



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3848

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COMMISSION
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TED J. ANDROMIDAS
5073 Glen Iris
Los Angeles, CA. 90041

DEC 28 11 57 AM '93

December 27, 1993

MUR 3848

Federal Election Commission
Office of General Counsel
999 "E" Str. N.W.
Washington, D.C. 20463

Via Certified Express Mail
GB 488-786-397
RETURN RECEIPT REQUESTED

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
93 DEC 28 AM 11:46

Re: Complaint of Violations of Federal Election Campaign Act
Committed by:

- 1) Anti-Defamation League of B'Nai B'Rith (ADL);
- 2) Milken Family Fund (aka Milken Family Foundations);
- 3) Los Angeles Unified School District, et al.
- 4) Los Angeles County Office of Education

Dear Sir or Madam:

I am currently running for the Democratic nomination for U.S. Senator from California in the June 1994 primary election. I am also a long-time public political associate of Lyndon H. LaRouche, Jr., who has been a candidate for President in the past and who has recently set up an exploratory committee for his 1996 Democratic Presidential primary campaign. This letter is a formal complaint regarding both past and ongoing violations of the Federal Election Campaign Act (hereinafter, "the Act") committed by:

- 1) the Anti-Defamation League of B'Nai B'Rith ("ADL");
- 2) the Milken Family Fund aka Milken Family Foundations, now based in Santa Monica, CA.;
- 3) the Los Angeles Unified School District ("LAUSD"), and numerous other schools and school districts;
- 4) the Los Angeles County Office of Education, Downey, CA.

This complaint is separate from, and in addition to, any other complaints versus any of the named respondents.

The violations alleged in this complaint directly impact my ongoing campaign for the 1994 Democratic nomination for U.S. Senate in California, ongoing federal electoral campaigns of many other public political associates of candidate LaRouche, and the past federal electoral campaigns of myself and many other public political associates of LaRouche.

I have already publicly announced my campaign for the 1994 California Democratic primary for U.S. Senator, and intend to run my campaign as a public political associate of LaRouche. I will prominently feature my political association with LaRouche, and his policies and programs, in my campaign. From my personal knowledge and belief, many other political associates of LaRouche have already announced a similar intention to conduct federal electoral campaigns for the 1994 election year as public political associates of LaRouche (see Attachment "G"). On knowledge and

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belief, many others will announce similar plans in the near future.

Attachment "F" is a list of individuals whose names have appeared on the ballot for federal elective office in various states who have campaigned as public political associates of candidate LaRouche in the election years 1988, 1990, and 1992, years relevant to this complaint.

The specific violations of the Act by the ADL and other respondents which are the basis of this complaint are the ADL's publication and wide-scale public dissemination nationwide, in concert with and/or financed by other respondents, of specific printed materials opposing candidate LaRouche and others who have campaigned, or are campaigning, as public political associates of LaRouche. Such prohibited activity by respondents has occurred and is occurring through the ADL's so-called "prejudice-reduction" curriculum for schools, known as "A World of Difference" ("AWOD"). Documents on the "A World of Difference" program state that respondent the Milken Family Fund has provided many hundreds of thousands of dollars for the circulation of these materials to schools, and that the Los Angeles Unified School District (LAUSD), the Los Angeles County Office of Education, and many other schools and school districts, have circulated and are circulating these ADL materials to teachers, guidance counselors, administrators, and students. To my knowledge, neither the ADL, the Milken Family Fund, the LAUSD, nor the Los Angeles County Office of Education are registered with the FEC as political committees. In addition, although not the focus of this complaint, the ADL is expanding the "A World of Difference" program to include both "workplaces" ("A World of Difference in the Work-place") and college campuses ("A World of Difference on Campuses").

The violations of the Act are the making of prohibited contributions and/or expenditures by the ADL and the other named parties, in the form of published materials, the costs of production and dissemination of these published materials, and the costs of teacher training and other "workshops" in this particular ADL program, plus such pro-rated portions of teachers' and administrators' salaries, and school plant and facilities's budgets, as have been and continue to be used to propagate these materials and statements. The prohibited acts include expenditures for the research costs, costs of writing and editing, direct costs of publishing and distributing of the printed materials, and training of the teachers and others for the program, and the use of the materials in the classroom, workshops, etc.

These acts, or a portion of them, are an illegal attempt on the part of the ADL and other respondents to this complaint to influence the outcome of federal elections in opposition to the candidacies of political associates of LaRouche, such as myself, in at least the years 1988, 1990, 1992, and currently. These contributions or expenditures do not qualify for any of the exemptions specified in 2 USC Section 431(8)(B).

A photocopy of the pertinent sections of the ADL's teaching materials

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for the Greater Southern California edition of the "A World of Difference" program is attached (see Attachment "A"). Note that the Milken Family Fund, associated with convicted felon Michael Milken, is listed as a "Sponsor" of the program. Materials from LAUSD state that the Milken Family Fund contributed "over \$300,000" to the initial 1988-89 "A World of Difference" program for the LAUSD (See Attachment "E").

As you will note from the excerpted ADL documents, Lesson 14 ("Hate Groups in America") has approximately one-half page, on page 95, on candidate LaRouche and the candidates movement associated with him, in a section entitled, "National Caucus of Labor Committees." The text at the bottom of page 95 states that the material there is taken from another 1988 ADL curriculum, entitled, "Extremist Groups in the United States, A Curriculum Guide." The same page of the ADL's "A World of Difference" curriculum (see Attachment "A") states in part:

" . . . Many LaRouche followers have run for public office at the local, state, and federal levels. LaRouche himself has run for president in 1976, 1980, 1984, and 1988. However, he has garnered only a minute percentage of the votes cast."

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Note that these ADL-published and widely disseminated materials specifically target the federal electoral candidacies of public political associates of LaRouche. Since I and other LaRouche political associates have already announced our intention to campaign for federal elective office as public political associates of LaRouche, clearly the continuing, current circulation of the above materials directly negatively impacts my and other LaRouche political associates's ongoing federal electoral campaigns. Attachment "C" includes documents from the Los Angeles County Office of Education proving the ongoing nature of the ADL's "A World of Difference" program into 1992 and 1993.

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The ADL's clear purpose in publishing and disseminating these materials was and is to adversely affect the electoral efforts of all those who ran or are running for federal elective office who have chosen to associate themselves publicly with candidate LaRouche, at least in the years 1988, 1990, 1992, and currently. These ADL "teaching materials" single out only one Presidential candidate, Mr. LaRouche, and only one class of non-Presidential candidates, that of "LaRouche followers"; no other candidates or candidacies are even mentioned. Moreover, the ADL materials (see Attachment "A") "lump together" LaRouche and his political movement with the Ku Klux Klan, Neo-Nazis, etc. This is a direct partisan attack on Presidential candidate LaRouche and all political associates of LaRouche who have run, or are running, for federal office. The cited ADL materials refer to the political viewpoints of LaRouche and "LaRouche followers" as "extremist" in order to damage the federal electoral campaigns of LaRouche and his political associates, then proceed to libel LaRouche (and "LaRouche followers," by implication) as "anti-Semitic," with the same damaging intent.

By willfully circulating these false accusations against candidate LaRouche and his political associates, and by identifying the federal

electoral campaigns of LaRouche and his political associates, the ADL was and is actively engaged in federal electoral campaigns, both Presidential and for U.S. Congress and U.S. Senate, in express violation of the Act. The ADL is well-aware of the political impact their prejudicial statements regarding candidate LaRouche and his political associates could reasonably be expected to have on LaRouche and his political associates's electoral campaigns. Since these ADL materials have been and are being today circulated to literally tens of thousands of American teachers, guidance counselors, and administrators, and to millions of American students (including students of voting age or who will soon be of voting age), the direct negative political impact and direct negative effect on the federal electoral campaigns of LaRouche and his political associates, such as myself, of these highly prejudicial and partisan materials is obvious, and this negative effect is unquestionably deliberate on the part of the ADL.

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The particular edition of the "A World of Difference" curriculum cited above, including the materials on LaRouche and "LaRouche follower" candidates for electoral office, is, on knowledge and belief, currently in use in the Los Angeles Unified School District, the second-largest school district in the United States, and in many other schools, public and private, throughout Southern California. Attachment "B" provides LAUSD documentation of approximately 100 different schools within LAUSD known to be participants in the ADL's "A World of Difference" program. On knowledge and belief, this is only a small fraction of the schools actually involved in the program, even in Southern California.

Attachment "C" consists of two documents from respondent Los Angeles County Office of Education, advertising "Teacher of Teachers" workshops for the ADL's "A World of Difference" program, co-sponsored by the Office of Education. Respondent Los Angeles County Office of Education was and is an active participant in and sponsor of the "A World of Difference" program, and has carried out extensive public relations and organizing efforts in its own name (at taxpayer's expense) for the program, including sponsoring workshops at which the "AWOD" materials were distributed free-of-charge to participating teachers and other school personnel.

Similar editions of the "A World of Difference" program, presumably containing identical sections on candidate LaRouche and "LaRouche follower" candidates are known to be in use throughout the United States in at least thousands of public, private, and parochial schools. Attachment "D" is a LAUSD document which states that the original Teacher/Student Study Guide for the ADL's "AWOD" program, reviewed by LAUSD staff in May 1988 for possible use in Los Angeles, was prepared by the ADL's Miami office; this gives some sense of the nationwide character of the ADL's "AWOD" program. It is recommended that the Commission ask the ADL to produce documentation regarding all the schools nationwide which utilize or have utilized the "A World of Difference" program.

If you need additional information or need to reach me regarding this complaint, you may contact me or my political associate Jim Duree by telephone at our daytime work number, (213)-259-1867, or you may write to

me at:

Ted J. Andromidas, 5073 Glen Iris, Los Angeles, CA. 90041.

Very truly yours,

Ted J. Andromidas
Ted J. Andromidas

Enclosed:

List of Attachments
Attachments "A" - "G"

DECLARATION OF TED J. ANDROMIDAS

I, Ted J. Andromidas, declare under penalty of perjury under the Laws of the State of California that the above complaint is true and correct to the best of my knowledge and belief.

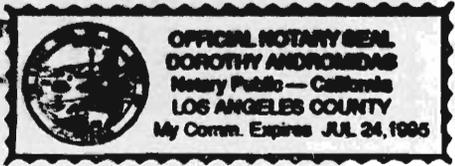
Ted J. Andromidas
Ted J. Andromidas

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State of California)
County of Los Angeles) ss.

Signed before me this 27th day of
December 1993.

Dorothy Andromidas
Notary Public



LIST OF ATTACHMENTS

Att. A -- Excerpts from ADL "A World of Difference" Program

Att. B -- List of Schools Using ADL "A World of Difference" Program

Att. C -- LAUSD Document re Milken Family Fund Involvement

**Att. D -- LAUSD Documents Regarding Staff Review of ADL "AWOD"
Materials Obtained from Miami ADL**

**Att. E -- Documents on Adoption of "AWOD" Program by LAUSD,
including Role of Milken Family Fund (Foundation)**

**Att. F -- Public Political Associates of Lyndon LaRouche
Whose Names Appeared on the Ballot for Federal Elective
Office in the Years 1988, 1990, and 1992**

**Att. G -- Public Political Associates of Lyndon LaRouche
Who Have Announced Their Intention to Campaign for
Federal Elective Office for Election Year 1994**

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-- ATTACHMENT "A" --

EXCERPTS FROM ADL "A WORLD OF DIFFERENCE"
("AMOD") PROGRAM (5 PAGES)

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"A WORLD OF DIFFERENCE" SPONSORS

THE ANTI-DEBAMATION LEAGUE OF B'NAI B'RITH

THE MILKEN FAMILY FOUNDATION

KCBS-TV

THE SOUTHERN CALIFORNIA HUMAN RELATIONS COALITION

24043601508

"A WORLD OF DIFFERENCE"

GREATER SOUTHERN CALIFORNIA
SECONDARY—UNIT 1

WRITING TEAM:

JANET CAMERON FISHER*
CALIFORNIA STATE UNIVERSITY, LOS ANGELES

ANGELA ANTENORE*
ANTI-DEEAMATION LEAGUE
PACIFIC SOUTHWEST REGION

CAROL DANAQ
ASIAN PACIFIC COUNSELING AND TREATMENT CENTER

JAMES DIMITRIJOU.
PALOS VERDES UNIFIED SCHOOL DISTRICT

CYNTHIA ESTY
ANTI-DEEAMATION LEAGUE
PACIFIC CENTRAL REGION

RONALD SIMA*
LOS ANGELES UNIFIED SCHOOL DISTRICT

JAMES ROGERS
SANTA MONICA/MALIBU UNIFIED SCHOOL DISTRICT

BARBARA VALLEJO-DOTEN
LOS ANGELES UNIFIED SCHOOL DISTRICT

CONSULTANTS:

JAMES BANKS*
UNIVERSITY OF WASHINGTON

MARJORIE B. GREEN*
WESTERN STATES EDUCATION DIRECTOR
ANTI-DEEAMATION LEAGUE OF B'NAI B'RITH

*EDITORS

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■ KEY IDEA:

Teenagers are being recruited by hate groups such as the Ku Klux Klan, the Aryan Nations, the American Neo-Nazi, and the White Aryan Resistance. Their efforts have often been successful.

