



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3969

DATE FILMED 4-28-97 CAMERA NO. 1

CAMERAMAN JMW

97043793111

Josd Singh
MLF003224



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

May 16, 1994

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: LENORA B. FULANI FOR PRESIDENT - REFERRAL MATTERS

On April 21, 1994 the Commission approved the final audit report (FAR) on Lenora B. Fulani for President. The report was released to the public on May 6, 1994. In accordance with the Commission approved materiality thresholds, the attached findings from the audit report are being referred to your office:

- Apparent Excessive Contributions Resulting from Staff Advances
- Reporting of Debts and Obligations

Please note that the Committee materially corrected its disclosure reports relative to the Reporting of Debts and Obligations finding. However, the Committee's interim audit report response to this finding did not include documentation to substantiate its claims regarding whether the payment arrangement with a law firm was in accordance with 11 CFR 116.3(a). As a result, this payment arrangement appears to constitute a contribution.

All workpapers and related documentation are available for review in the Audit Division. Should you have any questions, please contact Marty Favin at 219-3720.

97043793112

Attachments:

- FAR Finding II.A. (Apparent Excessive Contributions Resulting from Staff Advances), FAR Pgs. 4-9
- FAR Finding II.B. (Reporting of Debts and Obligations), FAR Pgs. 9-12
- Schedule of 116.5 Summary of Expenses, Pgs. 1-5
- Audit Analysis of Staff Advances under 116.5 for Fulani, Pgs. 1-32
- Explanation of Symbols and Methodology Used in Generating Report of Apparent Excessive Contributions Resulting from Staff Advances as Defined under 11 C.F.R. 116.5, Pgs. 1-4

97043793113

A. Apparent Excessive Contributions Resulting from Staff Advances

Section 441a(a)(1)(A) of Title 2 of the United States Code states, in part, that no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 116.5(b) of Title 11 of the Code of Federal Regulations states that the payment by an individual from his or her personal funds, including a personal credit card, for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or political committee is a contribution unless the payment is exempted from the definition of contribution under 11 C.F.R. §100.7(b)(8). If the payment is not exempted under 11 C.F.R. §100.7(b)(8), it shall be considered a contribution by the individual unless; the payment is for the individual's transportation expenses incurred while traveling on behalf of a candidate or political committee of a political party or for usual and normal subsistence expenses incurred by an individual, other than a volunteer, while traveling on behalf of a candidate or political committee of a political party; and, the individual is reimbursed within sixty days after the closing date of the billing statement on which the charges first appear if the payment was made using a personal credit card, or within thirty days after the date on which the expenses were incurred if a personal credit card was not used. For purposes of this section, the closing date shall be the date indicated on the billing statement which serves as the cutoff date for determining which charges are included on that billing statement. In addition, "subsistence expenses" include only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

During our review of the Committee's expense reimbursements to campaign staff, we noted that from the Committee's inception through December 31, 1992, 14 individuals advanced funds on behalf of the Committee in excess of the \$1,000 limitation. In order to calculate the amount of a contribution resulting from an advance made by an individual on behalf of the Committee, payments made by the Committee were applied against those expenses that had been incurred the earliest. The expenses incurred were for travel and subsistence and campaign-related goods and services. It was also noted that a number of individuals paid the transportation, travel, and other campaign expenses incurred by other individuals, including the candidate's expenses, using their personal credit cards. Several of the credit card statements we reviewed also included charge-activity summaries under the names of other individuals indicating that additional cards were provided to and used by these other individuals for campaign-related transactions. The excessive amount, which is the sum total of the highest excessive balance

97043793114

for each individual, totaled \$86,562. The number of days outstanding before reimbursement of the excessive amounts ranged from 1 to 133 days. At the close of fieldwork, no outstanding expense reimbursements were identified.

At the exit conference, the Audit staff provided the Committee with a listing of the relevant expenses and contributions associated with the 14 individuals. The Treasurer stated that the Committee was not aware of the requirements of 116.5. The Treasurer also commented that "the regulation and repayment periods are unfair to candidates who do not have access to credit as easily as a Governor or a U.S. Senator. Banks will grant credit to these people on the basis of name recognition or political position. Lesser known candidates and their committees are forced to rely on Committee volunteers and supporters to provide their good name. She added that there is no justification for being penalized for these reasons."

In addition, on March 18, 1993 the Audit staff requested, in writing, that the Treasurer obtain certain billing statements from individuals (8 of the 14 noted above plus 8 additional) whose credit cards were available for use by the Committee. These statements were requested to enable the Audit staff to complete the verification of qualified campaign expenses and the testing of excessive contributions resulting from advances made by Committee staff/individuals on behalf of the Committee.

The Committee was granted ten business days to respond to the request (April 7, 1993). On March 30, 1993 the Audit staff received a written response which stated that none of the missing statements would be provided since the statements were for the individuals' personal credit cards and therefore not in the Committee's possession. In addition to this response the Committee provided photocopies of documentation already reviewed by the Audit staff.

At the March 31, 1993 exit conference the Audit staff reiterated that the Committee still had until April 7, 1993 to provide the requested missing statements and that absent the production of these statements, a request would be made to the Office of General Counsel (OGC) for subpoenas to be issued to American Express, Chittenden Bank Visa, Chase: Visa and Mastercard, Citibank: Visa and Mastercard, Choice Visa and Chemical Bank Visa for the production of the credit card statements, charge slips and any other documentation related to the missing statements.

An additional written response from the Committee was received by the Audit staff on April 7, 1993. In this response, the Committee stated that the payments made by the Committee directly to credit card companies for individuals' expenses were for credit cards not under the Committee's control and that the missing statements covered the individuals' personal expenses

97043793115

only. The response concluded that the Committee did not have the authority to request the missing credit card statements from individuals for expenses not related to the campaign and viewed this request as an infringement on these individuals' privacy.

On August 10, 1993, the Commission approved the OGC's recommendation to issue subpoenas to the credit card companies noted above for the production of the missing credit card statements, charge slips and other documentation relevant to 16 individuals whose credit cards were available for use by the Committee. At the Committee's request, staff from OGC and the Audit Division met with the Treasurer and Committee Counsel on August 12, 1993 to discuss the Audit staff's request for the missing credit card documentation. At this meeting Committee Counsel discussed the possibility of obtaining affidavits from these individuals which attested that no charges were posted to their credit card statements for expenses to or on behalf of the Committee during the time periods in question.

It was agreed that affidavits would be acceptable from 3 of the 16 individuals given the relatively low level of activity and absence of any unusual patterns or other indications suggesting a significant level of activity occurred during the periods for which statements were not available. Signed affidavits for 7 of these 8 individuals were received in September 1993.^{3/}

In the interim audit report the Audit staff recommended that the Committee submit additional documentation to establish that the individuals noted did not exceed the contribution limits of 2 U.S.C. §441(a)(1)(A), and/or that the individuals were reimbursed in a timely manner [as defined under 116.5(b)(2)]; or provide any other relevant comments or documentation. It was further recommended that the Committee provide the documentation and affidavit requested by the Audit staff and that once reviewed, revisions would be made, if warranted.

In the initial response to the interim audit report the Committee Treasurer points out that "Dr. Fulani's campaign for President in 1992 was a "grassroots, community-based operation" which raised over \$2 million from almost 100,000 individuals and that since the candidate was on the ballot in 39 states and the District of Columbia, the candidate and Committee staff/volunteers travelled constantly. She explains that the Committee was denied

^{3/} In lieu of an affidavit, documentation relative to the remaining individual was received in October 1993. With respect to the other 8 individuals for which statements were requested, all missing documentation was subsequently provided by either the credit card companies or the Committee. See Page 8, Paragraph 6 for the results of the Audit staff's analysis of this additional documentation.

97043793116

a corporate American Express card and that it was "impossible" to make travel arrangements without credit. She adds that even Federal Express would not open an account for the Committee without a credit card for security since "...we were a political committee and thus presumably could not be trusted financially." As a result, the Committee relied upon individuals' credit to secure these essential services.

The Treasurer states that the Committee does not believe that the transactions in question violate 2 U.S.C. §441a because the credit card charges were paid in the normal course of business without any request from the Commission or from any other outside party, there was no intent on the part of these individuals for these charges to be contributions, and the individuals were told that the Committee was financially responsible for the charges. In addition, these charges were handled by the Committee as if they were routine vendor purchases and were usually paid back within 60 days when they were still open for payment, but not overdue.

The Treasurer argues that 11 C.F.R. §116.5 is unfair to the Committee because "...by solely exempting a person's own travel and subsistence expenses from the definition of contribution, the Commission is discriminatory towards smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." She adds that the Committee was forced to use these individuals' credit cards for campaign-related expenses which were not for their own travel and subsistence, but that in most cases these expenses were paid within 60 days and that if an individual advanced money towards the expenses it was done on their own initiative, not at the request of the Committee.

The Treasurer strongly urges the Commission not to take any enforcement action against the Committee relative to these transactions for two reasons. First, if the 60 days allowed for an individual's own travel was allowed for the types of transactions considered excessive contributions in the finding, "...there would be practically no 'excessive contributions.'" Secondly, she points out the "practical impossibility of operating without credit cards in our economy." The Treasurer adds that this regulation was not in existence when the candidate first qualified for matching funds in 1988 and that the Committee "...failed to notice the new regulation, and to realize its implications, for the practice of using personal credit cards for vendor transactions" when setting up its 1992 procedures. She further states that the Commission should find that no violation has occurred but if the Commission should find otherwise, "...this candidate will now be fully on notice of the Commission's interpretation of the law."

97043793117

The Treasurer concludes that "[t]he Commission has properly interpreted the Federal Election Campaign Act to make it possible for independent candidates to qualify for matching funds. We respectfully request that the Commission now take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours."

In the supplemental response to the interim audit report, the Committee's Counsel expands on the Treasurer's conclusion noted in the previous paragraph. He notes that "[t]he Commission has previously taken into account the differences between the actual operations of major party and independent/minor party campaigns so as to devise enforcement policies that are fair and even-handed in practice, not just in theory." He refers to a series of advisory opinions (AO) which dealt with the eligibility of minor party candidates to receive matching funds whether or not they were participating in a nomination or ballot access process that even included primary election contests [AO 1975-44 (Socialist Workers); AO 1983-47 (Sonia Johnson); and, AO 1984-25 (Sonia Johnson)].

Committee Counsel concludes that if the Commission applies the underlying principles used in formulating these advisory opinions to this issue that the Commission should "...not interpret or enforce 11 C.F.R. 116.5 in a rigid manner that discriminates against smaller, grassroots campaigns which, in the arena of presidential politics, has historically included virtually every independent or minor party presidential campaign."

It is the opinion of the Audit staff that the Committee's arguments and other comments provided in response to the interim audit report do not warrant any change to the Audit staff's analysis as presented in the interim audit report.

However, the excessive amount (\$86,562), which was developed based on records made available during fieldwork, requires revision. See discussion at pages 4 - 5.

Analysis of Documentation Received After Issuance of the Interim Audit Report

As noted above, the finding contained in the interim audit report addressed excessive contributions totaling \$86,562; the Committee's responses addressed the facts relative to the development of this figure.

Subsequent to the reissuance of the interim audit report, additional credit card documentation obtained from the credit card companies via the subpoena process and/or provided by the Committee was received. These credit card statements were reviewed by the Audit staff and since certain expenses relative to

97043793118

travel, subsistence and related expenses were incurred during the time periods for which these cards had been made available for the Committee's use, the Audit staff included them in the 11 CFR 116.3 analysis. Absent a demonstration to the contrary, these transactions were considered campaign-related.

It should be noted that the Committee has maintained from the onset that these charges are not related to the candidate's campaign for nomination (See pages 5-6). The Committee did not reimburse any of the individuals for any of the expenses enumerated, nor was there any indication in the records reviewed by the Audit staff that any individual requested reimbursement for any of these transactions.^{4/}

Based on the inclusion of these apparent campaign-related charges, the revised sum total of the highest excessive balances relative to the 14 individuals is \$107,072, an increase of \$20,510 (\$107,072 - \$86,562) from the figure cited in the interim audit report.

B. Reporting of Debts and Obligations

Section 434(b)(8) of Title 2 of the United States Code requires that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee.

Section 104.11 of Title 11 of the Code of Federal Regulations states, in part, that debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished. If the exact amount of a debt or obligation is not known, the report shall state that the amount reported is an estimate.

Section 116.3(a) of Title 11 of the Code of Federal Regulations states that a commercial vendor that is not a corporation may extend credit to a candidate, a political committee or another person on behalf of a candidate or political

^{4/} Included in the credit card documentation reviewed by the Audit staff were credit card slips imprinted with "Rainbow Lobby" under the basic and supplemental cardholders' name. The Rainbow Lobby was apparently formed by the New Alliance Party (NAP) in 1984. The NAP was the party which Dr. Fulani represented during the 1992 election.

A representative of American Express explained that the account in question is a company account not a corporate account and is therefore the sole responsibility of the basic cardholder, not the Rainbow Lobby. A cardholder can arrange for a company name to be imprinted on a credit card without the company being responsible for the account.

97043793119

committee; and, an extension of credit will not be considered a contribution to the candidate or political committee provided that the credit is extended in the ordinary course of the commercial vendor's business and the terms are substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation. Section 116.3(c) of Title 11 of the Code of Federal Regulations states that in determining whether credit was extended in the ordinary course of business, the Commission will consider: (1) whether the commercial vendor followed its established procedures and its past practice in approving the extension of credit; (2) whether the commercial vendor received prompt payment in full if it previously extended credit to the same candidate or political committee; and (3) whether the extension of credit conformed to the usual and normal practice in the commercial vendor's trade or industry.

During our review of selected Committee disbursements, the Audit staff noted that the Committee did not disclose \$98,209 of debts attributable to the International Peoples' Law Institution (IPLI), a firm which provided legal services to the Committee. Of this amount, \$59,179 was not reported on the September 1992 Report, and \$39,030 was not reported on the October 1992 Report. The Audit staff noted that the IPLI invoiced the Committee only twice during the campaign, on 1/30/92 in the amount of \$109,060, covering 3/1/91 through 12/31/91 services, and on 9/1/92 in the amount of \$124,004, covering 1/1/92 through 8/20/92 services.

At the exit conference the Committee was provided with a schedule of debts and obligations that were not properly disclosed. The Audit staff explained that by not disclosing fully large amounts of debt a Committee's financial condition is misstated. The Treasurer stated that she understood and she explained that the Committee did not always maintain the debt records on a current basis during the campaign.

The Audit staff requested that the Committee provide an explanation as to why it took so long for the IPLI to invoice the Committee. The Treasurer referred to the agreement between the IPLI and the Committee which stipulated that the Committee pay the IPLI a minimum monthly retainer of \$3,000 commencing in March, 1991. The agreement further stated that the IPLI would postpone the receipt of any amount in excess of the \$3,000 monthly retainer until the Committee received its first matching fund payment. A modification to the retainer agreement was made on September 1, 1991 in which the monthly retainer was increased from \$3,000 to \$4,000. The Audit staff noted that the Committee made payments in accordance with the retainer agreement.

The Audit staff asked the Committee Treasurer for an explanation regarding the length of time between the two invoices discussed above. She responded that an oral agreement was made with the IPLI in which the IPLI agreed to accrue amounts due, net

9704379312C

of the monthly retainer, until the end of the campaign, at which time the Committee would pay the balance due. The Audit staff questioned whether this extension of credit by the IPLI is in the ordinary course of business, and whether the terms are substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation. See 11 C.F.R. §§100.7(a)(4) and 116.3(a).^{5/}

In the interim audit report the Audit staff recommended that the Committee amend its September 1992 and October 1992 Reports for the two IPLI balances not disclosed as required and that the Committee demonstrate that the payment arrangement with the IPLI was in accordance with 11 C.F.R. §116.3(a). It was further recommended that, in the future, the Committee institute stronger internal controls to comply with debt reporting regulations.

In response to the interim audit report the Committee amended its September 1992 and October 1992 Reports correctly disclosing the two IPLI debts.

In addition, the Committee provided a letter from its Counsel, an individual who was a partner in the IPLI during the time it performed legal work for the Committee. Counsel describes IPLI as a "law firm partnership" that "...was founded for the purpose of advancing democracy and social justice by providing legal representation." He states that the IPLI's "...established procedures for billing included sliding scale fees and flexible credit arrangements" and that "[t]he payment arrangements with the Committee were within a normal range for such arrangements and, in any event, not unusually favorable towards the Committee in comparison to other IPLI clients."

He adds that the extension of credit met the "usual and normal practice in the commercial vendor's trade or industry" requirement of 11 C.F.R. §116.3(c)(3), in two respects. First, its common for law firms to accept payments from such clients based upon funding cycles or cash flow; in this case the receipt of federal matching funds and individual contributions from fundraising efforts. He states as an example that "...social service and other nonprofit organizations often are forced to build up substantial liabilities leading up to the date when a major grant or contract payment is received from a governmental or foundation source and "[l]aw firms, like other vendors are prepared to perform work during the 'lean' months without full payment for their services in anticipation of being paid in the future. Second, "...law firms are permitted to provide legal services to federal political committees for no charge at all, i.e. pro bono and that "...it was a 'usual and normal practice'

^{5/} The Audit staff verified with the State of New York, Department of State that the IPLI is not incorporated.

97043793121

for the IPLI to take the risk that a client that agreed to pay a fee might be unable to pay the entire fee and the representation would end up being largely (or entirely) pro bono."

Given that the vast majority of the legal fees relate to the inclusion of the candidate in debates and ballot access work performed by IPLI, the assertion that these services could have been provided pro bono is incorrect. The Regulations, at 11 C.F.R. §§ 100.7(b)(13) and (14) exempt from the definition of contribution legal services which (1) are not attributable to activities which directly further the election of any designated candidate for Federal office, or (2) services which are solely to ensure compliance with the Act or 26 U.S.C. §§ 9001 et seq. and 9031 et seq.

Further, although the Committee in its response, as detailed above, asserts that the extension of credit was not a contribution and has included representations relative to IPLI's ordinary course of business, including terms offered to other IPLI clients, and statements regarding the usual and normal practices for law firms, no documentation has been provided to substantiate the claims made.

The Audit staff finds that based on the information provided, the payment arrangement between the Committee and the IPLI appears to constitute a contribution under 11 C.F.R. §116.3(a).

97043793122

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

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

MAY 20 3 48 PM '96

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 3969
STAFF MEMBER: Andre G. Pineda

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Lenora B. Fulani for President Committee
Francine Miller, as Treasurer
David Belmont
Jini L. Berman
Eleanor Fain
Margaret E. Golden
Lawrence A. Grigsby
Jeannine Hahn
Robert Levy
Fred Newman
John B. Opdyke
Marsha Plafkin
James Ross
Nancy Ross
Cathy Stewart
Margaret E. Tanzosh
International Peoples' Law Institution

RELEVANT STATUTES/
REGULATIONS:

2 U.S.C. § 431(11)	2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)	11 C.F.R. § 100.7(a)(11)
11 C.F.R. § 100.10	11 C.F.R. § 116.1(c)
11 C.F.R. § 116.3	11 C.F.R. § 116.5(b)
11 C.F.R. § 116.5	11 C.F.R. §§ 100.7(b)(8) and (14)
11 C.F.R. § 9032.9	

INTERNAL REPORTS CHECKED: Audit Documents

FEDERAL AGENCIES CHECKED: None

97043793123

I. GENERATION OF MATTER

The Lenora B. Fulani for President Committee ("the Committee") is the authorized committee of Dr. Lenora B. Fulani, a candidate for the 1992 presidential nomination of a national party and four separate party committees in four states.¹ The Committee received \$2,013,323 in matching funds from the United States Treasury. 26 U.S.C. §§ 9033 and 9034. Pursuant to 26 U.S.C. § 9038(a), the Commission conducted an audit and examination of the Committee's receipts, disbursements, and qualified campaign expenses. In addition, the audit included an evaluation of whether the Committee complied with the Federal Election Campaign Act, as amended. 11 C.F.R. § 9038.1(c)(1)(i) and (iv). This matter was generated from information obtained during the audit of the Committee. 11 C.F.R. § 9038.1(e)(2). The Audit Division's referral materials are attached. Attachment 1; *see also* Attachment 2.

The Audit Division's referral materials include two findings. One is the Committee's receipt of excessive contributions from individuals who made advances to the Committee. The other finding is related to whether one of the Committee's vendors, the International Peoples' Law Institution ("IPLI"), extended credit to the Committee outside the ordinary course of business for the provision of legal services.² The Office of General Counsel recommends that the Commission find reason to believe that the individuals made, and the Committee accepted, excessive contributions as a result of staff advances. However, due to the overlap between the issues in this matter and the Commission's investigation of the Committee under 26 U.S.C.

¹ The Committee registered with the Commission on March 11, 1991.

² The Committee paid IPLI \$234,589.48 for legal services.

§ 9039, this Office recommends that the Commission take no action at this time with respect to the extension of credit from IPLI.

On July 26, 1994, the Commission opened an investigation pursuant to 26 U.S.C. § 9039(b) to examine the Committee's use of public funds. As part of this investigation, the Commission questioned whether the amount paid to IPLI was a qualified campaign expense. Based on the information obtained during the course of the investigation, the Commission made an initial determination that the payments made to IPLI were nonqualified campaign expenses.³ *Lenora B. Fulani for President*, Notice of Initial Repayment Determination (August 3, 1995).

Although the Commission's determinations in the Section 9039 inquiry and the enforcement matter involve different issues, the facts that will be considered in each context are essentially the same.⁴ For both issues, the Commission must review the facts underlying the Committee's financial transactions with IPLI. *Compare* 11 C.F.R. §§ 116.3(c)(1)-(3) with 11 C.F.R. §§ 9032.9(a)(1)-(3). However, since the Commission has only made an initial repayment determination as to whether the Committee's disbursements to IPLI were qualified campaign expenses, there has not been a resolution of the facts in that matter. *See* 11 C.F.R.

³ The Commission made an initial repayment determination that the Committee must repay \$612,537.32 to the United States Treasury. *Lenora B. Fulani for President*, Notice of Initial Repayment Determination (August 3, 1995). A portion of the initial repayment determination, \$83,832.87 [(\$194,585.03 (Committee payments before the candidate's date of ineligibility x .430829 (repayment ratio))], represents Committee payments made to IPLI that are repayable to the United States Treasury. *Id.* at 35.

⁴ The question of whether the disbursements to IPLI were qualified campaign expenses and the question of whether IPLI extended credit to the Committee in the ordinary course of business are legally distinct. A review of a committee's qualified campaign expenses examines the terms and prices provided by the vendors to determine if any funds that were eventually paid to a vendor were for the purpose of seeking the nomination. On the other hand, an analysis of the extension of credit between a committee and a vendor examines whether the arrangement results in a contribution by the vendor to the committee. *Compare* 11 C.F.R. §§ 116.3(c)(1)-(3) with 11 C.F.R. §§ 9032.9(a)(1)-(3). The same facts, however, may be used to resolve both questions.

9 7 0 4 3 7 9 3 1 2 5

§§ 9038.2(c)(2) and (3). The Commission will not resolve the facts in the repayment context until it makes a final repayment determination and issues a statement of reasons.⁵ See 11 C.F.R. § 9038.2(c)(4). In light of the factual overlap, the Office of General Counsel believes that it is appropriate to wait until the facts are resolved in the repayment context before making any recommendation regarding apparent violations by the Committee and IPLI. Cf. 11 C.F.R. § 9039.3(a)(2) (any information obtained during the course of an investigation under 26 U.S.C. § 9039(b) may be considered in connection with an enforcement action). Therefore, the Office of General Counsel recommends that the Commission take no action at this time on the IPLI extension of credit to the Committee. After the Commission makes a final repayment determination, the Office of General Counsel will submit a General Counsel's Report to the Commission with additional recommendations on ILPI's extension of credit to the Committee⁶

II. FACTUAL AND LEGAL ANALYSIS - STAFF ADVANCES

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No candidate or political committee shall knowingly accept any contribution that exceeds the contribution limitations. 2 U.S.C. § 441a(f). Moreover, no officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on

⁵ On September 12, 1995 and October 10, 1995, the Committee submitted written responses to the initial repayment determination. On February 7, 1996, the Committee made an oral presentation before the Commission.

⁶ The Office of General Counsel is currently reviewing the information obtained in the section 9039 inquiry and preparing a draft statement of reasons in support of the final repayment determination. As a result, this Office anticipates making a recommendation to the Commission on the extension of credit within the next few months.

97043793126

behalf of a candidate, in violation of any limitation imposed on contributions and expenditures.

Id.

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989)*. However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

The audit found that the following 14 individuals made expenditures for personal transportation and miscellaneous expenses or for the subsistence of others: Lawrence A. Grigsby, Fred Newman, John B. Opdyke, Cathy Stewart, Marsha Plafkin, David Belmont, Jini L. Berman,

97043793127

Eleanor Fain, Margaret E. Golden, Jeannine Hahn, James Ross, Nancy Ross⁷, Margaret E. Tanzosh and Robert Levy. Attachment 1. The following chart includes the date of the expenses, the range of expenses, the highest aggregate excessive amount, the date of the highest excessive amount, and the total excessive amounts for expenses incurred on behalf of others⁸:

⁷ Expenditures that have been attributed to Nancy Ross include credit card charges made to an American Express Company account for *The Rainbow Lobby*. Attachment 4. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words "*The Rainbow Lobby*." *Id.* Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Karliner, and Jeffrey Aron. *Id.* Because Nancy Ross is the basic cardholder for this account, these individuals were not responsible for the payment of any charges that they made to this account. *Id.* However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Office of General Counsel believes that it is appropriate to attribute all charges to Nancy Ross. Cf. 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be attributable to the candidate's personal expenditure limitation).

⁸ Column No. 6 of above-described chart contains expenses that were *solely* for the subsistence of others which result in excessive contribution amounts. It should be noted, however, that some of the individuals listed incurred expenses for the subsistence of others in addition to incurring expenses for personal transportation and personal miscellaneous expenses.

97043793128

**EXPENSES INCURRED FOR PERSONAL TRANSPORTATION, PERSONAL MISCELLANEOUS
EXPENSES AND THE SUBSISTENCE OF OTHERS**

NAME	DATES OF EXPENSES	RANGE	HIGHEST AGGREGATE AMOUNT	DATE OF HIGHEST EXCESSIVE AMOUNT	EXPENSES SOLELY FOR THE SUBSISTENCE OF OTHERS - EXCESSIVE CONTRIBUTION AMOUNTS
Belmont, David	06/26/91-09/07/92	\$ 1.59 - \$3,827.00	\$25,500.48	05/18/92	N/A
Berman, Jini L.	06/17/91-08/25/92	\$11.50 - 898.78	\$1,452.81	02/22/92	N/A
Fain, Eleanor	01/09/92-11/02/92	\$ 0.51 - 3,835.00	\$22,367.92	03/12/92	N/A
Golden, Margaret E.	04/04/92-10/22/92	\$ 1.30 - 1,600.00	\$838.70	03/06/92	N/A
Hahn, Jeannine	08/02/91-09/23/92	\$ 22.50 - 2,743.18	\$2,343.44	03/06/92	N/A
Ross, James	05/24/91-08/09/92	\$ 7.73 - 1,128.11	\$2,576.25	12/19/91	N/A
Ross, Nancy	06/01/91-09/05/92	\$ 10.55 - 6,409.77	\$19,455.23	05/30/92	N/A
Tanzosh, Margaret E.	02/12/92-10/13/92	\$ 0.46 - 1,732.98	\$8,933.27	09/15/92	N/A
Levy, Robert	N/A	N/A	N/A	N/A	\$ 636.78
Grigsby, Lawrence	N/A	N/A	N/A	N/A	\$1,345.25
Newman, Fred	N/A	N/A	N/A	N/A	\$930.58
Opdyke, John B.	N/A	N/A	N/A	N/A	\$8,340.14
Plafkin, Marsha	N/A	N/A	N/A	N/A	\$7,556.89
Stewart, Cathy	N/A	N/A	N/A	N/A	\$2,837.08

Pursuant to 11 C.F.R. § 100.7(b)(8), Mr. Belmont, Ms. Fain, Ms. Golden, Mr. Ross, and Ms. Ross could spend an aggregate amount of up to \$1,000 per election for their personal transportation expenses on behalf of Dr. Lenora B. Fulani without such expenditures counted as contributions to the Committee. *See* MUR 3974 (Kerry for President). Therefore, the highest excessive amounts for these individuals have been adjusted to reflect the actual amount of money that each of these individuals spent for personal transportation expenses. Moreover, Mr. Belmont, Ms. Berman, Ms. Fain, Ms. Golden, Ms. Hahn, Mr. Ross, Ms. Ross, Ms. Tanzosh incurred expenses that were not reimbursed within 30 or 60 days as required by the regulations. Attachment 1 at 12-52. Therefore, these expenditures are contributions to the Committee. 11 C.F.R. § 116.5(b)(2). Furthermore, Mr. Levy, Mr. Grigsby, Mr. Newman, Mr. Opdyke, Ms. Plafkin, and Ms. Stewart made contributions to the Committee by incurring expenses solely on the behalf of

97043793129

others. See 11 C.F.R. § 116.5(b)(1). These expenses were contributions to the Committee at the time they were incurred. *Id.*

In its response to the Interim Audit Report, the Committee argued that it was a "grassroots, community-based operation" which required Dr. Fulani, its staff, and volunteers to travel constantly. Attachment 1 at 5; see also Attachment 2. The Committee also contended that 11 C.F.R. § 116.5 is unfair to the Committee because it discriminates against "smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." Attachment 1 at 6. As a result, the Committee stated that it was forced to use the credit cards of individuals for campaign-related expenses that were not for their own travel and subsistence.⁹

The Committee further argued that the transactions in question did not violate 2 U.S.C. § 441a(a) because the credit card charges for the individuals were paid in the normal course of business without any request from the Commission or from any other outside party. *Id.* Moreover, the Committee asserts that these individuals did not intend to make contributions and that it told these individuals that they were responsible for payment of these charges. *Id.* Additionally, the Committee asserts that it reimbursed the individuals such expenses within 60 days, and that if an individual advanced money towards these expenses, it was done at the individual's own initiative. *Id.*

Moreover, the Committee stated that no enforcement action is warranted for several reasons. First, it argued that the 60 day rule for reimbursement should apply to non-personal

⁹ The Committee also asserts that it was denied an American Express corporate credit card. Attachment 1 at 6; see also Attachment 2.

travel and subsistence expenses. *Id.* Second, it asserted that non-credit card usage is virtually impossible and that it did not realize that 11 C.F.R. § 116.5 had been promulgated since the 1988 Presidential elections when it established its credit card procedures. *Id.* Additionally, the Committee urged the Commission to "take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours." Attachment 1. at 7; *see also* Attachment 2.

The Commission promulgated section 116.5 out of concern that during critical periods in a campaign when an authorized committee is experiencing financial difficulties, individuals may attempt to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. *Explanation and Justification of 11 C.F.R. § 116.5(b)*, 55 *Fed. Reg.* 26382 (June 27, 1989). Therefore, section 116.5 sets forth a specific time period for when a committee must reimburse an individual for his or her travel and subsistence. Any reimbursement that extends beyond the prescribed time period will be considered a contribution. 11 C.F.R. § 116.5(b). The Commission intended section 116.5 to provide a limited exception to the general rules governing contributions for an individual's personal transportation and subsistence. *See Explanation and Justification of 11 C.F.R. § 116.5(b)*, 55 *Fed. Reg.* 26382 (June 27, 1989). Therefore, any expense incurred by an individual that is not his or her own travel and subsistence (such as for travel for others, meeting rooms or telephone services) will be considered a contribution. *Id.* These expenses are contributions to the Committee regardless of the time that is required for the Committee to reimburse the individual. *Id.* The fact that the Committee contends that it was a small

97043793131

committee and could not obtain a corporate credit card or that the individuals did not intend to make a contribution is irrelevant for the purpose of this analysis.¹⁰

The Office of General Counsel recommends that the Commission find reason to believe that the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling \$ 105,114.82.¹¹ In addition, the Office of General Counsel recommends that the Commission find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Robert Levy, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart and Margaret E. Tanzosh violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions. However, consistent with prior Commission action, this Office recommends that no further action be taken against these individuals. See MURs 4172 and 3991 (Commission found reason to believe individuals made excessive contributions to committees pursuant to 11 C.F.R. § 116.5, but took no further action with respect to the individuals). If the Commission approves this recommendation, the Office of General Counsel will send admonishment letters to these individuals.

¹⁰ Since individuals can use their personal credit cards for their own travel and subsistence, section 116.5 was intended to provide the Committee flexibility in situations where a committee may not want to provide corporate credit cards to its field staff. *Explanation and Justification of 11 C.F.R. § 116.5(b)*, 55 *Fed. Reg.* 2638 2 (June 27, 1989). Therefore, the promulgation of 11 C.F.R. § 116.5 provided committees with greater opportunities to avoid the making of prohibited contributions by committee staff members. Compare 11 C.F.R. § 100.7(a)(1) with 11 C.F.R. § 116.5(b). It should be noted, however, that factors such as a committee's inability to obtain corporate credit cards, committee size, and/or intent (or the lack of intent) may be considered in mitigating the violation.

¹¹ The amount of excessive contributions represents the sum total of the amounts stated in the above-described chart (\$25,500.48 + \$1,452.81 + \$22,367.92 + \$838.70 + \$2,343.44 + \$2,576.25 + \$19,455.23 + \$8,933.27 + \$1,345.25 + \$930.58 + \$8,340.14 + \$7,556.89 + \$2,837.08 + \$636.78).

97043793132

III. DISCUSSION OF PROPOSED CONCILIATION

IV. RECOMMENDATIONS

1. Take no action at this time with respect to the transactions between Lenora B. Fulani for President Committee and Francine Miller, as treasurer, and the International Peoples' Law Institution;
2. Find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, Margaret E. Tanzosh, and Robert Levy violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the file with respect to these respondents;
3. Find reason to believe that the Lenora B. Fulani for President Committee, and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) for accepting excessive contributions through staff advances;
4. Enter into conciliation with the Lenora B. Fulani for President Committee, and Francine Miller, as treasurer, prior to a finding probable cause to believe;
5. Approve the attached conciliation agreement;

¹² A sample factual and legal analysis for individuals who made excessive contributions to the Committee is attached.

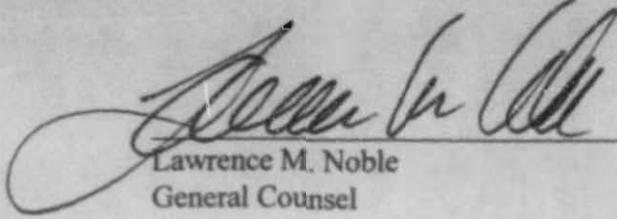
¹³ This amount has been rounded to the nearest thousand dollar amount.

