so we could comply on an ongoing basis.

Our records, which consisted of a checkbook and bank statements, show that the original fund consisted of $386 contributed by eight individuals who were executives and administrators of Bruno's, Inc. Activities of this checking account involved (1) relatively small contributions and expenditures, (2) expenditures to state and local candidates, for the most part, and (3) overall balances that are not substantial.

During the four year period beginning in 1982 and ending in 1985, for example, the total amount contributed to the fund from all sources during all four years was only $42,269. These contributions came from a total of approximately 24 executives or administrative personnel during the entire four year period. The median contribution amount received during those years was $300. From 1982 to 1985, contributions were made to 26 local candidates; only seven were federal and these were local candidates running as the hometown representative in Congress or the Senate. The median contribution size to candidates during this period was $300.

Beginning in 1985 more candidates and their campaign managers approached us to support their campaigns. They requested and received larger contributions from the fund. The leadership of Bruno's, by now established as philanthropic leaders in the local community, believed that if you wanted to improve your community by electing good candidates, you had to "put your money where your mouth is" and help to defray the increasing costs of campaigning.

For the four year period beginning 1986 and ending 1989 the median contribution made from the fund was still only $250. The median contribution from individuals during this same period of time was $500. The maximum we ever had in the checking account was $23,786, with the sole exception of the 1986 election year, when we had the largest amount ever in our checking account: $41,536. Yet, all contributions during that year were at the local and state level. The median amount in the checking account during the eight year period beginning 1982 and ending 1989 was $17,684.06; however, the 1986 election year in Alabama included a hotly contested governors race. No contributions went to federal candidates during the 1986 election year. During the years 1987-1989 the Committee supported a total of 9 federal candidates and 35 state candidates.

At all times, the bank account was viewed as as simple mechanism for a few Bruno's executives to "chip in"

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voluntarily to support local politicians. On one occasion, when the funds became insufficient to support a candidate and since we viewed our support of local candidates to be a civic obligation like a charitable contribution, the corporation wrote a check in the amount of $1,000. In 1989, when counsel discovered this contribution by reviewing our checkbooks and reconstructing the deposits and receipts, they informed the Committee that such amount needed to be refunded to Bruno's, Inc. and the Committee complied immediately. Similarly, when in 1986 the bank account came close to being depleted, Angelo Bruno and Lee Bruno, two of the chief executive officers of Bruno's, Inc. deposited personal funds in the amount of Ten Thousand Dollars and Fifteen Thousand Dollars respectively. Our counsel identified this as a violation during their review, also, and we immediately sought to remedy the situation. Since there was insufficient money in the account to repay the money, we reallocated these amounts as loans to the Committee and a repayment plan of the excessive amounts was begun.

During our review with counsel of the bank records we also learned that disbursements to candidates in some cases exceeded the limits. Despite the passage of time and, in some cases, how difficult it was to track down these candidates, the Committee requested reimbursements in order to come into compliance.

During the entire period of our extensive review with our counsel, our counsel informed us that they were in communication with representatives of the Federal Election Commission, who made various suggestions on how to handle the problems we brought to their attention. In every instance, we instructed counsel that we wished to take whatever corrective action was suggested by the FEC. We made substantial and costly efforts to correctly report all contributions received and disbursements made by the Committee.

The subject matter of the MUR consists entirely of facts that we voluntarily brought to the attention of the Federal Election Commission, by filing retroactive disclosure reports and each of these reports was executed by myself as Treasurer of the Committee. We wanted to, and did, voluntarily and in good faith, remedy every single violation, without any legal action by the FEC.

Any action taken during the period of time before January 1, 1989 was done without knowledge of the election laws and was done in the spirit of civic and charitable responsibility and commitment. There has never been any intent, at any time, to violate the law or to circumvent any requirements of the Federal Election Commission, as demonstrated by the corporation's self-motivated efforts to

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investigate all possible violations and come into compliance.

The information contained in this Affidavit is true and correct to Affiant's best knowledge.

Dated this 4th day of June, 1992.

Glenn Griffin,
Affiant

Sworn to and subscribed before me on this the 4th day of June, 1992.

Notary Public

Ref: PBC/2545337

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3512

NAME OF COUNSEL: Kim Rosenfield

ADDRESS: Sirote & Permutt, P. C.
2222 Arlington Avenue South
Birmingham, Alabama 35205

TELEPHONE: (205) 930-5161

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/28/92
Date

Signature Glenn Griffin

RESPONDENT'S NAME: Glenn Griffin

ADDRESS: 300 Research Parkway
Birmingham, Alabama 35211

HOME PHONE:

BUSINESS PHONE: (205) 940-9400

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3512

NAME OF COUNSEL: Kim Rosenfield

ADDRESS: Sirote & Permutt, P. C.
2222 Arlington Avenue South
Birmingham, Alabama 35205

TELEPHONE: (205) 930-5161

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/28/92
Date

Signature Glenn Griffin, Treasurer

RESPONDENT'S NAME: Bruno's Good Government League

ADDRESS: 300 Research Parkway
Birmingham, Alabama 35211

HOME PHONE:

BUSINESS PHONE: (205) 940-9400

92040914444

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Bruno's Good Government League and
Glenn J. Griffin, as treasurer

Bruno's, Inc.