■ OBJECTIVES:

1. To identify the ideology and activities of hate groups.
2. To contrast the goals and values of hate groups with a democratic belief system.

■ TIME:

Two to three class periods, plus library assignment.

■ MATERIALS:

"Shaved for Battle"

■ PROCEDURE:

1. Have students brainstorm their perception of hate groups. Cluster their ideas on the board under the following categories:
 - a. Who belongs to a hate group?
 - b. What do they believe?
 - c. What kinds of activities are they involved in?
2. Have students select two extremist groups to research and seek answers to the questions they previously brainstormed. (You may wish to list the following groups: American Nazi Party, American Protective Association, Aryan Nations, Black Panthers, German-American Bund, "No Nothing" Party, Ku Klux Klan, The Order, Posse Comitatus, Weathermen.)
3. Have students compare their new knowledge with their previous perceptions.

(A-3)

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VIOLENCE-PRONE ORGANIZATIONS

Ku Klux Klan—

An anti-Black, anti-Semitic, anti-immigrant, violent movement dating back to post-Civil War days. There are a number of competing Klan organizations with different leaders, but all have the same basic beliefs and use the same trappings of hoods, robes, and rituals.

Neo-Nazis—

An anti-Semitic, anti-Black, anti-immigrant group that patterns itself on the philosophy of Nazi Germany. The various neo-Nazi factions, the largest of which is the New Order, wear Nazi uniforms and regalia.

Aryan Nations—

Based in the American Northwest, this is a militant group promoting anti-Semitism, White supremacy and the establishment of a White racist state through a pseudo-theology called "Identity." The "Identity" movement holds that White "Aryans," not Jews, are the Biblical "chosen people." Hatred toward non-White races and relentless vilification of Jews are major components of the "Identity" movement's ideology.

Skinheads—

Skinheads are gangs of shaven-headed youths sporting Nazi insignia who espouse anti-Semitism and White supremacy. Many members have engaged in violence against Blacks, Jews and other minorities. Skinheads have been linked to several organized hate groups, many of whose leaders have targeted them for recruitment.

White Aryan Resistance (WAR)—

WAR is a White supremacist group headed by Tom Metzger of California. Metzger's influence extends well beyond his own group. In the mid-1980's Metzger began producing a videotaped series for cable television entitled "Race and Reason." The program features sympathetic interviews with hate group figures, and has been aired on "public access" cable channels in major cities across the country. WAR has been the group most active in the recruitment of Skinheads.

Christian Patriots Defense League—

A paramilitary organization, with a "survivalist" ideology, to which it has added anti-Black, anti-Semitic, anti-immigrant beliefs. Headquartered in Illinois, it has provided paramilitary training to persons steeped in hate.

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PROPAGANDA ORGANIZATIONS

National Caucus of Labor Committees (NCLC)—

An extremist group whose political arm was the now defunct United States Labor Party. It is headed by Lyndon H. LaRouche, Jr., whose conspiracy-oriented writings accuse various governments, groups, and prominent individuals of sinister and illegal plots to manipulate political, economic and social events. The group's publications have frequently promoted anti-Semitic views. The NCLC is the nucleus of a group of associated organizations that carry out LaRouche's program. Some of these are: the National Democratic Policy Committee which, despite its name, has no connection with the Democratic Party, the Fusion Energy Foundation, the National Anti-Drug Coalition. These groups exploit general public concern over such issues as nuclear energy and drug abuse in order to attract people to LaRouche's extremist beliefs. LaRouche also publicizes his program through the magazine *Executive Intelligence Review*, and the newspaper *New Federalist*. Many LaRouche followers have run for office at the local, state and federal levels. LaRouche himself has run for President in 1976, 1980, 1984 and 1988. However, he has garnered only a minute percentage of the votes cast.

Liberty Lobby—

A multi-million dollar propaganda organization that is the most active anti-Semitic group in the United States. Based in Washington, D.C., it publishes a weekly newspaper, *The Spotlight*, that has more than 100,000 subscribers. It has close ties to the Noonday Press, a publisher of pro-Nazi and other extremist books, and to the Institute for Historical Review, a pseudo-academic group, located in Torrance, California, that promotes, through publications and conferences, the anti-Semitic theme that the Holocaust is a "hoax."

Liberty Bell Press—

A propaganda outfit in West Virginia that publishes and widely disseminates hate literature. It is run by a neo-Nazi who was a member of the Hitler Youth before immigrating to the United States.

National Association for the Advancement of White People (NAAWP)—

NAAWP is a "Klan without robes" that provides an organizational framework through which its leader and founder, former Klan leader David Duke, exploits controversial issues such as busing, affirmative action and the financial troubles of U.S. farmers. Promoting itself as a "White rights" lobby, NAAWP contends that it is a "non-profit organization that defends White interests and rights." *NAAWP News*, the group's monthly newspaper, regularly publishes articles attacking Blacks, Jews and other minorities.

In addition, many extremist groups publish newspapers that contain articles and cartoons expressing their bigoted views.

Adapted from "Extremist Groups in the United States, A Curriculum Guide," Anti-Defamation League, 1988.

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--ATTACHMENT "B" --

LIST OF SOME SCHOOLS IN LAUSD USING
ADL "A WORLD OF DIFFERENCE" PROGRAM
(APPROXIMATELY 100 SCHOOLS LISTED)

(11 PAGES)

24043601513

INTER-OFFICE CORRESPONDENCE
Los Angeles Unified School District

INFORMATIVE

TO: Members, Board of Education

Date December 9, 1988

FROM: Leonard M. Britton

SUBJECT: A WORLD OF DIFFERENCE (AWOD) PROGRAM

Implementation of the above referenced program was approved by the Board on September 26, 1988 (see attached Board Report). At that time, staff indicated that schools recommended for participation would be reviewed for approval by Board Members.

Each Region and the Senior High Schools Division recommended schools for this first round based on the following criteria:

- CAP receiver schools which have experienced school/community based reservations.
- Schools in which the racial/ethnic diversity of the student population indicates a potential benefit.
- One or two schools with positive human relations and programs to serve as models.

Listed below are the schools recommended by Region Superintendents. Please recommend any changes you believe to be appropriate based on your knowledge and experiences and return your approved and/or revised list to Lorna Round at your earliest convenience, as the program will begin in January, 1989.

Please call Lorna Round at extension 6040 if you have questions.

REGION A

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Mr. Furutani	15th Street	Mr. Furutani	Carnegie JHS
"	135th Street	"	Curtiss JHS
"	Avalon Gardens	"	Dodson JHS
"	118th Street	"	Fleming JHS
"	Taper Avenue		
"	Meyler Street		
"	Dominguez		
"	Crestwood Street		

REGION B

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Walters	Miramonte	Ms. Walters	Edison JHS
"	Hooper Avenue	"	Drew JHS
"	Ascot Avenue	Ms. Quezada	Nimitz JHS
"	Holmes Avenue	Mr. Furutani	Markham Intermediate
Mr. Furutani	96th Street		
"	92nd Street		
Ms. Walters	Parmelee Avenue		
"	Russell		

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REGION C

<u>Board Member</u>	<u>Elementary Schools</u>
Ms. Walters	Hyde Park Boulevard
"	59th Street
"	Manchester Avenue
Mr. Furutani	97th Street
Mr. Gershman	Kentwood
"	Cowan Avenue
Mr. Furutani	Figueros Street
"	99th Street

<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Walters	Horace Mann JHS
"	Bret Harte Intermediate
Mr. Gershman	Wright JHS
Mr. Furutani	Compers Intermediate

REGION D

<u>Board Member</u>	<u>Elementary Schools</u>
Mr. Gershman	Marquez -
"	Pacific Palisades -
"	Canyon -
"	Kenter Canyon -
"	Brentwood -
"	Westwood -
"	Fairburn Avenue -
"	Overland Avenue -

<u>Board Member</u>	<u>Junior High Schools</u>
Mr. Gershman	Revere JHS
Ms. Walters	Audubon JHS
Mr. Gershman	Emerson JHS
"	Palms JHS

REGION E

<u>Board Member</u>	<u>Elementary Schools</u>
Ms. Weintraub	Chandler
"	Kester Avenue
Ms. Korenstein	Emelita Street 1
"	Stagg Street =
"	Tarzana •
"	Nestle Avenue 4
"	Lockhurst Drive S
"	Justice Street 2

<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Weintraub	Van Nuys JHS
Ms. Korenstein	Mulholland JHS
"	Portola JHS
"	Hale JHS

REGION F

<u>Board Member</u>	<u>Elementary Schools</u>
Ms. Korenstein	El Oro Way ¹²
Ms. Weintraub	Plainview Avenue
"	Pinewood Avenue
Ms. Korenstein	Limerick Avenue 5
"	Beckford Avenue
"	Nevada Avenue
Ms. Weintraub	Chase Street *
Ms. Korenstein	Castlebay Lane 2

<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Weintraub	Mt. Gleason JHS
Ms. Korenstein	Patrick Henry JHS
"	Robert Frost JHS
"	Northridge JHS

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REGION G

<u>Board Member</u>	<u>Elementary Schools</u>
Ms. Goldberg	Ann Street *
Ms. Quezada	Bushnell Way
"	Dacotah Street
"	Euclid Avenue
"	Glen Alta
"	Griffin Avenue
"	Kennedy
"	Utah Street

<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Quezada	Belvedere JHS
"	El Sereno JHS
"	Griffith JHS
"	Hollenbeck JHS

REGION H

<u>Board Member</u>	<u>Elementary Schools</u>
Ms. Quezada	Loreto Street
"	Annandale
Ms. Goldberg	Allesandro
<i>Quinn</i>	Arvester Avenue *
"	Elysian Heights
"	Ivanhoe
Ms. Quezada	Mt. Washington
"	Rockdale

<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Quezada	Burbank JHS
"	Nightingale JHS
"	Irving JHS
Ms. Goldberg	King JHS

SENIOR HIGH SCHOOLS DIVISION

<u>Board Member</u>	<u>Senior High Schools</u>
Ms. Goldberg	Belmont SHS
Mr. Furutani	Carson SHS
Ms. Walters	Fremont SHS
Ms. Goldberg	Hollywood SHS *

<u>Board Member</u>	<u>Senior High Schools</u>
Ms. Quezada	Lincoln SHS
Mr. Gershman	Palisades SHS
Ms. Korenstein	Reseda SHS
Ms. Weintraub	Verdugo Hills SHS

24043601516

M. Decker

Change to ...

INTER-OFFICE CORRESPONDENCE
Los Angeles Unified School District

REVISED INFORMATIVE

TO: Members, Board of Education

Date January 3, 1988

FROM: Leonard M. Britton

SUBJECT: A WORLD OF DIFFERENCE (AWOD) PROGRAM

Implementation of the above referenced program was approved by the Board on September 26, 1988. At that time, staff indicated that schools recommended for participation would be reviewed for approval by Board Members.

Each Region and the Senior High Schools Division recommended schools for this first round based on the following criteria:

- CAP receiver schools which have experienced school/community based reservations.
- Schools in which the racial/ethnic diversity of the student population indicates a potential benefit.
- One or two schools with positive human relations and programs to serve as models.

Listed below are the schools recommended by Region Superintendents. Please recommend any changes you believe to be appropriate based on your knowledge and experiences and return your approved and/or revised list to Lorna Round at your earliest convenience, as the program will begin in January, 1989.

Please call Lorna Round at extension 6040 if you have questions.