97043793133

- 6. Approve the attached sample factual and legal analysis; and
- 7. Approve the appropriate letters.

5/20/96

 Date



 Lawrence M. Noble
 General Counsel

Attachments

- 1. Audit Referral
- 2. Committee Responses to the Interim Audit Report
- 3. Audit Division adjustment to Section 116.5 Staff Advances Calculations
- 4. Letter from American Express dated October 1, 1993
- 5. Audit Division adjustments to Section 116.5 Staff Advances pursuant to 11 C.F.R. § 100.7(b)(8)
- 6. Proposed Conciliation Agreement for the Lenora B. Fulani for President and Francine Miller, as Treasurer
- 7. Factual and Legal Analysis for the Lenora B. Fulani for President Committee, and Francine Miller, as Treasurer
- 8. Sample Factual and Legal Analysis for Individuals who made excessive contributions to the Lenora B. Fulani for President Committee

97043793134

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Lenora B. Fulani for President)
Committee and Francine Miller,)
as treasurer;)
David Belmont;)
Jini L. Berman;)
Eleanor Fain;)
Margaret E. Golden;)
Lawrence A. Grigsby;)
Jeannine Hahn;) MUR 3969
Robert Levy;)
Fred Newman;)
John B. Opdyke;)
Marsha Plafkin;)
James Ross;)
Nancy Ross;)
Cathy Stewart;)
Margaret E. Tanzosh;)
International Peoples' Law)
Institution.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 24, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 3969:

1. Take no action at this time with respect to the transactions between Lenora B. Fulani for President Committee and Francine Miller, as treasurer, and the International Peoples' Law Institution.
2. Find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, Margaret E. Tanzosh, and Robert Levy violated 2 U.S.C § 441a(a)(1)(A), but take no further action and close the file with respect to these respondents.

(continued)

97043793135

3. Find reason to believe that the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) for accepting excessive contributions through staff advances.
4. Enter into conciliation with the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, prior to a finding probable cause to believe.
5. Approve the conciliation agreement, as recommended in the General Counsel's Report dated May 20, 1996.
6. Approve the sample factual and legal analysis, as recommended in the General Counsel's Report dated May 20, 1996.
7. Approve the appropriate letters, as recommended in the General Counsel's Report dated May 20, 1996.

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

Attest:

5-18-96

Date

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

Received in the Secretariat: Mon., May 20, 1996 3:48 p.m.
Circulated to the Commission: Tues., May 21, 1996 11:00 a.m.
Deadline for vote: Fri., May 24, 1996 4:00 p.m.

bjr

97043793136



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Ms. Eleanor Fain
124 W. 60th Street
New York, NY 10023

Re: MUR 3969
Eleanor Fain

Dear Ms. Fain:

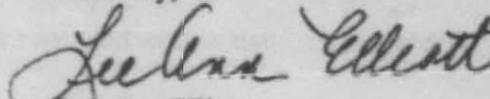
On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793137

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Eleanor Fain

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793138

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From January 9, 1992 to November 2, 1992, Eleanor Fain made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Fain paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Fain made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$.51 to \$3,835. On March 12, 1992, Ms. Fain's excessive amount reached its highest at \$22,367.92. *Id.*

Therefore, there is reason to believe that Eleanor Fain violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793139



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Margaret E. Golden
18 Winfield Ave.
Jersey City, NJ 07305

Re: MUR 3969
Margaret E. Golden

Dear Ms. Golden:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

9704379314C

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Margaret E. Golden MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793141

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793142
From April 4, 1992 to October 22, 1992, Ms. Golden made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Golden paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Golden made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$1.30 to \$1,600. On March 6, 1992, Ms. Golden's excessive amount reached its highest at \$838.70. *Id.*

Therefore, there is reason to believe that Margaret E. Golden violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Jeannine Hahn
210 W. 101 Street
#11C
New York, NY 10025

Re: MUR 3969
Jeannine Hahn

Dear Ms. Hahn:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793143

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Jeannine Hahn

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793144

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From August 2, 1991 to September 23, 1992, Jeannine Hahn made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee.

11 C.F.R. § 116.5(b). Because Ms. Hahn paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.*

By making expenditures for the subsistence of others, Ms. Hahn made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$22.50 to \$2,743.18. On March 6, 1992, Ms. Hahn's excessive amount reached its highest at \$2,343.44 *Id.*

Therefore, there is reason to believe that Jeannine Hahn violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793145



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Cathy Stewart
240 Cabrini Blvd.
New York, NY 10033

Re: MUR 3969
Cathy Stewart

Dear Ms. Stewart:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793146

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Cathy Stewart

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793147

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From September 14, 1991 to August 21, 1992, Cathy Stewart made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Ms. Stewart made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$ 4.90 to \$1,469.41. On December 28, 1991, Ms. Stewart's excessive amount reached its highest at \$2,837.08.

Therefore, there is reason to believe that Cathy Stewart violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793148



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Marsha Plafkin
125 W. 106th Street
#5B
New York, NY 10025

Re: MUR 3969
Marsha Plafkin

Dear Ms. Plafkin:

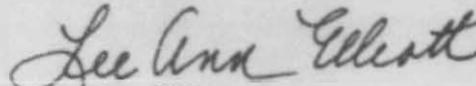
On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793149

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Marsha Plafkin

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

9704379315C

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From September 11, 1991 to November 2, 1992, Marsha Plafkin made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Ms. Plafkin made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$ 6.50 to \$1,640.50. On September 3, 1992, Ms. Plafkin's excessive amount reached its highest at \$7,556.89.

Therefore, there is reason to believe that Marsha Plafkin violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793151



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1998

Mr. Lawrence Grigsby
4116 Don Diablo Drive
Los Angeles, CA 90008-4306

Re: MUR 3969
Lawrence Grigsby

Dear Mr. Grigsby:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793152

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Lawrence A. Grigsby MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793153

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

9
7
0
4
3
7
9
3
1
5
4

From September 2, 1991 to October 11, 1991, Lawrence A. Grigsby made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Mr. Grigsby made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$263.33 to \$1,832.92. On October 11, 1992, Mr. Grigsby's excessive amount reached its highest at \$1,345.25.

Therefore, there is reason to believe that Lawrence A. Grigsby violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Francine Miller
Lenora B. Fulani for President Committee
50 West 77th Street
Apt. #10J
New York, NY 10024

RE: MUR 3969
Lenora B. Fulani for President Committee
Francine Miller, as Treasurer

Dear Ms. Miller:

On May 24, 1996, the Federal Election Commission found that there is reason to believe that Lenora B. Fulani for President Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") with respect to contributions received from David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Robert Levy, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, and Margaret E. Tanzosh. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793155

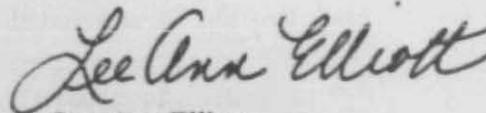
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lee Ann Elliott
Chairman

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

cc: Lenora B. Fulani

97043793156

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS:

Lenora B. Fulani for President Committee
Francine Miller, as Treasurer

I. BACKGROUND

The Lenora B. Fulani for President Committee ("the Committee") is the authorized committee of Dr. Lenora B. Fulani, a candidate for the 1992 presidential nomination of a national party and four separate party committees in four states.¹ The Committee received \$2,013,323 in matching funds from the United States Treasury. 26 U.S.C. §§ 9033 and 9034. Pursuant to 26 U.S.C. § 9038(a), the Commission conducted an audit and examination of the Committee's receipts, disbursements, and qualified campaign expenses. In addition, the audit included an evaluation of whether the Committee complied with the Federal Election Campaign Act, as amended ("the Act"). 11 C.F.R. § 9038.1(c)(1)(i) and (iv). This matter was generated from information obtained during the audit of the Committee. 11 C.F.R. § 9038.1(e)(2).

II. FACTUAL AND LEGAL ANALYSIS - STAFF ADVANCES

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No candidate or political committee shall knowingly accept any contribution that exceeds the contribution

¹ The Committee registered with the Commission on March 11, 1991.

97043793157

limitations. 2 U.S.C. § 441a(f). Moreover, no officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures. *Id.*

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989)*. However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.*

When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793158

The audit found that the following 14 individuals made expenditures for personal transportation and miscellaneous expenses or for the subsistence of others: Lawrence A. Grigsby, Fred Newman, John B. Opdyke, Cathy Stewart, Marsha Plafkin, David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Jeannine Hahn, James Ross, Nancy Ross², Margaret E. Tanzosh and Robert Levy. The following chart includes the date of the expenses, the range of expenses, the highest aggregate excessive amount, the date of the highest excessive amount, and the total excessive amounts for expenses incurred on behalf of others³:

² Expenditures that have been attributed to Nancy Ross include credit card charges made to an American Express Company account for *The Rainbow Lobby*. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words "*The Rainbow Lobby*." Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Karlmer, and Jeffrey Aron. Because Nancy Ross is the basic cardholder for this account, these individuals were not responsible for the payment of any charges that they made to this account. However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Commission believes that it is appropriate to attribute all charges to Nancy Ross. Cf. 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be attributable to the candidate's personal expenditure limitation).

³ Column No. 6 of above-described chart contains expenses that were *solely* for the subsistence of others which result in excessive contribution amounts. It should be noted, however, that some of the individuals listed incurred expenses for the subsistence of others in addition to incurring expenses for personal transportation and personal miscellaneous expenses.

97043793159

**EXPENSES INCURRED FOR PERSONAL TRANSPORTATION, PERSONAL
MISCELLANEOUS EXPENSES AND THE SUBSISTENCE OF OTHERS**

NAME	DATES OF EXPENSES	RANGE	HIGHEST AGGREGATE AMOUNT	DATE OF HIGHEST EXCESSIVE AMOUNT	EXPENSES SOLELY FOR THE SUBSISTENCE OF OTHERS - EXCESSIVE CONTRIBUTION AMOUNTS
Belmont, David	06/26/91-09/07/92	\$ 1.59 - \$3,827.00	\$25,500.48	05/18/92	N/A
Berman, Jini L.	06/17/91-08/25/92	\$11.50 - 898.78	\$1,452.81	02/22/92	N/A
Fain, Eleanor	01/09/92-11/02/92	\$ 0.51 - 3,835.00	\$22,367.92	03/12/92	N/A
Golden, Margaret E.	04/04/92-10/22/92	\$ 1.30 - 1,600.00	\$838.70	03/06/92	N/A
Hahn, Jeannine	08/02/91-09/23/92	\$ 22.50 - 2,743.18	\$2,343.44	03/06/92	N/A
Ross, James	05/24/91-08/09/92	\$ 7.73 - 1,128.11	\$2,576.25	12/19/91	N/A
Ross, Nancy	06/01/91-09/05/92	\$ 10.55 - 6,409.77	\$19,455.23	05/30/92	N/A
Tanzosh, Margaret E.	02/12/92-10/13/92	\$ 0.46 - 1,732.98	\$8,933.27	09/15/92	N/A
Levy, Robert	N/A	N/A	N/A	N/A	\$ 636.78
Grigsby, Lawrence	N/A	N/A	N/A	N/A	\$1,345.25
Newman, Fred	N/A	N/A	N/A	N/A	\$930.58
Opydyke, John B.	N/A	N/A	N/A	N/A	\$8,340.14
Plafkin, Marsha	N/A	N/A	N/A	N/A	\$7,556.89
Stewart, Cathy	N/A	N/A	N/A	N/A	\$2,837.08

Pursuant to 11 C.F.R. § 100.7(b)(8), Mr. Belmont, Ms. Fain, Ms. Golden, Mr. Ross, and Ms. Ross could spend an aggregate amount of up to \$1,000 per election for their personal transportation expenses on behalf of Dr. Lenora B. Fulani without such expenditures counted as contributions to the Committee. See MUR 3974 (Kerry for President). Therefore, the highest excessive amounts for these individuals have been adjusted to reflect the actual amount of money that each of these individuals spent for personal transportation expenses. Moreover, Mr. Belmont, Ms. Berman, Ms. Fain, Ms. Golden, Ms. Hahn, Mr. Ross, Ms. Ross, Ms. Tanzosh incurred expenses that were not reimbursed within 30 or 60 days as required by the regulations. Therefore, these expenditures are contributions to the Committee. 11 C.F.R. § 116.5(b)(2). Furthermore, Mr. Levy, Mr. Grigsby, Mr. Newman, Mr. Opydyke, Ms. Plafkin, and Ms. Stewart made contributions to the Committee by incurring expenses solely on the behalf of others. See

9704379316C

11 C.F.R. § 116.5(b)(1). These expenses were contributions to the Committee at the time they were incurred. *Id.*

In its response to the Interim Audit Report, the Committee argued that it was a "grassroots, community-based operation" which required Dr. Fulani, its staff, and volunteers to travel constantly. The Committee also contended that 11 C.F.R. § 116.5 is unfair to the Committee because it discriminates against "smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." As a result, the Committee stated that it was forced to use the credit cards of individuals for campaign-related expenses that were not for their own travel and subsistence.⁴

The Committee further argued that the transactions in question did not violate 2 U.S.C. § 441a(a) because the credit card charges for the individuals were paid in the normal course of business without any request from the Commission or from any other outside party. Moreover, the Committee asserts that these individuals did not intend to make contributions and that it told these individuals that they were responsible for payment of these charges. Additionally, the Committee asserts that it reimbursed the individuals such expenses within 60 days, and that if an individual advanced money towards these expenses, it was done at the individual's own initiative.

Moreover, the Committee stated that no enforcement action is warranted for several reasons. First, it argued that the 60 day rule for reimbursement should apply to

⁴ The Committee also asserts that it was denied an American Express corporate credit card.

97043793161

non-personal travel and subsistence expenses. Second, it asserted that non-credit card usage is virtually impossible and that it did not realize that 11 C.F.R. § 116.5 had been promulgated since the 1988 Presidential elections when it established its credit card procedures. Additionally, the Committee urged the Commission to "take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours."

The Commission promulgated section 116.5 out of concern that during critical periods in a campaign when an authorized committee is experiencing financial difficulties, individuals may attempt to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. *Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989)*. Therefore, section 116.5 sets forth a specific time period for when a committee must reimburse an individual for his or her travel and subsistence. Any reimbursement that extends beyond the prescribed time period will be considered a contribution. 11 C.F.R. § 116.5(b). The Commission intended section 116.5 to provide a limited exception to the general rules governing contributions for an individual's personal transportation and subsistence. See *Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989)*. Therefore, any expense incurred by an individual that is not his or her own travel and subsistence (such as for travel for others, meeting rooms or telephone services) will be considered a contribution. *Id.* These expenses are contributions to the Committee regardless of the time that is required for the

97043793162

Committee to reimburse the individual. *Id.* The fact that the Committee contends that it was a small committee and could not obtain a corporate credit card or that the individuals did not intend to make a contribution is irrelevant for the purpose of this analysis.⁵

Accordingly, the Commission has determined that there is reason to believe that the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling \$ 105,114.82.⁶

97043793163

⁵ Since individuals can use their personal credit cards for their own travel and subsistence, section 116.5 was intended to provide the Committee flexibility in situations where a committee may not want to provide corporate credit cards to its field staff. *Explanation and Justification of 11 C.F.R. § 116.5(b)*, 55 *Fed. Reg.* 26382 (June 27, 1989). Therefore, the promulgation of 11 C.F.R. § 116.5 provided committees with greater opportunities to avoid the making of prohibited contributions by committee staff members. Compare 11 C.F.R. § 100.7(a)(1) with 11 C.F.R. § 116.5(b).

⁶ The amount of excessive contributions represents the sum total of the amounts stated in the above-described chart (\$25,500.48 + \$1,452.81 + \$22,367.92 + \$838.70 + \$2,343.44 + \$2,576.25 + \$19,455.23 + \$8,933.27 + \$1,345.25 + \$930.58 + \$8,340.14 + \$7,556.89 + \$2,837.08 + \$636.78).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Dr. Fred Newman
175 W. 72nd Street
New York, NY 10023

Re: MUR 3969
Fred Newman

Dear Dr. Newman:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793164

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Fred Newman MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793165

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From January 6, 1992 to January 11, 1992, Fred Newman made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Dr. Newman made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$257.88 to \$1,422.70. On January 11, 1992, Dr. Newman's excessive amount reached its highest at \$930.58.

Therefore, there is reason to believe that Fred Newman violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793166



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Mr. James Ross
RD 2, Box 540
Middlebury, VT 05753-9315

Re: MUR 3969
James Ross

Dear Mr. Ross:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793167

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: James Ross MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793168

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793169
From May 24, 1991 to August 9, 1992, James Ross made expenditures for transportation and other miscellaneous costs. Since these expenditures were for himself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Mr. Ross paid for his own travel and subsistence costs with his personal credit card or by means other than his personal credit card, and because he was not reimbursed for these costs within 30 or 60 days, he made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Mr. Ross made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$7.73 to \$1,128.11. On December 19, 1991, Mr. Ross' excessive amount reached its highest at \$ 2,576.25. *Id.*

Therefore, there is reason to believe that James Ross violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Nancy Ross
1730 T Street, N.W.
Washington, D.C. 20009

Re: MUR 3969
Nancy Ross

Dear Ms. Ross:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

9704379317C

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Nancy Ross

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793171

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793172

From June 1, 1991 to September 5, 1992, Nancy Ross made expenditures for transportation and other miscellaneous costs.¹ Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Ross paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Ross made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged

¹ Expenditures that have been attributed to Nancy Ross include credit card charges made to an American Express Company account for *The Rainbow Lobby*. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words "*The Rainbow Lobby*." Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Karliner, and Jeffrey Aron. Because Nancy Ross is the basic cardholder for this account, these individuals were not responsible for the payment of any charges that they made to this account. However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Commission believes that it is appropriate to attribute all charges to Nancy Ross. *Cf.* 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be attributable to the candidate's personal expenditure limitation).

from \$10.55 to \$6,409.77. On May 30, 1992, Ms. Ross' excessive amount reached its highest at \$ 19,455.23. *Id.*

Therefore, there is reason to believe that Nancy Ross violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793173

On May 24, 1990, the...
violated 2 U.S.C. § 441a(a)(1)(A) as
assisted by...

Please be advised that...
contribution limitation at 2 U.S.C. §...
"advances" for the...
are used by...



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Ms. Margaret Tanzosh
285 Avenue C
New York, NY 10009

Re: MUR 3969
Margaret Tanzosh

Dear Ms. Tanzosh:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793174

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Margaret E. Tanzosh

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793175

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From February 12, 1992 to October 13, 1992, Margaret E. Tanzosh made expenditures for transportation and the subsistence of others. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee.

11 C.F.R. § 116.5(b). Because Ms. Tanzosh paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Tanzosh made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$.46 to \$1,732.98. On September 15, 1992, Ms. Tanzosh's excessive amount reached its highest at \$8,933.27. *Id.*

Therefore, there is reason to believe that Margaret E. Tanzosh violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793176



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Mr. John B. Opdyke
4313 Larchwood
Philadelphia, PA 19104

Re: MUR 3969
John B. Opdyke

Dear Mr. Opdyke:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793177

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: John B. Opdyke

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793178

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From September 17, 1991 to August 10, 1992, John B. Opdyke made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Mr. Opdyke made contributions to the Committee at the time he incurred such expenditures. The expenditures ranged from \$12.50 to \$4,457.50. On March 17, 1992, Mr. Opdyke's excessive amount reached its highest at \$8,340.14.

Therefore, there is reason to believe that John B. Opdyke violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

97043793179



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Mr. Robert Levy
250 W. 57th Street
New York, NY 10019

Re: MUR 3969
Robert Levy

Dear Mr. Levy:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

9704379318C

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Robert Levy MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793181

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

On April 2, 1992, Robert Levy made an expenditure for transportation and the subsistence of others. This expenditure resulted in a contribution to the Committee, 11 C.F.R. § 116.5(b). By making this expenditure, Mr. Levy made a contribution to the Committee at the time he incurred such expenditure. The above-stated expenditure was \$1,384.78. On April 2, 1992, Mr. Levy's excessive amount reached its highest at \$636.78. Therefore, there is reason to believe that Robert Levy violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making a contribution in excess of the contribution limitations.

97043793182



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Mr. David Belmont
5 W. 107th Street
#5B
New York, NY 10025

Re: MUR 3969
David Belmont

Dear Mr. Belmont:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793183

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: David Belmont

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

97043793184

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793185

From June 26, 1991 to September 7, 1992, Mr. Belmont made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for himself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Mr. Belmont paid for his own travel and subsistence costs with his personal credit card or by means other than his personal credit card, and because he was not reimbursed for these costs within 30 or 60 days, he made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Mr. Belmont made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$1.59 to \$3,827. On May 18, 1992, Mr. Belmont's excessive amount reached its highest at \$ 25,500.48. *Id.*

Therefore, there is reason to believe that David Belmont violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1996

Ms. Jini L. Berman
210 W. 101st Street
New York, NY 10025-5059

Re: MUR 3969
Jini L. Berman

Dear Ms. Berman:

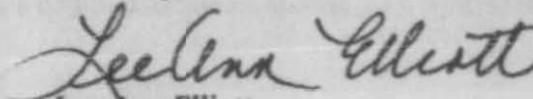
On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793186

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Jini L. Berman MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

97043793187

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793188
From June 17, 1991 to August 25, 1992, Ms. Berman made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Berman paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Berman made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$11.50 to \$898.78. On February 22, 1992, Ms. Berman's excessive amount reached its highest at \$ 1,452.81. *Id.*

Therefore, there is reason to believe that Jini L. Berman violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 17, 1996

Ms. Margaret E. Golden
251 Pierce Street
San Francisco, CA 94117-3308

Re: MUR 3969
Margaret E. Golden

Dear Ms. Golden:

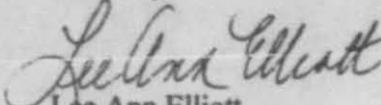
On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

97043793189

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Margaret E. Golden MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, *Explanation and Justification for 11 C.F.R. § 116.5(b)*, 55 Fed. Reg.

9704379319C

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

97043793191
From April 4, 1992 to October 22, 1992, Ms. Golden made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Golden paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Golden made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$1.30 to \$1,600. On March 6, 1992, Ms. Golden's excessive amount reached its highest at \$838.70. *Id.*

Therefore, there is reason to believe that Margaret E. Golden violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

JUN 24 4 24 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

June 19, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

Today I called you in response to the letter dated June 7, 1996 giving notice of MUR 3969 and I requested the following information:

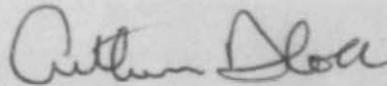
1. On what date was MUR 3969 opened? The number sequence suggests this MUR was opened in or about 1994.
2. There are several MUR's that have been fully processed and made public regarding allegations of excessive contributions involving use of credit cards in the 1992 election cycle. How did it happen that only at this late date the Commission is giving notice of this similar MUR to my client?
3. How is the opening up of this MUR, and the prosecution of this MUR in June 1996, permitted by 11 CFR 9038.1(e)(2)? The credit card "matters" were "contained" in the publicly-released audit report in April 1994. Therefore, there would seem to be no basis for opening up or prosecuting a confidential enforcement proceeding two years later. Even if the Commission has acted in this way in other cases, it does not mean that the practice is permitted by the regulation.
4. The MUR notification package contains a proposed conciliation agreement. I believe my client is entitled, nearly four years after the conclusion of her primary campaign, to be informed by the Commission whether there are any other agency-initiated MURs that have been

97043793192

Andre G. Pineda, Esq.
June 19, 1996
Page 2

opened regarding her 1992 campaign, and whether there are any other agency-initiated MURs that are being contemplated. At this late date, a precondition for the Commission to negotiate in good faith with my client in a conciliation context is for the Commission to disclose whether there any other enforcement matters against my client of which she has not been given notice.

Very truly yours,



Arthur R. Block

ARB/bp

cc: Lenora B. Fulani, Ph.D.
Francine Miller, Esq.

97043793193

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 24 9 46 AM '96

June 21, 1996

VIA FACSIMILE (202) 219-3923 AND FEDERAL EXPRESS

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

I represent the respondents in the above-referenced MUR. Enclosed is an executed designation of counsel form. This is a request for an extension of time of no fewer than 20 days to submit a response.

The notification letter dated June 7, 1996 was received on June 12, 1996. The initial due date is June 27, 1996. Hence, this request is for a due date of on or after July 17, 1996. The grounds for the request include, but are not limited to, the following.

First, responding to the factual allegations requires investigation, review, and analysis of financial transactions that are four or more years old, and that involve 14 credit card accounts and numerous individuals.

Second, my client had every reason to consider the matter of the alleged excessive contributions through the use of credit cards to be resolved by the Final Audit Report adopted in April 1994. Aside from the passage of over two years since the adoption of the report, pursuant to 11 C.F.R. sec. 9038.1(e)(2), if the Commission had wanted to pursue this matter in an enforcement proceeding, then the publicly released report should not have contained a discussion of these allegations, but rather, should have "indicate[d] that certain other matters have been referred to the Commission's Office of General Counsel." In fact, the report discussed these allegations in detail. Without prejudice to the Committee's position that the prosecution of this

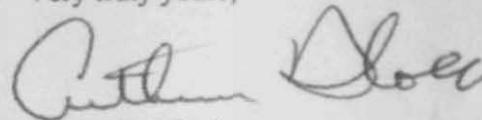
97043793194

Andre G. Pineda, Esq.
June 21, 1996
Page 2

MUR is not permitted by the regulation¹, it is clearly the case that if the Commission needed over two years from its adoption of the Final Audit Report to produce its Factual and Legal Basis document, then it is unfair and unreasonable to expect the Committee to produce a response to that document in two weeks.

Third, in addition to the factual issues, there are important legal issues implicated by this MUR that need to be researched and developed. Respondent Miller and her counsel have other professional commitments which require that additional time be granted in order to be able to schedule work on this unexpected matter.

Very truly yours,



Arthur R. Block

ARB/bp

cc: Lenora B. Fulani, Ph.D.
Francine Miller, Esq.

2143ap.lt2

¹ Also, prosecution of the MUR should be barred by laches. Not only is the MUR based on a two year old audit report, the docket number of the MUR indicates that the MUR itself was opened approximately two years ago. It is prejudicial, unconscionable, and against statutory intent and public policy to belatedly impose the burden of defending this MUR and the possibility of a substantial financial penalty on my client at this time. If this alleged violation could be prosecuted by the FEC at all, it should have been commenced long ago.

97043793195

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3969

NAME OF COUNSEL: Arthur R. Block, Esq.

ADDRESS: 72 Spring Street, Suite 1201
New York, NY 10012

TELEPHONE: (212) 966-0404

RECEIVED
 FEDERAL ELECTION
 COMMISSION
 OFFICE OF GENERAL
 COUNSEL
 JUN 24 9 46 AM '96

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.

6/20/96
 Date

Francine Miller
 Signature

Lenora B. Fulani for President
 Francine Miller, as Treasurer

RESPONDENT'S NAME: Lenora B. Fulani for President
Francine Miller, as Treasurer

ADDRESS: 50 West 77th Street #10J
New York, NY 10024

HOME PHONE: _____

BUSINESS PHONE: (212) 969-3742

97043793196



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 1996

VIA FACSIMILE AND FIRST CLASS MAIL

Arthur Block, Esq.
72 Spring Street
Suite 1201
New York, NY 10012

Re: MUR 3969
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Block:

This is in response to your letter, via facsimile, on behalf of Lenora B. Fulani for President ("the Committee") and Francine Miller, as Treasurer, dated June 21, 1996. As stated within your letter, you are requesting an extension of time "of no fewer than 20 days to submit a response" to the Federal Election Commission reason to believe finding in connection with MUR 3969. After considering the circumstances presented in your letter, as well as the substance of our June 26, 1996 phone conversation, the Office of the General Counsel has granted the Committee and Ms. Miller a 20-day extension of time. Accordingly, a response by the Committee and Ms. Miller is due by the close of business on July 17, 1996.

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

Sincerely,

Andre G. Pineda
Attorney

97043793197

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 9 2 17 PM '96

FACSIMILE

July 9, 1996

To: Andre G. Pineda, Esq.

Fax : 202-219-3923

From: Arthur R. Block, Esq.

Notes:

97043793198

Original sent via mail? yes

pages (including cover sheet) 3

THIS FACSIMILE TRANSMISSION CONTAINS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL(S) NAMED ON THE TRANSMISSION SHEET. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR THE TAKING OF ANY ACTION IN RELIANCE ON THE CONTENTS OF THIS FACSIMILE TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO THAT WE CAN ARRANGE FOR RETURN OF THE DOCUMENTS TO US AT NO COST TO YOU.

ARTHUR BLOCK

ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

July 9, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

This will confirm the information requests that I conveyed to you orally during the conference call on Wednesday, July 3, 1996, in which you, Francine Miller, and I participated. The main points were as follows.

First, the Interim Audit Report determined that there were excessive contributions resulting from the use of credit cards to purchase campaign-related goods and services in the amount of \$86,562. This calculation was based on records kept by the Committee in its accounts payable files, and which were available to the field auditors. However, the Final Audit Report added \$20,510 to the alleged excessive contribution amount based upon credit card records obtained outside of the Committee's files. The Committee disputes that credit card charges that were not reflected by documentation in the Committee's files were campaign related. However, it is impossible for the Committee to attempt to rebut the Commission's classification of \$20,510 of charges as campaign related without being informed as to what those charges were. Hence, my first request was for the Commission to identify the alleged campaign related charges that were the basis for the additional \$20,510.

Second, what are the criteria used by the Audit Staff to distinguish between advances made for his/her own travel and subsistence (Code 5) and advances made other than for his or her own travel or subsistence (Code 4)

Third, the Committee, on legal grounds, will challenge the denial of a 60 day period to pay any and all campaign related credit card charges before the charges are deemed

97043793199



Andre G. Pineda, Esq.
July 9, 1996
Page 2

contributions. We are asking the Commission to do a computer analysis with this data to calculate what excessive contributions, if any, would still be shown by the Commission's analysis if a 60 day period was applied to all of the credit card charges.

Thank you for your cooperation and assistance.

Very truly yours,

Arthur R. Block

ARB/bp
cc: Francine Miller, Esq.

97043793200C

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 11 6 59 PM '96

FACSIMILE

July 11, 1996

To: Andre Pineda, Esq.

Fax : (202) 219-3923

From: Arthur R. Block, Esq.

Notes:

97043793201

Original sent via mail? yes

pages (including cover sheet) 3

THIS FACSIMILE TRANSMISSION CONTAINS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL(S) NAMED ON THE TRANSMISSION SHEET. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR THE TAKING OF ANY ACTION IN RELIANCE ON THE CONTENTS OF THIS FACSIMILE TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO THAT WE CAN ARRANGE FOR RETURN OF THE DOCUMENTS TO US AT NO COST TO YOU.

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 11 6 59 PM '96

July 11, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

Yesterday there was a conference call among you, Rick Halter, Francine Miller and me, to discuss the informational queries that were previously raised in our July 3rd discussion as confirmed in my letter to you of July 12, 1996. Mr. Halter said that he would be able to provide the Committee with some of the materials it has requested, and that he expected to send the materials on Monday by overnight delivery to be received on July 16, 1996.

As we discussed, the current due date for the Committee's response is July 17, 1996. The Committee will submit a response within the current time frame, if necessary, but it will be impossible for such a response to reflect an analysis and response to the materials that the Audit Division will be sending us. Indeed, these materials -- which will, *inter alia*, identify charges on various person's credit card bills that the Commission deemed to be campaign related -- will necessitate consultations with third parties in order to evaluate the transactions, and third party affidavits might be needed as well. Hence I anticipate that after evaluating the materials, the Committee would seek to supplement its response.

I think your office may agree that it is most efficient from everyone's point of view to extend the time to submit the response, so that there should be no need to supplement it after the original filing. If your office would agree to the desirability of an extension of time, then I would request that it be granted to Monday, August 5, 1996, because I will be on vacation the week of

97043793202



Andre G. Pineda, Esq.

July 11, 1996

Page 2

week of July 22, 1996, and anticipate that I will be extremely pressed with other work in addition to completing this response the week that I return.

Please let me know what is the view of the Office of General Counsel on how to proceed.
Thank you.

Very truly yours,

Arthur R. Block

ARB/bp

cc: Francine Miller, Esq.

97043793203

JUL 12 3 07 PM '96

July 9, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

This will confirm the information requests that I conveyed to you orally during the conference call on Wednesday, July 3, 1996, in which you, Francine Miller, and I participated. The main points were as follows.

First, the Interim Audit Report determined that there were excessive contributions resulting from the use of credit cards to purchase campaign-related goods and services in the amount of \$86,562. This calculation was based on records kept by the Committee in its accounts payable files, and which were available to the field auditors. However, the Final Audit Report added \$20,510 to the alleged excessive contribution amount based upon credit card records obtained outside of the Committee's files. The Committee disputes that credit card charges that were not reflected by documentation in the Committee's files were campaign related. However, it is impossible for the Committee to attempt to rebut the Commission's classification of \$20,510 of charges as campaign related without being informed as to what those charges were. Hence, my first request was for the Commission to identify the alleged campaign related charges that were the basis for the additional \$20,510.

Second, what are the criteria used by the Audit Staff to distinguish between advances made for his/her own travel and subsistence (Code 5) and advances made other than for his or her own travel or subsistence (Code 4)

Third, the Committee, on legal grounds, will challenge the denial of a 60 day period to pay any and all campaign related credit card charges before the charges are deemed

97043793204

Andre G. Pineda, Esq.

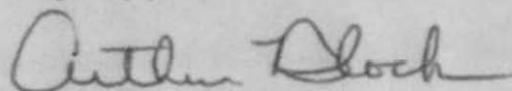
July 9, 1996

Page 2

contributions. We are asking the Commission to do a computer analysis with this data to calculate what excessive contributions, if any, would still be shown by the Commission's analysis if a 60 day period was applied to all of the credit card charges.

Thank you for your cooperation and assistance.

Very truly yours,



Arthur R. Block

ARB/bp

cc: Francine Miller, Esq.

97043793205



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

VIA FACSIMILE AND FEDERAL EXPRESS

Arthur Block, Esq.
72 Spring Street
Suite 1201
New York, NY 10012

Re: MUR 3969
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Block:

This letter is to confirm our phone conversations of July 11, 1996 and July 15, 1996, as well as to respond to your letters dated July 9, 1996 and July 11, 1996.

As we discussed during our July 11, 1996 conference call, and as requested in your July 9th letter, Rick Halter has prepared copies of the credit card statements pertaining to Lenora B. Fulani for President ("the Committee") expenditures totaling \$20,510. As you know, the Commission found that these expenses were campaign related. See Final Audit Report of Lenora B. Fulani for President dated April 24, 1994. Copies of these statements are enclosed.