SENSITIVE

MUR 3512

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 21, 1992, the Federal Election Commission found reason to believe Bruno's Good Government League ("Committee") and Glenn J. Griffin, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), (ii), (iii), and (iv), 441a(a), 441a(f), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). On the same day, the Commission also found reason to believe that Bruno's, Inc. violated 2 U.S.C. § 441b(a).

Thereafter, the Commission determined to enter into pre-probable cause conciliation with the Committee, Glenn J. Griffin, as treasurer, and Bruno's, Inc. ("Respondents"). On June 9, 1992, counsel for Respondents submitted a response to the Commission's reason to believe findings.

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II. DISCUSSION

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III. **RECOMMENDATIONS**

1. Accept the attached counterproposal submitted by Bruno's Good Government League and Glenn J. Griffin, as treasurer.

2. Accept the attached counterproposal submitted by Bruno's, Inc.

3. Approve the appropriate letter.

4. Close the file.

Lawrence M. Noble
General Counsel

Date 7/15/92

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
1. Committee's counterproposal
2. Bruno's, Inc.'s counterproposal
3. Copy of check

Staff Assigned: Veronica M. Gillespie

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Bruno's Good Government League and Glenn J. Griffin, as treasurer;	)	MUR 3512
	)	
Bruno's Inc.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3512:

1. Accept the counterproposal submitted by Bruno's Good Government League and Glenn J. Griffin, as treasurer, as recommended in the General Counsel's Report dated July 15, 1992.

2. Accept the counterproposal submitted by Bruno's Inc., as recommended in the General Counsel's Report dated July 15, 1992.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 15, 1992.

(Continued)

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4. Close the file.

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

Attest:

July 22, 1992
Date

Delores R. Harris
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., July 15, 1992 2:31 p.m.
Circulated to the Commission: Wed., July 15, 1992 4:00 p.m.
Deadline for vote: Wed., July 22, 1992 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

August 4, 1992

Kim E. Rosenfield, Esq.
Sirote & Permutt
2222 Arlington Avenue South
P.O. Box 55727
Birmingham, Alabama 35255-5727

RE: MUR 3512
Bruno's Good Government League
and Glenn J. Griffin, as treasurer
Bruno's Inc.

Dear Ms. Rosenfield:

On July 22, 1992, the Federal Election Commission accepted the signed conciliation agreements and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 433(a), 434(a)(4)(A)(i), (ii), (iii), and (iv), 441a(a), 441a(f), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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 agreements, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreements for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Veronica M. Gillespie

Veronica M. Gillespie
Attorney

Enclosures
Conciliation Agreements

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Bruno's, Inc.	)	MUR 3512
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Bruno's, Inc. ("Bruno's") ("Respondent") violated 2 U.S.C. § 441b(a).

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

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

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Bruno's Inc. is a corporation which was incorporated under the laws of the state of Alabama.

2. Bruno's Good Government League is the separate segregated fund of Bruno's Inc. established under the provisions of 2 U.S.C.§ 441b(b)(2)(C).

3. Glenn J. Griffin is the treasurer of Bruno's Good Government League.

4. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any corporation to make a contribution or expenditure in connection with any federal election.

5. On December 21, 1990, Bruno's Good Government League ("the Committee") filed a 1985 Year End Report disclosing that Bruno's, Inc., its corporate connected organization, made a contribution of $1000 to the Committee on August 20, 1985. The Committee's 1990 30 Day Post-General Report discloses a $1000 refund to Bruno's on November 19, 1990.

V. Respondent violated 2 U.S.C. § 441b(a) by making a prohibited $1000 corporate contribution to Bruno's Good Government League.

1. Respondent contends that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($500.00), 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 requirement thereof has been violated, it may institute a

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civil action for relief in the United States District Court for the District of Columbia.

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

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ Date 8/3/92
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENTS:

_____ Date 7/2/92
Name
Position Exec V.P. + C.F.O.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Bruno's Good Government League	)	MUR 3512
Glenn J. Griffin, as treasurer	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Bruno's Good Government League and Glenn J. Griffin, as treasurer, ("Respondents") violated 2 U.S.C. § 433(a), 2 U.S.C. § 434(a)(4)(A)(i)-(iv), 2 U.S.C. § 441a(a), 2 U.S.C. § 441a(f), and 2 U.S.C. § 441b(a).

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

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

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

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

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

1. Bruno's Good Government League is a separate segregated fund established under the provisions of 2 U.S.C. § 441b(b)(2)(C), and is a political committee within the meaning of 2 U.S.C. § 431(4)(B).