REGION A

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Mr. Furutani	Avalon Gardens	Mr. Furutani	Carnegie JHS
"	Crestwood Street	"	Curtiss JHS
"	Dominguez	"	Dodson JHS Peary JHS
"	15th Street	"	Fleming JHS
"	Meyler Street		
"	118th Street		
"	135th Street		
"	Taper Avenue		

REGION B

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Walters	Ascot Avenue	Ms. Walters	Drew JHS
"	Holmes Avenue	"	Edison JHS
"	Hooper Avenue	Ms. Quezada	Nimitz JHS
"	Miramonte	Mr. Furutani	Markham Intermediate
"	Parmelee Avenue		
"	Russell		
Mr. Furutani	92nd Street		
"	96th Street		

(B-4)

24043601517

REGION C

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Walters	59th Street	Ms. Walters	Bret Harte Intermediate
"	Hyde Park Boulevard	"	Horace Mann JHS
"	Manchester Avenue	Mr. Gershman	Wright JHS
Mr. Gershman	Cowan Avenue	Mr. Furutani	Gompers Intermediate
	Reservoir		
Mr. Furutani	Figueras Street		
"	99th Street		
	97th Street		
Goldberg	Wilton Place		

REGION D

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Mr. Gershman	Brentwood	Mr. Gershman	Revere JHS
"	Canyon	Ms. Walters	Audubon JHS
"	Fairburn Avenue	Mr. Gershman	Emerson JHS
"	Center Canyon	"	Palm JHS
"	Marquez		
"	Overland Avenue		
"	Pacific Palisades		
"	Westwood		
Goldberg	Wilton Place		

REGION E

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Weintraub	Chandler	Ms. Weintraub	Van Nuys JHS
"	Kester Avenue	Ms. Korenstein	Hale JHS
Ms. Korenstein	Emelita Street	"	Mulholland JHS
"	Justice Street	"	Portola JHS
"	Lockhurst Drive		
"	Nestle Avenue		
"	Stagg Street		
"	Tarzana		

REGION F

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Korenstein	Beckford Avenue	Ms. Korenstein	Robert Frost JHS
"	Castlebay Lane	"	Patrick Henry JHS
"	Chase Street*	"	Northridge JHS
"	El Oro Way	Ms. Weintraub	Mt. Gleason JHS
"	Limerick Avenue		
"	Nevada Avenue		
Ms. Weintraub	Pinewood Avenue		
"	Plainview Avenue		

24043601518

REGION C

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Quetzada	Ann Street	Ms. Quetzada	Belvedere JHS
"	Bushnell Way	"	El Sereno JHS
"	Dacotah Street	"	Griffith JHS
"	Euclid Avenue	"	Hollenbeck JHS
"	Glen Alta	Goldberg	Adams JHS
"	Griffin Avenue		
"	Kennedy		
"	Utah Street		
Goldberg	Castelar		
	San Pedro		

2844

REGION E

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Goldberg	Allendale Dayton HHS	Ms. Goldberg	King JHS
"	Blyden Heights Placencia	Ms. Quetzada	Burbank JHS
"	Ivanhoe	"	Irving JHS
Ms. Quetzada	Annandale	"	Nightingale JHS
"	Awater Avenue		
"	Loreto Street		
"	Mt. Washington		
"	Rockdale		
Goldberg	McNett		

SENIOR HIGH SCHOOLS DIVISION

<u>Board Member</u>	<u>Senior High Schools</u>	<u>Board Member</u>	<u>Senior High Schools</u>
Ms. Goldberg	Belmont SHS	Ms. Quetzada	Lincoln SHS
Mr. Furutani	Carson SHS	Mr. Gershman	Palisades SHS
Ms. Walters	Fremont SHS	Ms. Korenstein	Reseda SHS
Ms. Gershman	Hollywood SHS*	Ms. Weintraub	Verdugo Hills SHS

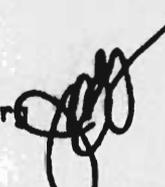
*Correction on Board Member area

24043601519

INTER-OFFICE CORRESPONDENCE
Los Angeles Unified School District

TO: Lorna Round

DATE: 1-5-89

FROM: Jackie Goldberg 

SUBJECT: District #3 Schools for World of Difference Program

In reviewing the memo dated January 3, 1989 to Dr. Britton, I would like the following schools in my district to receive the World of Difference Program:

*** Dayton Heights
*** Ivanhoe
*** Plascencia, Betty
*** Wilton Place
*** Adams Jr. High School
*** Belmont Jr. High School

** Castelar
** Norwood St.
** San Pedro St.
** Virgil Jr. High School

* Micheltorena St.
* Selma Ave.
* Twentieth St.
* Twenty-Eight St.

Schools with *** would greatly benefit from this program as there have been various racial tensions on these sites.

Schools with ** are isolated in terms of contacts with different ethnic groups and would benefit from exposure to others.

Schools with * could use some extra special programs.

If you have any questions, please feel free to call.

Thanks!!

(B-7)

24043601520

REGION D

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Mr. Gershman	Brentwood	Mr. Gershman	Emerson JHS
"	Canyon	"	Palms JHS
"	Fairburn Avenue	"	Revere JHS
"	Marquez	Ms. Walters	Andubon JHS
"	Overland Avenue		
"	Pacific Palisades		
"	Westwood		
Ms. Goldberg	Wilton Place		

REGION E

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Weintraub	Chandler	Ms. Weintraub	Van Noy JHS
"	Kester Avenue	Ms. Korenstein	Male JHS
Ms. Korenstein	Emelita Street	"	Milbolland JHS
"	Justice Street	"	Portola JHS
"	Lockhurst Drive		
"	Nestle Avenue		
"	Stagg Street		
"	Terzana		

REGION F

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Korenstein	Beckford Avenue	Ms. Korenstein	Robert Frost JHS
"	Castlebay Lane	"	Patrick Henry JHS
"	Chase Street	"	Northridge JHS
"	El Oro Way	Ms. Weintraub	Mt. Gleason JHS
"	Limerick Avenue		
"	Nevada Avenue		
Ms. Weintraub	Pinewood Avenue		
"	Plainview Avenue		

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REGION C

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Goldberg	Castelar	Ms. Goldberg	Adams JHS
"	San Pedro Street	Ms. Quezada	Belvedere JHS
"	28th Street	"	El Sereno JHS
Ms. Quezada	Dacotah Street	"	Hollenbeck JHS
"	Euclid Avenue		
"	Glen Alta		
"	Griffin Avenue		
"	Kennedy		
"	Utah Street		

REGION B

<u>Board Member</u>	<u>Elementary Schools</u>	<u>Board Member</u>	<u>Junior High Schools</u>
Ms. Goldberg	Allesandro	Ms. Goldberg	Virgil JHS
"	Dayton Heights	Ms. Quezada	Burbank JHS
"	Ivanhoe	"	Irving JHS
"	Plasencia	"	Nightingale JHS
Ms. Quezada	Annandale		
"	Atwater Avenue		
"	Loreto Street		
"	Mt. Washington		
"	Rockdale		

SENIOR HIGH SCHOOLS DIVISION

<u>Board Member</u>	<u>Senior High Schools</u>	<u>Board Member</u>	<u>Senior High Schools</u>
Ms. Goldberg	Belmont SHS	Ms. Quezada	Lincoln SHS
Mr. Furutani	Carson SHS	Mr. Gershman	Palisades SHS
Ms. Walters	Fremont SHS	Ms. Korenstein	Reseda SHS
Ms. Gershman	Hollywood SHS	Ms. Weintraub	Verdugo Hills SHS

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-- ATTACHMENT "C" --

DOCUMENTS FROM LOS ANGELES COUNTY

OFFICE OF EDUCATION (8 PAGES)

24043601525

Los Angeles County Office of Education
9300 East Imperial Highway, Downey, California 90242-2890 (213) 922-6111



August 1988

Stuart E. Gothold
Superintendent

TO: Chief Administrators, Selected Los Angeles County School Districts

**Attention: Assistant Superintendents, Educational Services
Directors of Curriculum and Instruction Programs
Principals of Elementary, Junior, and Senior High Schools
Directors of Bilingual Education
Head Start State Preschool Coordinators
Multicultural Education and Social Science Personnel
Consolidated Application Project Directors
School Improvement Coordinators**

**FROM: Jo Bonita S. Perez, consultant
Multicultural Education
Division of Curriculum and Instructional Programs**

**SUBJECT: ANTI-DEFAMATION LEAGUE'S "A WORLD OF DIFFERENCE"-
TRAINERS OF TRAINERS WORKSHOP**

You are invited to attend a trainers of trainers program entitled "A World of Difference" ("AWOD"). "AWOD" is a curriculum and media based project designed to reduce racial, ethnic, and religious prejudices among children and adults.

The Los Angeles County Office of Education in cooperation with the Anti-Defamation League of B'nai B'rith, KCBS-TV, and the Los Angeles Times will provide a training for educators on how to incorporate the "AWOD" materials in their History/Social Studies and English Language Arts curriculum. The training dates are scheduled for two different days. You may choose to attend one of the following:

Date: Tuesday, September 6, 1988

Time: 8 a.m - 3:30 p.m.

**Location: Jewish Community Building
6505 Wilshire Boulevard
Los Angeles**

Directions: Between La Cienega and Crescent Heights

Fee: No charge. Complimentary lunch provided.

(Over)

24043601526

ANTI-DEFAMATION LEAGUE'S "A WORLD OF DIFFERENCE" TRAINER OF TRainers WORKSHOP
August 1988
Page 2

Date: Thursday, September 8, 1988

Time: 8 a.m. - 3:30 p.m.

Location: City of South Gate Girls Clubhouse
4900 Southern Avenue
South Gate
(Map on back of flyer)

Fee: No charge. Complimentary lunch provided.

During the workshops, the participants will receive a set of the "AWOD" curriculum materials and be trained to use strategies for training others to use the curriculum materials in their classrooms. The "AWOD" curriculum materials have been aligned with the new History Social Studies and English Language Arts frameworks. Registration is limited at both sessions. If you plan to attend, please complete the enclosed registration form and forward to:

Anti-Defamation League, "AWOD"
6505 Wilshire Boulevard, Suite 814
Los Angeles, California 90048.

For further information regarding this trainers of trainers workshop, please contact Angela Antenore at (213) 655-8205.

Approved:
Dr. Donald K. Duncan, director
Division of Curriculum and Instructional Programs

JBP:pyr

Enclosure

CIP-5-88/89

(C-2)

7 2 5 1 0 6 3 4 4 3



Los Angeles County
Office of Education

A WORLD OF DIFFERENCE.

THE LOS ANGELES COUNTY OFFICE OF EDUCATION AND THE ANTI-DEFAMATION LEAGUE OF B'NAI B'RITH, THE MILKEN FAMILY FOUNDATION, KCBS-TV, AND THE SOUTHERN CALIFORNIA HUMAN RELATIONS COALITION extends an invitation for you to be part of a Trainer of Trainers Workshop

"A WORLD OF DIFFERENCE" (AWOD) is a cooperative partnership that will mobilize the schools, media, and community in an intensive campaign to reduce racial, ethnic and religious prejudice. "A World of Difference" activities encourage the valuing of differences in our increasingly pluralistic society while providing an understanding of prejudice tools for reducing prejudice and discrimination. Its activities are designed to encourage K-12 and adult students to distinguish between fact and opinion, between generalizing and stereotyping.

PARTICIPANTS WILL RECEIVE TRAINING

- Conduct AWOD workshops within their schools and districts.
- Liaison with AWOD support staff in utilizing television programming and print supplements.
- Identify how "AWOD" is aligned with the History/Social Studies and English/Language Arts frameworks and how it can be used to infuse human relations materials into the curriculum.
- Demonstrate a variety of techniques for reducing ethnic and racial tensions at local school sites.
- Implement a variety of cultural sensitivity strategies to provide collegial support, feedback, and skill development opportunities for teachers.
- Develop strategies for confronting racial/ethnic slurs and enhancing student self-esteem through cooperative learning and conflict resolution.
- Coordinate involvement of parents and the community in reinforcing AWOD activities.

PARTICIPANTS WILL RECEIVE:

- Free, 256 page National Studies Guide, plus additional lessons specific to the events and concerns of the Southern California areas.
- Information for ordering complimentary videos and resources which can be checked out from the Anti-Defamation League office.
- Bibliography and filmography will be given to each participant.

TRAINER OF TRAINERS WORKSHOP FOR K-12 EDUCATORS

Date: Tuesday, March 7, 1989
Time: 8 a.m. to 3:30 p.m.
Location: Santa Fe Springs Town Hall Center
 Social Hall
 11740 East Telegraph Road
 Santa Fe Springs (Map is on the back.)
Fee: No charge. Complimentary lunch provided.

Detach.....Detach
"A WORLD OF DIFFERENCE" WORKSHOP PRE-REGISTRATION FORM

(C-3)

Please complete this registration form and return by: FRIDAY, MARCH 3, 1989

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A WORLD OF DIFFERENCE II: AN EXPANSION ONE-DAY WORKSHOP Registration Form



PLEASE NOTE

The one-day A WORLD OF DIFFERENCE II: AN EXPANSION Training will be offered on two different dates. Both have been scheduled for the Spring.

SELECTION PROCESS

In the appropriate space below, please mark your first and second preference for training. Each training is limited to 80 participants. We will try to confirm your first choice. If that session is full when we receive your completed registration form and payment, we will try to accommodate your next choice.