The Office of the General Counsel also has reviewed your July 11th letter requesting additional time to respond to the above-stated matter based upon your need to review the enclosed materials. Specifically, this letter requests that the Committee be permitted to submit a response to the Office of the General Counsel on August 5, 1996. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the Committee and Ms. Miller a 16 day extension of time. Accordingly, a response by the Committee and Ms. Miller is due by the close of business on August 2, 1996.

Celebrating the Commission's 20th Anniversary
YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793206

on August 2, 1996.

Celebrating the Commission's 20th Anniversary
YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

July 16, 1996
Page -2-

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

Sincerely,



Andre G. Pineda
Attorney

Enclosure

97043793207

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

July 11, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

Yesterday there was a conference call among you, Rick Halter, Francine Miller and me, to discuss the informational queries that were previously raised in our July 3rd discussion as confirmed in my letter to you of July 12, 1996. Mr. Halter said that he would be able to provide the Committee with some of the materials it has requested, and that he expected to send the materials on Monday by overnight delivery to be received on July 16, 1996.

As we discussed, the current due date for the Committee's response is July 17, 1996. The Committee will submit a response within the current time frame, if necessary, but it will be impossible for such a response to reflect an analysis and response to the materials that the Audit Division will be sending us. Indeed, these materials -- which will, *inter alia*, identify charges on various person's credit card bills that the Commission deemed to be campaign related -- will necessitate consultations with third parties in order to evaluate the transactions, and third party affidavits might be needed as well. Hence I anticipate that after evaluating the materials, the Committee would seek to supplement its response.

I think your office may agree that it is most efficient from everyone's point of view to extend the time to submit the response, so that there should be no need to supplement it after the original filing. If your office would agree to the desirability of an extension of time, then I would request that it be granted to Monday, August 5, 1996, because I will be on vacation the week of

JUL 17 3 13 PM '96
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

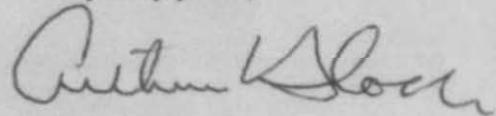
97043793208

Andre G. Pineda, Esq.
July 11, 1996
Page 2

week of July 22, 1996, and anticipate that I will be extremely pressed with other work in addition to completing this response the week that I return.

Please let me know what is the view of the Office of General Counsel on how to proceed.
Thank you.

Very truly yours,



Arthur R. Block

ARB/bp
cc: Francine Miller, Esq.

97043793209

**ARTHUR
BLOCK**
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

MUR 3969

FACSIMILE

August 2, 1996

To: Andre Pineda, Esq.

Fax: 202-219-1043

From: Arthur R. Block, Esq.

Notes:

Last two pages of
brief included

9704379321C

Original sent via Federal Express? yes

pages (including cover sheet) 89

THIS FACSIMILE TRANSMISSION CONTAINS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL(S) NAMED ON THE TRANSMISSION SHEET. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR THE TAKING OF ANY ACTION IN RELIANCE ON THE CONTENTS OF THIS FACSIMILE TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO THAT WE CAN ARRANGE FOR RETURN OF THE DOCUMENTS TO US AT NO COST TO YOU.

ARTHUR
BLOCK
ATTORNEY AT LAW

72 Spring Street, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

August 2, 1996

VIA FACSIMILE (202) 219-1043 AND FEDERAL EXPRESS

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

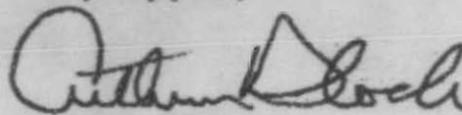
I am transmitting herewith the response of respondents Lenora B. Fulani for President Committee and Francine Miller, as Treasurer, to the Commission's reason to believe determination in MUR 3969. The papers include:

1. Declaration of Francine Miller, with exhibits
2. Declaration of Nancy Ross, with exhibits
3. Brief.

Pursuant to our discussion earlier this week, the respondents are satisfying today's filing deadline by sending the complete documentation to the Office of General Counsel by Federal Express for Monday delivery, and by sending to you by facsimile a copy of this letter along with copies of the first and last pages of each declaration and of the brief.

Thank you for your cooperation in this matter, and for the cooperation of Mr. Halter and Mr. Favin in the Audit Division in responding to technical questions from myself and Ms. Miller.

Very truly yours,


Arthur R. Block

ARB/bp

ccs.

cc: Francine Miller, Esq.
Lenora B. Fulani, Ph.D.

2143sp.15

97043793211

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

DECLARATION OF FRANCINE MILLER

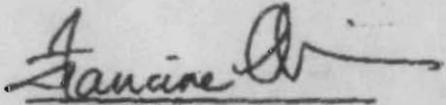
I, FRANCINE MILLER, make the following declaration under penalty of perjury:

1. I am the Treasurer of Lenora B. Fulani for President (the "Committee"), respondent herein, and make this affidavit in response to FEC-initiated MUR #3969.
2. During the 1992 election cycle, I was unaware of the requirements of 11 C.F.R. 116.5(b). (When I assisted the Treasurer of Dr. Fulani's campaign in 1988, this regulation was not in effect.) I first learned of the content of the regulation when I was presented with the Audit Division's analysis at the audit exit conference in March, 1993.
3. In the spring of 1991 I applied for an American Express corporate card on behalf of the Committee. The application was denied. Having access to a credit card was critical for a multitude of necessary transactions, so individuals volunteered the use of their credit cards to provide such access. The following descriptions of such use demonstrates the ways staff and volunteers necessarily used their credit cards to charge expenses on behalf of the Committee.

97043793212

portion of the charges assumed by the Audit Staff to not be for the cardholders' own travel were for the cardholders' own travel - either individuals cannot now remember, or documentary proof, such as rental car agreements, no longer exist.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed August 1, 1996.


FRANCINE MILLER

97043793213

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)	
for President Committee)	
and Francine Miller, as)	MUR 3969
Treasurer)	
)	

DECLARATION OF NANCY ROSS

I, NANCY ROSS, make the following declaration under penalty of perjury:

1. During the 1992 presidential campaign, I was the Chief Lobbyist for the Rainbow Lobby, Inc. (the "Lobby"), a not-for-profit, 501(c)(4) membership and lobbying organization. I make this declaration in support of the response of Lenora B. Fulani for President (the "Committee"), and Francine Miller, as Treasurer, to MUR #3969, opened by the Federal Election Commission ("FEC" or "Commission") regarding staff advances under 11 C.F.R. 116.5(b). I have personal knowledge of the facts stated herein.

2. The Rainbow Lobby was founded in 1986, and became a nationwide membership organization of over 200,000 citizens. It was a non-partisan, grassroots citizens lobby that supported legislation promoting election reform and human rights internationally. The Lobby performed many activities, including publishing a quarterly newsletter, initiating and

97043793214

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed July 31, 1996.

Nancy Ross
NANCY ROSS

97043793215

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE
AND FRANCINE MILLER, AS TREASURER,
TO REASON TO BELIEVE DETERMINATION

PRELIMINARY STATEMENT

Respondents Lenora B. Fulani for President Committee (the "Committee") and Francine Miller, as Treasurer, (hereinafter collectively referred to as "respondents") respectfully submit this response to the Commission's reason to believe determination in MUR 3969, and to the Factual and Legal Analysis which formed a basis for the Commission's finding.

Accompanying the instant brief and incorporated herein by reference are the declarations of Francine Miller ("Miller Dec.") and Nancy Ross ("Ross Dec."), and the exhibits annexed thereto.

For the reasons set forth in Point I below, the Commission should vacate the reason to believe determination and vacate the MUR for lack of jurisdiction. In the alternative, for the reasons stated in Point II below, the Commission should find that there is no probable cause to believe that a violation of 2 U.S.C. § 441a(f) occurred. Assuming arguendo that a probable cause finding were to be made, then the Commission should take no further action against the respondent, consistent with the proper ordering of the Commission's priorities and resources, and consistent with its decisions in other enforcement matters, see Point III.

97043793216

Finally, to put it into a broader perspective, one fails to see how the Commission can fairly prioritize the instant alleged violations for use of its limited enforcement resources when the Commission has failed to prioritize and pursue audit repayment or enforcement in cases involving vastly more money and much clearer culpability. Most striking is its failure to pursue against the 1992 Clinton Committee the staff findings that the Clinton Committee engaged in an egregious, unlawful manipulation of its finances that netted it approximately \$2 million in excess government funds. The Commission failed to take action either in the audit process or in response to complaint-initiated MUR 4192 to recover the \$2 million from the Clinton Committee for the Treasury.

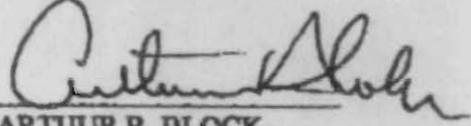
97043793217

CONCLUSION

For all of the aforstated reasons, the reason to believe determination should be vacated and this proceeding terminated. In the alternative, the Commission should made a finding that the Committee did not make any excessive contributions through staff advances. In the further alternative, if there are any excessive contributions, the Commission should assess no penalty and take no further action.

Dated: New York, N.Y.
August 2, 1996

Respectfully Submitted,



ARTHUR R. BLOCK
Attorney at Law
Attorney for Respondents
72 Spring Street, Suite 1201
New York, NY 10012
(212) 966-0404

On the Brief:

Arthur R. Block, Esq.
Michael R. Bressler, Esq.

The assistance of law student
Edward Taibi is gratefully acknowledged.

97043793218

August 2, 1996

VIA FACSIMILE (202) 219-1043 AND FEDERAL EXPRESS

Andre G. Pineda, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: *MUR 3969*
Lenora B. Fulani for President
Francine Miller, as Treasurer

Dear Mr. Pineda:

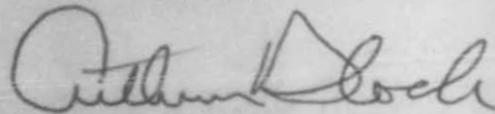
I am transmitting herewith the response of respondents Lenora B. Fulani for President Committee and Francine Miller, as Treasurer, to the Commission's reason to believe determination in MUR 3969. The papers include:

1. Declaration of Francine Miller, with exhibits
2. Declaration of Nancy Ross, with exhibits
3. Brief.

Pursuant to our discussion earlier this week, the respondents are satisfying today's filing deadline by sending the complete documentation to the Office of General Counsel by Federal Express for Monday delivery, and by sending to you by facsimile a copy of this letter along with copies of the first and last pages of each declaration and of the brief.

Thank you for your cooperation in this matter, and for the cooperation of Mr. Halter and Mr. Favin in the Audit Division in responding to technical questions from myself and Ms. Miller.

Very truly yours,



Arthur R. Block

ARB/bp
encs.

cc: Francine Miller, Esq.
Lenora B. Fulani, Ph.D.

2143ap.l15

Aug 5 10 08 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

97043793219

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

**RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE
AND FRANCINE MILLER, AS TREASURER,
TO REASON TO BELIEVE DETERMINATION**

ARTHUR R. BLOCK
72 Spring Street
Suite 1201
New York, NY 10012
(212) 966-0404

August 2, 1996

9704379322C

TABLE OF CONTENTS

PRELIMINARY STATEMENT 1

STATEMENT OF FACTS 2

ARGUMENT 15

POINT I: THE COMMISSION IS BARRED FROM PROSECUTING THIS
PROCEEDING AT THIS TIME BY THE EXPLICIT LANGUAGE OF 11
C.F.R. § 9038(e)(2), AND, ADDITIONALLY, BY UNREASONABLE AND
PREJUDICIAL AGENCY DELAY 15

 A. Because The Instant Allegations Were Contained In The Publicly-
 Released Audit Report They May Not Be The Subject Of An
 Enforcement Proceeding Under 2 U.S.C. § 437g And 11 C.F.R. Part 111
 15

 B. The Only Effective Remedy For The Commission's Unreasonable And
 Prejudicial Delay In Notifying Respondents Of Its Prosecution Of This
 MUR Is To Vacate The Proceeding 17

POINT II: THE ROUTINE COMMERCIAL VENDOR TRANSACTIONS WHICH WERE
REIMBURSED BY THE COMMITTEE WITHIN NORMAL BUSINESS
PAYMENT PERIODS DID NOT CONSTITUTE "CONTRIBUTIONS" UNDER
FECA, OR, IN THE ALTERNATIVE, FECA AS APPLIED TO THESE
TRANSACTIONS IS UNCONSTITUTIONAL 20

 A. The Instant Transactions Are Not Contributions Under FECA 22

 B. Section 116.5 Is Unconstitutional Because It Restricts First Amendment
 Activity And Is Not The Least Restrictive Means To Achieve A
 Compelling State Interest 23

 C. The Underinclusiveness of the "Exemption" In 11 C.F.R. § 116.5 Renders
 the Regulation Unconstitutional As A Violation Of The Equal Protection
 Principle of the Fifth Amendment 27

 D. The Methodology Used By The Audit Division To Apply The Regulation
 Unfairly Increases The Calculation Of Excessive Contributions 32

97043793221

POINT III: ASSUMING ARGUENDO THAT THE INSTANT STAFF ADVANCES ARE DETERMINED TO BE EXCESSIVE CONTRIBUTIONS, THE COMMISSION SHOULD TAKE NO FURTHER ACTION AND NO PENALTY SHOULD BE ASSESSED 38

CONCLUSION 44

97043793222

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

**RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE
AND FRANCINE MILLER, AS TREASURER,
TO REASON TO BELIEVE DETERMINATION**

PRELIMINARY STATEMENT

Respondents Lenora B. Fulani for President Committee (the "Committee") and Francine Miller, as Treasurer, (hereinafter collectively referred to as "respondents") respectfully submit this response to the Commission's reason to believe determination in MUR 3969, and to the Factual and Legal Analysis which formed a basis for the Commission's finding.

Accompanying the instant brief and incorporated herein by reference are the declarations of Francine Miller ("Miller Dec.") and Nancy Ross ("Ross Dec."), and the exhibits annexed thereto.

For the reasons set forth in Point I below, the Commission should vacate the reason to believe determination and vacate the MUR for lack of jurisdiction. In the alternative, for the reasons stated in Point II below, the Commission should find that there is no probable cause to believe that a violation of 2 U.S.C. § 441a(f) occurred. Assuming arguendo that a probable cause finding were to be made, then the Commission should take no further action against the respondent, consistent with the proper ordering of the Commission's priorities and resources, and consistent with its decisions in other enforcement matters, see Point III.

97043793223

STATEMENT OF FACTS

Credit cards are no longer a significant source of credit for most of their users. They are simply payment devices -- money at a distance. As a practical matter, it has become difficult to buy an airplane ticket or rent a car without a credit card.

J. Gleick, "Cash is Dying," The New York Times Magazine, June 16, 1996, p. 26, at p. 42.

Consistent with the above-quoted observation, it is virtually impossible for a candidate to conduct a national presidential campaign in the United States without using credit cards as a medium of purchase for essential goods and services. This indispensable function of credit cards is separable from the availability of credit card accounts to be sources of interest bearing loans for funds used to purchase goods and services.

The 1992 presidential campaign of Lenora B. Fulani was a grassroots operation from top to bottom. It was fueled by small contributions from approximately 100,000 Americans. The Committee had insufficient financial backing to qualify for a corporate credit card. The Treasurer applied for an American Express card for the Committee and the application was denied. Dr. Fulani, the candidate, did not have a personal credit card. There were high level operations people in her staff who did not have personal credit cards. At the rank and file level, many petitioners, canvassers, and other campaign workers did not have personal credit cards. Many of these workers and volunteers moved from state to state conducting ballot access petitioning drives accompanied by fundraising drives. Hence, significant travel and subsistence expenses were incurred by many rank and file workers and volunteers. Miller Dec.

The campaign did not have a set-piece national infrastructure of local and state level campaign offices. When campaign workers and volunteers needed to purchase supplies or

97043793224

97043793225

services, they could not drop into a local campaign office and get a cash advance. In order to function at all, they had to be able to purchase supplies, make photocopies, pay for printing fliers, pay for postage and courier services, make telephone calls, etc. and then get reimbursed through regional coordinators or directly from the national office in New York City. Miller Dec. The Commission, has, thus far, treated all of these purchases of goods and services as "contributions." For example, the payment by Margaret Golden, a campaign staff member, of a telephone bill containing campaign-related calls was treated by the Commission as a "contribution" even though Ms. Golden submitted the portion of the bill containing the campaign calls for reimbursement and was promptly reimbursed by the Committee. Miller Dec., Ex. E The Commission has interpreted 11 C.F.R. § 116.5 to mean that every payment by an individual for goods or services on behalf of the campaign is a "contribution," even if reimbursed in a timely fashion. The only transactions exempt from this designation are those in which an individual incurs expenses for his or her own travel or subsistence.

The transactions that form the basis for the Commission's allegation of excessive "contributions" to the Fulani campaign are far removed from the kind of "contribution" that the Act was intended to regulate. These are not injections of wealth into a campaign giving it a competitive advantage over other candidates. The transactions listed by the Audit Division's analysis are a multitude of routine day-to-day business transactions that were carried out by or for the benefit of the campaign and reimbursed within a normal window period for payments of invoices to commercial vendors. To characterize these transactions as "contributions" turns the intent and spirit of the Federal Election Campaign Act ("the Act") upside down. 11 C.F.R. § 116.5(b) was intended to further the statutory purpose of preventing candidates backed by

wealthy supporters from gaining undue advantage in the electoral arena; yet it is being used to punish a decidedly un-wealthy candidate with un-wealthy supporters for merely finding reasonable ways to cope with the practicalities of carrying out business transactions in the modern business environment.

97043793226

There is no corrupting influence of wealth in this case, nor even the appearance of it. To the contrary, the Commission's application of 116.5(b) to this case thus far is creating a new obstacle for fair participation in the electoral process by grass roots campaigns whose campaign committee and many of its campaign workers lack lines of credit from credit card companies and lending institutions. Furthermore, the Commission has adopted a definition of transactions exempt from the strictures of the regulation that is tailor-made for the characteristics of a campaign of an established candidate. An established candidate and most, if not all, of the staff and volunteers who travel on campaign business will have personal credit cards; they are able to purchase air plane tickets, hotel rooms, food, and rental cars on their own credit cards and qualify for the FEC created exemption. The candidate, his or her committee, and his or her fundraising chairs, are likely to have sufficient creditworthiness or contacts at financial institutions to obtain lines of credit or credit cards, and to open accounts with Federal Express, with travel agencies and other necessary commercial vendors.

The typical establishment campaign has regional, state and local campaign officials in different parts of the country who are able to draw checks on committee accounts to pay vendors at the time of purchase or give petty cash advances to campaign workers. The Commission's Explanation and Justification of 11 C.F.R. §116.5(b), 55 Fed. Reg. 26382 (June 27, 1989) states that the exemption was created because the agency wanted to accommodate

97043793227

campaigns -- if the Committee did not want to give corporate cards to campaign workers and volunteers, the individuals could use their own cards and the transaction would not be deemed a "contribution" as long as it is paid within the time frames set forth by the regulation.¹ This exemption, however, ignores the facts of a non-establishment campaign in which neither the committee, the candidate, nor many campaign workers have credit cards nor access to normal business credit, and which does not have campaign offices throughout the nation where expense checks can be written directly on committee accounts and from which petty cash can be disbursed. If the Fulani Committee had the same safe harbor of 60 days in which to reimburse the expenses listed in the Audit Division analysis as is extended by the regulation to the "exempt" transactions, then the excessive contribution finding against the Fulani Committee would virtually disappear, as explained below.

If the Committee had been aware of the regulation, it could have made some adjustments to mitigate the immediate impact of the restrictions. But the adjustments would have been costly in lost resources, efficiency and flexibility. Full compliance would have imposed a significant loss of operational ability. The Committee would have been put at a comparative disadvantage to the candidates who were able to (i) obtain committee corporate credit cards, thereby obviating the need for individuals to use their cards, and (ii) make good use

¹ The regulation provides that if a Committee is reimbursing an individual for a payment for his or her own travel or subsistence, if originally paid by cash or check, the Committee must reimburse the amount within thirty days; if originally paid by credit card, the Committee must reimburse the expense within sixty days of the closing date on the credit card statement.

of the exemptions set forth in the regulation, since many of their campaign workers had their own credit cards.

The Nature of the Staff Advance Transactions

The reason to believe determination is based upon "staff advances" made by or on the account of 14 individuals.² We will now fill out in more detail the general description above of the campaign's practices regarding staff advances and credit cards, by reviewing the role each of these individuals played.

Opdycke and Fain

John B. Opdycke made his credit card available to the Committee for a certain period of time. Eleanor Fain authorized additional cardholders on her American Express account, including Francine Miller, Lenora B. Fulani and Cathy Stewart. The Committee used these cards to remedy some of the practical problems created by the Committee's inability to obtain its own credit card or credit accounts with vendors.

For example, Federal Express would not accept cash for its services and would not open a Committee account. Federal Express was a vital service for the campaign's operations. Federal Express required the Committee to charge shipments to a credit card and thus, charges to the Opdycke credit card were functionally equivalent to charging shipments directly to a Federal Express account. Opdycke's credit card billing statements consist of long

² The analysis in the Interim Audit Report was based upon expenses incurred by these individuals that were documented in the Committee's files as campaign related. In the Final Audit Report the Commission added approximately \$20,000 in expenses the Committee contends were not campaign-related to totals for several individuals. See infra. Hence, the description in this section of the Response applies only to the expenses that the Committee says are campaign related.

97043793228

97043793229

lists of Federal Express charges (see Miller Dec., Ex. A). These charges were generally paid by the Committee within 60 days from the closing statement of the credit card. Yet, the Commission deems these Federal Express charges to be "contributions" because they were not charges for the travel and subsistence of Opdycke. If the Committee had a Federal Express account, there would have been no need for this use of the Opdycke card and there would have been no such "contributions." Similarly, if this use of a credit card had the benefit of the same 60 grace period the Commission has accorded other charges, there would be no excessive "contributions." The Commission has attributed \$8,340.14 in "excessive contributions" to Mr. Opdycke.

Ms. Fain's American Express account generally was used to perform transactions that would be difficult or impossible for the Committee to carry out without a credit card, such as booking airline and hotel reservations. The credit card statements were generally paid within 60 days. Hence, if the grace period was applied to these routine business transactions there would be no excessive "contributions." In addition, even though Dr. Fulani used the credit card she obtained through Ms. Fain's authorization to charge her own travel, since according to American Express, Ms. Fain was ultimately responsible for payment on the account, such charges were attributed by the Commission to Ms. Fain. The Commission attributed \$22,367.92 in "excessive contributions" to Ms. Fain.

David Belmont

David Belmont was the Committee's Ballot Access Coordinator. He ran the operation that got Dr. Fulani on the general election ballot in approximately 39 states and the District of Columbia, and which attempted to gain ballot access in several other states as well.

As began to be widely publicized in 1992 in the mass media because of the Perot petitioning drives, the kind of operation that Belmont ran is highly pressured, fast paced, labor intensive, and involves numerous logistical and other expenses. This was especially the case with the Fulani campaign, because the campaign could not rely on local petitioners to manage the drives. Rather, many of its petitioning drives around the nation were led by campaign staff who were deployed from state to state. There were considerable costs for airfare, car rentals, and subsistence, as well as a multitude of other out of pocket expenses. The campaign did not have a credit card or business accounts with vendors to make most of these purchases, and many people in the field did not have personal credit cards.

Belmont had a personal American Express card, and used it to charge many expenses incurred in connection with his operation. In addition, Belmont incurred expenses for which he paid cash or check. The Committee generally paid American Express directly, and reimbursed Belmont for his out-of-pocket expenses within a commercially reasonable time, usually within 60 days of the credit card statement closing date, if the charge was paid by credit card, and within 30 days if the expense was paid by check or cash. However, because payments or charges made for the travel or subsistence of others are not exempt under Commission rules and because some of the expenses incurred by Belmont were for goods, the charges were deemed contributions from the date they were incurred. The Commission attributed \$25,500.48 in "excessive contributions" to Mr. Belmont.

97043793230

Nancy Ross

Nancy Ross was the account holder for a credit card account on which there were also several other authorized card holders. When a cardholder other than Ross used the card for campaign travel or subsistence, the Commission would not categorize the expense as exempt, because the cardholder was not the account holder. The Committee questions this classification practice.

In any event the campaign-related charges on the Ross account were ordinary expenses such as transportation, lodging and rental of meeting rooms, and they were reimbursed by the Committee in a normal commercial period. In the Interim Audit Report, the Audit Staff's analysis resulted in a finding of \$6,711.52 of excessive contributions by Ms. Ross.³ If the 60-day safe harbor were applied to this set of transactions, there would be little or no excessive contribution amount on the Ross card.

Margaret Tanzosh, Marsha Plafkin, Margaret Golden, James and Lauren Ross

Margaret Tanzosh, Marsha Plafkin, Margaret Golden and Lauren Ross were field organizers for the campaign. They were responsible for running operations in different regions of the country. They made various expenditures on behalf of the campaign by cash or check or credit card, including for their own personal travel and subsistence, as well as for others' travel and subsistence. They made expenditures for goods needed to run their operations such as

³ Subsequently the Audit Staff determined that an additional \$16,139.66 in charges were campaign-related, which resulted in a finding increasing the excessive contributions from \$6,711.52 to \$19,455.23 in the MUR. See Ross Dec. for a detailed description of the charges and their actual, non-campaign related purposes.

970437933231

folding tables or flyers for fundraising. Their teams did a lot of traveling, predominantly for fundraising, as is reflected in the large proportion of credit card charges for car rentals.

If the Committee could have obtained credit cards or opened accounts with car rental companies and other vendors, then the above-described transactions could have been accomplished directly by the Committee. Because this was not possible, Tanzosh, Plafkin and Golden used personal credit cards to charge the car rentals and make the necessary purchases. In most cases, such charges were paid by the Committee directly to the credit card company in a commercially reasonable time. In other instances, the individuals were reimbursed by the campaign in a timely fashion.

Lauren Ross did not have a credit card of which she was the account holder. However, her father, James Ross, authorized her use of his credit card. It was never intended that James Ross advance payments to the credit card company for any of these campaign related expenses. This intent was carried out. All the charges incurred for the campaign on Ms. Ross' credit card were paid directly to the credit card company by the Committee. Hence, James Ross was, in practice, a guarantor of his daughter's use of the credit card on campaign business. Upon information and belief, in applying the exemption for personal travel and subsistence, the Audit Division did not scrutinize each of the thousands of credit cards used by campaign workers in federal elections in the 1992 election cycle in order to determine which credit card accounts had guarantors. Upon information and belief the Audit Division did not disallow the exemption with regard to every charge for personal travel and subsistence made by a campaign worker whose credit card was guaranteed by a parent or other third party. Accordingly, the "James Ross"

97043793232

charges should be deemed to be "Lauren Ross" charges and the exemption granted for Ms. Ross's travel and subsistence.

In summary, the credit card charges and other advances made by these four field organizers did not infuse wealth into campaign coffers, but merely made it possible for transactions to be concluded in the normal course of business which were paid for by the Committee in a commercially reasonable time. In most instances, the Committee paid the charges directly, so that the individuals never spent any money.

Cathy Stewart and Jini Berman

Cathy Stewart was a top level operations person, and Jini Berman was Dr. Fulani's personal secretary and aide. Both of them were limited in their ability to transact necessary business because neither Ms. Stewart nor Dr. Fulani had a credit card, and the campaign had neither a credit card account nor credit with various vendors. Berman had a personal credit card, which was used from time to time to charge campaign related expenses, which were generally reimbursed by the Committee in a commercially reasonable time frame.

The alleged excessive contributions attributed to Ms. Stewart are based on her having set up the Committee's New Hampshire primary campaign. Between November and December 1991, Ms. Stewart spent a significant amount of money to set up the Committee's operation, all of which was either advanced to her or reimbursed within the thirty day grace period.

Lawrence Grigsby and Fred Newman

Frederick Newman was Dr. Fulani's campaign manager. Cathy Salit, the Campaign Operations Coordinator, was an authorized cardholder on Dr. Newman's account, and

97043793233

97043793234

charged some of the expenses she incurred while in New Hampshire for the campaign's primary operation. The Commission attributed these charges to Dr. Newman, and since they were not for his own travel, deemed them "contributions." If the sixty day safe harbor exemption for personal travel applied to these charges, there would be no excessive contributions charged. See Miller Dec., Ex. I.

Similarly, Lawrence Grigsby rented a car for campaign staff in Los Angeles, because no one on staff at that time had a credit card. The Commission deemed this to be a "contribution," since the charge was not for Mr. Grigsby's own travel. Again, if the sixty day safe harbor rule applied, there would be no "excessive contributions" attributable to Mr. Grigsby. See Miller Dec., Ex. D.

Robert Levy and Jeannine Hahn

Robert Levy was a campaign staff member who charged the use of a mobile phone on his credit card, and was reimbursed within sixty days by the Committee. Since this expense was not for his personal travel or subsistence, the Commission deemed it to be a "contribution," resulting in a finding of \$636.78 in excessive contributions. See Miller Dec., Ex. K. Finally, Jeannine Hahn was a volunteer who rented a car on behalf of the Committee for the Committee's use during the New Hampshire primary operation. Since the Audit Staff determined this expense was not for her own travel or subsistence, it was deemed a "contribution" and resulted in a finding in the MUR of \$2,343.44 of "excessive contributions" by Ms. Hahn.

**\$20,510 in "Excessive Contributions" Are Erroneously Derived
From Transactions Unrelated to the Committee**

Subsequent to the interim audit report, the Audit Staff sought and received individuals' credit card statements for periods in which the individuals had not charged any campaign-related expenses. Such statements were not in the Committee's files, since those individuals had not charged any expenses on behalf of the Committee during the periods in question.

Upon receipt of those statements, the Audit Staff added \$20,510 in "excessive contributions" to their original finding in the interim audit report. They did so because they assumed that "since certain expenses relative to travel, subsistence and related expenses were incurred during the time periods for which these cards had been made available for the Committee's use," then those expenses were campaign related. (See Report of the Audit Division on Lenora B. Fulani for President in the Final Audit Report, p. 8-9.)

The Committee contends this is an erroneous assumption. The Ross Declaration submitted herewith demonstrates in detail the fallacy of this assumption; Nancy Ross and the authorized cardholders on her account charged expenses for their lobbying efforts on behalf of the Rainbow Lobby, not the Committee. Those expenses were substantially similar in terms of type of expense; they tended to be for transportation, lodging and office-related goods. They were not, however, incurred on behalf of the Committee.

The Ross Declaration and exhibits demonstrates that the Audit Division incorrectly attributed to the Committee charges on her credit card totaling \$16,139.66. This

97043793235

further corroborates the reliability of the records kept by the Committee Treasurer. If a credit card charge was not in the Committee's accounts payables files, it was not Committee related.⁴

The Ross account represents most the add-ons by the auditors after the Interim Audit Report. But for the two year delay in notifying the respondents of this MUR, detailed refutation of the other add-ons may have been available for a response.⁵ But the instant response is more than sufficient to show that the auditors' assumption is not validly applied here and all of the post-Initial Audit Report add-ons of expenses should be deleted from the calculation of alleged excessive contributions.⁶

⁴ The Audit Staff's assumption was based on the erroneous premise that the Committee controlled the individuals' credit cards in question. As the Committee asserted in response to the Audit Staff's initial request for such statements, that was not the case, except in a few limited circumstances, as described above. The Committee used and controlled Eleanor Fain's and J. B. Opdycke's cards. Other than those, however, individuals controlled their own credit cards, and charged their own personal expenses on such cards. Individuals could have traveled, stayed in hotels, and purchased goods during the campaign period not on behalf of the Committee. In fact, if the Committee had paid those charges, they would have been deemed non-qualified campaign expenses.

⁵ It is difficult for the Committee to document that the balance of the additional charges the Audit Staff assumed were campaign-related were not so. The Committee is severely prejudiced by the length of time between the majority of the transactions at issue and the Commission's finding that the Committee violated FECA.

⁶ Furthermore, the Audit Staff did not apply 11 C.F.R. § 100(b)(8) -- which allows an individual to spend up to \$1,000 of his or her own money, without being reimbursed, on travel or subsistence expenses on behalf of the campaign -- to the expenses they assumed were campaign-related.

97043793236

ARGUMENT

POINT I: THE COMMISSION IS BARRED FROM PROSECUTING THIS PROCEEDING AT THIS TIME BY THE EXPLICIT LANGUAGE OF 11 C.F.R. § 9038(e)(2), AND, ADDITIONALLY, BY UNREASONABLE AND PREJUDICIAL AGENCY DELAY

A. Because The Instant Allegations Were Contained In The Publicly-Released Audit Report They May Not Be The Subject Of An Enforcement Proceeding Under 2 U.S.C. § 437g And 11 C.F.R. Part 111

97043793237
The Commission's own regulations specifically provide that the agency must decide before issuing a publicly-released audit report of a committee that received presidential primary matching funds, whether or not the agency will reserve any matters raised by the audit for possible enforcement action under 2 U.S.C. § 437g and 11 C.F.R. Part 111. If the Commission does want to reserve the possibility of enforcement action on any matter, then the publicly released report may not contain such matter. 11 C.F.R. § 9038.1(e)(2) expressly prescribes:

If the Commission determines, on the basis of information obtained under the audit and examination process, that certain matters warrant enforcement under 2 U.S.C. 437g and 11 CFR Part 111, those matters will not be contained in the publicly-released report. In such cases, the audit report will indicate that certain other matters have been referred to the Commission's Office of General Counsel.

(emphasis supplied)

The regulation ensures that the committee will be on notice no later than the adoption of the final audit report of where it stands relative to possible enforcement action arising out of the audit report. This is consistent with Congressional intent that the Commission act expeditiously, and do what it can to avoid having audits and enforcement proceedings involving presidential campaigns carry over into the next presidential election cycle. Cf. 26

U.S.C. § 9038(c) (three year statute of limitations for Commission to notify candidate of repayment determination). The regulation also ensures that the confidentiality of possible enforcement proceedings will be preserved as required by 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A). Congress mandated that enforcement proceedings be confidential.

The Commission's actions in this case violated the letter, the purpose, and the spirit of this regulation. In April 1994, the Commission released to the public an audit report that discussed in detail the allegations that are the basis for this MUR -- confidentiality of the enforcement proceeding was breached by the agency from its inception. Furthermore, the audit report did not state that certain matters had been referred to Office of General Counsel. There was a general statement: "It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action." Final Audit Report, p. 3. But this statement was consistent with the possibility that no matters had been referred to the OGC.