2. Glenn J. Griffin is the treasurer of Bruno's Good Government League.

3. Pursuant to 2 U.S.C. § 433(a) and 11 C.F.R. § 102.1(c), each separate segregated fund established under the provisions of 2 U.S.C. § 441b(b)(2)(C) must file a statement of organization no later than ten days (10) after establishment.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv), unauthorized political committees are required to file periodic reports of receipts and disbursements on a quarterly or monthly basis during calendar years in which a regularly scheduled election is held. Furthermore, in any other calendar year, unauthorized political committees shall file a Mid-Year and a Year-End report.

5. Pursuant to 2 U.S.C. § 441a(a), a political committee, other then a multicandidate political committee, is precluded from making contributions to a federal candidate or his authorized committees, which in the aggregate exceed $1000 per election.

6. Pursuant to 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution in violation of the provisions of 2 U.S.C. § 441a. Furthermore, 2 U.S.C. § 441a(a)(1)(C) limits contributions a person may make

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to a political committee, other than a candidate committee or a national party committee, to $5,000 per calendar year.

7. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any political committee to knowingly accept any contribution containing corporate funds.

8. Pursuant to 11 C.F.R. § 103.3(b)(3), contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor. If the reattribution or redesignation is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

9. On January 9, 1989, the Committee filed its statement of organization with the Commission. On December 21, 1990, the Committee filed Year End Reports covering calendar years 1982-1988. These reports evidenced that the Committee engaged in federal activity as early as 1982, nearly 7 years prior to the January 9, 1989 registration date.

10. The Committee failed to timely file reports for calendar years 1982 through 1989 and failed to file the 1990 April, July, and October Quarterly reporting periods in a timely manner.

11. On December 21, 1990, the Committee filed a 1987 Year End Report disclosing that on February 17, 1987, the Committee made an undesignated $2,500 contribution to the

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Richard Shelby Campaign. The Committee's 1991 Mid-Year Report discloses a $1,500 reimbursement from the Shelby Campaign on April 2, 1991.

12. On December 21, 1990, the Committee filed a 1988 Year End Report disclosing that on September 8, 1988, the Committee made an undesignated $2,000 contribution to the Ronnie Flippo Committee. The Committee's 1989 12 Day Pre-Special Election Report discloses a $1000 refund from the Ronnie Flippo Committee on January 17, 1989.

13. On December 21, 1990, the Committee filed a 1986 Year End Report disclosing that Angelo Bruno made a contribution to the Committee of $5,000 on February 19, 1986, and another $5,000 contribution on June 13, 1986 for a total of $10,000. The Committee's 1991 Year End Report discloses that $5,000 was refunded on August 30, 1991.

14. On December 21, 1990, the Committee filed a 1986 Year End Report disclosing that Lee Bruno made a contribution to the Committee of $5,000 on February 19, 1986, another $5,000 contribution on June 16, 1986, and a third $5,000 contribution on June 25, 1986, for a total of $15,000. The Committee's 1991 Year End Report discloses that $5,000 was refunded on August 30, 1991, but $5,000 has not yet been refunded to Lee Bruno's estate.

15. On December 21, 1990, the Committee filed a 1985 Year End Report disclosing that the Committee accepted a contribution of $1000 on August 20, 1985, from Bruno's, Inc., the Committee's corporate connected organization. The

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Committee's 1990 30 Day Post-General Report discloses a $1000 refund to Bruno's on November 19, 1990.

V. 1. Respondents violated 2 U.S.C. § 433(a) by failing to timely file the statement of organization within 10 days of establishment.

2. Respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv) by failing to timely file its reports.

3. Respondents violated 2 U.S.C. § 441a(a) by making two excessive contributions to two federal candidate committees, totalling $2,500.

4. Respondents violated 2 U.S.C. § 441a(f) by accepting excessive contributions from two individual contributors totalling $15,000.

5. Respondents violated 2 U.S.C. § 441b(a) by accepting a prohibited contribution from Bruno's, Inc., its corporate connected organization, totaling $1000 in 1985.

6. Respondents contend that the violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of twenty five thousand dollars ($25,000.00), 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 requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for

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the District of Columbia.

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

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 8/3/92
Lois G. Lerner — Date
Associate General Counsel

FOR THE RESPONDENTS:

_____ 7/2/92
Name — Date
Position TREASURER

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Bruno's INC.

CK. NO. 793935

DATE
7/2/92

AMOUNT
$**25,500.00**

PAY TO THE ORDER OF

FEDERAL ELECTION COMMISSION

BRUNO'S INC.

AUTHORIZED SIGNATURE

WACHOVIA BANK & TRUST COMPANY N.A.
WINSTON-SALEM N.C.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3512

DATE FILMED 8-7-92 CAMERA NO. 4

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