REGISTRATION FEE

The \$85 registration fee includes a collection of prejudice awareness curricula materials, refreshments and lunch. Please note the deadline dates for each scheduled training are indicated in the parenthesis.

A WORLD OF DIFFERENCE II: AN EXPANSION TRAINING DATES

DATE PREFERENCE AND TIME

- Monday, March 8, 1993
8:30 a.m. to 3:30 p.m.
(Deadline for registrations & refunds: 2/25/93)
- Monday, May 17, 1993
8:30 a.m. to 3:30 p.m.
(Deadline for registrations & refunds: 5/6/93)

LOCATION

- L.A. County Office of Education
9300 Imperial Highway, Boardroom
Downey, California
- L.A. County Office of Education
9300 Imperial Highway, Boardroom
Downey, California

Name: _____

Grade Levels: _____

Subject Area(s): _____

District/Agency: _____

School: _____

Work Phone: _____

Address: _____

City/Zip: _____

Enclosed is my check, or purchase order, made payable to the Los Angeles County Office of Education. The \$85 registration fee includes curricula materials, refreshments, and lunch.

Please mail registration to: Francine Padilla, Secretary
Multicultural Education
Los Angeles County Office of Education
Curriculum Programs and Instructional Technologies
9300 Imperial Highway, Room 299
Downey, CA 90242-2890

24043601529

Los Angeles County Office of Education

9300 Imperial Highway, Downey, California 90242-2890 (310) 922-6111

Stuart E. Gothold
Superintendent

January 5, 1993

TO: Chief Administrators, Los Angeles County School Districts

Attention: Assistant Superintendents, Educational Services
 Directors of Curriculum and Instruction
 Directors of Bilingual Education
 Directors of Adult Education
 Deans of Instruction, Community Colleges
 Principals of Elementary, Junior, Senior High Schools
 and Continuation High Schools
 Coordinators of Multicultural Education and Social Science
 Coordinators of School Improvement
 PTA Presidents

FROM: Tom Gibbons, Consultant, History-Social Science
 Division of Curriculum Programs and Instructional Technologies

SUBJECT: **A WORLD OF DIFFERENCE: A PREJUDICE AWARENESS
 WORKSHOP TO COMBAT DISCRIMINATION AND VALUE DIVERSITY**

A WORLD OF DIFFERENCE II: AN EXPANSION

Since the A WORLD OF DIFFERENCE training program was introduced in Southern California, many participants have requested additional training on how to expand the infusion of the A WORLD OF DIFFERENCE materials into their school's curricula and how to address issues of prejudice and discrimination in a more comprehensive fashion. Therefore, an A WORLD OF DIFFERENCE II: AN EXPANSION training program has been developed for those educators who have already participated in an initial six-hour A WORLD OF DIFFERENCE training.

During the A WORLD OF DIFFERENCE II: AN EXPANSION training session, participants will:

- acquire new strategies designed to promote awareness about prejudice and discrimination and ways to address both.
- plan a Human Relations Unit using the newly developed curricular alignment in conjunction with your A WORLD OF DIFFERENCE *Teacher/Student Study Guide*.
- assess their school's environment.
- work in teams to generate a plan for creating a bias-free school climate.

All participants will receive additional A WORLD OF DIFFERENCE and Anti-Defamation League materials and resources. These materials will include the *Living Constitution Poster Series*, 16 separate topics on our rights and responsibilities as guaranteed by our constitution, and the *Prejudice is Foul Play Athletic Poster Series*. The athletic poster series has photos of noted champions who stress the harm of prejudice. Both poster sets can be used to introduce lesson concepts. They also could be used on bulletin boards in classrooms, libraries or displayed in key areas throughout the school. Elementary teachers will receive the *Wonderful World of Difference K-8* curriculum guide and *Teacher They Called Me A—!*, a prejudice reduction handbook. Secondary teachers will receive

A WORLD OF DIFFERENCE: A PREJUDICE AWARENESS WORKSHOP
JANUARY 5, 1993
PAGE 2

Being Fair and Being Free, a secondary resource guide, and *The End of Innocence*, a curriculum on Anne Frank and the Holocaust.

Two dates have been scheduled for this follow-up training session. They are listed below. The prerequisite for attending this training is that you must have previously participated in an A WORLD OF DIFFERENCE I training session where you received the *Teacher/Student Study Guide* notebook. You must bring this notebook with you to the A WORLD OF DIFFERENCE II: AN EXPANSION training.

The registration fee of \$85 will provide the participants with refreshments, lunch, and additional prejudice awareness curricula materials as described above. The dates are as follows:

Dates and Times

Location

Monday, March 8, 1993
8:30 a.m. to 3:30 p.m.
(Deadlines for registrations and no refunds after
Thursday, February 25, 1993)

L.A. County Office of Education
9300 Imperial Highway, Boardroom
Downey, California

Monday, May 17, 1993
8:30 a.m. to 3:30 p.m.
(Deadlines for registrations and no refunds after
Thursday, May 6, 1993)

L.A. County Office of Education
9300 Imperial Highway, Boardroom
Downey, California

Since registration is limited to 80 participants for each training date, please complete the enclosed pre-registration form and forward it with your check or purchase order payable to the Los Angeles County Office of Education as soon as possible to my secretary:

Francine Padilla, Multicultural Education
Los Angeles County Office of Education
Curriculum Programs and Instructional Technologies
9300 Imperial Highway, Room 299
Downey, Ca 90242-2890

For further information regarding the A WORLD OF DIFFERENCE II: AN EXPANSION Prejudice Awareness Workshop, please contact Francine Padilla at (310) 922-6323 or Debbie Stogel at the Anti-Defamation League at (310) 446-8000.

Approved:
Celia C. Ayala, Director
Division of Curriculum Programs and Instructional Technologies

TG:fp
Enclosure

CPIT/63/92-93

(C-6)

24043601531

Los Angeles County Office of Education
9300 Imperial Highway, Downey, California 90242-2890 (213) 922-6111



Stuart E. Gothold
Superintendent

October 5, 1992

TO: Chief Administrators, Los Angeles County School Districts

Attention: Assistant Superintendents, Educational Services
Directors of Curriculum and Instruction
Directors of Bilingual Education
Directors of Adult Education
Deans of Instruction, Community Colleges
Principals of Elementary, Junior, and Senior High Schools
and Continuation High Schools
Coordinators of Multicultural Education and Social Science
Coordinators of School Improvement
PTA Presidents

FROM: Tom Gibbons, Consultant, History-Social Science
Division of Curriculum Programs and Instructional Technologies

**SUBJECT: A WORLD OF DIFFERENCE; A PREJUDICE REDUCTION:
A WORKSHOP TO COMBAT PREJUDICE AND VALUE DIVERSITY**

The Multicultural Education unit of the Los Angeles County Office of Education is pleased to offer the "A WORLD OF DIFFERENCE" Training conducted by the Anti-Defamation League. This workshop will provide educators with the knowledge of how to incorporate the "A WORLD OF DIFFERENCE" prejudice reduction lessons into their History/Social Science and English Language Arts curricula. Participants will learn strategies: for infusing human relations materials into the curriculum, techniques that use controversial subjects to teach critical thinking, approaches for confronting their own prejudices and those of their students, and ways to utilize cooperative learning and conflict resolution techniques. The initial training on the AWOD materials, "AWOD I: A Beginning," will be offered three different times during the coming year. Please refer to the section that follows entitled, "AWOD I: A Beginning" and to the enclosed AWOD I flyer for the particulars on these trainings.

"AWOD I: AN INTRODUCTION"

Because of the many requests for the AWOD I trainings during the past year, three trainings have been scheduled to introduce the concepts, instructional materials, and teaching strategies of the AWOD program to new participants. This training series is called "AWOD I: A Beginning." The schedule of one-day training dates are listed below on the enclosed registration form. Registrants are asked to indicate the training date that is their first, second, and third choice. Your training date will be confirmed on a first received basis. If your choice cannot be confirmed, your other choices will be used. Each registration date has specific deadlines. This information is stated within the parenthesis listed below each training date.

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"A WORLD OF DIFFERENCE": A PREJUDICE REDUCTION WORKSHOP

October 5, 1992

Page 2

The registration fee of \$85 will cover the cost of the one-day training, your 400-page A WORLD OF DIFFERENCE TEACHER/STUDENT STUDY GUIDE, refreshments, and lunch. The training dates are as follows:

Dates and Times

Location (Map is enclosed)

Monday, November 9, 1992
8:30 a.m. - 3:30 p.m.
(Deadline for registrations and no refunds after
Monday, November 2, 1992)

LA. County Office of Education, Boardroom
9300 Imperial Highway, Downey

Friday, February 5, 1993
8:30 a.m. - 3:30 p.m.
(Deadline for registrations and no refunds after
Friday, January 29, 1993)

LA. County Office of Education, Boardroom
9300 Imperial Highway, Downey

Tuesday, March 30, 1993
8:30 a.m. - 3:30 p.m.
(Deadline for registrations and no refunds after
Tuesday, March 23, 1992)

LA. County Office of Education, Boardroom
9300 Imperial Highway, Downey

Since registration is limited to 80 participants for each training date, please complete the enclosed pre-registration form and forward it with your check or purchase order as soon as possible to:

Francine Padilla, Secretary, Multicultural Education
Los Angeles County Office of Education
Division of Curriculum Programs and Instructional Technologies
9300 Imperial Highway, Room 299
Downey, CA 90242-2890

For further information regarding the "AWOD I: A Beginning," please contact Francine Padilla, Secretary, at (310) 922-6323 or Debbie Stogel at the Anti-Defamation League at (310) 446-8000.

Approved:

Celia C. Ayala, Director

Division of Curriculum Programs and Instructional Technologies

TG:fp

Attachments

CPIT/40/92-93

(C-8)

24043601533

-- ATTACHMENT "D" --

LAUSD DOCUMENTS REGARDING STAFF REVIEW
OF ADL "AWOD" MATERIALS OBTAINED FROM
MIAMI ADI (1 PAGE)

94043601534

INTER-OFFICE CORRESPONDENCE
Los Angeles Unified School District

TO: Leonard M. Britton

Date May 6, 1988

FROM: Sid Thompson

SUBJECT: A WORLD OF DIFFERENCE, TEACHER/STUDENT STUDY GUIDE, ANTI-DEFAMATION LEAGUE

Staff has reviewed the Teacher/Student Study Guide for A World of Difference developed by the Anti-Defamation League of B'Nai B'Rith, Miami, Florida. The materials are excellent for the goal of prejudice reduction in a changing community. These lessons focus on:

- Local community history and development
- American Beliefs and Values
- Prejudice, Sterotyping and Discrimination
- Scapegoating and Racism

A major strength is that materials are developed by teachers and members of the local community, which is the process planned by the Los Angeles version.

The program will provide a much needed vehicle for District emphasis.

I will be pleased to provide any additional information you may require.

ST:lr

(D-1)

24043601535

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-- ATTACHMENT "E" --

DOCUMENTS ON ADOPTION OF "AWOD" PROGRAM
BY LAUSD, INCLUDING ROLE OF MILKEN FAMILY
FUND (FOUNDATION) (4 PAGES)

24043601536

ADOPTED Los Angeles, California
September 26, 1988

TO THE BOARD OF EDUCATION OF THE CITY OF LOS ANGELES, GOVERNING BOARD OF THE
LOS ANGELES UNIFIED SCHOOL DISTRICT:

The Educational Development and Student Life Committee recommends that the
items submitted by the Superintendent in the following communications, dated
September 19, 1988, attached hereto and made a part hereof as if fully set
forth herein, be adopted as shown below:

COMMUNICATION NO. 1 (TAB 13)
Prepared by Office of the Superintendent

- (1)-1 Authorizing Superintendent to continue Work-Ability I program for
handicapped students as allocated under California State
Department of Education funding; for period indicated; authorizing
Budget Services and Financial Planning Division to establish
position and expenditure authority as necessary.

COMMUNICATION NO. 1 (TAB 14)
Prepared by Office of Instruction

- (2)-1 Authorizing one Indian Education Program Parent Committee
representative to attend 20th Annual National Indian Education
Association Conference in Tulsa, Oklahoma, with payment of actual
and necessary expenses on dates indicated; authorizing Chief
Business and Financial Officer to issue cash advance in amount
shown.

REVISED COMMUNICATION NO. 2 (TAB 15)
Prepared by Office of Instruction

- (3)-2 Authorizing Superintendent to initiate A World of Difference
program in 1988-89 school year, as set out; authorizing Budget
Services and Financial Planning Division to implement transfers
from Superintendent's Districtwide Priority Needs Account in
amount shown.