As time passed, this possibility grew to appear to be a likelihood if not a certainty. In 1994, the Commission did not notify the Committee that the alleged excessive staff advances issue had been referred to OGC. Another entire year passed -- in all of 1995, the Commission did not notify the Committee that this matter had been referred to OGC. And then another five months elapsed before notice was given in June 1996, more than two years after the public release of the audit report, and during the final five month stretch of the 1996 presidential election cycle.

Confidentiality was blatantly breached. The "confidential" Factual and Legal Basis document that forms the basis for the reason to believe determination is comprised of

97043793238

information and analysis that the Commission released to the public in the Final Audit Report more than two years before notice of the "confidential" MUR was given to the Committee.

The prosecution of this MUR is a clear violation of 11 C.F.R. § 9038.1(e)(2).

The only effective remedy for this violation is to vacate the reason to believe determination and to close this MUR.

B. The Only Effective Remedy For The Commission's Unreasonable And Prejudicial Delay In Notifying Respondents Of Its Prosecution Of This MUR Is To Vacate The Proceeding

The Office of General Counsel opened MUR 3969 on May 16, 1994, shortly after the Commission's adoption of the Final Audit Report. However, the Commission did not notify the Committee of the MUR until more than two years later, in June 1996. This delay in notification is inexcusable and highly prejudicial.

Other presidential candidates with similar issues were notified much earlier than Fulani of OGC enforcement proceedings. For example, MUR 3947, involving Senator Kerry's 1992 campaign, had a reason to believe determination issued by August 2, 1994, nearly two years earlier than the notice to Fulani. The 1992 Agran Committee was the subject of a MUR on the identical issue as this one. However, the Commission made a reason to believe determination on August 5, 1993. With regard to the 1992 Buchanan Committee, the agency presumably opened MUR 4108 considerably after the instant MUR 3969, but the Commission issued a reason to believe determination for the multifaceted Buchanan proceeding on September 1, 1995, nine months before giving notice to Fulani of her single-issue MUR.

Not only was Fulani deprived of fair notice, and of notice comparable to other similarly situated candidates, but also the Commission engaged in other enforcement actions

97043793239

9704379324C

which would lead Fulani to believe that the staff advances issue was closed. In July 1994, the Commission invoked a rarely (if ever) used regulation to open an unprecedented post-final audit report special audit "inquiry" of the Committee's expenditures. This massive proceeding, which still is not concluded more than two years later, was based upon the allegation that the Fulani campaign was a sham campaign fabricated for the purpose of receiving federal matching fund grants and then diverting the funds out of the campaign to its campaign manager. The Commission has failed to find any evidence to support these allegations. The thrust of the inquiry, therefore, is in completely the opposite direction of the issue raised in the instant MUR. The charge that the Committee received excessive contributions due to staff advances under 116.5 is premised on the existence of a real, operational campaign, and the alleged violation is that resources were improperly being given to the campaign to carry out its operations, as opposed to taken from the campaign.

MUR 3969 was opened two months before the Commission opened its massive, high priority, special audit inquiry. If the Commission had prosecuted the MUR in a normal manner, it would have been in the position of prosecuting simultaneously two proceedings whose theories are inconsistent. Instead, indisputably, the Commission suspended the investigation of the charges in the MUR for nearly two years, without notifying the respondents that the MUR existed. This prejudicial manipulation of its law enforcement docket is arbitrary, capricious and an abuse of discretion.⁷

⁷ The timing of the adoption of the reason to believe determination also creates, at least, an appearance of politicized enforcement. After two years of inactivity, this MUR was activated shortly after Dr. Fulani notified the FEC that she was taking steps to be prepared to participate in the Reform Party presidential nominating contest. Similarly, the opening of the

The agency delay was highly prejudicial. When the Commission gave notice to the Committee in June 1996, the transactions being questioned were already 4-5 years old! There were hundreds of transactions, involving dozens of people. Many of these people had long since lost touch with the Committee. Additional documentation that might rebut some of the allegations became more difficult if not impossible to obtain because of the passage of time. Moreover, although this MUR is based on information culled from the routine field audit conducted in late 1992 and early 1993, just after the 1992 election, the Commission did not even notify the respondents of the MUR until five months before the 1996 election. Congress and the courts have made clear that in the area of federal election law enforcement, time is of the essence. Cf. Simon v. FEC, 53 F.3d 356 (D.C. Cir. 1995), Dukakis v. FEC, 53 F.3d 361 (D.C. Cir. 1995).

In the instant case, the respondents did not even know that there was an enforcement proceeding open against them so they did not even have the option of asking the District of Columbia Circuit to issue a mandamus order requiring a decision to be issued. Clearly, the only effective remedy for the agency's delay is for the MUR to be vacated forthwith. Cf. Simon and Dukakis, *supra* (in both cases the court ordered the termination of the entire agency repayment process because of agency delay).

massive audit inquiry coincided with Fulani's challenge to Democratic Party icon Mario Cuomo in the New York State Democratic Primary, and ultimately served the purpose of imposing a major obstacle to Dr. Fulani's possible challenge to President Clinton in the 1996 Democratic Party presidential primary contest.

97043793241

POINT II: THE ROUTINE COMMERCIAL VENDOR TRANSACTIONS WHICH WERE REIMBURSED BY THE COMMITTEE WITHIN NORMAL BUSINESS PAYMENT PERIODS DID NOT CONSTITUTE "CONTRIBUTIONS" UNDER FECA, OR, IN THE ALTERNATIVE, FECA AS APPLIED TO THESE TRANSACTIONS IS UNCONSTITUTIONAL

The participation of American citizens in the presidential electoral process is one of the most essential First Amendment freedoms. Associating with candidates, working on campaigns as volunteers and staff, and contributing labor and financial resources to campaigns, are protected activities. The government may regulate them only to achieve a compelling state interest, and only when there is no less restrictive alternative to fulfill such an interest.

The Federal Election Campaign Act of 1971 (the "Act" or "FECA") was enacted for the purpose of remedying both the appearance and reality of corruption of the electoral process through the influence of money. Congress sought to level the electoral playing field by restricting the size of contributions, thereby (it was hoped) reducing the costs of competing for election and the disproportionate influence of wealthy institutions and individuals on elections and governance. Buckley v. Valeo, 424 U.S. 1, 14-23 (1976)(Buckley). Both the broad sweep and the intimate details of FECA and its implementing regulations have repeatedly been subjected to searching scrutiny by the federal courts. Most notably, twenty years ago the Supreme Court found certain provisions of the Act to be unconstitutional in Buckley, and a month ago the Supreme Court again invalidated a significant provision of the Act in Colorado Republican Federal Campaign Committee v. FEC, No. 95-489, ___ U.S. ___ (June 26, 1996)(CRFCC). The Court reiterated that a regulation of expenditures for electoral purposes is forbidden under the compelling state interest test unless there is evidence or legislative findings

97043793242

suggesting "special dangers of corruption . . . that tip the constitutional balance." *Id.*, Slip Op. at 7-8.

In the instant case, the Commission seeks to apply the statutory prohibition on certain kinds of contributions and expenditures set forth in 2 U.S.C. § 441a(f), which provides, in part:

No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section.

9
7
0
4
3
7
9
3
2
4
3

One such "limitation" is that an individual shall contribute no more the \$1,000 to any candidate for federal office in a single election cycle. 2 U.S.C. § 441a(a)(1)(A). "Contribution" is defined to include, *inter alia*, "any gift, subscription, loan, advance, or deposit of money or anything of value" (emphasis supplied). 2 U.S.C. § 431(8)(A)(i). Subsection 431(8)(B)(iv) excludes from the definition of "contribution" up to \$1,000 in unreimbursed advances for travel expenses on behalf of a candidate or political committee. Hence, by applying 441a(a)(1)(A) and 431(8)(B)(iv), an individual may, without exceeding any limitation enforced through 441a(f), directly contribute \$1,000 to a candidate for federal office and, in addition, advance \$1,000 in travel expenses which are not reimbursed.⁸

⁸ Nowhere in the Act is it stated that the \$1,000 exclusion from the definition of "contribution" is to be offset against the \$1,000 limit on transactions that are within the definition of "contribution." (This is not surprising because such an offset would contradict the logical distinction between a exclusion from contributions and a cap on contributions.) Consequently, the Audit Division analysis of staff advances significantly overstated the amount of alleged excessive contributions because it did not take into account at all the \$1,000 exclusion under the subsection. *See* subpoint D, *infra*.

Respondents contend that the transactions that are the subject of this MUR are not "contributions" within the meaning of the Act. In the alternative, if FECA does deem these transactions to be "contributions," then the Act is unconstitutional as applied herein.

A. The Instant Transactions Are Not Contributions Under FECA

Prior to the 1992 election cycle, the Commission did not contend that the kinds of transactions at issue here were "contributions" under the Act. Indeed, the Fulani Committee followed substantially the same practices with regard to reimbursements and staff advances in 1992 as Dr. Fulani's 1988 committee had followed in the previous election cycle. All of the relevant documentation was presented to the field auditors in 1988, just as it was in 1992, without the Commission ever suggesting that these transactions were contributions.

The asserted legal grounds for the Commission to treat these transactions as contributions in 1992 is its newly enacted regulation, 11 CFR § 116.5. However, there is no legal basis in the Act for the enactment of 116.5. The Commission has set forth its legal justification for 116.5 in Explanation and Justification for 11 C.F.R. § 116.5, 55 Fed. Reg. 26,382 (June 27, 1989). The Explanation and Justification cites one provision of the Act as the basis for the new regulation, 2 U.S.C. § 431(8)(B)(iv), the subsection discussed above. This citation is inapposite. The statutory subsection exempts \$1,000 in unreimbursed advances from the definition of "contribution" and "advance." It does not state that payment for campaign related expenses of the type engaged in by the Committee which were reimbursed within normal commercial vendor timeframes are contributions. (And prior to the 1992 election cycle the Commission never claimed that this or any other provision in the statute had such an effect.) In fact, the statute says nothing about reimbursed expenses or about credit card charges that are paid

97043793244

directly by the Committee to a staff member's credit card company within the regular billing cycle.

Furthermore, 116.5 is inconsistent with the purported statutory justification in that the regulation creates an exemption only for personal expenses; but the statutory subsection has no such limitation. The statute refers only to "travel," whereas the regulation exempts travel and subsistence.⁹

In short, when the Commission promulgated 116.5 it legislated outside the scope of any applicable statutory authority. Accordingly, the Commission has no legal basis to determine that the Committee accepted unlawful excessive contributions in 1992 when it simply followed the same practices that the Commission found to be lawful in 1988. The intervening promulgation of an ultra vires regulation is no basis for the change in law enforcement actions.

B. Section 116.5 Is Unconstitutional Because It Restricts First Amendment Activity And Is Not The Least Restrictive Means To Achieve A Compelling State Interest

The association of candidates for elected office with their supporters is protected by the First Amendment. Both in 1988 and in 1992, several of Dr. Fulani's supporters helped her campaign by letting their credit cards be used to facilitate transactions with commercial vendors in ways that would be difficult without credit cards. Other supporters used cash, checks

⁹ The new regulation also cannot be derived from the statutory subsection because the regulation creates an unlimited exemption for certain staff advances provided that they are reimbursed within certain time frames. There is no \$1,000 limit. Under the statute, a campaign worker can advance \$500.00 in travel expenses and never be repaid, without being credited with a "contribution." Under the regulation, a campaign worker can advance \$5,000.00, \$10,000, \$15,000 -- there is no limit -- for their own travel and subsistence expenses and they are not contributions, as long as they are reimbursed in a timely manner by the candidate.

97043793245

or credit cards to purchase goods and services on behalf of the Committee. In the instances in which their credit cards were used, the Committee generally paid the credit card company directly. Where supporters made purchases by cash or check, they were reimbursed in a timely fashion. These practices were necessary because of the practical difficulties for the campaign to make those purchases directly (see Miller Dec.) In 1988 the Commission accepted such practices as not being "contributions." In 1992, unless the expense was for the individual's own travel or subsistence, it contends that all these expenses are contributions. There is no compelling governmental interest for this change of position.

The Commission acknowledged in its official justification for promulgating 116.5 that not every kind of advance or credit card charge by an individual on behalf of a candidate should be deemed a contribution. It pointed to one kind of potential practice that it wanted to restrict through the regulation:

Although many campaign workers may only be able to advance relatively small amounts, individuals with sizable resources may have the ability to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. The Commission is concerned that this could occur during critical periods in a campaign when a candidate's authorized committee may be experiencing financial difficulties.

(emphasis supplied) Explanation and Justification Assuming arguendo that preventing this kind of injection of wealth into a campaign could be a compelling state interest, this interest is inapplicable to the Committee's transactions in this case. In the instant case, the individuals did expect prompt reimbursement -- in fact, with respect to credit cards, the payment was so prompt that it was not "reimbursement" per se because the Committee paid the charges directly to the credit card company before the individual was out of pocket any money at all. Since 116.5's

97043793246

exemptions provide for a 30/60 day grace period and the Committee reimbursed almost all of the pertinent transactions within those time frames, the instant case does not involve postponement of "reimbursement for substantial periods of time."

The second Commission rationale is equally inapplicable. The timing and nature of the instant transactions had no relation to bailing out the Committee during a crucial competitive juncture in a primary election contest. For example, credit cards were not used to purchase \$50,000 worth of radio advertising time during the two days prior to a primary election. None of the transactions at issue had the potential to affect the outcome of any primary election. As described in the Miller Declaration, the practices that give rise to the alleged excessive contributions were part of the routine administration of campaign operations. The practices did not result in any corrupting injection of wealth into the Fulani campaign. If the Committee could have opened a Federal Express account without securing payment of the charges by credit card, if the candidate and her staffers had personal credit cards, if there were field offices around the country to make various purchases directly, then the Committee would have functioned at the exact same level of expenditures as it did under the practices it actually followed. In short, there is no compelling state interest in regulating the type of use of credit cards and other advances that is the subject of this MUR.

Even if there was a compelling state interest here, 116.5 as applied here is not the least restrictive means of achieving it. This is particularly the case because of its adverse impact on minor parties, independent candidates, and grassroots insurgents. In Buckley, 424 U.S. at 70, the Court recognized that:

the Government's interest in deterring the "buying" of elections and the undue influence of large contributors on officeholders may be reduced where contributions to a minor party or independent candidate are concerned, for it is less likely that the candidate will be victorious.

The FEC, in three advisory opinions, viz. 1975-44 (Socialist Workers), 1983-47 (Sonia Johnson), 1984-25 (Sonia Johnson), affirmed the need for construing FECA so as not to reduce the effectiveness of third-party candidates, to insure such candidates have equal opportunities to participate in the electoral process. This is consistent with the principle that the First Amendment may require a modification of otherwise valid election regulation when the laws are applied to certain minor parties. Brown v. Socialist Workers '74 Campaign Committee, 459 U.S. 87 (1982).

Applying 116.5 in the instant case affirmatively discriminates against candidates whose constituency is at a lower economic stratum of the electorate and thereby violates the central purpose of Act, i.e. to neutralize the advantages for a candidate who has wealthy supporters. The regulation limits the exemption to travel and subsistence expenses by the credit card holder and for the credit card holder, and conditions the exemption on payment of the credit card account charges by the campaign within 60 days of the closing date on the credit card statement.¹⁰ Thus the regulation makes unlawful practices engaged in by the Committee to deal with the obstacles created by running a campaign staffed by individuals with less wealth than a more established campaign, and creates narrow exemptions from its prohibitions that assist the

¹⁰ Also, there is the 30 day grace period for reimbursement of non-credit card staff advances, but again this is limited to advances made for travel and subsistence by the person making the advance.

97043793248

campaigns with a wealthier stratum of staff and volunteers -- whose supporters generally have credit cards.

The Commission must interpret and apply the regulation in a manner that takes into account the practical realities of the Fulani campaign (and other similar grass roots candidacies). Its enforcement activities herein are plainly inconsistent with the purposes of FECA and unconstitutional.

C. The Underinclusiveness of the "Exemption" In 11 C.F.R. § 116.5 Renders the Regulation Unconstitutional As A Violation Of The Equal Protection Principle of the Fifth Amendment

By adopting the exemptions and safe harbors of 116.5, the Commission recognized that not all staff advances should be deemed contributions. However, as discussed above, it promulgated a regulation which exempts transactions in ways that are contrary to the purposes of FECA, discriminatory, and unconstitutional under the First Amendment.

[FECA]'s contribution and expenditure limitations operate to regulate the most fundamental of protected First Amendment activities. Discussion of public issues and debate on the qualifications of candidates are integral to the operation of the system of government established by our Constitution. The First Amendment affords the broadest protection to such activities to "to assure [the] unfettered interchange of ideas for the bringing about of political and social changes desired by the people.

Buckley v. Valeo, 424 U.S. 1, 14 (1976) (internal citation omitted). FECA's contribution limitations' primary purposes are to limit the actuality and appearance of corruption resulting from large individual financial contributions. *Id.* at 26 The interests served by restricting the size of financial contributions must be weighed against the effects of these limitations on an individual contributor's First Amendment freedoms. Restrictions on financial contributions must

97043793249

not discriminate and selectively abridge First Amendment rights in violation of the Fifth Amendment.

Equal protection analysis in the Fifth Amendment area is the same as that under the Fourteenth Amendment. Weinberger v. Wiesenfeld, 420 U.S. 636, 638 n.2 (1975); Bolling v. Sharpe, 347 U.S. 497, 499 (1954). The Constitution invalidates governmental choices which are "clearly wrong, a display of arbitrary power, not an exercise of judgment." Matthews v. deCastro, 429 U.S. 181, 185 (1976).

"Underinclusiveness" is one variant of approximation which the Court may invalidate as too arbitrary. O'Brien v. Skinner, 414 U.S. 524 (1974) (overturning a state statute allowing incarcerated persons to vote by absentee ballot only if confined in county where they were not resident); See also, Tussman & tenBroeck, "The Equal Protection of the Laws," 37 Cal.L.Rev. 341, 348-51 (1949). Underinclusive classifications do not include all who are similarly situated with respect to a rule, and thereby burden less than would be logical to achieve the intended governmental end. Tribe, American Constitutional Law, 2nd ed., p. 1447 (1988). The Supreme Court noted in Railway Express Agency, Inc. v. New York, 336 U.S. 106, 112-13 (1949) that

nothing opens the door to arbitrary action so effectively as to allow . . . officials to pick and choose only a few to whom they will apply legislation and thus to escape the political retribution that might be visited upon them if larger numbers were effected.

Professor Lawrence H. Tribe further warned that

[i]n benefiting a smaller group than would be logical in light of a law's purposes, the legislature may have chosen to exclude the politically powerless for no better reason than that it fears reprisal from this group less than it does others.

97043793250

Tribe, *op. cit.*, p. 1448 n. 11.

The constitutional mandate of equal protection governs not only discriminatory legislation, but discriminatory executive and administrative behavior as well. *Id.* at 1451, 1482-83; See, e.g., Yick Wo v. Hopkins, 118 U.S. 356 (1886); Shapiro v. Thompson, 394 U.S. 618 (1969). A law or regulation may be "fair on its face and impartial in appearance" but still have an unequal impact and be deemed unconstitutional. Yick Wo, op. cit.

First, limiting the exemption to advances for one's own travel and subsistence is underinclusive. Instead, the 30/60 day grace period for a committee to reimburse staff advances should apply to all travel and subsistence expenses incurred in the normal course of campaign work. When three Fulani campaign workers traveled to New Hampshire and needed plane tickets and hotel accommodations, but only one of them had a credit card, the person with a credit card should be able to charge the expenses for all three persons and have the campaign pay the credit card company within 60 days. It is respectfully submitted that there is no practical, legal, moral, or logical reason why a credit card cannot be used for one's own travel but not for others traveling to the same location for the same purpose.

Second, limiting the exemption solely to travel expenses is underinclusive. Advances for other routine travel and subsistence operational expenses which are paid for by the campaign in a normal vendor payment cycle should not be considered "contributions." When a committee operates in the way the Fulani campaign did, where there are not numerous offices from which to disburse funds, it is really impossible to function if an individual cannot make purchases on behalf of the Committee and then get reimbursed.

9 7 0 4 3 7 9 3 2 5 2

The distinction between paying for one's own travel and subsistence and paying for a colleague's travel and subsistence is wholly arbitrary and, actually, *contrary* to the purpose of 116.5, viz. to facilitate the travel of campaign "field workers" without having to provide them with committee credit cards. 55 Fed. Reg. 26,382 (June 27, 1989). If the Commission wants to help facilitate field workers' travel, why limit a worker's credit card use to only the travel of that worker/cardholder? The more workers permitted to travel on one worker's credit card, the less committee credit cards need to be distributed to "outsiders," "unknown entities," or "potential loose cannons." The less individuals having committee credit cards, the more control a committee has over its spending. Furthermore, as noted supra, although FEC § 431(8)(B)(iv) was cited by the Commission as authority for the regulation, it does not limit the "travel" exemption to just personal travel.

The exemption provided for in the regulation is facially neutral. However, it has a substantial negative impact on the Committee. Although the Commission attempted to ameliorate the regulation's impact by exempting certain transactions, the exemptions do not help the Committee. As stated above, few Committee staff people held credit cards. The Committee and the candidate were unable to obtain credit. Thus, the Committee was unable to benefit from the exemption provided in 116.5.

In contrast, major party candidates are more likely to have hundreds or thousands of field workers holding credit cards.¹¹ In the rare instance where a credit card is needed for travel and the worker does not have her own, the committee credit card of an established

¹¹ Some of these cards are undoubtedly guaranteed by parents or others and thus, are dodging Commission scrutiny (see *infra*).

campaign is always available. Thus, the regulation provides yet another advantage for major party committees which cannot be utilized by minor campaigns, effectively disadvantaging grassroots candidacies.

In sum, the regulation draws an arbitrary line between use of a credit card for personal travel and use for travel of others. § 116.5 is underinclusive and therefore, unconstitutional. *Cf. Lubin v. Parrish*, 415 U.S. 709, 716 (1974) ("a restriction can be sustained only if it furthers a vital governmental interest by means that do not unfairly or unnecessarily burden either a minor party's or individual candidate's equally important interest in the continued availability of political opportunity."); *Buckley*, at 94.

In addition, limiting 116.5's exemption to travel and subsistence expenses is underinclusive. Advances for other routine operational expenses which are paid for by the campaign in a normal vendor payment cycle should not be treated by the Commission as "contributions." While the regulation arbitrarily allows workers to advance payment for personal travel and subsistence, it disallows advances for other important transactions.¹²

As applied in the reason to believe determination, the regulation infringes upon Fulani's ability to run a presidential campaign in the modern commercial economy because of her lack of wealth and lack of wealthy constituents, staff and volunteers. It gives yet another advantage and tool to established parties and candidates at the expense of grassroots candidates

¹² The Committee, for example, did not have offices around the country from which individuals could obtain a check to purchase goods necessary to accomplish their work. Rather, it was necessary for individuals to pay for such goods and then be reimbursed by the national office. Disallowing these types of transactions severely hampers the ability of a minor party or grassroots candidacy to political expression, participation, speech and association.

97043793253

and parties, by exempting from the definition of contribution charges incurred by an individual for their own travel and subsistence, but not exempting the use of others' credit cards for such uses. Thus the regulation makes it easier for major party campaigns to operate, i.e. they can now use a campaign credit card, where needed and appropriate, *and* personal credit cards in limited circumstances. The Committee, on the other hand, did not have the option of using a campaign credit card *and* could not use personal credit cards, except in limited cases, since Dr. Fulani and many staffers could not obtain them. Thus, 116.5 abridges the Committee's First Amendment rights in violation of the equal protection component of the Fifth Amendment. As the Court in Buckley held:

[R]estrictions on access to the electoral process must survive exacting scrutiny. The restriction can be sustained only if it furthers a "vital" governmental interest that is achieved by a means that does not unfairly or unnecessarily burden either a minor party's or individual candidate's equally important interest in the continued availability of political opportunity.

424 U.S. at 94.

D. The Methodology Used By The Audit Division To Apply The Regulation Unfairly Increases The Calculation Of Excessive Contributions

For the reasons stated above, the Committee is not liable for any excessive contributions arising from staff advances.¹³ Assuming arguendo that 116.5 could be applied to

¹³ The Committee requested through the Office of General Counsel that the Audit Division do a computer run that would show the reduced amount of alleged excessive contributions that would apply to each of the 14 individuals if all of the transactions had the benefit of the 60 day grace period (and the additional grace resulting from the credit card statement closing date rule). The Audit Division representative stated that it was against agency policy to conduct such a reanalysis, and therefore denied the request. The representative also informed the Committee that agency policy precludes providing the Committee with the software program developed by the agency to do the computer analyses of excessive contributions.

97043793254

the Committee in a manner that results in the calculation of excessive contributions, there are three flaws in the Audit Division's methodology that must be corrected. The alleged amount of excessive contributions must then be recalculated using the revised methodology.

1. The Commission Failed To Apply § 431(8)(B)(iv) To The Instant Transactions, And Thereby Overstated The Amount Of Alleged Excessive Contributions

As discussed above, FECA expressly excludes from the definition of "contribution":

any unreimbursed payment for travel expenses made by any individual on behalf of any candidate or any political committee of a political party, to the extent that the cumulative value of such activity by such individual on behalf of a single candidate does not exceed \$1,000 with respect to a single election, and on behalf of all political committees of a political party does not exceed \$2,000 in any calendar year.

2 U.S.C. §431(8)(B)(iv) (the "subsection"). The plain meaning of the subsection is unreimbursed expenses for travel up to \$1,000 are not counted as contributions, i.e. are not counted towards the \$1,000 limit on contributions by an individual. Indeed, if this \$1,000 exclusion were not separate from the direct contribution limit of \$1,000 under 441a(a)(1)(A), then the subsection would be pointless. Absent the subsection, all unreimbursed expense advances would count as direct contributions, regardless of whether they were for travel expenses, photocopying, printing costs,

There are repeated references in this Response to the "60 day" safe-harbor, the grace period for the reimbursement of exempt transactions. In fact, with respect to properly documented credit card charges for personal travel the safe harbor period for reimbursement is always greater than 60 days (except for the rare case of charges made on the last day of the billing cycle). The 60 day grace period for exempt charges does not begin on the date of the charge, but on the closing date of the monthly credit card bill. For example, if a charge is made on January 15, and the statement closing date is January 31, then the grace period ends 60 days after January 31. In this example, the actual safe harbor for reimbursing the charge is 76 days.

97043793255

or advertising space. Furthermore, the subsection does not limit the exclusion to travel expenses for one's own travel. Rather, it broadly refers to travel expenses "on behalf of any candidate." Thus, the payment could include travel expenses of the candidate, of campaign workers or of volunteers. It does not refer to payment for travel expenses incurred solely by the person making the payment.

In the analysis which is the basis for the reason to believe determination, the Audit Division's threshold for each individual -- beyond which an "excessive contribution" was registered -- was solely the threshold of \$1,000 in direct contributions by the individual. That threshold is incorrect. The threshold should have been calculated as follows: First, unreimbursed travel expenses up to \$1,000 would be excluded from "contributions." 2 U.S.C. § 431(8)(B)(iv) Second, the individual's direct contributions would be subtracted from \$1,000, yielding the available amount of additional direct contributions. 2 U.S.C. § 441a(1)(A)(a). That number would be the threshold beyond which excessive contributions would be calculated. Finally, any remaining unreimbursed expenses not within the 116.5 safe harbor would be offset against the individual's available amount of additional direct contributions. Only the remaining unreimbursed expenses should be deemed excessive "contributions."

The reason to believe determination is based upon advances by 14 individuals. The analysis as to each individual deprived the individual and the Committee of the benefit of the \$1,000 exclusion under 431(8)(B)(iv). Accordingly, even if it is determined that the regulation should apply to the Committee in its current form, the Audit Division's analysis significantly overstated the alleged excessive contributions. The Audit Division should be able to calculate the exact overstatement by modifying its software program to conform to the

97043793256

subsection and doing another computer run. The amount of overstatement is likely to be in the range of \$14,000.

2. Allocating reimbursements by FIFO unfairly inflates the amount of excessive contributions

9 7 0 4 3 7 9 3 2 5 7

The Audit Division's analysis of staff advances did not allocate reimbursements according to the designation of the respective campaign treasurers. Instead, the Audit Division artificially allocated the reimbursements on the basis of FIFO. The Audit Division could have used a straightforward methodology of tracking the reimbursement of expenses on an item by item basis. Consider this hypothetical situation. Smith charges an exempt transaction of \$100.00 on January 15, and a non-exempt transaction for \$50.00 on January 20. On January 21, the committee reimburses Smith \$50.00 for the nonexempt transaction. On January 21, the nonexempt transaction should be closed, after having been outstanding for merely one day. Not so, under the Audit Division's artificial methodology. Even though the committee earmarked the \$50.00 reimbursement to close out the non-exempt transaction, the audit methodology will not credit it against that charge. Instead, it will credit the \$50.00 payment on January 21 to reduce the exempt charge of \$100.00, because that charge was made first. It uses a "first in/first out" methodology even though this distorts the actuality that exempt and non-exempt charges operate under separate rules.

Respondents contend that it is inappropriate for a law enforcement agency to use an artificial methodology that inflates alleged violations, when no less respectable and sound accounting approaches would minimize the magnitude of the alleged violations. With regard to staff advances, the Audit Division should have applied reimbursement payments first to reduce

any outstanding excessive contribution. The Commission should instruct the Audit Division to recalculate the Committee's schedules of staff advances accordingly. This recalculation will reduce the alleged amount of staff advances.

3. Lauren Ross, Lenora Fulani, Cathy Stewart, Francine Miller, Deborah Green, Ada Ivonne Vasquez, Amy Freeman, Kate Gardner, Todd Bentsen, Bonnie Gilden, Jeffrey Aron, Christopher Barclay, and Cathy Salit should be deemed to be account holders for purposes of classifying expenses as personal

As related above, and in the Miller and Ross Declarations, the Committee lost the benefit of the grace periods of 116.5 with respect to tens of thousands of dollars in transactions merely because the card holder was one individual and the account holder was someone else. The candidate, Lenora Fulani, charged travel and subsistence expenses to a credit card issued in her name, on the account of Eleanor Fain. This was done because the candidate herself did not have adequate credit to obtain a major credit card account of her own. As a result, all of the charges made by the candidate for her travel and subsistence were deemed charges not within the safe harbor of 30/60 days because it was she, not Eleanor Fain, who was traveling around the country and staying in hotels, etc.

Lauren Ross charged many expenses for her own campaign related travel (i.e. car rentals) but the auditors excluded all of them from the 30/60 day grace periods because the account holder was her father, James Ross. The campaign manager, Frederick Newman, authorized the Campaign Operations Coordinator, Cathy Salit, to make charges on his credit card account. The auditors did not apply the 30/60 grace period to any of these transactions, even if they were for the personal travel and subsistence of Ms. Salit on campaign business. Nancy Ross had a number of cards issued on her credit card account to individuals. If those individuals used

97043793258

their cards for personal travel or subsistence on campaign business, the auditors would deny the transactions the 30/60 day grace period because the account holder was Nancy Ross.

This denial of the exemptions for these transactions is arbitrary. The Commission's auditors do not routinely require that someone who uses a credit card for campaign expenses demonstrate that no third party is a guarantor of the credit card account.¹⁴ Therefore, in their audits of other committees in 1992, the Audit Division undoubtedly granted the personal use exemption of 116.5 to credit card users who had guarantors on their account. There is no relevant functional distinction between an arrangement in which James Ross authorized Lauren Ross to use his account, and an arrangement in which James Ross serves as a guarantor thereby enabling Lauren Ross to obtain a credit card on her "own" account. However, based on audit practices, the difference between the two arrangements can result in thousands of dollars of transactions being deemed unlawful excessive contributions. This distinction is unfair and serves no legitimate purpose of the Act. It rewards Committees and individuals who have third party guaranteed credit cards for campaign staff knowing that the government auditors are not likely to find out about the guarantees. If the Committee had been aware of the new regulation it would have reasonably considered whether or not to try to arrange for a number of campaign staff to have credit card accounts opened in their names as a result of

¹⁴ Representatives of the Audit Division so informed Committee counsel in a technical consultation arranged by the OGC in connection with the Committee's preparation of this response. The representatives did say that if they actually obtained information disclosing that there was a guarantor for a credit card account then the guarantor rather than the card holder might be deemed to be the account holder for the purposes of 116.5. However, they stated that it was not part of the audit methodology to require every individual who used a credit card for campaign expenses to represent or demonstrate affirmatively that there was no guarantor on his or her credit card account.

97043793259

third party guarantees, so that the Committee could benefit from the same loophole that other committees would benefit from.

It is respectfully submitted that the purposes of FECA are not served by distinctions like this, and that the lawfulness of a committee's actions should as much as possible be based upon the substance of transactions in relation to the purposes of the statute, and not based upon mere technicalities or the manipulation of loopholes in legal standards or in audit practices. Indeed, if the Committee had been aware of the regulation, it would probably have found technically proper ways to mitigate some of the impact of 116.5's restrictions. (It certainly could not have mitigated most of the impact.) But this is not what regulation in this sensitive area of First Amendment activity should be about. The above-listed persons should be considered the same as account holders for the purposes of applying the 116.5 exemptions for the kinds of transactions that are the subject of this MUR. The relationships above are the functional equivalents of guarantees and the Fulani Committee should not be treated differently.

POINT III: ASSUMING ARGUENDO THAT THE INSTANT STAFF ADVANCES ARE DETERMINED TO BE EXCESSIVE CONTRIBUTIONS, THE COMMISSION SHOULD TAKE NO FURTHER ACTION AND NO PENALTY SHOULD BE ASSESSED

Respondents demonstrated in Point I, supra, that the Commission is barred from prosecuting this MUR, irrespective of whether or not the Committee received excessive contributions in the form of staff advances. In Point II, supra, respondents demonstrated that under applicable legal principles, the Committee did not receive excessive contributions, i.e. there is no liability. In the instant Point III, it will be shown that even if there were excessive contributions, the Commission should take no further action, consistent with the proper ordering

9704379326C

of the Commission's priorities and resources. The circumstances that gave rise to the alleged staff advances mitigate any liability. The alleged violations did not cause any of the kind of corrupting influence on the electoral process that FECA is supposed to remedy. The Commission should follow its own precedents in MUR 3789 (Agran), MUR 3947 (Kerry) and MUR 4014 (Republican Convention Committee), in which the Commission took no further action after finding violations of 116.5.

There are numerous elements of this case discussed earlier in this brief which are not only relevant to the jurisdiction and liability issues, but which also are mitigating factors to be considered if there were to be a finding of liability. They include the following:

1. The Committee Treasurer was unaware of the new regulation, 116.5, and did not knowingly violate it. Miller Dec. To the contrary, the Treasurer, believing in good faith that the staff advance practices of the Committee were in compliance with FEC regulations, maintained documentation and records of the credit card usage and staff advances and these records were duly available for review by the field auditors. Hence, there was no intent to commit a violation and no failure of disclosure of the underlying transactions to Audit Staff.

2. The practices of the Committee regarding use of personal credit cards and other staff advances were engaged in not to increase the resources of the campaign, but merely to allow the campaign to operate in the modern commercial economy. As demonstrated supra, and in the Miller Declaration, the grassroots Fulani campaign could not even begin to compete in the electoral arena without the use by individuals of their credit cards on behalf of the Committee without respect to whether the charge was for their own or someone else's travel, and without the ability to have staff members in the field advance expenses. The Committee was not enriched.

The Committee paid for the expenditures charged to the credit cards in time frames that are consistent with standard commercial practices. The alleged violations at issue arise merely from the technicality that the transactions were engaged on the accounts of individuals rather than on the account of the Committee.

3. One of the rationales given by the Commission for 116.5 is that it will prevent advances from being used to infuse resources into a campaign at a critical juncture. For example, the regulation prevents a cash strapped campaign from using personal credit lines to purchase \$50,000 of radio time two days before a crucial primary election and to buy \$10,000 worth of airplane tickets to send a team of campaign workers across the country for a last minute voter pull operation. But this rationale is not applicable to the Fulani Committee. As stated above, the use of credit cards and advances was a routine operational function necessary to interface with commercial vendors. The practices engaged in by the Committee did not enable it to launch any campaign initiatives that it was not already in a position to carry out; it solely provided a medium for purchasing the necessary goods and services.

4. The instant advances did not tilt any election contest in favor of Fulani. The advances did not have any potential whatsoever to affect the outcome of any election contest.

5. The advances were promptly reimbursed without any intervention by the Commission. Long before the field audit, there were no unreimbursed advances. Hence, no disgorgement of funds was ever necessary.

6. There is no need to impose a sanction to deter future violations by Fulani in any future election contests. Both in 1988 and in 1992, the Final Audit Reports for the Fulani

Committees demonstrated excellent compliance with FECA. The statement by the respondents that if these practices are improper then they will not be followed in the future is completely credible, and no onerous financial penalty is needed to reinforce it.

7. Although the reason to believe determination sets for a figure of \$105,114.82 in alleged excessive contributions from staff advances, this alleged figure must be significantly reduced because of (a) inclusion of non-campaign related expenses; (b) failure to apply the exclusion of \$1,000 per person under 2 U.S.C. § 431(8)(B)(iv); and (c) improper use of FIFO methodology instead of crediting payments to reduce first the advances that are creating liability for excessive staff advances.

While the above-stated mitigating factors are sufficient grounds in and of themselves for the Commission to take no further action, such a result is also required by Commission precedents. There is no fair rationale for assessing a penalty against the Fulani Committee when the Commission imposed no penalty on Agran, Kerry, or the Republican Convention Committee. Indeed, no penalty was assessed against the Kerry Committee even though the committee was permanently enriched by the staff advances. Kerry did not reimburse any of the \$8,977.65 advances by respondent Diller for fundraising expenses during Kerry's candidacy. Much later, Kerry entered into a debt settlement plan which provided only for partial payment of the advances. The Commission approved the plan and did not require disgorgement by Kerry of the amount the committee was enriched by the advances nor did the Commission impose any penalty on Kerry. Such lenient treatment was accorded Kerry even though he had been considered a contender in the Democratic Party primary process and, therefore, the amounts

97043793263

by which his campaign was enriched by staff advances had the potential to affect the outcome of a primary election.

The Commission has proposed a conciliation agreement

97043793264

Finally, to put it into a broader perspective, one fails to see how the Commission can fairly prioritize the instant alleged violations for use of its limited enforcement resources when the Commission has failed to prioritize and pursue audit repayment or enforcement in cases involving vastly more money and much clearer culpability. Most striking is its failure to pursue against the 1992 Clinton Committee the staff findings that the Clinton Committee engaged in an egregious, unlawful manipulation of its finances that netted it approximately \$2 million in excess government funds. The Commission failed to take action either in the audit process or in response to complaint-initiated MUR 4192 to recover the \$2 million from the Clinton Committee for the Treasury.

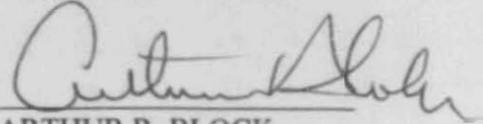
97043793265

CONCLUSION

For all of the aforestated reasons, the reason to believe determination should be vacated and this proceeding terminated. In the alternative, the Commission should made a finding that the Committee did not make any excessive contributions through staff advances. In the further alternative, if there are any excessive contributions, the Commission should assess no penalty and take no further action.

Dated: New York, N.Y.
August 2, 1996

Respectfully Submitted,



ARTHUR R. BLOCK
Attorney at Law
Attorney for Respondents
72 Spring Street, Suite 1201
New York, NY 10012
(212) 966-0404

On the Brief:

Arthur R. Block, Esq.
Michael R. Bressler, Esq.

The assistance of law student
Edward Taibi is gratefully acknowledged.

97043793266

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

DECLARATION OF NANCY ROSS

I, NANCY ROSS, make the following declaration under penalty of perjury:

1. During the 1992 presidential campaign, I was the Chief Lobbyist for the Rainbow Lobby, Inc. (the "Lobby"), a not-for-profit, 501(c)(4) membership and lobbying organization. I make this declaration in support of the response of Lenora B. Fulani for President (the "Committee"), and Francine Miller, as Treasurer, to MUR #3969, opened by the Federal Election Commission ("FEC" or "Commission") regarding staff advances under 11 C.F.R. 116.5(b). I have personal knowledge of the facts stated herein.

2. The Rainbow Lobby was founded in 1986, and became a nationwide membership organization of over 200,000 citizens. It was a non-partisan, grassroots citizens lobby that supported legislation promoting election reform and human rights internationally. The Lobby performed many activities, including publishing a quarterly newsletter, initiating and

97043793267

lobbying for legislation, presenting testimony to various governmental agencies on a wide variety of topics,¹ and organizing forums, conferences and Congressional tours.²

3. According to counsel to the Committee, the Audit Division issued an interim audit report which found \$6,711.52 in excessive contributions from me to the Committee in the form of staff advances based on expenses charged to my American Express account. After the issuance of the interim audit report, upon request by the Commission, I voluntarily provided the Committee (for submission to the Commission) monthly statements for my American Express account which the Committee did not have in its possession (since there were no campaign-related charges incurred for those months).

4. I have been informed by counsel to the Committee that the Commission has preliminarily determined from the monthly statements I submitted that a substantial number of charges appearing on my American Express card statements from January, 1992 through September, 1992 were charges incurred on behalf of the Committee, and therefore are deemed to be contributions from me to the Committee. In MUR #3969, therefore, the Commission has preliminarily determined that I gave \$19,455.23 in excessive contributions in the form of staff advances to the Committee. To make such a determination, the Commission erroneously found that \$16,139.66 in charges on my American Express statements were incurred on behalf of the Committee.

¹ For example, the Lobby made written and oral presentations to the FEC in its MCEL Rulemaking Proceeding in October 1992.

² The Lobby dissolved in the spring of 1993.

97043793268

5. I authorized a number of different cardholders on my American Express account, mostly members of the Rainbow Lobby staff. Cardholders had my permission to use their cards for both business and personal expenses. Some of the personal expenses cardholders could have charged were expenses they incurred as supporters of the Fulani campaign.

6. Cardholders who incurred expenses on behalf of the Committee submitted such expenses to the Committee to be paid, and to my knowledge, the Committee always paid such expenses in the ordinary course of business directly to American Express. Staff who incurred personal expenses which were not on behalf of the Committee were required to reimburse those charges as well.

7. According to counsel to the Committee, the Commission has determined that every charge on my American Express card for expenses related to "travel, subsistence and related expenses" -- i.e., expenses that look like they could be campaign-related -- and which were incurred during the time period cardholders on my account incurred expenses on behalf of the Committee which were paid by the Committee, should be considered campaign-related and thus treated as contributions for purposes of the Audit Division's analysis. This criteria -- the time period and the type of charge -- is extremely unreliable since expenses incurred by cardholders on my American Express account which were actually incurred on behalf of the Lobby were similar to those incurred by staff members on behalf of the Committee and were incurred during the same time period.

8. I reviewed my American Express statements for the closing dates of February 20, 1992 through September 20, 1992 to analyze the expenses the Audit Division deemed to be incurred on behalf of the Committee, and to set forth, where possible, the actual

97043793269

purpose of the charges. Attached as Exhibit A is the "Review of Credit Card Documentation Provided Subsequent to the IAR (via Subpoena Process)," prepared by M. Favin (the "Favin Analysis"), provided to counsel to the Committee to assist it in responding to the instant MUR, coded to reflect the following types of expenses which were clearly not incurred on behalf of the Committee.³

9. There are several charges that appear on my credit card statements which were completely credited in later statements because they were not valid charges (and so, in fact, were never paid). For example, there are two charges, dated February 28 and 29, 1992, for \$1,302.44 and \$1,608.09 respectively, which were credited in full in later statements. (See Exhibit B.) In addition, there is a charge dated September 1, 1992 for \$872.54 which was disputed, and a credit for \$589.61 toward such charge appears on a later statement. (See Exhibit C.) These charges are coded "A" on the Favin Analysis, and total \$3,500.14.

10. There are charges that the Commission determined were campaign-related that reflect the personal expenses of cardholders. Such charges include several airplane tickets (one for our receptionist and one for the fiance of one of the cardholders); these charges are coded "B" on the Favin Analysis, and total \$456.00.

11. The Lobby had offices in New York City and Washington, D.C., and there was a substantial amount of travel by staff members between the two cities. Deborah Green, Ada Ivonne Vazquez, Amy Freeman and Kate Gardner, for example, were located in New York,

³ Note that the only entries relevant on the Favin Analysis to my American Express account are those under "Nancy Ross." Note also that in his analysis, Favin did not state every time a charge was actually paid by the Committee.

9704379327C

while the rest of the Lobby staff who were cardholders were located in D.C. With a few minor exceptions, all the charges to Amtrak and to the airplane shuttle between New York and D.C. are for cardholders' travel between the two cities on Rainbow Lobby business. These charges, as reflected in the Favin Analysis coded "C", total \$4,648.00.

12. There are many charges to Compuserve reflected on the American Express bills attributed to cardholder Christopher Barclay. Mr. Barclay accessed Compuserve predominantly to obtain news articles regarding Africa, as he was the Lobby's main lobbyist on issues concerning the various countries we were concerned with on the African continent. To my knowledge, Mr. Barclay never accessed Compuserve on behalf of the Committee. Mr. Barclay was also responsible for managing the Lobby's computer operations, and thus charges appear on the credit card statements for related purchases. These charges, as reflected in the Favin Analysis coded "D", total \$1,310.04 during the relevant period.

13. In order to keep informed regarding current events and analyses, the Lobby subscribed to many publications, some of which were charged to my American Express account. Charges for all such publications on my American Express card were incurred on behalf of the Lobby, and as reflected in the Favin Analysis coded "E", total \$854.44 on the bills during this period.

14. A substantial responsibility of Lobby staff members was fundraising and membership by canvassing neighborhoods, walking door-to-door, and asking people to join the Lobby by paying a membership fee. Thus, staff members charged automobile expenses (rentals or automobile maintenance) on my American Express card, as well as lodging while travelling on such business. In addition, the staff also travelled both domestically and

97043793271

internationally for speaking engagements or Rainbow Lobby events. Charges related to these speaking engagements or events might be incurred for airfare, rental cars, and lodging. These types of charges incurred on behalf of the Lobby during this period and reflected in the Favin Analysis coded "F" total \$1,875.08.

15. Some of the advertising the Lobby did was charged to my American Express card. Generally, the Lobby advertised for student interns and for fundraisers. The total charges on the bills I reviewed for this type of expense as reflected in the Favin Analysis coded "G" were \$304.69.

16. Occasionally, the Lobby would subsidize individuals' expenses for travelling to New York or D.C. to lobby on certain issues, to attend conferences, or to attend other kinds of political meetings or events; in these instances, individuals' travel and lodging would be paid for by the Lobby. Charges of this nature, as reflected in the Favin Analysis coded "H," totalled \$3,145.05 during this period.

17. Amy Freeman, one of the cardholders I authorized on my American Express account, was the accounts payable clerk and general office manager in the New York office. As such, she would purchase various items for the office and charge them to my American Express card. She never charged these types of goods on behalf of the Committee. Bonnie Gildin, another Lobby staff member, also occasionally purchased supplies. Charges such as these, as reflected in the Favin Analysis coded "I", total \$46.22 in the bills I reviewed.

18. In sum, as reflected on the Favin Analysis, the Commission has overstated the Committee-related charges on my American Express account by \$16,139.66, and thus, the amount of excessive contributions in MUR # 3969 is erroneous.

97043793272

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing
is true and correct to the best of my knowledge and belief. Executed July 31, 1996.

Nancy Ross
NANCY ROSS

97043793273

Lenora E. Fulani for President

Review of Credit Card Documentation Provided
 Subsequent to the IAR (via Subpoena Process)
 Prepared by M. Favini

8
7
0
4
3
7
9
3
2
7
4

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>W/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>
1. <u>John Opdycke</u> (Fundraiser) On LBF P/R	7/92, 8/92	F-13/1 ✓	\$1,866.00	5/28/92- 6/15/92	Federal Express (104 charges) --LBF for Pres-- Paid LBF#5998 \$1,866.00 8/1/92
2. <u>Eleanor Fain</u> Not on P/R Rec'd Reimbs	9/92	F-9/1(C) ✓	8.60 151.20	8/29/92 9/18/92	Computer Access-Compuserve Publications (Bill in dispute)
3. <u>David Belmont</u> (Ballot Access Coordinator/ Audit Prep.) On LBF P/R	10/91, 11/91	F-11/1 ✓	194.84 415.50 880.92 121.52 329.58 1,320.50 98.50 122.50	10/10/91 9/30/91 11/91 11/91 11/5/91- 11/7/91 11/06/91 11/13/91 11/13/91	Office Supplies NY Airfare, Ins. NY-SF S.Davies Car Repairs NY Car Rental NY Phone Rental Mail Order Products (9 charges) Airfare, Ins. DFW-NY R.Faust Airfare, Ins. BOS-NY D.Belmont Airfare, Ins. NY-BOS D.Belmont
4. <u>Margaret Golden</u> (Fundraiser) On LBF P/R	9/91-1/92	F-11/1 ✓	160.50 218.00 140.68 242.48 142.83 40.88 418.00	9/01/91 9/05/91 10/91 10/24/91 11/04/91 11/17/91 1/07/92	Target Stores CA Gen'l Merch. Airfare SF Purchase Car Rental Milbrae, CA Car Rental SF Purchase Target Stores CA Gen'l Merch. Target Stores CA Gen'l Merch. Airfare By Mail (MI)
5. <u>Marsha Plafkin</u> (Fundraiser) On LBF P/R	11/91, 12/91	F-13/2, F-15/1 F-18/1 ✓	997.26	11/11/91	Car Rental SF Purchase
6. <u>Nancy Ross</u> Not on P/R Rec'd 2 Reimbs 5/91	2/92-9/92	F-13/1 ✓	C 83.00 C 69.00 D 32.38 D 60.68	1/31/92 2/02/92 1/18/92 1/25/92	Amtrak DC-NY N.Ross Amtrak NY-DC N.Ross Comp. Access-Compuserve C.Barclay Comp. Access-Compuserve C.Barclay

97043793275

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>W/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>
6. <u>Nancy Ross</u> (cont'd)			C 83.00	1/31/92	Amtrak DC-NY C.Barclay
			C 89.00	2/01/92	Amtrak NJ-DC C.Barclay
			D 21.53	2/01/92	Comp. Access-Compuserve C.Barclay
			D 25.66	2/08/92	Comp. Access-Compuserve C.Barclay
			H 333.50	2/92	Hotel NY A.I.Vazquez
			C 83.00	2/07/92	Amtrak DC-NY A.I.Vazquez
			H 78.61	2/13/92	Hotel NH 2/10-2/11/92 A.I.Vazquez
			C 64.00	2/13/92	Amtrak NY-DC A.I.Vazquez
			C 83.00	2/14/92	Amtrak DC-NY A.I.Vazquez
			G 50.35	2/18/92	Wash.Post-Classif.Ad T.Bentsen
			C 166.00	1/09/92	Amtrak DC-NY D.Green, B.Gilden (Green-'88 LBF Treasurer)
			704.82	1/17/92	Car Repairs-NY D.Green Paid LBF#4181
			E 128.00	2/06/92	Amtrak NY-DC D.Green
			C 64.00	2/07/92	Amtrak DC-NY D.Green
			C 83.00	2/28/92	Amtrak DC-NY N.Ross
			C 69.00	3/01/92	Amtrak NY-DC N.Ross
			D 59.50	2/15/92	Comp. Access-Compuserve C.Barclay
			D 61.58	2/22/92	Comp. Access-Compuserve C.Barclay
			D 21.23	2/29/92	Comp. Access-Compuserve C.Barclay
			D 42.37	3/07/92	Comp. Access-Compuserve C.Barclay
			D 20.52	3/14/92	Comp. Access-Compuserve C.Barclay
			H 450.00	3/01/92	Cast.Cult.Ctr. NY: 30 Tickets for Play- <u>The Resurrection...</u> A.Freeman (LBF Systems Mgmt.)
			C 64.00	3/17/92	Amtrak NY-DC K.Gardner (LBF Telemarketer)
			186.80	3/92	Hotel NY A.I.Vazquez
			27.11	3/92	Hotel NY A.I.Vazquez
			C 64.00	3/16/92	Amtrak NY-DC A.I.Vazquez
			C 64.00	3/92	Amtrak NY-DC C.Sadell
			F 436.06	2/21/92	Car Repairs-DC T.Bentsen
			F 87.00	3/14/92	Hotel PHL T.Bentsen
			239.55	3/05/92	Hotel NY D.Green
			53.23	2/27/92	Hotel NY D.Green

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>W/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>
6. <u>Nanc. Ross</u> (cont'd)			A 1,302.44	2/28/92	Hotel NY D.Green
			A 1,608.09	2/29/92	Hotel NY D.Green
			263.07	3/12/92	Hotel NY D.Green
			C 49.00	3/02/92	Amtrak NY-DC D.Green
			C 249.00	3/05/92	Amtrak DC-NY D.Green
			36.20	2/28/92	Hotel FL J.Aron (LBF Fundraiser)
			30.79	2/29/92	Hotel FL J.Aron
			93.08	3/03/92	Car Rental FL J.Aron
			128.96	3/20/92	Car Rental IN 3/17-3/20 J.Aron
			C 83.00	4/09/92	Amtrak DC-NY N.Ross
			D 79.85	3/21/92	Comp. Access-Compuserve C.Barclay
			F 145.70	3/26/92	Car Rental DC C.Barclay
			D 40.97	4/04/92	Comp. Access-Compuserve C.Barclay
			D 29.45	4/11/92	Comp. Access-Compuserve C.Barclay
			G 150.00	3/24/92	Village Voice Ad K.Gardner
			C 64.00	3/20/92	Amtrak DC-NY K.Gardner
			C 128.00	3/25/92	Amtrak NY-DC K.Gardner
			C 64.00	3/19/92	Amtrak DC-NY A.I.Vazquez
			C 83.00	3/24/92	Amtrak NY-DC A.I.Vazquez
			C 83.00	3/30/92	Amtrak NY-DC A.I.Vazquez
			C 83.00	4/01/92	Amtrak DC-NY A.I.Vazquez
			C 83.00	4/07/92	Amtrak NY-DC A.I.Vazquez
			C 64.00	4/08/92	Amtrak DC-NY A.I.Vazquez
			C 83.00	4/08/92	Amtrak DC-NY A.I.Vazquez
			E 185.50	3/92	Publishing
			F 93.70	3/21/92	Hotel PHL T.Bentsen
			E 625.00	3/25/92	Nat.Tech.Info.Svc. FBIS PC
			6,409.77	4/09/92	Hotel NY D.Green
			C 89.00	3/23/92	Amtrak NY-DC D.Green
			100.80	3/14/92	Hotel Detroit J.Aron
			159.00	3/23/92	Airfare Det-Ind J.Aron
			352.00	3/24/92	Airfare Ind-Det-NY J.Aron
			C 166.00	4/17/92	Amtrak DC-NY N.Ross
			C 60.00	4/19/92	Airfare NY-DC N.Ross
			C 60.00	4/25/92	Airfare DC-NY N.Ross
			C 60.00	4/25/92	Airfare NY-DC N.Ross
			D 27.74	4/18/92	Comp. Access-Compuserve C.Barclay
			D 29.03	4/25/92	Comp. Access-Compuserve C.Barclay
			B 308.00	5/04/92	Airfare DC-LA-DC C.Reid

97043793276

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>W/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>	
6. <u>Nancy Ross</u> (cont'd)			D 37.47	5/02/92	Comp. Access-Compuserve C.Barclay	
			B 148.00	5/04/92	Airfare DC-NY-DET-NY-DC S.Shivers	
			D 24.75	5/09/92	Comp. Access-Compuserve C.Barclay	
			H 90.00	4/92	Cast.Cult.Ctr. NY: 3 Tickets for Play- <u>Dead As A Jew</u> A.I.Vazquez	
			C 83.00	4/20/92	Amtrak DC-NY A.I.Vazquez	
			C 83.00	4/20/92	Amtrak NY-DC A.I.Vazquez	
			C 89.00	5/04/92	Amtrak NY-DC A.I.Vazquez	
			C 83.00	5/11/92	Amtrak DC-NY A.I.Vazquez	
			C 83.00	5/11/92	Amtrak NY-DC A.I.Vazquez	
			H 796.26	5/11/92	Hotel DC T.Bentsen	
			C 64.00	4/19/92	Amtrak NY-DC D.Green	
			C 89.00	4/22/92	Amtrak NY-DC D.Green	
			C 83.00	5/11/92	Amtrak DC-NY D.Green	
			C 34.00	5/11/92	Amtrak PHL-DC D.Green	
				31.89	5/01/92	Hotel: Ventura, CA J.Aron
				327.44	4/19/92	Car Rental LA 4/19-5/3/92 J.Aron
				38.75	5/03/92	Hotel: Riverside, CA J.Aron
				59.00	5/03/92	Airfare LA-OAK J.Aron
				330.08	5/03/92	Car Rental OAK 5/3-5/17/92 J.Aron
			F 130.00	5/11/92	Airfare DC-NY-BOS-NY-DC D.Waks	
			C 60.00	6/14/92	Airfare NY-DC N.Ross	
			D 79.50	6/11/92	Int'l Computer Networks C.Barclay	
			D 17.10	5/16/92	Comp. Access-Compuserve C.Barclay	
			D 26.16	5/28/92	PC Software C.Barclay	
			D 24.47	5/23/92	Comp. Access-Compuserve C.Barclay	
			D 15.87	5/30/92	Comp. Access-Compuserve C.Barclay	
			D 18.84	6/06/92	Comp. Access-Compuserve C.Barclay	
			E 43.94	5/26/92	Nat'l Journal-Books A.Freeman	
			C 89.00	5/28/92	Amtrak NY-DC D.Green	
			C 89.00	6/07/92	Amtrak NY-DC D.Green	
			184.00	5/17/92	Car Rental LA 5/17-5/31/92 J.Aron	
		C 60.00	6/22/92	Airfare DC-NY N.Ross		
		D 26.73	6/20/92	Comp. Access-Compuserve C.Barclay		
		D 35.02	6/20/92	Comp. Access-Compuserve C.Barclay		
		D 27.53	6/27/92	Comp. Access-Compuserve C.Barclay		
		D 14.70	7/04/92	Comp. Access-Compuserve C.Barclay		
		F 265.25	7/06/92	Car Rental DC 6/26-7/6 C.Barclay		
		D 13.52	7/11/92	Comp. Access-Compuserve C.Barclay		

97043793277

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>M/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>
6. <u>Nancy Ross</u> (cont'd)			I 24.57	7/10/92	Office Supplies NY A.Freeman
			C 64.00	7/03/92	Amtrak NY-DC A.I.Vazquez
			H 858.60	7/07/92	Airfare-No Info Y.Pastrana
			C 89.00	6/22/92	Amtrak DC-NY T.Bentsen
			C 89.00	6/22/92	Amtrak DC-NY D.Green
			341.97	7/03/92	Car Rental NY 7/3-7/7/92 J.Aron
			213.66	7/14/92	LA Times Ad J.Aron
			I 21.65	6/15/92	Bullhorn Purchase B.Gilden
			C 65.00	7/18/92	Airfare DC-NY N.Ross
			C 69.00	7/19/92	Amtrak DC-NY N.Ross
			C 89.00	8/14/92	Amtrak DC-NY N.Ross
			D 21.90	7/18/92	Comp. Access-Compuserve C.Barclay
			D 29.50	7/25/92	Comp. Access-Compuserve C.Barclay
			D 17.38	7/31/92	Jacobs Gardner C.Barclay
			D 23.65	8/01/92	Comp. Access-Compuserve C.Barclay
			D 10.55	8/08/92	Comp. Access-Compuserve C.Barclay
			D 224.76	7/20/92	Computer Sftwre/Hrdwre C.Barclay
			G 104.34	7/26/92	Wash.Post-Classif.Ad T.Bentsen
			C 85.00	8/03/92	Amtrak NY-DC D.Green
			C 64.00	8/05/92	Amtrak DC-NY D.Green
			160.56	7/20/92	LA Times Ad J.Aron
			257.64	7/21/92	Car Rental LA 7/7-7/21/92 J.Aron
			214.34	8/04/92	Car Rental LA 7/21-8/4/92 J.Aron
			213.66	8/07/92	LA Times Ad J.Aron
			280.00	8/17/92	Airfare LA-NY-LA J.Aron
			C 140.00	8/23/92	Airfare NY-DC D.Green
			D 13.04	8/15/92	Comp. Access-Compuserve C.Barclay
			D 14.86	8/22/92	Comp. Access-Compuserve C.Barclay
			D 22.37	8/29/92	Comp. Access-Compuserve C.Barclay
			D 17.88	9/05/92	Comp. Access-Compuserve C.Barclay
		F 106.00	8/21/92	Hotel MI K.Gardner	
		F 91.37	8/23/92	Car Rental MI 8/21-8/23 K.Gardner	
		H 538.08	8/21/92	Hotel NY 8/21-8/24 A.I.Vazquez	
		F 260.00	8/13/92	Airfare DC-Det-DC K.Gardner	
		F 260.00	8/13/92	Airfare DC-Det-DC D.Waks	

97043793278

<u>Name</u> <u>(Position)</u>	<u>Missing</u> <u>Statements</u>	<u>W/P</u> <u>Location</u>	<u>Campaign</u> <u>Charges</u>	<u>Trans.</u> <u>Date</u>	<u>Description</u>
6. <u>Nancy Ross</u> (cont'd)			C 64.00 C 34.00 214.34 A 872.54	8/27/92 8/30/92 8/18/92 9/01/92	Amtrak NY-DC D.Green Amtrak DC-PHL D.Green Car Rental LA 8/4-8/18/92 J.Aron Car Rental LA 8/18-9/1/92 J.Aron
7. <u>Margaret Tanzosh</u> Not on P/R Rec'd Reimbs	2/92-7/92	F-11/1 ✓	475.63 1,732.98 48.15 111.24 316.06 358.31 358.31 119.15 447.13 344.99	2/14/92 3/19/92 4/92 7/92 6/15/92 6/30/92 7/01/92 7/92 6/07/92 6/07/92	Car Rental (National) Car Repairs-Santa Fe Hotel-Phelan, CA Hotel-Anchorage, AK Car Rental (National) Car Rental (National) Car Rental (National) Hotel-Anchorage, AK J.Williamson Car Rental (National) Car Rental (National)
8. <u>James Ross</u> Not on P/R Rec'd Reimbs	5/91-9/91, 11/91 2/92, 4/92	F-11/1, F-16/1 ✓	89.00 176.50 213.00 700.00 151.72	6/21/91 7/17/91 8/23/91 3/30/92 4/13/92	Amtrak NY-DC-NY Airfare NY-BOS-NY Airfare VT-Newark Car Rental Portland, OR Car Rental Portland, OR
9. <u>Robert Dattner</u> (Candidate's Driver) On LBF P/R	10/91-11/91 2/92, 4/92-6/92	F-13/2 ✓	73.43 67.66	10/07/91 6/09/92	Car Repairs (Candidate) NY Paid LBF#2267 Car Repairs NY <u>CASH ADVANCES: 9/21/91-5/33/92</u> <u>22 = \$3,410.00</u>

97043793279

Exhibit B



American Express
Travel Related Services Company, Inc.
Southern Region Operations Center
777 American Expressway
Ft. Lauderdale, FL 33337

April 28, 1992

NANCY ROSS
RAINBOW LOBBY
250 W. 37TH ST. NO. 317
NEW YORK NY 10107-0317

Your account number is [REDACTED]

Dear Nancy Ross:

You recently asked us to remove the charge(s) from your Card Account because you had paid the amount(s) directly to DAYS INN - NEW YORK.

In order to fulfill your request, please send us one of the following verifications in the enclosed return envelope:

- o If you paid by check, clear copies of both the front and back of your cancelled check;
- o If you paid in cash, a copy of your receipt;
- o If you paid by voucher, a copy of the cancelled voucher which can be obtained from your travel agent or tour operator;
- o If you paid by any other means, a copy of the document verifying that you did so.

While waiting for this matter to be resolved, we are issuing temporary credit(s) for \$2,910.53 to your account. Unless we receive the above item from you by May 14, 1992 we will remove the temporary credit(s) and charge your account again.

We appreciate your help in resolving this situation quickly.

If you have any questions, or if we can be of further service, please call us at the telephone number on your statement.

Sincerely,

sent 5/12/92

S. Erskine
S. Erskine
Supervisor, Customer Service

9704379328C

[REDACTED] SGLBH19

1102D BRE



American Express
Travel Related Services Company, Inc.
Southern Region Operations Center
777 American Expressway
Ft. Lauderdale, FL 33337

May 27, 1992

NANCY ROSS
RAINBOW LOBBY
250 W. 57TH ST. NO. 317
NEW YORK NY 10107-0317

Your account number is [REDACTED]

Dear Nancy Ross:

You recently inquired about an error on your statement.

We have made the necessary adjustment(s) to your Card Account.
Credit(s) of \$2,910.53 are being made today.

We have therefore reversed the temporary credit(s) for \$2,910.53 and
the adjustment(s) appear on your June, 1992 statement.

If you have any questions, or if we can be of further service, please
call us at the telephone number on your statement.

Sincerely,

S. Erskine
S. Erskine
Supervisor, Customer Service

E [REDACTED] 10701 SGLB200 SGLBN19

1312E

97043793281

Summary of Corporate Card Account

Retain this portion for your files.



Exhibit

Corporate Cardholder Name
NANCY ROSS

Corporate Account Number
[REDACTED]

Statement Closing Date
11-19-92



Card Number	Cardholder Name	Total Charges	Total Credits
	PREVIOUS BALANCE	\$4,128.75	
3782 [REDACTED]	NANCY ROSS	6615.58	\$2,326.02
3782 [REDACTED]	ADA IVONNE VAZQUEZ	852.25	5.00
3782 [REDACTED]	DEBORAH GREEN	2718.00	5.00
3782 [REDACTED]	JEFFREY ARON	5.00	\$589.81
3782 [REDACTED]	SHELLY KARLINER	9561.38	5.00
	TOTAL CHARGES AND CREDITS	\$1,828.91	\$2,915.83
	BALANCE DUE	\$3,199.44	
	<p><i>3135.44</i> <i>< 1082.11 > paid NOV</i></p> <hr/> <p><i>2057.33</i> <i>< 282.93 > balance of disputed amount</i></p> <hr/> <p><i>1774.40 paid 12/16/92</i> <i>ck# 3555</i></p>		



97043793282

Payments or credits received after closing date above will appear on next month's statement.

IF YOU HAVE ANY QUESTIONS ABOUT YOUR ACCOUNT, CALL 1-800-492-3344 (24 HOURS 7 DAYS)
OR WRITE US AT P.O. BOX 53779, PHOENIX, AZ 85072-3779.

A9001804
988

Please see reverse side for important information regarding certain types of charges.

97043793283

Reference Number	Time Number	Description of Monthly Activity	Charges	Credits
CARD NUMBER [REDACTED]				
898311		PAYMENT RECEIVED - THANK YOU 11/06		214.34
838811		PAYMENT RECEIVED - THANK YOU 11/06		2,713.88
892312	1	VISTA HERMOSA WASHINGTON DC INV#69D280	40.00	
501285	2	COMPUSERVE COLUMBUS OH		
		229308587 COMP ACCESS 7074400536 10/17/92	18.87	
801307	3	COMPUSERVE COLUMBUS OH		
		230006428 COMP ACCESS 7074400536 10/24/92	14.37	
501311	4	C CRANE COMPANY FORTUNA CA		
		820290883 ELECTRONIC EQUIPMENT 11/06/92	234.97	
501917	5	COMPUSERVE COLUMBUS OH		
		231836281 COMP ACCESS 7074400536 11/07/92	33.99	
664317	6	UNITED AIRLINES WASHINGTON DC		
		TKT# 0181489884868 10/28	446.00	
		TOTAL FOR NANCY ROSS	\$788.00	\$2,928.02
CARD NUMBER [REDACTED]				
181312	7	SUNLIGHT BSTR NEW YORK NY INV#08B134	17.35	
501306	8	AMEXCO CREDIT CD REGISTRY		
		2C0821228 1 YR MEMBERSHIP RENEWAL 10/28/92	18.00	
		TOTAL FOR ADA IVONNE VAZQUEZ	\$35.35	\$ 0.00
CARD NUMBER [REDACTED]				
485294	8	AMTRAK ACH WASHINGTON DC		
		292044880 TKT# 2891048048632 10/16/92	55.00	
485294	10	AMTRAK ACH WASHINGTON DC		
		282102330 TKT# 2808871284101 10/16/92	54.00	
600302	11	DELTA AIRLINES ATLANTA GA		
		TKT# 0082181379897 10/27	478.00	
485324	12	AMTRAK ACH WASHINGTON DC		
		323011410 TKT# 3204675103989 11/15/92	89.00	
		TOTAL FOR DEBORAH GREEN	\$716.00	\$ 0.00
CARD NUMBER [REDACTED]				
485315	13	AVIS RENT-A-CAR BORBANK CA CA		
		R/A# 879948370 AVIS RENT-A-CAR 11/08/92		589.51
		TOTAL FOR JEFFREY ARON	\$ 0.00	\$589.51



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)
)

MUR 3969

DECLARATION OF FRANCINE MILLER

I, FRANCINE MILLER, make the following declaration under penalty of perjury:

1. I am the Treasurer of Lenora B. Fulani for President (the "Committee"), respondent herein, and make this affidavit in response to FEC-initiated MUR #3969.
2. During the 1992 election cycle, I was unaware of the requirements of 11 C.F.R. 116.5(b). (When I assisted the Treasurer of Dr. Fulani's campaign in 1988, this regulation was not in effect.) I first learned of the content of the regulation when I was presented with the Audit Division's analysis at the audit exit conference in March, 1993.
3. In the spring of 1991 I applied for an American Express corporate card on behalf of the Committee. The application was denied. Having access to a credit card was critical for a multitude of necessary transactions, so individuals volunteered the use of their credit cards to provide such access. The following descriptions of such use demonstrates the ways staff and volunteers necessarily used their credit cards to charge expenses on behalf of the Committee.