COMMUNICATION NO. 3 (TAB 16)
Prepared by Office of Instruction

- (4)-3 Authorizing Superintendent to implement funded screening programs
for gifted/talented students in elementary and secondary schools
effective as shown; authorizing Budget Services and Financial
Planning Division to establish position and expenditure authority,
and to make budget adjustments as necessary.

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(E-1)

TO: LOS ANGELES CITY BOARD OF EDUCATION
FROM: SUPERINTENDENT OF SCHOOLS
VIA: EDUCATIONAL DEVELOPMENT AND STUDENT LIFE COMMITTEE

15

Revised Communication No. 2
Prepared by the Office of Instruction
for presentation to the Committee of the Whole
September 19, 1988

SUBJECT: A WORLD OF DIFFERENCE

A. PROPOSAL

It is proposed that the Superintendent be authorized to initiate a A World of Difference program in the Los Angeles Unified School District in the 1988-89 school year.

B. BACKGROUND

A World of Difference (AWOD) is a school and media-based project designed to reduce racial, ethnic, and religious intolerance in a responsible and measurable way. Research consistently points to the fact that prejudice is learned and that children can be taught to appreciate and value their own culture and the cultures of their classmates.

The Anti-Defamation League with the assistance of the Southern California Human Relations Coalition and representatives from the Los Angeles educational community, has created curriculum materials designed for elementary and secondary classroom use reflective of local community concerns. Teaching strategies provide an experientially based format and include cooperative learning and conflict resolution strategies.

Cooperative partners in A World of Difference include:

1. The Milken Family Foundation....over \$300,000 to underwrite the major costs of the educational component;
2. KCBS-TV....an estimated \$3 million of specialized programming and public service announcements;
3. Los Angeles Times....a 32-page supplement for the campaign;
4. Irvine Foundation....a \$27,000 seed grant to explore involving California State PTA and public and private youth serving agencies in the campaign;
5. Los Angeles County Office of Education....to beam out information for on-site facilitators through the Educational Television Network.

Educational Development and Student Life Committee
Office of Instruction
Communication No. 2

- 1 -

September 19, 1988

(E-2)

041

94043601538

Los Angeles Unified School District partnership responsibilities to begin in 1988-89 school year:

- trainer of trainers workshops to be given by AWOD staff for mentors, teacher advisors, and selected school site personnel
- faculty workshops to be conducted at selected school sites during shortened day upon request
- symposia to be conducted in four geographic areas of the District for selected schoolwide teams (administrator, classroom teacher, parent, and/or business or community leader). Each region superintendent shall prior to initiation of the project, submit to Board Members a list of proposed sites. With Board Members approval, each region superintendent shall designate eight AWOD elementary schools and four junior highs to participate in an all-day symposium incorporating an action plan for promoting positive intergroup activities. The senior high superintendent shall designate eight AWOD high schools with Board Members approval (two to participate in each geographic region.) (Budget implication-- substitutes for the 104 teacher participants at \$100 each = \$10,400; materials and supplies = \$1,100.)
- one additional conference period for one District certificated employee to help coordinate in-service programs (\$6,000)
- Human Resources Development Branch to provide salary point credit for 16-hour workshops and points or salary for teacher leader
- Instructional Media and Resources Branch to be involved in joint education AWOD/LAUSD in-service program
- reproduction of noncopyrighted videos by the Instructional Media and Resources Branch and purchase of human relations materials for region (\$1,500)
- \$500 materials budget per Region/Division to be used for a regional human relations resource center (\$5,000)

C. BUDGET IMPLICATIONS

The amount required for the implementation of this program would be \$24,000, which requires a budget adjustment from the Superintendent's Districtwide Priority Needs Account in the 1988-89 final budget.

D. DESEGREGATION IMPACT

This action has been reviewed and does not require a Desegregation Impact Report.

24043601539

E. RECOMMENDATIONS

IT IS RECOMMENDED THAT:

1. The Superintendent be authorized to initiate the A World of Difference program.
2. The Budget Services and Financial Planning Division be authorized to implement transfers from the Superintendent's Districtwide Priority Needs Account in the amount of \$24,000 in order to implement this report.

Respectfully submitted,

LEONARD M. BRITTON

Superintendent

Prepared by:

Rosalyn S. Heyman

ROSALYN S. HEYMAN, Assistant Superintendent
Secondary Instruction

Presented by:

Lorna Round

LORNA ROUND
Associate Superintendent, Instruction

Educational Development and Student Life Committee
Office of Instruction
Communication No. 2

- 3 -

September 19, 1988

(E-4)

043

24043601540

ATTACHMENT "F"

**PUBLIC POLITICAL ASSOCIATES OF LYNDON LAROUCHE
WHOSE NAMES HAVE APPEARED ON THE BALLOT
FOR FEDERAL ELECTIVE OFFICE
in the
Election Years 1988. 1990. and 1992**

24043601541

ATTACHMENT "F"

Following is a list of public political associates of Lyndon LaRouche whose names have appeared on the ballot for federal elective office in the years 1988, 1990, and 1992, organized by year and state (the list is not all-inclusive):

ELECTION YEAR 1988 -- PRIMARY ELECTION

Illinois (Primary Election March 15, 1988)

G. Laurence -- U.S. Congress, 4th CD
T. Glossenger -- U.S. Congress, 6th CD
D. Jeffrey -- U.S. Congress, 13th CD
E. Washington -- U.S. Congress, 2nd CD
M. Johnson -- U.S. Congress, 3rd CD

Pennsylvania (Primary Election April 26, 1988)

Donald Hadley -- U.S. Congress, 5th CD
George Elder -- U.S. Congress, 21st CD
NG. Eddleston -- U.S. Congress, 10th CD
Cladia Billington -- U.S. Congress, 7th CD
Steve Douglas -- U.S. Senate

5 Ohio

1 Mark Brown -- U.S. Congress, 12th CD

6 California (Primary Election June 7, 1988)

3 Don Marquis -- U.S. Congress, 39th CD

4 Missouri (Primary Election, August 2, 1988)

0 J. Gallagher -- U.S. Congress, 6th CD

4 Oklahoma

2 G. Gentry -- U.S. Congress, 1st CD

New Hampshire (Primary Election, August 23, 1988)

Lewis DuPont Smith -- U.S. Congress, 1st CD

Minnesota

Andy Olson -- U.S. Congress, 20th CD
Stan Bentz -- U.S. Congress, 3rd CD

New York

Keith Perez -- U.S. Congress, 29th CD

(cont'd)

(F-1)

1988 ELECTION YEAR -- PRIMARY ELECTION (cont'd)

Massachusetts (Primary Election September 15, 1988)

Dave Peterson -- U.S. Congress, 11th CD

1988 ELECTION YEAR -- GENERAL ELECTION

Pennsylvania

Donald Hadley -- U.S. Congress, 5th CD

George Elder -- U.S. Congress, 21st CD

Ohio

Mark Brown -- U.S. Congress, 12th CD

California

Don Marquis -- U.S. Congress, 39th CD

1990 ELECTION YEAR -- PRIMARY

California

Edward Anderson -- U.S. Congress, 4th CD

Robert Ingham -- U.S. Congress, 14th CD

Arthur Dunn -- U.S. Congress, 16th CD

Scott Gaulke -- U.S. Congress, 26th CD

Ted Andromidas -- U.S. Congress, 29th CD

Art Hoffman -- U.S. Congress, 38th CD

1990 ELECTION YEAR -- GENERAL

Virginia

Nancy Spannaus -- U.S. Senate

Harry Broskie -- U.S. Congress, 2nd CD

Gerry Berg -- U.S. Congress, 6th CD

L. Chandler -- U.S. Congress, 4th CD

R. Simpson -- U.S. Congress, 4th CD

Texas

Bruce Director -- U.S. Congress, 22nd CD

(cont'd)

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1990 ELECTION YEAR -- GENERAL (cont'd)

Pennsylvania

Lewis DuPont Smith -- U.S. Congress, 5th CD

Michigan

Joan Dennison -- U.S. Congress, 10th CD

1992 ELECTION YEAR

California

Dr. Charles Greene -- U.S. Senate

Scott Gaulke -- U.S. Congress

4

Minnesota

4

Glenn Mesaros -- U.S. Congress

Stan Bentz -- U.S. Congress

5

Andy K. Olson -- U.S. Congress

1

South Dakota

0

Ron Wieczorek -- U.S. Congress

6

North Dakota

3

Anna Bourgois -- U.S. Congress

4

Washington State

4

Brian Wilson -- U.S. Congress

2

Pat Ruckert -- U.S. Congress

Paul Glumaz -- U.S. Congress

New York

John Basar -- U.S. Congress

Keith Perez -- U.S. Congress

Iowa

Sue Atkinson -- U.S. Senate

(cont'd)

(F-3)

1992 ELECTION YEAR (cont'd)

Vermont

Mike Godeck -- U.S. Senate
Doug Miller -- U.S. Congress

Massachusetts

Dennis Ingalls -- U.S. Congress
Jeff Rebello -- U.S. Congress
Robert Knapp -- U.S. Congress

Indiana

John W. "Willie" Taylor -- U.S. Congress, 8th CD

Idaho

John Abel -- U.S. Congress, 1st CD
David Mansfield -- U.S. Congress, 2nd CD

Virginia

Alan Ogden -- U.S. Congress, 10th CD
Gerald Berg -- U.S. Congress, 7th CD

Illinois

Sheila Jones -- U.S. Congress
Barabara Godeaux -- U.S. Congress
Rosemary Love -- U.S. Congress

Virginia

Nancy Spannaus -- U.S. Congress, 10th CD

ATTACHMENT "G"

**SOME PUBLIC POLITICAL ASSOCIATES OF LYNDON LABOUCHE
WHO HAVE ALREADY ANNOUNCED THEIR INTENTIONS
TO CAMPAIGN FOR FEDERAL ELECTIVE OFFICE
for Election Year 1994 (as of 12/24/93)**

24043601546

ATTACHMENT "G"

Following is a list of some of the public political associates of Lyndon LaRouche who have already announced their intention to run for federal elective office in election year 1994, as of December 24, 1993:

ELECTION YEAR 1994

California

Ted Andromidas -- U.S. Senate
Dr. Charles Greene -- U.S. Congress, 33rd CD

Virginia

7 Nancy Spannaus -- U.S. Senate
4 Alan Ogden -- U.S. Congress, 10th CD
5 Lewis Highsmith -- U.S. Congress, 11th CD
4 William C. Jones -- U.S. Congress, 8th CD
5 Matt Voorhees -- U.S. Congress, 1st CD

New Jersey

0 Matt Guice -- U.S. Congress, 9th CD
6 Mike di Marco -- U.S. Congress, 4th CD
3 Mary Freuholz -- U.S. Congress, 11th CD
4 Jim Cleary -- U.S. Congress, 7th CD
0 Richard Forbes -- U.S. Congress, 5th CD

Illinois

4 John McCarthy -- U.S. Congress, 5th CD
2 George Laurence -- U.S. Congress, 13th CD



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JANUARY 6, 1994

Ted J. Andromidas
5073 Glen Iris
Los Angeles, CA 90041

RE: MUR 3848

Dear Mr. Andromidas:

This letter acknowledges receipt on December 28, 1993, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the Anti-Defamation League of B'nai B'rith, the Milken Family Foundation, Los Angeles County Office of Education and the Los Angeles Unified School District. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3848. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

24043601548



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

JANUARY 6, 1994

Honorable Jack M. Newman, President
Anti-Defamation League of B'nai B'rith
6505 Wilshire Boulevard, Suite 814
Los Angeles, CA 90048-4987

RE: MUR 3848

Dear Mr. Newman:

The Federal Election Commission received a complaint which indicates that the Anti-Defamation League of B'nai B'rith may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3848. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Anti-Defamation League of B'nai B'rith in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

24043601549

Honorable Jack H. Newman, President
Anti-Defamation League of B'nai B'rith
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3400. For your information, we have enclosed a brief
description of the Commission's procedures for handling
complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043601550



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

JANUARY 6, 1994

Dr. Jules Lesner, Executive Director
Milken Family Foundation
c/o Foundations of the Milken Family
15250 Ventura Blvd., 2nd Floor
Sherman Oaks, CA 91403

RE: MUR 3848

Dear Dr. Lesner:

The Federal Election Commission received a complaint which indicates that the Milken Family Foundation may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3848. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Milken Family Foundation in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

3 4 0 4 3 6 0 1 5 5 1

Dr. Jules Lesner, Executive Director
Milken Family Foundation
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043601552



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

JANUARY 6, 1994

Stuart E. Gothold, Superintendent
Los Angeles County Office of Education
9300 East Imperial Highway
Downey, CA 90242-2890

RE: MUR 3848

Dear Mr. Gothold:

The Federal Election Commission received a complaint which indicates that the Los Angeles County Office of Education may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3848. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Los Angeles County Office of Education in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

24043601553

Stuart E. Gothold, Superintendent
Los Angeles County Office of Education
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3400. For your information, we have enclosed a brief
description of the Commission's procedures for handling
complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043601554



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

JANUARY 6, 1994

Superintendent
Los Angeles Unified School District
450 North Grand Avenue
Los Angeles, CA 90012

RE: MUR 3848

Dear Madam or Sir:

The Federal Election Commission received a complaint which indicates that the Los Angeles Unified School District may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3848. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Los Angeles Unified School District in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

34043601555

Superintendent
Los Angeles Unified School District
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043601556



COUNTY OF LOS ANGELES

OFFICE OF THE COUNTY COUNSEL

648 HALL OF ADMINISTRATION

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

AN 2 28 94

DE WITT W. CLINTON, COUNTY COUNSEL

January 27, 1994

TELEPHONE
(213) 974-1866
TELECOMPER
(213) 680-2165

Via Fax No. (212) 209-3923 and U.S. Mail

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

Re: MUR 3848

Dear Ms. McEnery:

This will confirm the request I made to you in our telephone conversation on January 25 for a brief extension time to respond on behalf of Dr. Stuart E. Gothold, Los Angeles County Superintendent of Schools to the above referenced complaint.