97043793284

4. For example, since the Committee was a political committee and had established no credit, Federal Express refused to open a Committee account unless the shipments were charged to a credit card. J. B. Opdyke made his American Express account available to the Committee for this purpose. With a few minor exceptions, all the charges on Mr. Opdyke's account were for Federal Express shipments from October 1991 through July 1992, totaling \$30,214.26. (See Exhibit A attached hereto for an example of one month's charges to Mr. Opdyke's card.)

5. For several reasons, I decided early in the campaign to maintain one checking account in New York, rather than open accounts around the country. First, it gave me greater control of spending. Second, it insured that I controlled the maintenance of the necessary documentation of expenses, and had all the information needed to file financial disclosure reports with the FEC. Our high-level staff people outside national headquarters changed locations with some frequency, given petitioning and fundraising requirements, and so to insure complete and accurate record-keeping, I did not authorize the opening of checking accounts in locations around the country.

6. I set up a national system whereby individuals would incur expenses on behalf of the Committee, and then request reimbursement from the national office (me and my staff). Staff members managing operations incurred significant expenses, since they were responsible for purchasing goods for such operations. In some cases, where I could determine beforehand that expenses were likely to be large, I would provide advances to staff.

97043793285

9
7
0
4
3
7
9
3
2
8
6

7. For example, Cathy Stewart was a national staff member deployed by the Committee to direct various campaign operations. She traveled to New Hampshire in the fall of 1991 to set up the Committee's operation. Between November and December, 1991, Ms. Stewart spent a significant amount of money to set up the Committee's office, recruit volunteers and do the various other activities involved in setting up a campaign operation. Yet the FEC has determined that Ms. Stewart gave \$2,837.08 in excessive contributions, all stemming from expenses associated with setting up the New Hampshire Committee office, and all of which were reimbursed, in a timely fashion.

8. David Belmont was the Ballot Access Coordinator for the Committee. As such, Mr. Belmont was ultimately responsible for getting Dr. Fulani on the ballot in each individual state. The vast majority of the charges incurred by Mr. Belmont on behalf of the Committee and charged on his American Express card -- or paid out of his pocket and then reimbursed -- are either for expenses related to travel or lodging of ballot access petitioners, are for other types of ballot access expenses, or are for expenses associated with the travel and lodging of Dr. Fulani and her aides. (See Exhibit B for an example of one month's charges appearing on Mr. Belmont's American Express statement, and one example of a reimbursement for out-of-pocket expenses).

9. Unlike most candidates, Dr. Fulani did not have a credit card. One cannot easily make an airplane or hotel reservation without using a credit card. Therefore, in order to make arrangements for Dr. Fulani's travel and lodging, her

secretary, Jini Berman and I (or whoever was making the arrangements) used supporters' credit cards to book flights and reserve hotel rooms.

10. In February, 1992, Eleanor Fain obtained additional credit cards on her American Express account for Dr. Fulani, Cathy Stewart and me. (None of us had access to credit cards.) Most of the expenses incurred on behalf of the Committee charged to Ms. Fain's American Express were for expenses associated with work done by the three of us, i.e., travel, lodging and office-related expenses. (See Exhibit C for an example of one month's charges to Ms. Fain's account. Note that card 101 was in my name, card 103 was in Dr. Fulani's name, and card 104 was in Cathy Stewart's name.)

11. James Ross is the father of Lauren Ross. Ms. Ross was a Committee staff member who managed petitioning and fundraising drives at different locations throughout the campaign period. She used her father's credit card for travel and lodging, as well as to obtain supplies. When Mr. Ross's bill arrived each month, Ms. or Mr. Ross would request payment for all charges Ms. Ross had incurred on behalf of the Committee, and I would pay the credit card company, Chittenden Bank Visa, directly. I assumed Ms. Ross could not obtain her own credit card or she would have done so.

12. The Committee maintained significant fundraising operations in southern and northern California (based in Los Angeles and San Francisco). Staff members and volunteers would set up tables on the sidewalk and canvas door-to-door, asking people to sign a petition and give a contribution to the Committee. In the

970437933287

summer of 1992, this operation expanded substantially, with the hiring of students out of school for the summer. Generally, fundraisers did not own cars, and the Committee decided that the simplest method for transporting people to their fundraising locations was to rent cars. Since one cannot rent a car without a credit card, there are significant amounts of charges to individuals' credit cards relating to car rentals, particularly in California where mass transit was not very useful.

13. Lawrence Grigsby, for example, was a supporter in the Los Angeles area who used his credit card to help Committee staff in southern California rent cars, since those in the area at the time had no credit cards. The two charges the Audit Division deemed to be contributions to the Committee from Mr. Grigsby represent charges for car rentals. Such charges were paid within thirty days. The total excessive contribution attributed to Mr. Grigsby is \$1,345.25. (See Exhibit D for the charges incurred by Mr. Grigsby on behalf of the Committee.)

14. Margaret Golden was responsible for administering the Committee's fundraising operations in northern California. As is reflected on the credit card charges for which she was reimbursed, she purchased supplies, rented cars, and paid for other types of travel on behalf of the Committee. She would submit her credit card statement to me when it came in and reflected such charges, and I would generally pay the credit card company directly. If she paid by cash or check for supplies, or if she paid the credit card bills herself, she would submit a reimbursement form and I would reimburse her by check.

15. For example, campaign workers utilized Ms. Golden's telephone for telemarketing/fundraising. She submitted the bills to my office for reimbursement for campaign-related telephone calls. The Audit Division, pursuant to 116.5(b), treated this reimbursement as a contribution. If a campaign worker uses an individual's telephone for a Committee call, and thus incurs an expense on behalf of the Committee, the Committee must be allowed to reimburse the individual who allowed the use of his or her telephone for Committee business. The MUR attributes \$838.70 in "excessive contributions" to Ms. Golden. (See Exhibit E for an example of one month's charges to Ms. Golden's credit card, and an example of a reimbursement made to her for telephone expense).

16. Margaret Tanzosh was a Committee staff person who was located for most of the campaign in the Los Angeles area. She used her credit card predominantly to rent cars for the Committee's fundraising operation in southern California. Ms. Tanzosh authorized American Express to issue a card on her account to another Committee staff member, Jeff Williamson, who traveled to different locations around the country participating in various petitioning drives. Ms. Tanzosh's credit card statements, and the Audit Analysis determining the amount of excessive contributions, reflect charges both she and Mr. Williamson incurred on behalf of the Committee. The MUR attributes \$8,933.27 in excessive contributions to Ms. Tanzosh. (See Exhibit F for an example of one month's charges on Ms. Tanzosh's American Express account.)

17. Marsha Plafkin was a Committee staff person located in northern California, and used her credit cards solely to charge car rentals for the fundraising operation. My review of the designations made by the Audit Division as to whether the rental car charges on Ms. Plafkin's credit cards were for her own travel, or for another person's travel, raises the seemingly arbitrary nature of such designations.

18. For example, on Ms. Plafkin's American Express bill with a closing date of July 8, 1992, there are six rental car charges on June 12, 1992 for a total amount of \$1,387.85. (See Exhibit G.) The Audit Division classified the total amount for these charges as a contribution by Ms. Plafkin, since the Division staff member determined that the charges were for the travel or subsistence of others. In addition, there are rental car charges for \$62.29, \$167.37 and \$33.46 on June 15, 22 and 28, respectively, designated in the same manner. Finally, there are eight charges totaling \$1,540 for rental cars on June 26, 1992, which the Division classified as contributions. It is unclear how the determination was made that none of these cars were for Ms. Plafkin's own travel. The Audit Division staff member coding Ms. Plafkin's expenses treated some rental cars charged to Ms. Plafkin's credit card as for her own travel, but only until June 7, 1992. (See Exhibit H, the entries with the number "6".) After June 7, expenses for rental cars charged to Ms. Plafkin's credit card are not considered to be for her own travel; the reason for this is completely unclear. The MUR attributes \$7,556.89 in "excessive contributions" to Ms. Plafkin.

19. During the field audit, as is required by law, I was available to the auditors to answer any questions they had regarding our documentation. No one

9704379329C

asked me any questions regarding whether any expenses incurred by individuals, submitted for reimbursement, were incurred on their own behalf or on behalf of others.

20. Frederick Newman was Dr. Fulani's campaign manager. Cathy Salit, the Campaign Operations Coordinator, was an authorized cardholder on Dr. Newman's American Express account. Ms. Salit was in New Hampshire for part of the campaign's primary operation, and charged hotel expenses incurred on behalf of the Committee for herself and another individual to her credit card. The Audit Staff attributed these charges to Dr. Newman, since he was the primary accountholder, and found that he gave \$930.58 in excessive contributions to the Committee. (See Exhibit I for the credit card statement containing the charge, the hotel bill that documents the charge and the Audit Analysis showing the calculation of the excess charge.)

21. Jeannine Hahn was a volunteer for the Committee who occasionally used her credit card to charge expenses incurred on behalf of the Committee. The Audit Staff, in their analysis, determined that Ms. Hahn gave \$2,343.44 to the Committee in excessive contributions. This amount stems from a charge Ms. Hahn made to her American Express account to rent a car utilized by the Committee for its operations during the New Hampshire primary. (See Exhibit J for the credit card statement containing the charge, and the Audit Analysis showing the calculation of the excess charge.)

22. Robert Levy was a Committee staff member who worked closely with the campaign manager to implement various campaign strategies. The Audit

Staff, in their analysis, determined that Mr. Levy gave \$636.78 to the Committee in excessive campaign contributions. This amount stems from Mr. Levy's rental of a mobile phone for the campaign manager's use. Mr. Levy charged this expense to his American Express card and thus, the Audit Staff determined the charge to be a "contribution." (See Exhibit K for the credit card statement on which the charge appears, and the Audit Analysis showing the calculation of the "excessive contribution.")

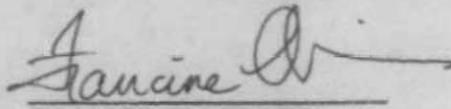
23. To my knowledge, whenever a charge was incurred on behalf of the Committee by one of the cardholders on Nancy Ross's American Express account, the Committee would make a payment directly to American Express as payment of that expense. I have reviewed the affidavit of Nancy Ross submitted herewith and the credit card statements discussed therein, and concur with Ms. Ross's statements concerning the Committee's practices with respect to payments made for Committee charges to her American Express account.

24. The Committee first learned of the analysis performed by the Audit Division at the exit conference of the audit, where I was presented with a computer run dated March 18, 1993, containing the Audit Staff's analysis. The Final Audit Report, approved April 21, 1994, also contains reference to the issue. I was not notified that an MUR was opened by the Commission on this issue. My ability to respond to this MUR is hampered, and has been prejudiced, by the time that has elapsed -- at least four years -- from the date of the majority of the charges being questioned. It is difficult at this late date, for example, to demonstrate that some

97043793292

portion of the charges assumed by the Audit Staff to not be for the cardholders' own travel were for the cardholders' own travel -- either individuals cannot now remember, or documentary proof, such as rental car agreements, no longer exist.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed August 1, 1996.


FRANCINE MILLER

97043793293

A

LENORA B. FULANI FOR PRESIDENT
200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

3759

American Express

Three thousand two hundred two

2/22 92
3000
1.37/26



AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

Spayke



James W.
NOT NEGOTIABLE

⑈003759⑈ ⑆026003379⑆ 3103154⑈

97043793294



Summary of Account

Retain this portion for your files.

Cardmember Name
J B OPDYCKE

Account Number
[REDACTED]

Closing Date
02-02-92

If you have a question about your account, call 1-800-528-4800 (24 hours/7 days).

Page 1 of 1

Previous Card Balance	Card Payments/Credits	New Card Charges	New Card Balance (A)	Sign & Travel Minimum Payment (B)	Minimum Amount Due (C)
\$5,603.37	\$2,175.10	\$3,202.25	\$6,630.52	\$60.00	\$6,690.52

Amax Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
835003-0		PAYMENT RECEIVED - THANK YOU 01/03		2,175.10
501005-1	001	FEDERAL EXPRESS NEW YORK NY 372851082 1 STANDARD LETTER 01/02/92	9.00	
501005-1	002	FEDERAL EXPRESS NEW YORK NY 351581803 1 OVERNIGHT LETTER 12/23/91	25.50	
501005-1	003	FEDERAL EXPRESS NEW YORK NY 372851083 1 STANDARD PKG 1 LB 01/02/92	13.00	
501005-1	004	FEDERAL EXPRESS NEW YORK NY 351581804 1 OVERNIGHT LETTER 12/23/91	20.50	
501005-1	005	FEDERAL EXPRESS NEW YORK NY 372851075 1 STANDARD PKG 1 LB 01/02/92	13.00	
501005-1	006	FEDERAL EXPRESS NEW YORK NY 671547187 1 OVERNIGHT LETTER 12/23/91	20.50	
501005-1	007	FEDERAL EXPRESS NEW YORK NY 372851076 1 STANDARD PKG 1 LB 01/02/92	13.00	
501005-1	008	FEDERAL EXPRESS NEW YORK NY 372604778 1 OVERNIGHT LETTER 12/30/91	15.50	
501005-1	009	FEDERAL EXPRESS NEW YORK NY 324534518 1 OVERNIGHT LETTER 12/31/91	15.50	
501005-1	010	FEDERAL EXPRESS NEW YORK NY 671547188 1 OVERNIGHT LETTER 12/23/91	20.50	
501005-1	011	FEDERAL EXPRESS NEW YORK NY 372851077 1 STANDARD LETTER 01/02/92	9.00	
501005-1	012	FEDERAL EXPRESS NEW YORK NY 671547190 1 OVERNIGHT LETTER 12/23/91	15.50	
501005-1	013	FEDERAL EXPRESS NEW YORK NY 295527390 1 STANDARD LETTER 12/30/91	9.00	
501005-1	014	FEDERAL EXPRESS NEW YORK NY 372851164 1 STANDARD LETTER 12/26/91	9.00	
PAGE TOTAL			208.50	2,175.10

Payments or credits received after closing date above will appear on next month's statement.

FEBRUARY IS CRUISE VACATION MONTH. DON'T MISS THE BOAT.
CALL 1-800-YES AMEX OR YOUR TRAVEL AGENT NOW!

Please see reverse side for important information.



97043793295



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 2 of 32 CBA008
K3 11

97043793296

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
501005-1	015	FEDERAL EXPRESS NEW YORK NY 874084705 1 OVERNIGHT LETTER 12/30/91	13.00	
501005-1	016	FEDERAL EXPRESS NEW YORK NY 351925915 1 STANDARD PKG 1 LB 12/30/91	13.00	
501005-1	017	FEDERAL EXPRESS NEW YORK NY 323629016 1 STANDARD PKG 1 LB 12/30/91	13.00	
501005-1	018	FEDERAL EXPRESS NEW YORK NY 351925946 1 OVERNIGHT LETTER 01/02/92	13.00	
501005-1	019	FEDERAL EXPRESS NEW YORK NY 372851080 1 STANDARD LETTER 01/02/92	9.00	
501005-1	020	FEDERAL EXPRESS NEW YORK NY 372851071 1 STANDARD LETTER 12/28/91	26.50	
501005-1	021	FEDERAL EXPRESS NEW YORK NY 372851081 1 STANDARD LETTER 01/02/92	9.00	
501005-1	022	FEDERAL EXPRESS NEW YORK NY 372851072 1 STANDARD PKG 1 LB 01/02/92	13.00	
501005-1	023	FEDERAL EXPRESS NEW YORK NY 323628752 1 COURIER PAK 12/30/91	27.25	
501005-1	024	FEDERAL EXPRESS NEW YORK NY 372851073 1 OVERNIGHT LETTER 01/02/92	13.00	
501005-1	025	FEDERAL EXPRESS NEW YORK NY 007008503 1 COURIER PAK 12/30/91	32.75	
501005-1	026	FEDERAL EXPRESS NEW YORK NY 671547184 1 OVERNIGHT LETTER 12/23/91	20.50	
501005-1	027	FEDERAL EXPRESS NEW YORK NY 323629014 1 COURIER PAK 12/31/91	21.75	
501005-1	028	FEDERAL EXPRESS NEW YORK NY 351925944 1 OVERNIGHT LETTER 01/02/92	13.00	
501005-1	029	FEDERAL EXPRESS NEW YORK NY 372604775 1 OVERNIGHT LETTER 12/30/91	15.50	
501005-1	030	FEDERAL EXPRESS NEW YORK NY 351925945 1 STANDARD PKG 1 LB 01/02/92	13.00	
501005-1	031	FEDERAL EXPRESS NEW YORK NY 319626716 1 OVERNIGHT LETTER 12/30/91	13.00	
501005-1	032	FEDERAL EXPRESS NEW YORK NY 372604776 1 STANDARD PKG 2 LB 12/31/91	16.50	
501005-1	033	FEDERAL EXPRESS NEW YORK NY 350500766 1 COURIER PAK 12/31/91	21.75	
501005-1	034	FEDERAL EXPRESS NEW YORK NY 372851078 1 STANDARD PKG 2 LB 01/02/92	14.00	
501005-1	035	FEDERAL EXPRESS NEW YORK NY 372851079 1 STANDARD PKG 2 LB 01/02/92	14.00	
501005-1	036	FEDERAL EXPRESS NEW YORK NY 283775038 1 OVERNIGHT LETTER 12/30/91	18.00	
501005-1	037	FEDERAL EXPRESS NEW YORK NY 351581809 1 OVERNIGHT LETTER 12/23/91	20.50	
501008-1	038	FEDERAL EXPRESS NEW YORK NY 372604777 1 STANDARD PKG 2 LB 01/03/92	16.50	
501008-1	039	FEDERAL EXPRESS NEW YORK NY 372851174 1 STANDARD AIR 10 LB 01/02/92	19.50	
501008-1	040	FEDERAL EXPRESS NEW YORK NY 372851165 1 STANDARD AIR 10 LB 01/02/92	19.50	
501010-1	041	FEDERAL EXPRESS NEW YORK NY 352213254 1 OVERNIGHT LETTER 01/06/92	13.00	
501010-1	042	FEDERAL EXPRESS NEW YORK NY 296002815 1 COURIER PAK 01/06/92	20.00	
501010-1	043	FEDERAL EXPRESS NEW YORK NY 381613919 1 STANDARD LETTER 01/06/92	9.00	
501010-1	044	FEDERAL EXPRESS NEW YORK NY 311728267 1 STANDARD LETTER 01/06/92	9.00	
501010-1	045	FEDERAL EXPRESS NEW YORK NY 341544954 1 OVERNIGHT LETTER 12/30/91	13.00	
501010-1	046	FEDERAL EXPRESS NEW YORK NY 351925914 1 STANDARD PKG 1 LB 01/06/92	13.00	
501010-1	047	FEDERAL EXPRESS NEW YORK NY 352338282 1 COURIER PAK 01/06/92	25.00	
501010-1	048	FEDERAL EXPRESS NEW YORK NY 313304296 1 STANDARD PKG 1 LB 01/06/92	13.00	
501010-1	049	FEDERAL EXPRESS NEW YORK NY 372851084 1 STANDARD PKG 2 LB 01/04/92	14.00	
501010-1	050	FEDERAL EXPRESS NEW YORK NY 372851086 1 STANDARD LETTER 01/04/92	9.00	
501010-1	051	FEDERAL EXPRESS NEW YORK NY 372851087 1 STANDARD PKG 2 LB 01/06/92	14.00	
501010-1	052	FEDERAL EXPRESS NEW YORK NY 372851085 1 STANDARD LETTER 01/04/92	9.00	
501010-1	053	FEDERAL EXPRESS NEW YORK NY 089210509 1 COURIER PAK 01/06/92	21.75	
501010-1	054	FEDERAL EXPRESS NEW YORK NY 323693638 1 OVERNIGHT LETTER 12/31/91	13.00	

PAGE TOTAL

635.25

.00



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 3 of 32 CBA000
02-02-92

97043793297

Amex Ref. No	Item No	Listing of Charges and Credits			Charges	Credits
501010-1	055	FEDERAL EXPRESS	NEW YORK	NY		
		311471518 1	COURIER PAK	01/06/92	20.00	
501010-1	056	FEDERAL EXPRESS	NEW YORK	NY		
		379590749 1	COURIER PAK	12/31/91	20.00	
501010-1	057	FEDERAL EXPRESS	NEW YORK	NY		
		341750263 1	OVERNIGHT LETTER	01/06/92	15.50	
501010-1	058	FEDERAL EXPRESS	NEW YORK	NY		
		050333120 1	COURIER PAK	01/07/92	43.75	
501010-1	059	FEDERAL EXPRESS	NEW YORK	NY		
		342293868 1	STANDARD LETTER	01/06/92	9.00	
501010-1	060	FEDERAL EXPRESS	NEW YORK	NY		
		372604768 1	STANDARD PKG	1 LB 01/06/92	15.50	
501010-1	061	FEDERAL EXPRESS	NEW YORK	NY		
		326268764 1	COURIER PAK	12/02/91	20.00	
501010-1	062	FEDERAL EXPRESS	NEW YORK	NY		
		372604785 1	STANDARD LETTER	01/06/92	11.50	
501010-1	063	FEDERAL EXPRESS	NEW YORK	NY		
		283775037 1	OVERNIGHT LETTER	01/06/92	20.50	
501012-1	064	FEDERAL EXPRESS	NEW YORK	NY		
		993169192 1	STANDARD LETTER	01/08/92	11.50	
501012-1	065	FEDERAL EXPRESS	NEW YORK	NY		
		323275682 1	COURIER PAK	01/07/92	30.00	
501015-1	066	FEDERAL EXPRESS	NEW YORK	NY		
		372851107 1	OVERNIGHT LETTER	01/09/92	13.00	
501015-1	067	FEDERAL EXPRESS	NEW YORK	NY		
		372851104 1	COURIER PAK	01/09/92	21.75	
501015-1	068	FEDERAL EXPRESS	NEW YORK	NY		
		372851111 1	OVERNIGHT LETTER	01/09/92	13.00	
501015-1	069	FEDERAL EXPRESS	NEW YORK	NY		
		372851098 1	COURIER PAK	01/09/92	21.75	
501015-1	070	FEDERAL EXPRESS	NEW YORK	NY		
		323629017 1	COURIER PAK	12/23/91	32.75	
501016-1	071	FEDERAL EXPRESS	NEW YORK	NY		
		372851074 1	STANDARD PKG	1 LB 01/09/92	13.00	
501016-1	072	FEDERAL EXPRESS	NEW YORK	NY		
		372604767 1	STANDARD PKG	3 LB 01/06/92	15.00	
501016-1	073	FEDERAL EXPRESS	NEW YORK	NY		
		372851097 1	STANDARD LETTER	01/09/92	9.00	
501016-1	074	FEDERAL EXPRESS	NEW YORK	NY		
		372851099 1	STANDARD AIR	2 LB 01/09/92	11.50	
501016-1	075	FEDERAL EXPRESS	NEW YORK	NY		
		372851090 1	STANDARD PKG	6 LB 01/09/92	18.75	
501016-1	076	FEDERAL EXPRESS	NEW YORK	NY		
		372851091 1	STANDARD PKG	3 LB 01/09/92	15.00	
501016-1	077	FEDERAL EXPRESS	NEW YORK	NY		
		372851092 1	STANDARD PKG	2 LB 01/09/92	16.50	
501016-1	078	FEDERAL EXPRESS	NEW YORK	NY		
		372851094 1	STANDARD AIR	2 LB 01/09/92	11.50	
501016-1	079	FEDERAL EXPRESS	NEW YORK	NY		
		372851110 1	STANDARD PKG	2 LB 01/09/92	14.00	
501016-1	080	FEDERAL EXPRESS	NEW YORK	NY		
		372851095 1	STANDARD PKG	2 LB 01/09/92	14.00	
501016-1	081	FEDERAL EXPRESS	NEW YORK	NY		
		372851114 1	STANDARD AIR	4 LB 01/10/92	13.50	
501016-1	082	FEDERAL EXPRESS	NEW YORK	NY		
		372851096 1	STANDARD PKG	4 LB 01/09/92	16.00	
501016-1	083	FEDERAL EXPRESS	NEW YORK	NY		
		372851115 1	STANDARD LETTER	01/11/92	9.00	
501016-1	084	FEDERAL EXPRESS	NEW YORK	NY		
		372604781 1	STANDARD LETTER	01/09/92	11.50	
501016-1	085	FEDERAL EXPRESS	NEW YORK	NY		
		352212462 1	OVERNIGHT LETTER	01/13/92	18.00	
501016-1	086	FEDERAL EXPRESS	NEW YORK	NY		
		372851112 1	STANDARD PKG	2 LB 01/09/92	14.00	
501016-1	087	FEDERAL EXPRESS	NEW YORK	NY		
		372851089 1	COURIER PAK	01/08/92	20.00	
501016-1	088	FEDERAL EXPRESS	NEW YORK	NY		
		351925913 1	STANDARD LETTER	01/10/92	9.00	
501016-1	089	FEDERAL EXPRESS	NEW YORK	NY		
		372851113 1	STANDARD AIR	4 LB 01/10/92	13.50	
501016-1	090	FEDERAL EXPRESS	NEW YORK	NY		
		372851100 1	STANDARD PKG	2 LB 01/09/92	14.00	
501016-1	091	FEDERAL EXPRESS	NEW YORK	NY		
		038044338 1	COURIER PAK	01/13/92	24.50	
501016-1	092	FEDERAL EXPRESS	NEW YORK	NY		
		372851105 1	STANDARD PKG	3 LB 01/09/92	15.00	
501016-1	093	FEDERAL EXPRESS	NEW YORK	NY		
		372851103 1	STANDARD PKG	2 LB 01/09/92	14.00	
501017-1	094	FEDERAL EXPRESS	NEW YORK	NY		
		297173562 1	OVERNIGHT LETTER	01/13/92	15.50	



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 4 of 32 CBA008
02-02-92 K3 13

Amax Ref. No.	Item No	Listing of Charges and Credits	Charges	Credits
501017-1	095	FEDERAL EXPRESS NEW YORK NY 341750262 1 OVERNIGHT LETTER 01/13/92	15.50	
501017-1	096	FEDERAL EXPRESS NEW YORK NY 708635173 1 COURIER PAK 01/13/92	21.75	
501017-1	097	FEDERAL EXPRESS NEW YORK NY 295527391 1 STANDARD LETTER 01/13/92	11.50	
501017-1	098	FEDERAL EXPRESS NEW YORK NY 394780711 1 STANDARD LETTER 01/14/92	9.00	
501017-1	099	FEDERAL EXPRESS NEW YORK NY 351925948 1 OVERNIGHT LETTER 01/13/92	13.00	
501017-1	100	FEDERAL EXPRESS NEW YORK NY 295527389 1 STANDARD LETTER 01/06/92	9.00	
501017-1	101	FEDERAL EXPRESS NEW YORK NY 305537865 1 COURIER PAK 01/14/92	32.50	
501017-1	102	FEDERAL EXPRESS NEW YORK NY 311471517 1 COURIER PAK 01/13/92	20.00	
501017-1	103	FEDERAL EXPRESS NEW YORK NY 283775036 1 OVERNIGHT LETTER 01/13/92	13.00	
501017-1	104	FEDERAL EXPRESS NEW YORK NY 351925949 1 STANDARD PKG 1 LB 01/13/92	13.00	
501018-1	105	FEDERAL EXPRESS NEW YORK NY 341750261 1 OVERNIGHT LETTER 01/14/92	15.50	
501018-1	106	FEDERAL EXPRESS NEW YORK NY 379622701 1 COURIER PAK 01/14/92	21.75	
501018-1	107	FEDERAL EXPRESS NEW YORK NY 372851101 1 COURIER PAK 01/09/92	21.75	
501018-1	108	FEDERAL EXPRESS NEW YORK NY 372851108 1 OVERNIGHT LETTER 01/09/92	13.00	
501018-1	109	FEDERAL EXPRESS NEW YORK NY 657906217 1 STANDARD PKG 2 LB 01/15/92	16.50	
501018-1	110	FEDERAL EXPRESS NEW YORK NY 657906218 1 STANDARD PKG 2 LB 01/15/92	16.50	
501018-1	111	FEDERAL EXPRESS NEW YORK NY 350488001 1 COURIER PAK 01/15/92	22.50	
501018-1	112	FEDERAL EXPRESS NEW YORK NY 372604784 1 OVERNIGHT LETTER 01/08/92	20.50	
501018-1	113	FEDERAL EXPRESS NEW YORK NY 379227394 1 STANDARD PKG 1 LB 01/14/92	18.00	
501018-1	114	FEDERAL EXPRESS NEW YORK NY 372851116 1 OVERNIGHT LETTER 01/15/92	13.00	
501018-1	115	FEDERAL EXPRESS NEW YORK NY 991819486 1 OVERNIGHT LETTER 01/14/92	13.00	
501018-1	116	FEDERAL EXPRESS NEW YORK NY 351925959 1 STANDARD PKG 2 LB 01/14/92	14.00	
501019-1	117	FEDERAL EXPRESS NEW YORK NY 372851152 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	118	FEDERAL EXPRESS NEW YORK NY 372851153 1 COURIER PAK 01/16/92	20.00	
501019-1	119	FEDERAL EXPRESS NEW YORK NY 372851158 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	120	FEDERAL EXPRESS NEW YORK NY 372851109 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	121	FEDERAL EXPRESS NEW YORK NY 311364839 1 COURIER PAK 01/14/92	20.00	
501019-1	122	FEDERAL EXPRESS NEW YORK NY 372851150 1 STANDARD LETTER 01/16/92	9.00	
501019-1	123	FEDERAL EXPRESS NEW YORK NY 372851121 1 COURIER PAK 01/16/92	21.75	
501019-1	124	FEDERAL EXPRESS NEW YORK NY 351326133 1 STANDARD PKG 4 LB 01/16/92	16.00	
501019-1	125	FEDERAL EXPRESS NEW YORK NY 372851122 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	126	FEDERAL EXPRESS NEW YORK NY 372851118 1 STANDARD PKG 6 LB 01/16/92	18.75	
501019-1	127	FEDERAL EXPRESS NEW YORK NY 323275680 1 COURIER PAK 01/14/92	27.25	
501019-1	128	FEDERAL EXPRESS NEW YORK NY 372851119 1 COURIER PAK 01/16/92	20.00	
501019-1	129	FEDERAL EXPRESS NEW YORK NY 372851117 1 STANDARD LETTER 01/16/92	9.00	
501019-1	130	FEDERAL EXPRESS NEW YORK NY 372851154 1 STANDARD PKG 3 LB 01/16/92	15.00	
501019-1	131	FEDERAL EXPRESS NEW YORK NY 372851149 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	132	FEDERAL EXPRESS NEW YORK NY 372851156 1 STANDARD PKG 2 LB 01/16/92	14.00	
501019-1	133	FEDERAL EXPRESS NEW YORK NY 372851157 1 STANDARD LETTER 01/16/92	9.00	
501022-1	134	FEDERAL EXPRESS NEW YORK NY 372851172 1 STANDARD AIR 1 LB 01/16/92	10.50	

97043793298

PAGE TOTAL

844.50

.00



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 5 of 32
02-02-92

CBA0080
14

97043793299

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
501022-1	135	FEDERAL EXPRESS NEW YORK NY 372851123 1 STANDARD LETTER 01/16/92	14.00	
501023-1	136	FEDERAL EXPRESS NEW YORK NY 295527392 1 STANDARD LETTER 01/20/92	9.00	
501023-1	137	FEDERAL EXPRESS NEW YORK NY 355105334 1 COURIER PAK 01/20/92	21.75	
501023-1	138	FEDERAL EXPRESS NEW YORK NY 372851124 1 OVERNIGHT LETTER 01/17/92	25.50	
501023-1	139	FEDERAL EXPRESS NEW YORK NY 381613917 1 STANDARD LETTER 01/20/92	9.00	
501023-1	140	FEDERAL EXPRESS NEW YORK NY 372851127 1 OVERNIGHT LETTER 01/18/92	13.00	
501023-1	141	FEDERAL EXPRESS NEW YORK NY 372851128 1 STANDARD LETTER 01/18/92	9.00	
501023-1	142	FEDERAL EXPRESS NEW YORK NY 351925947 1 COURIER PAK 01/13/92	24.50	
501023-1	143	FEDERAL EXPRESS NEW YORK NY 372851140 1 OVERNIGHT LETTER 01/18/92	13.00	
501023-1	144	FEDERAL EXPRESS NEW YORK NY 341750260 1 OVERNIGHT LETTER 01/20/92	13.00	
501023-1	145	FEDERAL EXPRESS NEW YORK NY 351326131 1 STANDARD LETTER 01/20/92	9.00	
501023-1	146	FEDERAL EXPRESS NEW YORK NY 372851141 1 STANDARD LETTER 01/18/92	9.00	
501023-1	147	FEDERAL EXPRESS NEW YORK NY 311471516 1 COURIER PAK 01/20/92	20.00	
501024-1	148	FEDERAL EXPRESS NEW YORK NY 108198567 1 STANDARD PKG 1 LB 01/20/92	13.00	
501024-1	149	FEDERAL EXPRESS NEW YORK NY 296002814 1 STANDARD PKG 4 LB 01/21/92	16.00	
501024-1	150	FEDERAL EXPRESS NEW YORK NY 311728266 1 STANDARD LETTER 01/20/92	9.00	
501024-1	151	FEDERAL EXPRESS NEW YORK NY 372851130 1 OVERNIGHT LETTER 01/21/92	13.00	
501024-1	152	FEDERAL EXPRESS NEW YORK NY 323995670 1 STANDARD PKG 4 LB 01/21/92	16.00	
501024-1	153	FEDERAL EXPRESS NEW YORK NY 351925950 1 OVERNIGHT LETTER 01/14/92	13.00	
501024-1	154	FEDERAL EXPRESS NEW YORK NY 372851129 1 OVERNIGHT LETTER 01/21/92	13.00	
501024-1	155	FEDERAL EXPRESS NEW YORK NY 283775035 1 STANDARD PKG 1 LB 01/20/92	13.00	
501024-1	156	FEDERAL EXPRESS NEW YORK NY 992862818 1 OVERNIGHT LETTER 01/21/92	13.00	
501026-1	157	FEDERAL EXPRESS NEW YORK NY 290736747 1 STANDARD LETTER 01/21/92	9.00	
501026-1	158	FEDERAL EXPRESS NEW YORK NY 353412069 1 OVERNIGHT LETTER 01/20/92	13.00	
501026-1	159	FEDERAL EXPRESS NEW YORK NY 372604780 1 COURIER PAK 01/22/92	27.00	
501026-1	160	FEDERAL EXPRESS NEW YORK NY 372851155 1 STANDARD PKG 1 LB 01/16/92	13.00	
501026-1	161	FEDERAL EXPRESS NEW YORK NY 372851120 1 STANDARD LETTER 01/16/92	9.00	
501026-1	162	FEDERAL EXPRESS NEW YORK NY 340635798 1 STANDARD LETTER 01/22/92	9.00	
501026-1	163	FEDERAL EXPRESS NEW YORK NY 348863515 1 COURIER PAK 01/21/92	32.75	
501026-1	164	FEDERAL EXPRESS NEW YORK NY 351326130 1 COURIER PAK 01/23/92	32.75	
501026-1	165	FEDERAL EXPRESS NEW YORK NY 351326128 1 COURIER PAK 01/23/92	24.50	
501029-1	166	FEDERAL EXPRESS NEW YORK NY 305427953 1 OVERNIGHT LETTER 01/24/92	13.00	
501029-1	167	FEDERAL EXPRESS NEW YORK NY 351326127 1 COURIER PAK 01/24/92	32.50	
501029-1	168	FEDERAL EXPRESS NEW YORK NY 350500770 1 OVERNIGHT LETTER 01/17/92	13.00	
501031-1	169	FEDERAL EXPRESS NEW YORK NY 305709124 1 COURIER PAK 01/28/92	21.75	
501031-1	170	FEDERAL EXPRESS NEW YORK NY 372851147 1 STANDARD LETTER 01/23/92	11.50	
501031-1	171	FEDERAL EXPRESS NEW YORK NY 372851148 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	172	FEDERAL EXPRESS NEW YORK NY 372604769 1 COURIER PAK 01/23/92	22.50	
501031-1	173	FEDERAL EXPRESS NEW YORK NY 372851132 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	174	FEDERAL EXPRESS NEW YORK NY 340635792 1 PRIORITY ONE 3 LB 01/27/92	27.00	
PAGE TOTAL			651.00	.00



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 5 of 32 CBA000

02-02-92

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
501031-1	175	FEDERAL EXPRESS NEW YORK NY 379493942 1 STANDARD PKG 2 LB 01/21/92	14.00	
501031-1	176	FEDERAL EXPRESS NEW YORK NY 372851125 1 COURIER PAK 01/23/92	22.50	
501031-1	177	FEDERAL EXPRESS NEW YORK NY 372851126 1 STANDARD PKG 2 LB 01/23/92	16.50	
501031-1	178	FEDERAL EXPRESS NEW YORK NY 372851144 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	179	FEDERAL EXPRESS NEW YORK NY 197178165 1 STANDARD PKG 1 LB 01/23/92	20.50	
501031-1	180	FEDERAL EXPRESS NEW YORK NY 372851145 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	181	FEDERAL EXPRESS NEW YORK NY 298338626 1 STANDARD LETTER 01/21/92	11.50	
501031-1	182	FEDERAL EXPRESS NEW YORK NY 372851146 1 STANDARD PKG 2 LB 01/23/92	16.50	
501031-1	183	FEDERAL EXPRESS NEW YORK NY 197178166 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	184	FEDERAL EXPRESS NEW YORK NY 372851133 1 COURIER PAK 01/23/92	27.50	
501031-1	185	FEDERAL EXPRESS NEW YORK NY 372851142 1 STANDARD PKG 5 LB 01/23/92	19.50	
501031-1	186	FEDERAL EXPRESS NEW YORK NY 372851134 1 STANDARD LETTER 01/23/92	11.50	
501031-1	187	FEDERAL EXPRESS NEW YORK NY 372851143 1 STANDARD PKG 3 LB 01/23/92	17.50	
501031-1	188	FEDERAL EXPRESS NEW YORK NY 372851135 1 STANDARD PKG 1 LB 01/23/92	15.50	
501031-1	189	FEDERAL EXPRESS NEW YORK NY 351326126 1 OVERNIGHT LETTER 01/28/92	13.00	
501031-1	190	FEDERAL EXPRESS NEW YORK NY 341750258 1 OVERNIGHT LETTER 01/27/92	15.50	
501033-1	191	FEDERAL EXPRESS NEW YORK NY 993169185 1 OVERNIGHT LETTER 01/29/92	13.00	
501033-1	192	FEDERAL EXPRESS NEW YORK NY 340970328 1 STANDARD PKG 1 LB 01/27/92	13.00	
501033-1	193	FEDERAL EXPRESS NEW YORK NY 354827959 1 COURIER PAK 01/20/92	20.00	
501033-1	194	FEDERAL EXPRESS NEW YORK NY 283775034 1 STANDARD PKG 2 LB 01/27/92	16.50	
501033-1	195	FEDERAL EXPRESS NEW YORK NY 311728271 1 STANDARD LETTER 01/27/92	9.00	
501033-1	196	FEDERAL EXPRESS NEW YORK NY 313856383 1 STANDARD LETTER 01/27/92	9.00	
501033-1	197	FEDERAL EXPRESS NEW YORK NY 290736745 1 STANDARD LETTER 01/28/92	9.00	
501033-1	198	FEDERAL EXPRESS NEW YORK NY 323621417 1 COURIER PAK 01/28/92	27.25	
501033-1	199	FEDERAL EXPRESS NEW YORK NY 911341447 1 OVERNIGHT LETTER 01/29/92	13.00	
PAGE TOTAL			397.75	.00
ACCOUNT TOTAL			\$3,202.25	\$2,175.10

9704379330C

Statement of Sign & Travel® Account Account No: [REDACTED]

YOUR SIGN & TRAVEL ACCOUNT IS PAST DUE

Creditor: AMERICAN EXPRESS CENTURION BANK Closing Date: 02-02-92

Previous Balance 1,047.62	Payments/Credits .00	New Charges .00	FINANCE CHARGE 16.00	New Balance 1,063.62
------------------------------	-------------------------	--------------------	-------------------------	-------------------------

Reference Number	Item No.	Posting Date	Description of Transaction	Charges	Credits

Finance Charge Schedule			ANNUAL PERCENTAGE RATE	Minimum Payment Includes		Payment Due Date: 02-27-92
Balance(s) to Which Rate Applies	Average Daily Balance	Daily Periodic Rate	17.90%	Past Due Amount	This Month's Payment	Minimum Payment
ALL	1055.33	.0489%		30.00	30.00	\$50.00

Important Sign & Travel Account Information

Amendment to Minimum Payment Terms

Prior to January 1, 1990, the Sign & Travel Account Agreement (the "Agreement") required a Minimum Payment of 1/24th of the New Balance of your Sign & Travel Account, but not less than \$20 or the entire New Balance if less than \$20. After January 1, 1990, the Agreement is amended to require a Minimum payment of 1/36th of the New Balance, but not less than \$20 or the entire New Balance if less than \$20. If you wish, you can always pay more than the Minimum Payment.

Finance Charge

To calculate the Finance Charge, we multiply the Daily Periodic Rate by the Average Daily Balance during the billing period. Then we multiply the product by the number of days in the billing cycle. To get the Average Daily Balance, we take the beginning balance of the Sign & Travel Account each day, add any new Sign & Travel Charges and accrued and unpaid Finance Charges (except such Finance Charges will not be included for residents of CO, IA, ME, NC and PR), and subtract any payments or credits. Then we add up the daily balance for the billing period and divide by the number of days in the billing period. This gives us the Average Daily Balance. This method of computation of the Average Daily Balance results in compound interest (except for residents of CO, IA, ME, NC and PR).

Payments

Mail your payment in the enclosed envelope or to the address for payments listed on the back of your Card Account statement. Remember, your payment each month should be for at least the Minimum Amount Due or the Total Amount Due, whichever appears on the Card Account Statement. Either amount includes the Sign & Travel Minimum Payment shown above and the balance due on your Card Account. If you want to pay more than the Minimum Payment (up to the entire Sign & Travel New Balance), make your payment for the larger amount and the excess will be applied to your Sign & Travel Account.

How to avoid additional Finance Charge

You have the right to pay the entire New Balance of your Sign & Travel Account at any time without penalty. No Finance Charge will be assessed in any billing period in which there are no new Sign & Travel Charges, and payments or credits received before the Payment Due Date equal or exceed the previous balance. The Payment Due Date is 25 days after the Closing Date of the Sign & Travel Statement.

Finance Charge Information for Certain Cardmembers

If (i) as of 6/30/88 the creditor for your Sign & Travel Account was not American Express Centurion Bank and you have not thereafter reduced your Sign & Travel Account to zero ("Specified Accounts") and (ii) a Sign & Travel Charge has not been posted to your Specified Account on or after 7/1/88 (9/1/88 for billing addresses in IA and NJ, 10/1/88 for CO and OK, 12/1/88 for ID, KS, and WY, 5/1/89 for WI), then (x) no additional Finance Charge will be assessed if you pay the entire New Balance before the Payment Due Date and (y) no Finance Charge will be assessed in any billing period in which there is no previous balance.

Billing Inquiries

For all billing inquiries concerning your Sign & Travel Account, contact American Express, Customer Service Department, P.O. Box 53832, Phoenix, Arizona 85072-3832 or 1-800-526-4800 or (602) 954-1800. See the reverse side of the first page of your Card Account statement for additional information concerning billing inquiries.

97043793301

ITEM 001
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851082	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
CAROLINE DONNOLA	27701		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510822			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 002
FEDERAL EXPRESS NEW YORK NY \$25.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	351581803	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
TOM HARKIN	50061		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3515818036			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$25.50

ITEM 003
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851083	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
BETH PEELER/C STEWART	03101		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510833			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 004
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	351581804	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
SENATOR J ROBERT KERREY	20510		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3515818040			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 005
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851075	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
LOIS TRAUENSTEIN/LINDA COURTIS	77002		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510752			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 006
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	671547187	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENDRA B, FOR PRESIDENT	101070317		
WILLIAM JEFFERSON CLINTON	72206		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 6715471873			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50



Cardmember Name

J B OPOYCKE

Account Number

Closing Date

Page 8 of 33

CBA008

02-02-92

W3

17

ITEM 007 FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851076	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI, LENORA B, FOR PRESIDENT	101070317		
FULANI FOR PRESIDENT	95814		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510763			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 008 FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	372804778	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
ILLEGIBLE	06120		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728047780			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 009 FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/31/91	324534518	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
LCV KATE MITCHELL	03801		
FULANI PRO PRESIDENT	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3245345180			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 010 FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	871547188	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
NATIONAL RAINBOW COALITION 700 20036			
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 8715471884			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 011 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851077	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
SANDRA COLEMAN	55402		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510774			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 012 FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	871547190	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
LAWRENCE DOUGLAS WILDER	23219		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 8715471906			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 013 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	295527390	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
M C BARTON	48204		
FULANI FOR PRES	10019		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 2955273904			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 014 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/26/91	372851184	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
C/L FULANI FOR PRESIDENT	06120		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728511840			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

97043793302



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 9 of 38 CBA008

02-02-92

WJ

ITEM 015
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	874084705	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRES		94103	
FULANI FOR PRES NEW YORK NY		10019	
CUSTOMER SERVICE			
ROC NUMBER 8740847054			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 018
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	351925915	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI FOR PRESIDENT		03101	
FULANI FOR PRESIDENT NEW YORK NY		10019	
CUSTOMER SERVICE			
ROC NUMBER 3519259155			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 017
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	323629016	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB LBF FOR PRES '92		90027	
LENDRA B FULANI FOR PRESIDENT NEW YORK NY		10019	
CUSTOMER SERVICE			
ROC NUMBER 3236290164			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 018
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	351925946	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRESIDENT		03101	
RULES & BYLAWS CTTE DEMOCRATIC 20003 NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3519259461			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 019
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851080	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT		101070317	
MC BARTON NEW YORK NY		46204	
CUSTOMER SERVICE			
ROC NUMBER 3728510800			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 020
FEDERAL EXPRESS NEW YORK NY \$26.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/28/91	372851071	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT		101070317	
CAROL IN NEW YORK NY		27701	
CUSTOMER SERVICE			
ROC NUMBER 3728510715			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$26.50

ITEM 021
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851081	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT		101070317	
APRIL BUTCHER/D CHERRY NEW YORK NY		46204	
CUSTOMER SERVICE			
ROC NUMBER 3728510811			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 022
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851072	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENDRA B, FOR PRESIDENT		101070317	
HARRIET HOFFMAN NEW YORK NY		98122	
CUSTOMER SERVICE			
ROC NUMBER 3728510725			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793303



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 10 of 32 CBA000

ITEM 023
FEDERAL EXPRESS NEW YORK NY \$27.25

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	12/30/91	323828752	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LBFFP 1035		90029	
LENORA B FULANI FOR PRESIDENT		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 323828752B			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$27.25

ITEM 024
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/02/92	372851073	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B. FOR PRESIDENT		101070317	
BETSY PUDEY		02124	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510730			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 025
FEDERAL EXPRESS NEW YORK NY \$32.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	12/30/91	007008503	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LENORA B FULANI FOR PRES		94110	
LENORA B FULANI FOR PRES		10023	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 0070085035			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$32.75

ITEM 026
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	12/23/91	671547184	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B. FOR PRESIDENT		101070317	
PAUL E TSONGAS		01853	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 6715471840			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 027
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	12/31/91	323829014	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LBF		90029	
LENORA B FULANI FOR PRESIDENT		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3238290142			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 028
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/02/92	351925944	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI FOR PRESIDENT 201		03101	
DEMOCRATIC PARTY OF NY		03301	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3519259446			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 029
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	12/30/91	372804775	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B. FOR PRESIDENT		101070317	
METER BROOKS		31038	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728047754			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 030
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/02/92	351925945	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI FOR PRESIDENT		03101	
I P L I		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3519259450			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793304



An American Express company

Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 11 of 32 CBA00

03-02-92 K3

ITEM 031
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	319826716	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT HOLD FOR PICK-UP NEW YORK NY CUSTOMER SERVICE		101070317 03101	
ROC NUMBER 3198267163			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 032
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/31/91	372604776	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT MARK M COVE NEW YORK NY CUSTOMER SERVICE		101070317 03801	
ROC NUMBER 3726047765			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$16.50

ITEM 033
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/31/91	350500766	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT ARISTOTLE INDUSTRIES NEW YORK NY CUSTOMER SERVICE		101070317 20003	
ROC NUMBER 3505007660			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 034
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851078	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT REGENT FOREX 1035 NEW YORK NY CUSTOMER SERVICE		101070317 90029	
ROC NUMBER 3728510785			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 035
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851079	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT JOYCE DATTNER NEW YORK NY CUSTOMER SERVICE		101070317 94117	
ROC NUMBER 3728510796			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 036
FEDERAL EXPRESS NEW YORK NY \$18.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	283775038	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER HARRIET HOFFMAN CREATIVE EXCHANGE NEW YORK NY CUSTOMER SERVICE		96112 10019	
ROC NUMBER 2837750381			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$18.00

ITEM 037
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	351581809	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT EDMUND G BROWN JR NEW YORK NY CUSTOMER SERVICE		101070317 94115	
ROC NUMBER 3515818095			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 038
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/03/92	372604777	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT JIM HORTON NEW YORK NY CUSTOMER SERVICE		101070317 21201	
ROC NUMBER 3726047778			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$16.50

97043793305



No American Express Company

Cardmember Name

J B OPDYCKE

Account Number

Closing Date

Page 12 of 32 CBA0080

02-02-92

K3

21

ITEM 039 FEDERAL EXPRESS NEW YORK NY \$19.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851174	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 10 LB FULANI, LENORA B, FOR PRESIDENT 101070317 JANINE CARPENTER 97203 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511743			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$19.50

ITEM 040 FEDERAL EXPRESS NEW YORK NY \$19.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/02/92	372851166	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 10 LB FULANI, LENORA B, FOR PRESIDENT 101070317 LAUREL HEIGHTS HOSPITAL 30306 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511651			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$19.50

ITEM 041 FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	352213254	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 101070317 LENORA B FALANI FOR PRESIDENT 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3522132541			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 042 FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	296002815	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LBF '92 90027 LBF '92 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 2960028153			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 043 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	381613919	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER JANINE CARPENTER 97203 FULANI FOR PRESIDENT 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3816139191			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 044 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	311728267	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER NAP 35206 CREATIVE EXCHANGE 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3117282674			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 045 FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/30/91	341544954	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 101070317 BURLINGTON CITY HALL 05401 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3415449542			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 046 FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	351925914	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI FOR PRESIDENT 201 03101 FULANI FOR PRESIDENT 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3519259144			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793306



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 13 of 38 CBA008
K3 22

ITEM 047
FEDERAL EXPRESS NEW YORK NY \$25.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	352331282	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B, FOR PRESIDENT	101070317		
LENORA B FULANI FOR PRESIDENT	10023		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 352338282			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$25.00

ITEM 048
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	313304298	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
BETS1 PENDRY	02124		
LENORA B FULANI FOR PRESIDENT	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3133042984			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 049
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/04/92	372851084	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B, FOR PRESIDENT	101070317		
REGENT FDREX 1035	90029		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728510844			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 050
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/04/92	372851086	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
LD15 TROUNSTEIN/LINDA CORNS	77002		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728510866			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 051
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	372851087	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B, FOR PRESIDENT	101070317		
KITTY REESE	94117		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728510870			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 052
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/04/92	372851088	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
APRIL BUTCHER/DAVID CHERRY	46204		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728510855			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 053
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	089210509	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LBF FOR PRESIDENT	27701		
LBF FOR PRESIDENT	10107		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 0892105093			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 054
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/31/91	323693638	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
SHARON EGMIGIAN	95814		
LENORA B FULANI FOR PRES	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3236936382			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793307



Cardmember Name
J B OPDYCKE

Account Number
Closing Date 02-02-92
Page 14 of 32 CBA000

ITEM 055
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	311471518	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LENORA FULANI FOR PRESIDENT		55404	
LENORA B FULANI FOR PRESIDENT		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3114715181			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 056
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/31/91	379590749	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI FOR PRES		94117	
FULANI FOR PRES		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3795907496			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 057
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	341750263	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI FOR PRESIDENT CONN CAMP		06120	
LENORA B FULANI FOR PRESIDENT		10107	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3417502631			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 058
FEDERAL EXPRESS NEW YORK NY \$43.75

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/07/92	050333120	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LENORA B FULANI FOR PRESIDENT		94117	
LENORA B FULANI FOR PRES		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 0503331205			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$43.75

ITEM 059
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	342293868	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT		101070317	
LBF FOR PRES 317		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3422938680			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 060
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	372604768	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
MOLLY HART		94117	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3726047684			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 061
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/02/91	326268764	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LBF FOR PRES		10027	
LBF FOR PRES		10019	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3262687643			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 062
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	372604785	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT		101070317	
JIM HORTON		21201	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3726047850			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

97043793308



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 19 of 32 CBA008

02-02-92

W3

24

ITEM 063
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	283775037	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
HARRIET HOFFMAN	98112		
CREATIVE EXCHANGE 317	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 2837750370			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 064
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	993169192	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
ANDRE VASQUES	23454		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 9931691921			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 065
FEDERAL EXPRESS NEW YORK NY \$30.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/07/92	323275682	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LSF FOR PRES	90029		
LENORA B FULANI FOR PRES 317	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3232756822			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$30.00

ITEM 066
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851107	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
JOHN ROBERTSON	85040		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511076			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 067
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851104	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B, FOR PRESIDENT	101070317		
L B FULANI FOR PRESIDENT	03101		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511043			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 068
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851111	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	101070317		
APRIL BUTCHER	46208		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511113			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 069
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851098	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B, FOR PRESIDENT	101070317		
SHARON EDHIGIAN	95814		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728510984			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 070
FEDERAL EXPRESS NEW YORK NY \$32.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/23/91	323829017	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
LENORA B FULANI FOR PRES 1035	90029		
LENORA B FULANI FOR PRES 317	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3238290175			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$32.75

97043793309



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 16 of 38 CBA00803

02-02-92

WJ

25

ITEM 071 FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851074	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 101070317 C/O FULANI FOR PRESIDENT 06120 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510741			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 072 FEDERAL EXPRESS NEW YORK NY \$15.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	372604767	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 3 LB FULANI, LENORA B, FOR PRESIDENT 101070317 FULANI FOR PRESIDENT 02135 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3726047673			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.00

ITEM 073 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851097	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 101070317 DARYL HELLER 95073 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510973			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 074 FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851099	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 2 LB FULANI, LENORA B, FOR PRESIDENT 101070317 C/O WULD 35211 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510995			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 075 FEDERAL EXPRESS NEW YORK NY \$18.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851090	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 8 LB FULANI, LENORA B, FOR PRESIDENT 101070317 JOYCE DATTNER 94117 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510903			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$18.75

ITEM 076 FEDERAL EXPRESS NEW YORK NY \$15.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851091	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 3 LB FULANI, LENORA B, FOR PRESIDENT 101070317 REGENT FOREX 1035 90029 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510914			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.00

ITEM 077 FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851092	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT 101070317 D: BARBARO 90660 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510925			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.50

ITEM 078 FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851094	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 2 LB FULANI, LENORA B, FOR PRESIDENT 101070317 JANINE CARPENTER 97203 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728510940			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

9704379331C



ITEM 079
FEDERAL EXPRESS

NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851110	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
LINDA CURTIS SUITE E		78701	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728511102			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 17 of 92 CBA0080
K3 26

ITEM 080
FEDERAL EXPRESS

NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851095	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
SANDRA COLEMAN		55402	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510951			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 081
FEDERAL EXPRESS

NEW YORK NY \$13.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/10/92	372851114	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 4 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
REGENT FOREX 1035		90029	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728511146			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.50

ITEM 082
FEDERAL EXPRESS

NEW YORK NY \$16.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851096	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 4 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
LAUREL HEIGHTS HOSPITAL		30306	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728510962			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.00

ITEM 083
FEDERAL EXPRESS

NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/11/92	372851115	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT		101070317	
DAVY HELLER		95073	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728511150			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 084
FEDERAL EXPRESS

NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372804781	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT		101070317	
JAMES BELL		32792	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728047813			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 085
FEDERAL EXPRESS

NEW YORK NY \$18.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	352212482	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT		101070317	
LENORA B FULANI FOR PRESIDENT		10049	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3522124820			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$18.00

ITEM 086
FEDERAL EXPRESS

NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851112	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B, FOR PRESIDENT		101070317	
M C BARTON		48204	
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3728511124			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

97043793311



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 18 of 99 CBA008
K3 27

ITEM 087
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	372851089	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT ELYSE MEADEL NEW YORK NY CUSTOMER SERVICE		101070317 55402	
ROC NUMBER 3728510892			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 088
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/10/92	351925913	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI FOR PRES FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		03101 10023	
ROC NUMBER 3519259133			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 089
FEDERAL EXPRESS NEW YORK NY \$13.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/10/92	372851113	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 4 LB FULANI, LENDRA B, FOR PRESIDENT JOYCE DATHER /MOLLY NEW YORK NY CUSTOMER SERVICE		101070317 94117	
ROC NUMBER 3728511135			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.50

ITEM 090
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851100	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT BETSY PENORY NEW YORK NY CUSTOMER SERVICE		101070317 02124	
ROC NUMBER 3728511005			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 091
FEDERAL EXPRESS NEW YORK NY \$24.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	038044338	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LBF LBF FOR PRES 317 NEW YORK NY CUSTOMER SERVICE		94103 10019	
ROC NUMBER 0380443383			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$24.50

ITEM 092
FEDERAL EXPRESS NEW YORK NY \$15.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851105	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 3 LB FULANI, LENDRA B, FOR PRESIDENT CAROLINE DONNOLA NEW YORK NY CUSTOMER SERVICE		101070317 27701	
ROC NUMBER 3728511054			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.00

ITEM 093
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851103	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT LBF FOR PRES NEW YORK NY CUSTOMER SERVICE		101070317 92037	
ROC NUMBER 3728511032			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 094
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	297173562	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER 30 E GEORGIO LENDRA B FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		462043601 10107	
ROC NUMBER 2971735620			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

97043793312



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 19 of 32 CBA008
W3 28

ITEM 095
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	341750282	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRESIDENT CT CAMP 08120 LENORA B FULANI FOR PRESIDENT 10107 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 341750282			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 096
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	708635173	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT 101070317 L B FALANIPA FOR PRESIDENT 317 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 708635173			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 097
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	295527391	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER CARRIE SACKETT 48202 LENORA B FULANI FOR PRES 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 295527391			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 098
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	394780711	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FDX/SWFA STATION 125501702 LENORA B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 394780711			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 099
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	351925948	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRESIDENT 03101 PAUL MURRAY 02107 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 351925948			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 100
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/06/92	295527389	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER SACKETT 48202 LENORA FULANI FOR PRES 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 295527389			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 101
FEDERAL EXPRESS NEW YORK NY \$32.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	305537865	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LENORA B FULANI FOR PRES 94117 LENORA B FULANI FOR PRES 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 305537865			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$32.50

ITEM 102
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	311471517	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LENORA B FULAN FOR PRES MINN 55404 LENORA FULAN & FOR PRESIDENT 3 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 311471517			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

97043793313



An American Express Company

Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 20 of 32 CBA008

W3

29

ITEM 103
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	283775036	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER HARRIET HOFFMAN CREATIVE EXCHANGE NEW YORK NY CUSTOMER SERVICE		98112 10017	
ROC NUMBER 2837750366			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 104
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	351925949	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB B PEELER LBF FOR PRES NEW YORK NY CUSTOMER SERVICE		03101 10019	
ROC NUMBER 3519259494			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 105
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	341750261	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRES CONN CAMPAIGN LENORA B FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		06120 10107	
ROC NUMBER 3417502616			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 106
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	379622701	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LBF FOR PRESIDENT LBF FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		95073 10019	
ROC NUMBER 3796227013			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 107
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851101	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT LB FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		101070317 93105	
ROC NUMBER 3728511010			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 108
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/09/92	372851108	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT JIM HORTON NEW YORK NY CUSTOMER SERVICE		101070317 19132	
ROC NUMBER 3728511080			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 109
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/15/92	657906217	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT LENORA FULANI FOR PRES NEW YORK NY CUSTOMER SERVICE		101070317 92637	
ROC NUMBER 6579062173			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$16.50

ITEM 110
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/15/92	657906218	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT LBF FOR PRESIDENT 76 NEW YORK NY CUSTOMER SERVICE		101070317 95073	
ROC NUMBER 6579062184			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$16.50

97043793314



An American Express Company

Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 21 of 32 CBA008
W3 30

ITEM 111
FEDERAL EXPRESS NEW YORK NY \$22.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/15/92	350488001	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B. FOR PRESIDENT	101070317		
WILLIAM SMITH COLLEGE W103	14458		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3504880013			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$22.50

ITEM 112
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/08/92	372604784	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B. FOR PRESIDENT	101070317		
SANDRA KELLY	12747		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 372604784			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 113
FEDERAL EXPRESS NEW YORK NY \$18.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	379227394	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
LENORA B FULANI FOR PRES	93105		
LENORA B FULANI FOR PRES	10107		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 379227394			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$18.00

ITEM 114
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/15/92	372851118	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B. FOR PRESIDENT	101070317		
NEW ENGLAND TELEPHONE	02107		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511181			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 115
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	991819488	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI FOR PRES	98112		
FULANI FOR PRES	10019		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 9918194880			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 116
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	351925959	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI FOR PRESIDENT	03101		
LAKE REGIONS FAMILY SVCS	03248		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3519259590			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 117
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851152	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
FULANI, LENORA B. FOR PRESIDENT	10023		
LBF FOR PRES	92037		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511522			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 118
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851153	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B. FOR PRESIDENT	10023		
APRIL BUTCHER	46208		
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 3728511533			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

97043793315



An American Express Company

Cardmember Name

J B OPOYCKE

Account Number

Closing Date

Page 22 of 39

CBA0088

02-02-92

W3

31

ITEM 119 FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851158	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT 10023 LBF FOR PRESIDENT 93105 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511581			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 120 FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851109	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT 10023 LINDA CORTIS 77002 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511091			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 121 FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	311364839	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LBF FOR PRESIDENT 92037 LBF FOR PRESIDENT STE 317 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3113648392			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 122 FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851150	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 10023 JOHN ROBERTSON 85040 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511500			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 123 FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851121	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 10023 CAROLINE DONNOLA 27701 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511218			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 124 FEDERAL EXPRESS NEW YORK NY \$16.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	351326133	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 4 LB FULANI, LENDRA B, FOR PRESIDENT 10023 DEMOCRATIC NATIONAL COMM 20003 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513261334			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$16.00

ITEM 125 FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851122	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT 10023 C/O HARRIET HOFFMAN 98122 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511220			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 126 FEDERAL EXPRESS NEW YORK NY \$18.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851118	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 6 LB FULANI, LENDRA B, FOR PRESIDENT 10023 JOYCE DATTNER 94117 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511183			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$18.75

97043793316



An American Express Company

Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 23 of 32 CBA0080

WG

32

ITEM 127
FEDERAL EXPRESS NEW YORK NY \$27.25

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	323275680	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 10023 LENDRA B FULANI FOR PRES 317 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 323275680			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$27.25

ITEM 128
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851119	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 10023 BETSY PENDRY 02124 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511194			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 129
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851117	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 10023 DARRYL HELLER 95073 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511172			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 130
FEDERAL EXPRESS NEW YORK NY \$15.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851154	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 3 LB FULANI, LENDRA B, FOR PRESIDENT 10023 REGENT FOREX 1035 90029 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511544			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$15.00

ITEM 131
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851149	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT 10023 LBF FOR PRESIDENT 03101 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511496			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 132
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851158	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENDRA B, FOR PRESIDENT 10023 SHARON FGHIGIAN 95814 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511586			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 133
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851157	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 10023 C/O FULANI FOR PRESIDENT 06120 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511570			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 134
FEDERAL EXPRESS NEW YORK NY \$10.50

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851172	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD AIR 1 LB FULANI, LENDRA B, FOR PRESIDENT 10023 D1 BARBARO 80660 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511721			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$10.50

97043793317



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 24 of 38 CBA0090
02-02-92 WJ 33

ITEM 135
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/16/92	372851123	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT LAUREL HEIGHTS HOSPITAL NEW YORK NY CUSTOMER SERVICE		100232824 30308	
ROC NUMBER 3728511231			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 136
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	295527392	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER C SACKETT LENORA B FULANI FOR PRES NEW YORK NY CUSTOMER SERVICE		47302 10019	
ROC NUMBER 2955273926			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 137
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	355105334	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LBF FOR PRESIDENT LENORA FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		12202 10019	
ROC NUMBER 3551053343			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 138
FEDERAL EXPRESS NEW YORK NY \$25.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/17/92	372851124	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT TELLY HANLEY AUDIO SYSTEMS NEW YORK NY CUSTOMER SERVICE		100232824 02139	
ROC NUMBER 3728511242			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$25.50

ITEM 139
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	381813917	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER JANINE CARPENTER FULANI FOR PRESIDENT NEW YORK NY CUSTOMER SERVICE		97203 10023	
ROC NUMBER 3818139178			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 140
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/18/92	372851127	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT JAYCE DATLER/CYNTHIA CAPATHOS NEW YORK NY CUSTOMER SERVICE		100232824 94117	
ROC NUMBER 3728511275			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 141
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/18/92	372851128	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT JEFF BERGMAN/ NEW YORK NY CUSTOMER SERVICE		100232824 95073	
ROC NUMBER 3728511288			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 142
FEDERAL EXPRESS NEW YORK NY \$24.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/13/92	351925947	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI FOR PRESIDENT DAVID WATTERS NEW YORK NY CUSTOMER SERVICE		03101 03820	
ROC NUMBER 3519259472			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$24.50

97043793318



An American Express Company

Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 25 of 32 CBA008
02-02-92 W3 34

ITEM 143
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/18/92	372851140	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 C/O FULANI FOR PRESIDENT 06120 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511404			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 144
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	341750260	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRESIDENT CONN CAMP 06120 LENORA B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3417502605			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 145
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	351326131	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 FULANI FOR PRESIDENT 10024 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513261312			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 146
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/18/92	372851141	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 LINDA CURTIS 78701 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511415			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 147
FEDERAL EXPRESS NEW YORK NY \$20.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	311471516	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LENORA FULANI FOR PRESIDENT-MN 55404 LENORA FULANI FOR PRESIDENT 30 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3114715166			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 148
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	108198567	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB CAROLINE DONNOLA 27701 L B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 1081985671			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 149
FEDERAL EXPRESS NEW YORK NY \$16.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	296002814	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 4 LB FULANI, LENORA B, FOR PRESIDENT 100232824 LENORA B FULANI FOR PRES 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 2960028142			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.00

ITEM 150
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	311728266	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER NAP 35205 CREATIVE EXCHANGE 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3117282663			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

97043793319



An American Express Company

Cardmember Name
J B O'DYCKE

Account Number

Closing Date Page 26 of 32 CBA0080

02-02-92

W3

35

ITEM 151
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	372851130	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 LENORA FULANIA FOR PRES 03101 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511301			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 152
FEDERAL EXPRESS NEW YORK NY \$16.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	323995670	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 4 LB SHARON EGHIGIAN 95814 LEGOLO B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3239956705			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.00

ITEM 153
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/14/92	351925950	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI FOR PRESIDENT 03101 FULANI FOR PRESIDENT 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3519259505			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 154
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	372851129	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 ATTN PAT ROHAN 03108 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511290			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 155
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	283775035	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB HARRIET HOFFMAN 98112 LENORA FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 2837750355			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 156
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	992862818	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 QUILL CORP CREDIT DEPT 80089 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 9928628183			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 157
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	290736747	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER GENEVIEVE TORRES 90027 LBF FOR PRESIDENT RM 30 10024 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 2907367470			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 158
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	353412089	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 LENORA B FULANI FOR PRESIDENT 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3534120893			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793320



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 27 of 32 CBA009
WJ 36

ITEM 159
FEDERAL EXPRESS NEW YORK NY \$27.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/22/92	372804780	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 100232824 LB EMANI FOR PRS 46208 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 372804780			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$27.00