As I indicated, last week's devastating earthquake in Los Angeles has precluded our ability to file a response by January 26, 15 days after the receipt of the packet from the FEC. Our office only received the materials last week. Since then, the parties necessary to evaluate the complaint and formulate a response have been unable to meet, either because of their unavailability because of personal damage suffered in the earthquake or because of their required involvement in the governmental response to the earthquake.

For these reasons, I request that we be permitted an extension through and including February 4, 1994, to submit a response. From our discussion, I understand that the FEC grants such requests if good cause is presented. I am confident the Commission will understand the need of my office and my client to prioritize our workload in this time of emergency and will grant our request.

You indicated that our response can be sent by facsimile and provided your facsimile number. At your request, we sent the Statement of Designation of Counsel by facsimile.

Thank you for your assistance and cooperation. If there is any decision by the Commission regarding this request or

94 JAN 31 PM 3:51

FEDERAL RECEIVED
FEDERAL ELECTION COMMISSION

24043601557

Joan McEnery
Page 2

there is further information which I can provide, please call
me directly.

Very truly yours,

DE WITT W. CLINTON
County Counsel

By *Roberta M. Fesler*
ROBERTA M. FESLER
Assistant County Counsel
Public Services Division

RMF:jg

c: Dr. Stuart Gothold

24043601558

RECEIVED
FEDERAL ELECTION COMMISSION

94 JAN 27 PM 3:21

STATEMENT OF BUSINESS OF COUNSEL

NAME: Mr. [Redacted]

NAME OF COMPANY: Smith H. Gilman, C. Mr. Counsel

ADDRESS: 500 W. Temple Street, Suite C

Los Angeles, California 90010

TELEPHONE: (213) 974-1801

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.

JENNIFER M. [Redacted]
DATE

Jennifer M. [Redacted]
[Redacted] 1/27/04

EMPLOYER'S NAME: Frank B. [Redacted] Los Angeles County Superintendent of Schools

ADDRESS: Los Angeles County Office

500 West Municipal Building

Downey, California 90242

TELEPHONE: HOME ()

BUSINESS (310) 922-6111

34043601559



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

FEBRUARY 3, 1994

De Witt W. Clinton, Esq.
County Counsel
County of Los Angeles
684 Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

MUR 3848

Dear Mr. Clinton:

This is in response to your letter dated January 27, 1994, received on January 28, 1994, requesting an extension until February 4, 1994 to respond to the complaint filed in the above-noted 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 February 4, 1994.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

24043601560

Los Angeles Unified School District

OFFICE OF THE SPECIAL COUNSEL TO THE SUPERINTENDENT
ADMINISTRATIVE OFFICES: 499 NORTH GRAND AVENUE, LOS ANGELES, CALIFORNIA
MAILING ADDRESS: BOX 3397, LOS ANGELES, CALIFORNIA 90051
TELEPHONE: (213) 625-6601 FAX: (213) 485-1700

SIDNEY A. THOMPSON
Superintendent of Schools
RICHARD K. MASON
Special Counsel

January 26, 1994

BY FAX

RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB - 1 AM 9:36

Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
999 East N.W.
Washington, D.C. 20463

Re: Complaint No. MUR 3848

Dear Ms. Taksar:

On behalf of the of the Los Angeles Unified School District, I am requesting an extension of time to February 4, 1994, to respond to the above-identified complaint.

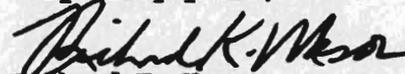
It is my understanding that Mr. McConville of my office spoke with Joan McEnery today by telephone regarding this request. As he discussed, our school district has been severely impacted by the earthquake which recently occurred in the Los Angeles area.

It is my further understanding that the Federal Election Commission must approve this request. Whatever you can do to assist in this matter will be greatly appreciated.

I have also attached a completed Designation of Counsel Statement for your files.

Should you have any questions, please contact me at (213) 625-6601.

Very truly yours,


Richard K. Mason
Special Counsel

Attachment

c: Sidney A. Thompson
Terry McConville
Donovan Main
Roberta Fesler
Joan McEnery

24043601561

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3848

NAME OF COUNSEL: Richard K. Mason

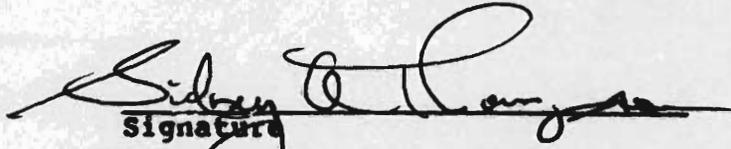
ADDRESS: 450 North Grand Avenue, Room A-215

Los Angeles, California 90012

TELEPHONE: (213) 625-6601

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.

1-26-94
Date


Signature
Sidney A. Thompson, Superintendent

RESPONDENT'S NAME: Los Angeles Unified School District

ADDRESS: 450 North Grand Avenue

Los Angeles, California 90012

TELEPHONE: HOME (_____) _____

BUSINESS (213) 625-6601

24043601562

94 FEB - 1 AM 9:36

RECEIVED
FEDERAL ELECTORAL COMMISSION



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

FEBRUARY 3, 1994

Richard K. Mason, Esq.
Special Counsel
Los Angeles Unified School District
Box 3307
Los Angeles, CA 90051

MUR 3848

Dear Mr. Mason:

This is in response to your letter dated January 27, 1994, requesting an extension until February 4, 1994 to respond to the complaint filed in the above-noted 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 February 4, 1994.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

24043601563



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL
 646 HALL OF ADMINISTRATION
 500 WEST TEMPLE STREET
 LOS ANGELES, CALIFORNIA 90012

DE WITT W. CLINTON, COUNTY COUNSEL

RECEIVED
 FEDERAL ELECTION
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 MAIL ROOM

FEB 9 8 20 AM '94

RECEIVED
 FEDERAL ELECTION
 COMMISSION
 MAIL ROOM

FEB 9 8 20 AM '94

TELEPHONE
 (213) 974-1796
 TELECOPIER
 (213) 680-2165

February 3, 1994

VIA FAX NO. 202-219-3923 & U.S. MAIL

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

Re: MUR 3848
 Response of the Los Angeles County
Office of Education

RECEIVED
 FEDERAL ELECTION COMMISSION
 94 FEB -9 PM 3: 06

To Whom It May Concern:

Pursuant to 11 CFR Ch. 1, section 111.6, this is to respond to MUR 3848, purporting to complain of violations of the Federal Election Campaign Act by the Los Angeles County Office of Education.

No action should be taken on the complaint because it fails to describe a violation of a statute or regulation over which the Commission has jurisdiction.

The Los Angeles County Office of Education is not a "political committee" as defined in the Act. 2 U.S.C. section 431(4); United States v. National Committee For Impeachment, 469 F.2d 1135, 1138 (1972) (Act applies only to political committees).

The Los Angeles County Office of Education has made no contribution or expenditure for the purpose of influencing any election for federal office. 2 U.S.C. sections 431(8) and (9). The words "made for the purpose of influencing" means an expenditure made with the authorization or consent, express or implied, or under the control, direct or indirect, of a candidate or his agents. United States v. National Committee For Impeachment, *supra*, p. 1141. The Los Angeles County Office of Education has made no contribution or expenditure with the authorization or consent, express or implied, or under the control, direct or indirect, of a candidate or his agents.

24043601564

The Los Angeles County Office of Education has made no contribution to any candidate or political committee; thus is not subject to the limitations of contributions or expenditures set forth in 2 U.S.C. section 441a. The Los Angeles County Office of Education has made no contributions or expenditures prohibited by the Act.

Insofar as the complainant complains of the distribution by the Los Angeles County Office of Education of educational materials to teachers, teacher training with respect to educational materials, or use of educational materials in the classroom, these are activities within its official function protected by the First Amendment to the United States Constitution. Assuming, for the sake of argument, that an indirect effect of education respecting the complained of materials might be to influence how a particular candidate's qualifications for elective office may be evaluated by educated voters, this is not prohibited by the Act. United States v. National Committee For Impeachment, supra, pps. 1141- 1142.

Very truly yours,

DE WITT W. CLINTON
County Counsel

BY 

ADA TREIGER
Senior Deputy County Counsel
Public Services Division

AT:fc

24043601565

Los Angeles Unified School District

OFFICE OF THE SPECIAL COUNSEL TO THE SUPERINTENDENT
ADMINISTRATIVE OFFICES: 450 NORTH GRAND AVENUE, LOS ANGELES, CALIFORNIA
MAILING ADDRESS: BOX 3307, LOS ANGELES, CALIFORNIA 90051
TELEPHONE: (213) 625-6601 FAX: (213) 485-8700

RECEIVED
SIDNEY A. THOMPSON
FEDERAL ELECTION COMMISSION
MAIL ROOM
RICHARD K. MASON
Special Counsel

FEB 14 10 05 AM '94

February 8, 1994

BY FAX

Federal Election Commission
Office Of The General Counsel
999 "E" Street, N.W.
Washington, D.C. 20463

Attention: Mary L. Taksar

Re: MUR 3848 -- Response of the Los Angeles
Unified School District

Dear Ms. Taksar:

This is to respond to MUR 3848 on behalf of the Los Angeles Unified School District (LAUSD). I would ask that the previous extension of time be extended to this date: I had to deal with the unexpected illness of my five year old son.

This response is made pursuant to 11 CFR Ch.1, section 111.6. I have read the response made by Ada Treiger on behalf of the Los Angeles County Office of Education (copy attached for your reference) and join with that response in all of its particulars on behalf of the LAUSD, based on the facts and law set forth in Ms. Treiger's letter.

Should you have any questions regarding the position of this District, please feel free to contact me.

Very truly yours,


Richard K. Mason
Special Counsel

ew

- c: Mr. Sidney A. Thompson
- Dr. Ruben Zacarias
- Mr. Ron Apperson
- Mr. Terry McConville
- Ms. Amy McKenna
- Ms. Ada Treiger

24043601566

94 FEB 14 PM 2:45

RECEIVED
FEDERAL ELECTION COMMISSION



COUNTY OF LOS ANGELES

OFFICE OF THE COUNTY COUNSEL

648 HALL OF ADMINISTRATION

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

DE WITT W. CLINTON, COUNTY COUNSEL

TELEPHONE
(213) 974-1786

TELECOPIER

(213) 680-2165

February 3, 1994

VIA FAX NO. 202-219-3923 & U.S. MAIL

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

Re: MUR 3848
Response of the Los Angeles County
Office of Education

To Whom It May Concern:

Pursuant to 11 CFR Ch. 1, section 111.6, this is to respond to MUR 3848, purporting to complain of violations of the Federal Election Campaign Act by the Los Angeles County Office of Education.

No action should be taken on the complaint because it fails to describe a violation of a statute or regulation over which the Commission has jurisdiction.

The Los Angeles County Office of Education is not a "political committee" as defined in the Act. 2 U.S.C. section 431(4); United States v. National Committee For Impeachment, 469 F.2d 1135, 1138 (1972) (Act applies only to political committees).

The Los Angeles County Office of Education has made no contribution or expenditure for the purpose of influencing any election for federal office. 2 U.S.C. sections 431(8) and (9). The words "made for the purpose of influencing" means an expenditure made with the authorization or consent, express or implied, or under the control, direct or indirect, of a candidate or his agents. United States v. National Committee For Impeachment, *supra*, p. 1141. The Los Angeles County Office of Education has made no contribution or expenditure with the authorization or consent, express or implied, or under the control, direct or indirect, of a candidate or his agents.

24043601567

94 FEB 14 PM 2:43

RECEIVED
FEDERAL ELECTION COMMISSION

Federal Election Commission

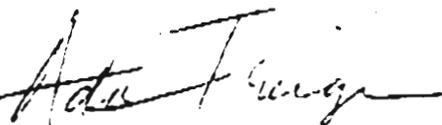
Page 2

The Los Angeles County Office of Education has made no contribution to any candidate or political committee; thus is not subject to the limitations of contributions or expenditures set forth in 2 U.S.C. section 441a. The Los Angeles County Office of Education has made no contributions or expenditures prohibited by the Act.

Insofar as the complainant complains of the distribution by the Los Angeles County Office of Education of educational materials to teachers, teacher training with respect to educational materials, or use of educational materials in the classroom, these are activities within its official function protected by the First Amendment to the United States Constitution. Assuming, for the sake of argument, that an indirect effect of education respecting the complained of materials might be to influence how a particular candidate's qualifications for elective office may be evaluated by educated voters, this is not prohibited by the Act. United States v. National Committee For Impeachment, supra, pps. 1141- 1142.

Very truly yours,

DE WITT W. CLINTON
County Counsel

By 

ADA TREIGER
Senior Deputy County Counsel
Public Services Division

AT:fc

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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POSTMASTER

U.S. POSTAL SERVICE
LOS ANGELES, CA 90048

MUR 3848

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: ANTI-DEEMATION LEAGUE OF BIRME BIRITH
LAST KNOWN ADDRESS: 6505 WELSHERE BOULEVARD, SUITE 819
LOS ANGELES, CA 90048

Under 39 C.F.R. § 265.9(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- () Moved, left no forwarding address
- () No such address
- () Other (Please Specify)

New Address : 10495 Santa Monica Bl
Los Angeles, Ca 90025

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR 3848

DATE COMPLAINT FILED: December 28, 1993

DATE OF NOTIFICATION: January 6, 1994

DATE ACTIVATED: July 7, 1994

STAFF MEMBER: Andrea Low

COMPLAINANT: Ted J. Andromidas

**RESPONDENTS: Anti-Defamation League of B'nai B'rith
Milken Family Foundation
Los Angeles County Office of Education
Los Angeles Unified School District**

MUR 4054

DATE COMPLAINT FILED: September 6, 1994

DATE OF NOTIFICATION: September 12, 1994

DATE ACTIVATED: September 27, 1994

STAFF MEMBER: Andrea Low

COMPLAINANT: Kathy A. Magraw

**RESPONDENTS: Anti-Defamation League of B'nai B'rith
Mira Boland**

**RELEVANT STATUTES: 2 U.S.C. § 431(4)(A)
2 U.S.C. § 431(9)(A)(i)
2 U.S.C. § 431(17)
2 U.S.C. § 431(18)
2 U.S.C. § 433
2 U.S.C. § 434
2 U.S.C. § 434(b)(6)(B)(iii)
2 U.S.C. § 434(c)(1)
2 U.S.C. § 434(c)(2)
2 U.S.C. § 441b(a)
11 C.F.R. § 109.1(b)(2)**

**INTERNAL REPORTS CHECKED: Disclosure Reports
MUR index
AO index
Dun & Bradstreet corporate reports**

FEDERAL AGENCIES CHECKED: None

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I. GENERATION OF MATTER

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Ted J. Andromidas, Democratic candidate for U.S. Senate in California in the June 1994 primary election,¹ filed the complaint in MUR 3848 alleging that Respondents made "prohibited contributions and/or expenditures . . . in the form of published materials." The allegations stem from Respondents' funding, publication, and dissemination nationwide of printed materials criticizing Lyndon H. LaRouche, Jr., and his political associates. Responses to the complaint have been received by the Los Angeles County Office of Education ("Office of Education") and the Los Angeles Unified School District ("LAUSD"), which joined with the Office of Education's response in all of its particulars. See Attachments 1-2. No responses have been received from Respondents Anti-Defamation League of B'nai B'rith ("ADL") and Milken Family Foundation ("Milken").

In MUR 4054, Kathy A. Magraw, Treasurer of the Committee to Reverse the Accelerating Global Economic and Strategic Crisis: A LaRouche Exploratory Committee, filed a complaint against ADL and its Washington, D.C. fact-finding director, Mira Boland, "for failure to register and report as a political committee as provided for in 2 U.S.C. § 433 et seq." Complainant alleges that two ADL publications, Partners in Bigotry: The LaRouche Cult and the Nation of Islam and Paroled: The LaRouche Political Cult Regroups, are "directed at defeating a candidate for federal

1. Andromidas lost the June 1994 primary election with 14% of the vote.

office."² A joint response was received from Respondents ADL and Boland.

II. FACTUAL AND LEGAL ANALYSIS

A. STATEMENT OF THE LAW

Under the Federal Election Campaign Act of 1971, as amended, (the "Act"), it is unlawful for any corporation to make a contribution or expenditure in connection with any election.

2 U.S.C. § 441b(a).

Any committee, club, association, or other group of persons which makes expenditures aggregating in excess of \$1,000 during a calendar year is a "political committee." 2 U.S.C. § 431(4)(A). Pursuant to 2 U.S.C. § 433, a political committee must file a statement of organization within ten (10) days after becoming a political committee within the meaning of Section 431(4)(A). The treasurer of each political committee must file disclosure reports in accordance with Section 434 of the Act.

An expenditure includes any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A)(i). The Act defines the term "independent expenditure" as an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or

2. The complaint also includes, as Exhibit D, a copy of a letter sent on August 24, 1994 to supporters of LaRouche enclosing the Paroled report. The text of this cover letter is thus analyzed as part of the Paroled report.

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agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate. 2 U.S.C. § 431(17).

The term "clearly identified" means that the name of the candidate involved appears, a photograph or drawing of the candidate appears, or the identity of the candidate is apparent by unambiguous reference. 2 U.S.C. § 431(18). "Expressly advocating" means any communication containing a message advocating election or defeat, including but not limited to the name of the candidate, or expressions such as "vote for," "elect," "support," "cast your ballot for," and "Smith for Congress," or "vote against," "defeat," or "reject." 11 C.F.R. § 109.1(b)(2). Various court decisions, however, have made clear that such specific words are not required for express advocacy. See Federal Election Comm'n v. Massachusetts Citizens for Life, 479 U.S. 238, 249 (1986); Federal Election Comm'n v. Furgatch, 807 F.2d 857, 862-64 (9th Cir.), cert. denied, 484 U.S. 850 (1987). The U.S. Supreme Court has determined that when a communication urges voters to vote for candidates who hold a certain position and identifies specific candidates who hold that position, such a message "is marginally less direct than 'Vote for Smith'" but "goes beyond issue discussion to express electoral advocacy." Massachusetts Citizens for Life, 479 U.S. at 248.³

3. In Furgatch, the court noted that limiting a finding of express advocacy to the "magic words" or "their nearly perfect synonyms" would "preserve the First Amendment right of unfettered expression only at the expense of eviscerating" the Act. Furgatch, 807 F.2d at 863. Speech is express advocacy under the Act "when read as a whole, and with limited reference to external

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B. SUMMARY OF COMPLAINTS

In MUR 3848, Complainant Andromidas alleges that the violations of the Act by ADL, Milken, the Office of Education, and LAUSD "directly impact [his] ongoing campaign for the 1994 Democratic nomination for U.S. Senate in California, ongoing federal electoral campaigns of many other public political associates of candidate LaRouche, and the past federal electoral campaigns of [himself] and many other public political associates of LaRouche." He then states that "[t]he specific violations of the Act by the ADL and other respondents which are the basis of this complaint are the ADL's publication and wide-scale public dissemination nationwide, in concert with and/or financed by the other respondents, of specific printed materials opposing candidate LaRouche and others who have campaigned, or are campaigning, as public political associates of LaRouche." Although Complainant Andromidas does not allege violations of any particular sections of the Act, he states that "[t]he violations of the Act are the making of prohibited contributions and/or expenditures by the ADL and the other named parties" and that "to his knowledge," none of these Respondents are registered as "political committees."

Complainant Andromidas includes photocopies of sections of

(Footnote 3 continued from previous page)
events," it is "susceptible of no other reasonable interpretation but as an exhortation to vote for or against a specific candidate." Id. at 864. Under the Furgatch test, speech is express "if its message is unmistakable and unambiguous, suggestive of only one plausible meaning," and constitutes advocacy only if "it presents a clear plea for action," and it is clear what that action is. Id.

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ADL's teaching materials from its "A World of Difference" program.⁴ One lesson in the curriculum, titled "Hate Groups in America," describes the National Caucus of Labor Committees ("NCLC") as an "extremist group" headed by Lyndon H. LaRouche, Jr. NCLC is listed as one of four "propaganda organizations," each of whose purported activities are described. The text states in part that "[m]any LaRouche followers have run for office at the local, state and federal levels" and that "LaRouche himself has run for President in 1976, 1980, 1984 and 1988." Complainant Andromidas suggests that the "cited ADL materials refer to the political viewpoints of LaRouche and 'LaRouche followers' as 'extremist' in order to damage the federal electoral campaigns of LaRouche and his political associates."

In MUR 4054, Complainant Magraw states that "[i]n response to the LaRouche committee's registering with the FEC in August of 1993, the ADL initiated a new round of illegal activities directed at opposing Mr. LaRouche's candidacy" and that ADL is "expending monies and manpower directed at defeating a candidate for federal office." Magraw alleges that ADL is operating an unregistered political committee. The particular ADL initiatives to which Complainant Magraw points are the publication and dissemination of two reports, Partners in Bigotry: The LaRouche Cult and the Nation of Islam and Paroled: The LaRouche Political Cult Regroups. These publications are alleged to have been distributed in the

4. KCBS-TV and the Southern California Human Relations Coalition are listed as "A World of Difference" sponsors along with ADL and Milken, but Complainant Andromidas does not name them as Respondents in MUR 3848.

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spring of 1994 and July-August 1994, respectively, after Mr. LaRouche filed a statement of candidacy with the Commission on August 9, 1993. Complainant Magraw claims that the ADL is "actively distributing" the Paroled report and that "[t]he wide dissemination of this derogatory report is clearly intended to negatively impact Mr. LaRouche's candidacy."

In MUR 4054, the Complainant cites MUR 2163, an earlier matter involving the ADL, in which the Commission found that there was probable cause to believe that ADL violated U.S.C. § 441b(a). According to Complainant Magraw, ADL's latest activities are "the same kind of vilification campaign" that was conducted against Mr. LaRouche's 1988 presidential bid and which was the subject of MUR 2163. Moreover, the Complainant in MUR 4054 states that the FEC's decision to take no further action in MUR 2163, "clearly provided the 'green light' for the ADL to continue its unlawful activity without impunity."

C. ANALYSIS

It appears that the Complainant in 3848 is alleging that the production and dissemination of the "A World of Difference" teaching materials are an independent expenditure⁵ by Respondents expressly advocating the defeat of federal candidates LaRouche, Andromidas, and their other associates. If so, because

5. There is no allegation that the expenditure is made in coordination with another candidate.

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Respondents ADL and Milken are corporations,⁶ they would have violated Section 441b(a). In both MURs 3848 and 4054, the complaints suggest that ADL is an unregistered political committee. We will analyze each of these allegations in turn.

a. Prohibited Corporate Expenditures

As there is no evidence of coordination with any candidate or committee, Section 441b(a) would prohibit ADL and the other Respondents from making these distributions only if they expressly advocate the election or defeat of a clearly identified candidate. In MUR 3848, Complainant Andromidas states that LaRouche "has been a candidate for President in the past and . . . has recently set up an exploratory committee for his 1996 Democratic Presidential primary campaign."⁷ However, no reference is made to Mr. LaRouche's 1996 presidential candidacy or the 1996 presidential election in the ADL "A World of Difference" materials. The text which Complainants claim violates the Act consists of three sentences on the 95th page of these teaching materials, which states: "Many LaRouche followers have run for office at the local, state and federal levels. LaRouche himself has run for President

6. Anti-Defamation League of B'nai B'rith was incorporated in New York on April 19, 1971. Milken Family Foundation was incorporated in California on October 22, 1986. Massachusetts Citizens for Life excepts a class of non-profit corporations from the prohibition of Section 441b(a). Federal Election Comm'n v. Massachusetts Citizens for Life, 479 U.S. 238 (1986) ("MCFL"). In MUR 2163, this Office concluded that ADL was not the type of non-profit corporation excepted from Section 441b(a) under MCFL. It is unclear whether that conclusion is still accurate today.

7. As noted, Mr. LaRouche filed a Statement of Candidacy with the Commission on August 9, 1993.

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in 1976, 1980, 1984 and 1988. However, he has garnered only a minute percentage of the votes cast."

The above-quoted text states historically that LaRouche "has run" for President in the past. There is no direct or indirect mention of any election for federal office in which LaRouche might now be a candidate or was a candidate at the time the teaching materials were published. Nor does ADL suggest that he is likely to be a candidate in the future.

Complainant Andromidas also alleges that the expenditures advocate the defeat of public political associates of LaRouche, whom he names in Attachments F and G to the complaint. The text of the "A World of Difference" teaching materials, however, merely states that many LaRouche followers have run for office at the local, state and federal levels. None of these individuals is even named, let alone identified as candidates, and there is no mention of any specific elections or offices that they might be seeking. The statement that "many LaRouche followers" have run for office is not an unambiguous reference to Mr. Andromidas or any of the federal candidates he has listed by name in his attachments. Again, there is no mention of any candidates in any upcoming election, or any information from which a reader could infer that there were federal elections pending.

Despite Complainant Andromidas's assertions, the statements about Mr. LaRouche and his followers appear to be purely informational and historical. The text, while it may be negative, does not state that Mr. LaRouche or his political associates should be defeated in any particular federal election. Rather,

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the text is a description of a number of ways in which various groups which ADL/Milken views as "propaganda organizations" operate, i.e., LaRouche's newspaper and magazine. It is in that context that the prior political races of Mr. LaRouche and his followers are broadly noted.

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Here criticism of a political figure, which is susceptible of multiple meanings, does not constitute express advocacy. In this case, the text of the teaching materials could be reasonably interpreted as criticism of the political practices and views of LaRouche organizations, not an exhortation to vote against specific candidates. Another susceptible interpretation of the language is simply an identification and description of LaRouche organizations in the context of other groups the ADL characterizes as "propaganda organizations." This is a discussion of ideology, more akin to issue advocacy that is distinguished from express advocacy of federal candidates and protected under the First Amendment by judicial precedent.

In their response in MUR 4054, ADL and Boland argue that the Act's prohibition against corporate expenditures on communications is limited to communications containing express advocacy. They claim that there is no mention whatsoever in either publication at issue, or ADL's transmittal letter with the Paroled report, of federal elections, ballots or voting, victory or defeat at the polls, past or present candidacies of LaRouche, or any campaign committee of LaRouche. They conclude that "ADL's communications do not constitute express advocacy, and ADL is therefore under no obligation to register and report as a political committee." See

Attachment 2 at 6.

The reports referenced in MUR 4054 do not attack LaRouche candidates; indeed, they do not even mention one candidacy or election. Mr. LaRouche himself is depicted as a "cult leader," not as a candidate currently or previously standing for election, or even as a member of a political party. The reports list the political positions of the LaRouche organizations and the organizations' historical relationships to political figures such as "Reagan Administration officials" and Congressman James Traficant, but do not state or imply that Mr. LaRouche is currently seeking election to federal office or was at the time of publication.

The Paroled report also lists and describes the National Democratic Policy Committee, as a LaRouche "policy entity," and "'both a policy association and a . . . political action committee.'" However, this report does not describe any of the activities of the PAC or state how it may seek to influence federal elections.

The reports at issue in these two matters are thoroughly distinguishable from the communications addressed by the Commission in MUR 2163, a prior matter which also involved ADL. In MUR 2163, the Commission found that there was probable cause to believe that ADL violated Section 441b(a) when it published a report entitled The LaRouche Political Cult: Packaging Extremism. Two segments of that fifty-four page report were specifically related to federal elections. One discussed the 1986 primary victories of persons associated with Lyndon LaRouche who were

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candidates for the general election at the time the ADL report was circulated, and discussed specific pending elections. That ADL report specifically identified seven persons who were candidates in the upcoming general elections in Illinois, California, Pennsylvania, Ohio, New Hampshire, New Jersey, and New York. In addition to those specifically named candidates, that ADL report noted the various states in which other unnamed LaRouche candidates had attained a place on the ballots. Immediately following the discussion of the LaRouche candidates, the segment concluded with predicted rejection of such candidates by the public. Additionally, in MUR 2163, ADL published a fundraising solicitation negatively discussing the candidacies of Lyndon LaRouche and his followers. The references in that letter to the LaRouche candidacies and ADL's acknowledged program to counter those candidacies led to the inextricable conclusion that the fundraising letter was also election-related.

Here, in MURs 3848 and 4054, there is no such discussion of particular candidates in particular pending elections, rejection of candidates, or solicitation of contributions by referring to the candidacies of LaRouche and his followers. Thus, it does not appear that the teaching materials and reports were independent expenditures. As such, neither ADL nor Milken, as corporations, would have been prohibited under Section 441b(a) from publishing and financing them. Accordingly, this Office recommends that the Commission find no reason to believe that ADL or Milken violated 2 U.S.C. § 441b(a).

b. Registration and Reporting Requirements of
Political Committees

1) Corporate Respondents

The complaints also raise the question of whether ADL and Milken are political committees which have not registered or reported as required by the Act. To qualify as a political committee, these Respondents would have to make contributions or expenditures totaling in excess of \$1,000, and a major purpose of the organizations would have to be influencing federal elections.

There is nothing in either MURs 3848 or 4054 which suggest that Respondents ADL and Milken expended over \$1,000 to influence any federal elections. As noted, none of the materials at issue in MUR 3848 even discuss any pending elections, current candidacies or voting.⁸ With respect to the reports in MUR 4054, they do not even mention any federal elections, political parties, or voting. Regardless of the amount of money alleged to have been spent on these publications, it does not appear that any of these funds were directed toward influencing a federal election. Accordingly, the complaints present no evidence that ADL and Milken are political committees. Thus, this Office recommends that the Commission find no reason to believe that ADL and Milken violated 2 U.S.C. §§ 433 and 434.

8. Nor were the teaching materials used for direct intervention or involvement in a federal election, such as to spur voter registration or get-out-the-vote efforts. In fact, they were not even directed at voter education because the target audiences in the Los Angeles Unified School District and in the other Los Angeles area schools where the materials were distributed were primarily too young to vote.

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The complaint in MUR 4054 also charges that Mira Boland, an apparent employee of ADL, violated the Act but does not indicate what provision. As we have concluded that the publications in MUR 4054 do not constitute express advocacy and are not federal election-influencing, this Office recommends that the Commission find no reason to believe that Ms. Boland violated the Act or Commission regulations with respect to MUR 4054.

ii) Education Respondents

Only the County of Los Angeles, Office of the County Counsel, on behalf of the Office of Education, wrote a response to the complaint in MUR 3848. The response was joined in all of its particulars by the LAUSD. The response flatly denies that the Office of Education is a "political committee" as defined in the Act. It further denies that the Office of Education made a contribution or expenditure under Sections 431(8) and (9). It concludes that because the Office of Education has made no contribution to any candidate or political committee, it is not in violation of 2 U.S.C. § 441a. The response next states that "an indirect effect of education respecting the complained of materials might be to influence how a particular candidate's qualifications for elective office may be evaluated by educated voters," but "this is not prohibited by the Act."

Under the analysis above, this Office concludes that the publications at issue do not expressly advocate candidates for federal election and are not for the purpose of influencing any federal election. The Respondents who disseminated the materials would therefore not qualify as political committees for their use

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of the materials. Nor is there any other evidence at hand to support this allegation that these entities are political committees. Therefore, this Office recommends that the Commission find no reason to believe that Respondent Office of Education or LAUSD violated 2 U.S.C. §§ 433 or 434.

III. RECOMMENDATIONS

1. Find no reason to believe that Anti-Defamation League of B'nai B'rith violated 2 U.S.C. §§ 441b(a), 433, and 434 in MUR 3848 and MUR 4054.

2. Find no reason to believe that Milken Family Foundation violated 2 U.S.C. §§ 441b(a), 433, and 434 in MUR 3848.

3. Find no reason to believe that Los Angeles Unified School District and Los Angeles County Office of Education violated 2 U.S.C. §§ 433 and 434 in MUR 3848.

4. Find no reason to believe that Mira Boland violated any provision of the Act or Commission regulations in MUR 4054.

5. Approve the appropriate letters.

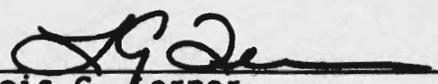
6. Close the files.

Lawrence M. Noble
General Counsel

Date

11-17-94

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Response of the Los Angeles County Office of Education
2. Response of Anti-Defamation League and Mira Boland

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Anti-Defamation League of B'nai)
B'rith;)
Milken Family Foundation;)
Los Angeles County Office of) NURS 3848/4054
Education;)
Los Angeles Unified School)
District;)
Mira Boland.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 22, 1994, the Commission decided by a vote of 5-0 to take the following actions in NURS 3848/4054:

1. Find no reason to believe that Anti-Defamation League of B'nai B'rith violated 2 U.S.C. §§ 441b(a), 433, and 434 in NUR 3848 and NUR 4054.
2. Find no reason to believe that Milken Family Foundation violated 2 U.S.C. §§ 441b(a), 433, and 434 in NUR 3848.
3. Find no reason to believe that Los Angeles Unified School District and Los Angeles County Office of Education violated 2 U.S.C. §§ 433 and 434 in NUR 3848.

(continued)

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4. Find no reason to believe that Mira Boland violated any provision of the Act or Commission regulations in MUR 4054.
5. Approve the appropriate letters, as recommended in the General Counsel's Report dated November 17, 1994.
6. Close the files.

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

Attest:

11-24-94
Date

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

Received in the Secretariat: Thurs., Nov. 17, 1994 9:30 a.m.
Circulated to the Commission: Thurs., Nov. 17, 1994 11:00 a.m.
Deadline for vote: Tues., Nov. 22, 1994 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

December 2, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ted J. Andromidas
5073 Glen Iris
Los Angeles, CA 90041

RE: MUR 3848

Dear Mr. Andromidas:

On November 22, 1994, the Federal Election Commission reviewed the allegations of your complaint dated December 27, 1993, and a complaint involving similar issues filed September 6, 1994 (MUR 4054). The Commission found that on the basis of the information provided in your complaint, and information provided by respondents, there is no reason to believe that the Anti-Defamation League of B'nai B'rith violated 2 U.S.C. §§ 441b(a), 433, and 434 in MUR 3848 and MUR 4054. The Commission found that there is no reason to believe that the Milken Family Foundation violated 2 U.S.C. §§ 441b(a), 433, and 434 in MUR 3848 and that there is no reason to believe that the Los Angeles Unified School District and the Los Angeles County Office of Education violated 2 U.S.C. §§ 433 and 434 in MUR 3848. Accordingly, on November 22, 1994, the Commission closed the file in this matter.

The Federal Election Campaign Act of 1971, as amended ("the Act") allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 2, 1994

Dr. Jules Lesner, Executive Director
Milken Family Foundation
c/o Foundations of the Milken Family
15250 Ventura Blvd., 2nd Floor
Sherman Oaks, CA 91403

RE: MUR 3848
Milken Family Foundation

Dear Dr. Lesner:

On January 6, 1994, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On November 22, 1994, the Commission found, on the basis of the information in the complaint, that there is no reason to believe that the Milken Family Foundation violated 2 U.S.C. §§ 441b(a), 433, and 434. Accordingly, the Commission closed its file 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.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 2, 1994

Roberta M. Fesler, Esq.
Los Angeles County Office of Education
9300 East Imperial Highway
Downey, CA 90242-2890

RE: MUR 3848
Los Angeles County
Office of Education

Dear Ms. Fesler:

On January 6, 1994, the Federal Election Commission notified the Los Angeles County Office of Education of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On November 22, 1994, the Commission found, on the basis of the information in the complaint, and information provided by respondents, that there is no reason to believe that the Los Angeles County Office of Education violated 2 U.S.C. §§ 433 and 434. Accordingly, the Commission closed its file 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.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

24043601589



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 2, 1994

Richard K. Mason, Esq.
Los Angeles Unified School District
Box 3307
Los Angeles, CA 90051

RE: MUR 3848
Los Angeles Unified School District

Dear Mr. Mason:

On January 6, 1994, the Federal Election Commission notified the Los Angeles Unified School District of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On November 22, 1994, the Commission found, on the basis of the information in the complaint, and information provided by respondents, that there is no reason to believe the Los Angeles Unified School District violated 2 U.S.C. §§ 433 and 434. Accordingly, the Commission closed its file 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.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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THIS IS THE END OF MUR # 3848

DATE FILMED 12-23-94 CAMERA NO. 2

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