ITEM 160
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/16/92	372851155	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENDRA B, FOR PRESIDENT 100232824 SANDRA COLEMAN 55402 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 372851155			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 161
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/16/92	372851120	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 10023 JANINE CARPENTER 97203 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 372851120			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 162
FEDERAL EXPRESS NEW YORK NY \$9.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/22/92	340635798	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 100232824 EAST SIDE CENTER 10003 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 340635798			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 163
FEDERAL EXPRESS NEW YORK NY \$32.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/21/92	348863515	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK LENDRA B FULANI FOR PRESIDENT 94117 LENDRA B FUTANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3488635150			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$32.75

ITEM 164
FEDERAL EXPRESS NEW YORK NY \$32.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/23/92	351328130	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 100232824 LEAGUE OF WOMEN VOTERS 20036 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513281301			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$32.75

ITEM 165
FEDERAL EXPRESS NEW YORK NY \$24.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/23/92	351328128	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENDRA B, FOR PRESIDENT 100232824 EAST SIDE CENTER 202 10013 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513281286			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$24.50

ITEM 166
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	01/24/92	305427953	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER LBF FOR PRESIDENT 95814 LBF FOR PRESIDENT STE 30 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3054279535			
S/E # 4416508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793321



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 28 of 38 CBA0085

02-02-92

W3

37

ITEM 167
FEDERAL EXPRESS NEW YORK NY \$32.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/24/92	351326127	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT 100232824 FULANI FOR PRESIDENT 10024 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513261275			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$32.50

ITEM 168
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/17/92	350500770	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 SANDRA COLEMAN 55402 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3505007704			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 169
FEDERAL EXPRESS NEW YORK NY \$21.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/28/92	305709124	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK SHARON EGHIGIAN 95814 LENORA B FULARI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3057091240			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$21.75

ITEM 170
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851147	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 DARRYL HELLER/PAT 95073 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511474			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 171
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851148	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 BETSY PENDRY 02124 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511485			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 172
FEDERAL EXPRESS NEW YORK NY \$22.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372604769	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT 100232824 LEAGUE OF WOMEN VOTERS/ED FUND 20038 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3726047695			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$22.50

ITEM 173
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851132	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 M C BARTON 46204 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511323			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 174
FEDERAL EXPRESS NEW YORK NY \$27.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	340635792	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 PRIORITY ONE 3 LB LENORA B FULANE FOR PRES 03101 LENORA B FULANE FOR PRES 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3406357920			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$27.00

97043793322



Cardmember Name
J B OPDYCKE

Account Number

Closing Date
02-02-92

Page 29 of 32 CBA008

KG

38

ITEM 175
FEDERAL EXPRESS NEW YORK NY \$14.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	379193942	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB LENORA B FULANI FOR PRESIDENT 95073 LENORA B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 379493942			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$14.00

ITEM 176
FEDERAL EXPRESS NEW YORK NY \$22.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851125	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT 100232824 CAROLINE DONNOLA 27701 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511253			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$22.50

ITEM 177
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851126	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT 100232824 LBF FOR PRESIDENT 03101 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511264			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.50

ITEM 178
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851144	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 HARRIET HOFFMAN 98122 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511441			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 179
FEDERAL EXPRESS NEW YORK NY \$20.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	197178165	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 BARBARA SANDS 12202 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 1971781652			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.50

ITEM 180
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851145	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 SANDRA COLEMAN/ELYSE MENDEL 55402 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511452			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 181
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/21/92	298338626	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER LINDEN TRAVEL 100221958 L B FULANI FOR PRES 031012139 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 2983386265			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 182
FEDERAL EXPRESS NEW YORK NY \$16.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851146	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB FULANI, LENORA B, FOR PRESIDENT 100232824 SHARON 95814 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511463			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.50

97043793323



Cardmember Name
J B OPDYCKE

Account Number
Closing Date Page 30 of 32 CBA008
02-02-92 NJ 39

ITEM 183
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	197178166	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 DONALD LOWERY/JOHN ROBERTSON 85040 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 1971781663			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 184
FEDERAL EXPRESS NEW YORK NY \$27.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851133	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK FULANI, LENORA B, FOR PRESIDENT 100232824 APRIL 46204 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511334			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$27.50

ITEM 185
FEDERAL EXPRESS NEW YORK NY \$19.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851142	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 5 LB FULANI, LENORA B, FOR PRESIDENT 100232824 JOYCE DATTNER 94117 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511428			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$19.50

ITEM 186
FEDERAL EXPRESS NEW YORK NY \$11.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851134	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 C/O FULANI FOR PRESIDENT 06120 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511345			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$11.50

ITEM 187
FEDERAL EXPRESS NEW YORK NY \$17.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851143	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 3 LB FULANI, LENORA B, FOR PRESIDENT 100232824 REGENT FOREY 1035 90029 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511430			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$17.50

ITEM 188
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/23/92	372851135	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB FULANI, LENORA B, FOR PRESIDENT 100232824 LINDA CURTIS/LOIS 77002 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3728511356			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

ITEM 189
FEDERAL EXPRESS NEW YORK NY \$13.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/28/92	351326126	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER FULANI, LENORA B, FOR PRESIDENT 100232824 ARTHUR BLOCK ESQ 10019 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3513261264			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 190
FEDERAL EXPRESS NEW YORK NY \$15.50

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	341750258	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER LENORA B FULANI FOR PRES CONN 06120 LENORA B FULANI FOR PRESIDENT 10023 NEW YORK NY CUSTOMER SERVICE			
ROC NUMBER 3417502583			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$15.50

97043793324



Cardmember Name
J B OPDYCKE

Account Number

Closing Date Page 31 of 39 CBA00900

02-02-92

KQ

40

ITEM 191 \$13.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/29/92	993189185	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 OVERNIGHT LETTER			
FULANI, LENORA B, FOR PRESIDENT	100232824		
LBF/PRESIDENT STE 201	03101		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 9931891851			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 192 \$13.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	340970328	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 1 LB			
FULANI, LENORA B, FOR PRESIDENT	100232824		
LBF 92 3	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3409703286			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

ITEM 193 \$20.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/20/92	354827959	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI FOR PRESIDENT	02134		
FULANI LENORA B FOR PRESIDENT	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3548279593			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$20.00

ITEM 194 \$16.50
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	283775034	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD PKG 2 LB			
HARRIET HOFFMAN	98112		
FULANIE FOR PRES	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 2837750344			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$16.50

ITEM 195 \$9.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	311728271	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
NAP	35205		
LBF CAMPAIGN	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3117282711			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 196 \$9.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/27/92	313856383	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
FULANI, LENORA B, FOR PRESIDENT	100232824		
LENORA B FULANI FOR PRESIDENT	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3138563831			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 197 \$9.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/28/92	290738745	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 STANDARD LETTER			
GENEVIEVE TORRES	90027		
LBF FOR PRESIDENT	10024		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 2907387455			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$9.00

ITEM 198 \$27.25
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/28/92	323621417	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Record of Charge			
1 COURIER PAK			
FULANI, LENORA B, FOR PRESIDENT	100232824		
LENORA B FULANI FOR PRES 30	10023		
NEW YORK	NY		
CUSTOMER SERVICE			
ROC NUMBER 3236214170			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$27.25

97043793325



Cardmember Name
J B QPOYCKE

Account Number

Closing Date Page 32 of 32 CBA0080

02-02-92

K3

41

ITEM 199 \$13.00
FEDERAL EXPRESS NEW YORK NY

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/29/92	911341447	
Service Establishment and Location			
FEDERAL EXPRESS	NEW YORK	NY	
Store of Charge			
1 OVERNIGHT LETTER			
ARISTOTLE INDUSTRIES		200031164	
FULANI FOR PRESIDENT		10023	
NEW YORK NY			
CUSTOMER SERVICE			
ROC NUMBER 9113414472			
S/E # 4418508471			
TOTAL CHARGE AMOUNT			\$13.00

97043793326

LENORA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

5446

7/3 92 1-337/288

American Express
Ten thousand eight hundred sixty eight + 1/4

10,868.69

AB AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

Stewart NOT NEGOTIABLE

⑆005446⑆ ⑆026003379⑆ 31031542⑆

LENORA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

5447

7/3 92 1-337/288

American Express
Six hundred fifty one + 51/100

1,651.50

AB AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

Stewart NOT NEGOTIABLE

⑆005447⑆ ⑆026003379⑆ 31031542⑆

97043793327

The Gold Card Statement of Account

57 E88010002
1678

Please enter Account Number on all checks and correspondence.
Detach and return this portion with your remittance. Do not staple or fold.
Payable upon receipt in U.S. dollars. A check drawn on a bank located in the U.S.

E1 O 1

YOUR COMMUNICATION IS ACKNOWLEDGED. DO NOT PAY DISPUTED AMOUNT UNTIL RESOLVED.

Check here if address or telephone number has changed. See reverse side.

Account Number XXXXXXXXXX Closing Date **05-26-92** Minimum Amount Due **\$12,194.60**

DAVID E BELMONT
5 W 107TH ST
NO 5B
NEW YORK NY
10025-3324

MAIL PAYMENT TO:
AMERICAN EXPRESS
P.O. BOX 2855
NEW YORK NY 10116-2855



2814225872 012194600013454606



The Gold Card Summary of Account

Please retain this portion for your files.

Card Member Name **DAVID E BELMONT** Account Number XXXXXXXXXX Closing Date **05-26-92**

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days).
FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT 1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. Page 1 of 8

97043793328

Previous Card Balance	Card Payments/Credits	New Card Charges	New Card Balance (A)	Min. Payment (B)	Minimum Amount Due (C)
\$19,063.19	\$20,343.19	\$13,454.60	\$12,174.60	\$20.00	\$12,194.60

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
CARD 3728-142258-71007 TRANSACTIONS				
8335143-0		PAYMENT RECEIVED - THANK YOU 05/22		5,538.00
8335143-0		PAYMENT RECEIVED - THANK YOU 05/22		420.99 - ?
8335143-0		PAYMENT RECEIVED - THANK YOU 05/22		8,889.20
300119-1		US AIR INC # 03785535847213	r 25	243.00 <i>leave b.</i>
564133-1		ADJ. CAR RENTAL LOSS/ DAMAGE	100.00	
		DATE OF ABOVE 05/12		
564133-1		ADJ. CAR RENTAL LOSS/ DAMAGE	200.00	
		DATE OF ABOVE 05/12		
560134-1		REVERSAL OF PREVIOUS TEMPORARY CREDIT	269.00	
		DATE OF ABOVE 05/13		
560142-1		TEMPORARY CREDIT FOR BILLING INQUIRY		1,052.00
		DATE OF ABOVE 05/21		
560142-1		TEMPORARY CREDIT FOR BILLING INQUIRY		516.00
		DATE OF ABOVE 05/21		
560142-1		TEMPORARY CREDIT FOR BILLING INQUIRY		369.00 - ?
		DATE OF ABOVE 05/21		
560142-1		TEMPORARY CREDIT FOR BILLING INQUIRY		255.00 - ?
		DATE OF ABOVE 05/21		
560142-1		TEMPORARY CREDIT FOR BILLING INQUIRY		30.00 ✓
		DATE OF ABOVE 05/21		
663143-1		AMERICAN AIRLINES INC		369.00 ✓
		# 00113798548719		
663143-1		AMERICAN AIRLINES INC		369.00 ✓
		# 00113798548739		
663143-1		AMERICAN AIRLINES INC		369.00 ✓
		# 00113798548759		
663143-1		AMERICAN AIRLINES INC		1,052.00 ✓ <i>skewer</i>
		# 00113798548869		
PAGE TOTAL			568.00	19,472.19

already paid. The card is refunded.

if card.

Payments of credits received after closing date above will appear on next month's statement.

Treat someone special with a BE MY GUEST Restaurant Certificate. They make great Graduation and Wedding Gifts. Call 1-800-535-GIFT.

Amax Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
663143-1		DELTA AIR LINES ATLANTA GA # 00613798559209		127.00
663143-1		DELTA AIR LINES ATLANTA GA # 00613798559219		127.00
663143-1		DELTA AIR LINES ATLANTA GA # 00613798559229		127.00
663143-1		US AIR INC # 03713798549849		490.00 <i>vs set</i>
221140-1	001	AMTRAK ACH WASHINGTON DC	249.00	
975142-1	002	AMERICA WEST - SAC SCOTTSDALE AZ INV#648201	216.25	
133118-1	003	ROBERT'S RSTR NEW YORK NY INV#017859	85.10	
018129-1	004	AU PRINTEMPS NEW YORK NY	85.51	
194139-1	005	CHELSEA RACQUET CLUB INC NEW YORK NY INV#471604	24.00	
495118-1	006	NATIONAL CAR RENTAL MINNEAPOLIS MN 52F83643 NATIONAL CAR RENTAL 04/07/92	713.44	
663122-1	007	AMERICAN AIRLINES NEW YORK NY TKT# 0011382601403 04/23	410.00	
663122-1	008	AMERICAN AIRLINES NEW YORK NY TKT# 0011382601404 04/23	410.00	
663122-1	009	AMERICAN AIRLINES NEW YORK NY TKT# 0011382601405 04/23	410.00	
663122-1	010	AMERICAN AIRLINES NEW YORK NY TKT# 0018553584617 04/20	415.00	
663122-1	011	AMERICAN AIRLINES NEW YORK NY TKT# 0018553584726 04/26	375.00	
663122-1	012	DELTA AIRLINES NEW YORK NY TKT# 0061379855920 04/20	292.00	
663122-1	013	DELTA AIRLINES NEW YORK NY TKT# 0061379855921 04/20	292.00	<i>less 105 x 3 refund</i>
663122-1	014	DELTA AIRLINES NEW YORK NY TKT# 0061379855922 04/20	292.00	
663122-1	015	DELTA AIRLINES NEW YORK NY TKT# 0068553584724 04/22	835.00	
501125-1	016	PASTADORE NEW YORK NY 360493039 FOOD/BEV 05/03/92	43.00	
663129-1	017	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602028 04/30	350.00	
663129-1	018	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602029 04/30	420.00	
663129-1	019	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602030 04/30	420.00	
663129-1	020	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602049 04/30	460.00	
663129-1	021	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602050 04/30	460.00	
663129-1	022	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602051 04/30	460.00	
663129-1	023	AMERICAN AIRLINES NEW YORK NY TKT# 0018553584635 04/30	375.00	<i>no flight taken</i>
663129-1	024	NORTHWEST AIRLINES NEW YORK NY TKT# 0125583584629 04/28	725.00	<i>325 refunded</i>
663136-1	025	AMERICAN AIRLINES NEW YORK NY TKT# 0011382602694 05/07	700.00	
663136-1	026	NORTHWEST AIRLINES NEW YORK NY TKT# 0121382602685 05/07	350.00	
663136-1	027	TRANS WORLD AIRLINES NEW YORK NY TKT# 0151382602679 05/07	350.00	<i>no flight taken</i>
663136-1	028	US AIR NEW YORK NY TKT# 0371382602709 05/07	606.00	
663136-1	029	US AIR NEW YORK NY TKT# 0371382602710 05/07	606.00	
663136-1	030	US AIR NEW YORK NY TKT# 0371382602711 05/07	606.00	
663136-1	031	US AIR NEW YORK NY TKT# 0371382602712 05/07	120.00	
663136-1	032	US AIR NEW YORK NY TKT# 0371382602713 05/07	120.00	
663136-1	033	US AIR NEW YORK NY TKT# 0371382602714 05/07	120.00	
501139-1	034	PERRETTI'S ITL CFE#27 NEW YORK NY 000499067 FOOD AND BEVERAGE 05/17/92	35.00	
495140-1	035	AMTRAK ACH WASHINGTON DC 133022440 TKT# 1344665041175 05/13/92	47.00	
501145-1	036	EAR INN NEW YORK NY 01103243 FOOD-BEV 05/22/92	41.00	

97043793329

TOTAL FOR CARD 100

13,056.30

20,343.19

PAGE TOTAL

12,518.30

871.00

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
056132-1	037	CARD ██████████ TRANSACTIONS THE COMFORT CONNECTION SAN FRANCISCO CA INV#306746	254.94	
		TOTAL FOR CARD 101	254.94	.00
821142-1		CARD ██████████ TRANSACTIONS ANNUAL MEMBERSHIP FEE KIMBERLY SVOBODA PERIOD 05/92 THRU 05/93	35.00	
501146-1	038	MATLES FLORIST NEW YORK NY 146454868 FLOWERS/PLANTS/GIFTS 05/23/92	78.36	
		TOTAL FOR CARD 102	113.36	.00
		PAGE TOTAL	368.30	.00
		ACCOUNT TOTAL	\$13,454.60	\$20,343.19

93330437

Statement of Sign & Travel® Account

Account No: ██████████

HAVE YOUR TRAVEL AGENT TYPE OR KEY "E" FOR SIGN & TRAVEL

Creditor: AMERICAN EXPRESS CENTURION BANK

Closing Date: 05-26-92

Previous Balance	Payments/Credits	New Charges	FINANCE CHARGE	New Balance
.00	.00	650.00	1.59	651.59

Reference Number	Item No.	Posting Date	Description of Transaction	Charges	Credits
663143-1	001	05/22	UNITED AIRLINES # 01685535846690	325.00	
663143-1	002	05/22	UNITED AIRLINES # 01685535847283	325.00	

Finance Charge Schedule				Minimum Payment Includes		Payment Due Date: 06-20-92
Balances to Which Rate Applies	Average Daily Balance	Daily Periodic Rate	ANNUAL PERCENTAGE RATE	Past Due Amount	This Month's Payment	Minimum Payment
ALL	108.44	.0489%	17.90%	.00	20.00	\$20.00

Amendment to Minimum Payment Terms

Important Sign & Travel Account Information

Prior to January 1, 1990, the Sign & Travel Account Agreement (the "Agreement") required a Minimum Payment of 1/24th of the New Balance of your Sign & Travel Account, but not less than \$20 or the entire New Balance if less than \$20. After January 1, 1990, the Agreement is amended to require a Minimum Payment of 1.26% of the New Balance, but not less than \$20 or the entire New Balance if less than \$20. If you wish, you can always pay more than the Minimum Payment.

Finance Charge
To calculate the Finance Charge, we multiply the Daily Periodic Rate by the Average Daily Balance during the billing period. Then we multiply the product by the number of days in the billing cycle. To get the Average Daily Balance, we take the beginning balance of the Sign & Travel Account each day, add any new Sign & Travel Charges and accrued and unpaid Finance Charges (except such Finance Charges will not be included for residents of CO, IA, ME, NC and PR) and subtract any payments or credits. Then we add up the daily balance for the billing period and divide by the number of days in the billing period. This gives us the Average Daily Balance. This method of computation of the Average Daily Balance results in compound interest (except for residents of CO, IA, ME, NC and PR).

Mail your payment in the enclosed envelope or to the address for payments listed on the back of your Card Account statement. Remember, your payment each month should be for at least the Minimum Amount Due or the Total Amount Due, whichever appears on the Card Account Statement. Either amount includes the Sign & Travel Minimum Payment shown above and the balance due on your Card Account. If you want to pay more than the Minimum Payment (up to the entire Sign & Travel New Balance), make your payment for the larger amount and the excess will be applied to your Sign & Travel Account.

How to avoid additional Finance Charge
You have the right to pay the entire New Balance of your Sign & Travel Account at any time without penalty. No Finance Charge will be assessed in any billing period in which there are no new Sign & Travel Charges, and payments or credits received before the Payment Due Date equal or exceed the previous balance. The Payment Due Date is 25 days after the Closing Date of the Sign & Travel Statement.

Finance Charge Information for Certain Cardmembers
As of 5/22/92, the card for your Sign & Travel Account was not American Express Centurion Bank and you have not thereafter reduced your Sign & Travel Account to zero (Specified Accounts) and for a Sign & Travel Charge has not been posted to your Specified Account on or after 7/1/88 (\$1.50 for billing addresses in IA and NJ, \$2.19 for CO and OK, 12/1/88 for IL, KS, and WI; \$1.89 for WY), then (a) no additional Finance Charge will be assessed if you pay the entire New Balance before the Payment Due Date and (b) no Finance Charge will be assessed in any billing period in which there is no previous balance.

Billing Inquiries
For all billing inquiries concerning your Sign & Travel Account, contact American Express, Gold Card Customer Service Department, American Expressway, P.O. Box 248, Florida 33101 or 1-800-525-8800. See the reverse side of the first page of your Card Account statement for additional information concerning billing inquiries.

ITEM 001 AMTRAK ADH WASHINGTON DC \$249.00

PASSenger TICKET AND BAGGAGE CHECK
BOARDING PASS

ARC

WASHINGTON DC
NEW YORK PEAK

22755510962

ITEM 002 AMERICA WEST - SAC SCOTTSDALE AZ \$218.25

AMER. WEST ULTRA/AMEX C/C
MERCHANT # 502-655-370-1

5026553701 05/12/92

SONICAIR COURIERS

PHONE ORDER COURIER SERVICE

TRAVEL DATE	APPROXIMATE TIME	ORDER NUMBER	AMOUNT CHARGED	TAX
29		PHONE ORDER		
TOTAL			218.25	

INVOICE NUMBER 00 648201

ITEM 003 ROBERT'S RSTR NEW YORK NY INV#017858 \$85.10

01/92 THRU 01/95 82 AT

DAVID E BELMONT

RESTAURANT
NEW YORK, NY

042294

64.75
5.35
15.00
TOTAL 85.10

American Express® Cards

ITEM 004 AU PRINTemps NEW YORK NY \$85.51

01/92 THRU 01/95 82 AT

DAVID E BELMONT

AU PRINTemps
NEW YORK, NY

042992

85.51

American Express® Cards

ITEM 005 CHELSEA RACQUET CLUB INC NEW YORK NY \$24.00

01/92 THRU 01/95 82 AT

David Belmont

CHELSEA RACQUET CLUB INC
NEW YORK, NY

051392

24.00

American Express® Cards

ITEM 006 NATIONAL CAR RENTAL MINNEAPOLIS MN \$713.44

NATIONAL CAR RENTAL MINNEAPOLIS MN

04/07/92

0000000

LOCATION	DATE TIME	AGREEMENT
RENTAL NEW YORK	NY 04/07/92	52763543
RETURN NEW YORK	NY 04/25/92	11302

S/E # 7223820044

\$713.44

1
3
3
3
9
7
0
4
3
7

ITEM 007
AMERICAN AIRLINES NEW YORK NY \$410.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/23/92		00113828014035	
Passenger Name PULANI/L			Traveling Airline AMERICAN AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			410.00		
GREENSBORO NC	US	BB			
RALEIGH NC		VO			
LASJARDIA INTL A/P	AA	Y2	312120004558 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

ITEM 008
AMERICAN AIRLINES NEW YORK NY \$410.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/23/92		00113828014049	
Passenger Name HINMAN/L			Traveling Airline AMERICAN AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			410.00		
GREENSBORO NC	US	BB			
RALEIGH NC		VO			
LASJARDIA INTL A/P	AA	Y2	312120004558 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

ITEM 009
AMERICAN AIRLINES NEW YORK NY \$410.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/23/92		00113828014050	
Passenger Name SULLIVAN/J			Traveling Airline AMERICAN AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			410.00		
GREENSBORO NC	US	BB			
RALEIGH NC		VO			
LASJARDIA INTL A/P	AA	Y2	312120004558 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

ITEM 010
AMERICAN AIRLINES NEW YORK NY \$415.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/20/92		00185535848174	
Passenger Name EBIGHIEN/S			Traveling Airline AMERICAN AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
COLUMBUS OH			415.00		
OHARE FIELD IL	AA	Y			
SAN FRANCISCO CA	AA	Y			
			312120004558 003700 24 123000		
Amex Use Only					
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY S/E # 788270000					

ITEM 011
AMERICAN AIRLINES NEW YORK NY \$375.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/25/92		00185535847281	
Passenger Name WEINTRAUB/S			Traveling Airline AMERICAN AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
J F KENNEDY A/P NY			375.00		
SAN FRANCISCO CA	TR	B			
			312120004551 003700 00 123000		
Amex Use Only					
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY S/E # 788270000					

ITEM 012
DELTA AIRLINES NEW YORK NY \$292.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/20/92		00613788558226	
Passenger Name PULANI/L			Traveling Airline DELTA AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			292.00		
PROVIDENCE RI	DL	80			
ALBANY NY	US	B			
			312120003720 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

ITEM 013
DELTA AIRLINES NEW YORK NY \$292.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/20/92		00613788558215	
Passenger Name HINMAN/L			Traveling Airline DELTA AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			292.00		
PROVIDENCE RI	DL	80			
ALBANY NY	US	B			
			312120003720 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

ITEM 014
DELTA AIRLINES NEW YORK NY \$292.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/20/92		00613788558220	
Passenger Name SULLIVAN/J			Traveling Airline DELTA AIRLINES		
Agent Name LINDEN TRAVEL BUREAU			Agent Address NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LASJARDIA INTL A/P			292.00		
PROVIDENCE RI	DL	80			
ALBANY NY	US	B			
			312120003720 003700 00 123000		
Amex Use Only					
PASSENGER TICKET S/E # 788270000					

9704379332

ITEM 015 NEW YORK NY \$835.00
DELTA AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/22/82	00685535847248
Passenger Name	Traveling Airline	
FULANI/L	DELTA AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
PROVIDENCE RI	DL	B
ASQUARDIA INTL A/P	AA	Y
ALBANY NY		
Transaction Amount		
835.00		
Address Use Only		
312120023767 003700 09 133000		
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY S/E # 7892700013		

ITEM 018 NEW YORK NY \$43.00
PASTADORE

Cardmember Account No	Date of Charge	Reference Code	Approved Code
[REDACTED]	05/03/82	380493039	
Service Establishment and Location	NEW YORK	NY	
PASTADORE			
Account or Charge			
FOOD/BEV		\$35.85	
TIP		\$7.05	
S/E # 6311338958			
TOTAL CHARGE AMOUNT			\$43.00

ITEM 017 NEW YORK NY \$350.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020280
Passenger Name	Traveling Airline	
DICHARA/C	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
J F KENNEDY A/P NY	AA	Y2
LOS ANGELES CA		
Transaction Amount		
350.00		
Address Use Only		
312820002170 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

ITEM 018 NEW YORK NY \$420.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020281
Passenger Name	Traveling Airline	
MASSAD/S	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
J F KENNEDY A/P NY	AA	VE
SAN FRANCISCO CA	AA	VE
J F KENNEDY A/P NY	AA	VE
Transaction Amount		
420.00		
Address Use Only		
312820002171 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

ITEM 019 NEW YORK NY \$420.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020303
Passenger Name	Traveling Airline	
WEINTRAUB/S	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
SAN FRANCISCO CA	AA	VE
J F KENNEDY A/P NY	AA	VE
SAN FRANCISCO CA	AA	VE
Transaction Amount		
420.00		
Address Use Only		
312820002172 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

ITEM 020 NEW YORK NY \$460.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020480
Passenger Name	Traveling Airline	
FULANI/L	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
J F KENNEDY A/P NY	AA	DE
SAN FRANCISCO CA	AA	DE
J F KENNEDY A/P NY	AA	DE
Transaction Amount		
460.00		
Address Use Only		
312820002178 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

ITEM 021 NEW YORK NY \$460.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020601
Passenger Name	Traveling Airline	
FULANI/L	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
J F KENNEDY A/P NY	AA	DE
SAN FRANCISCO CA	AA	DE
J F KENNEDY A/P NY	AA	DE
Transaction Amount		
460.00		
Address Use Only		
312820002177 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

ITEM 022 NEW YORK NY \$460.00
AMERICAN AIRLINES

Cardmember Account No	Transaction Date	Total Number
[REDACTED]	04/30/82	00113828020612
Passenger Name	Traveling Airline	
SULLIVAN/J	AMERICAN AIRLINES	
Agent Name	Agent Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
J F KENNEDY A/P NY	AA	DE
SAN FRANCISCO CA	AA	DE
J F KENNEDY A/P NY	AA	DE
Transaction Amount		
460.00		
Address Use Only		
312820002178 003700 00 130000		
PASSENGER TICKET S/E # 7892700008		

9704379333

DAVID E. BELMONT

57

ITEM 023 AMERICAN AIRLINES NEW YORK NY \$375.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/30/82		00185535846362	
Passenger Name			Issuing Airline		
WOLFE/B			AMERICAN AIRLINES		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
SAN FRANCISCO CA	AA	Y	375.00		
J F KENNEDY A/P NY			Amount Use Only		
			31282000189		
			003700		
			00 130000		
VISC CHARGE ORDER/PREPAID TICKET AUTHORITY					
S/E # 1892700005					

ITEM 024 NORTHWEST AIRLINES NEW YORK NY \$725.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		04/28/82		01285535846252	
Passenger Name			Issuing Airline		
LACEY/E			NORTHWEST AIRLINES		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
MINNEAPOLIS MN	NW	YH	725.00		
SAN FRANCISCO CA			Amount Use Only		
			312820025272		
			003700		
			19 130000		
VISC CHARGE ORDER/PREPAID TICKET AUTHORITY					
S/E # 1892700104					

ITEM 025 AMERICAN AIRLINES NEW YORK NY \$700.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		00113828026841	
Passenger Name			Issuing Airline		
BERMAN/J			AMERICAN AIRLINES		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
J F KENNEDY A/P NY	AA	Y2	700.00		
SAN FRANCISCO CA			Amount Use Only		
J F KENNEDY A/P NY	AA	Y2	312820004283		
			003700		
			00 137000		
PASSENGER TICKET					
S/E # 1892700005					

ITEM 026 NORTHWEST AIRLINES NEW YORK NY \$350.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		01213828026884	
Passenger Name			Issuing Airline		
LACY/L			NORTHWEST AIRLINES		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
MINNEAPOLIS MN	NW	Y2	350.00		
SAN FRANCISCO CA			Amount Use Only		
			312820031895		
			003700		
			00 137000		
PASSENGER TICKET					
S/E # 1892700104					

ITEM 027 TRANS WORLD AIRLINES NEW YORK NY \$350.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		01513828026790	
Passenger Name			Issuing Airline		
DID-1ARA/C			TRANS WORLD AIRLINES		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
J F KENNEDY A/P NY	TW	BT	350.00		
SAN FRANCISCO CA			Amount Use Only		
			312820035332		
			003700		
			00 137000		
PASSENGER TICKET					
S/E # 1892700155					

ITEM 028 US AIR NEW YORK NY \$606.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		03713828027098	
Passenger Name			Issuing Airline		
PULANI/L			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
SAN FRANCISCO CA	US	H	606.00		
LOS ANGELES CA			Amount Use Only		
SAN FRANCISCO CA	US	H	312820050123		
FRESNO CA	US	H8	003700		
SAN FRANCISCO CA	US	H8	00 137000		
PASSENGER TICKET					
S/E # 1892400218					

ITEM 029 US AIR NEW YORK NY \$606.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		03713828027110	
Passenger Name			Issuing Airline		
SULLIVAN/J			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
SAN FRANCISCO CA	US	H	606.00		
LOS ANGELES CA			Amount Use Only		
SAN FRANCISCO CA	US	H	312820050124		
FRESNO CA	US	H8	003700		
SAN FRANCISCO CA	US	H8	00 137000		
PASSENGER TICKET					
S/E # 1892400218					

ITEM 030 US AIR NEW YORK NY \$606.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/82		03713828027111	
Passenger Name			Issuing Airline		
SULLIVAN/J			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
SAN FRANCISCO CA	US	H	606.00		
LOS ANGELES CA			Amount Use Only		
SAN FRANCISCO CA	US	H	312820050125		
FRESNO CA	US	H8	003700		
SAN FRANCISCO CA	US	H8	00 137000		
PASSENGER TICKET					
S/E # 1892400218					

97043793334

ITEM 031 US AIR NEW YORK NY \$120.00

Corporate Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/92		0371382827122	
Passenger Name			Traveling Airline		
FULANI/L			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LAGUARDIA INTL A/P	US	U	120.00		
WASHINGTON NAT'L DC					
Amount Use Only					
			313520050128		
			003700		
			00 137000		
PASSENGER TICKET S/E # 7892400218					

ITEM 032 US AIR NEW YORK NY \$120.00

Corporate Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/92		03713828027133	
Passenger Name			Traveling Airline		
HINMAN/L			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LAGUARDIA INTL A/P	US	U	120.00		
WASHINGTON NAT'L DC					
Amount Use Only					
			313520050127		
			003700		
			00 137000		
PASSENGER TICKET S/E # 7892400218					

ITEM 033 US AIR NEW YORK NY \$120.00

Corporate Account No		Transaction Date		Ticket Number	
[REDACTED]		05/07/92		03713828027144	
Passenger Name			Traveling Airline		
SULLIVAN/J			US AIR		
Agent Name			Agent Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
LAGUARDIA INTL A/P	US	U	120.00		
WASHINGTON NAT'L DC					
Amount Use Only					
			313520050128		
			003700		
			00 137000		
PASSENGER TICKET S/E # 7892400218					

ITEM 034 PERRETTI'S ITL CFE#27 NEW YORK NY \$35.00

Corporate Account No		Date of Charge	Reference Code	Approval Code
[REDACTED]		05/17/92	000498057	
Service Establishment and Location				
PERRETTI'S ITL CFE#27 NEW YORK NY				
Name of Charge				
FOOD AND BEVERAGE				
S/E # 8311157871				
TOTAL CHARGE AMOUNT				\$35.00

ITEM 035 AMTRAK ACH WASHINGTON DC \$47.00

Corporate Account No		Date of Charge	Reference Code	Approval Code
[REDACTED]		05/13/92	138022440	
Service Establishment and Location				
AMTRAK NEW YORK PENNY				
Name of Charge				
TICKET-TO 1344885041178 NEW YORK PENN P-L-30TH ST				
NEW YORK PENN				
S/E # 7892300218				
TOTAL CHARGE AMOUNT				\$47.00

ITEM 036 EAR INN NEW YORK NY \$41.00

Corporate Account No		Date of Charge	Reference Code	Approval Code
[REDACTED]		05/22/92	01105243	
Service Establishment and Location				
EAR INN NEW YORK NY				
Name of Charge				
FOOD-BEV \$34.30				
WAITER \$6.70				
S/E # 8311337083				
TOTAL CHARGE AMOUNT				\$41.00

ITEM 037 THE COMFORT CONNECTION SAN FRANCISCO CA \$254.94

Corporate Account No		Date of Charge	Reference Code	Approval Code
[REDACTED]		2/95		
Name of Charge				
DANIEL A. BELMONT				
3225 CALIFORNIA ST - 43 - MOD 13 - 44				
THE COMFORT CNCT. 5417522500613181 05069				
601401885021775				
5045692704 CA				
PHONE SALE				
TOTAL CHARGE AMOUNT				\$254.94

ITEM 038 MATLES FLORIST NEW YORK NY \$78.36

Corporate Account No		Date of Charge	Reference Code	Approval Code
[REDACTED]		05/22/92	148454855	
Service Establishment and Location				
MATLES FLORIST NEW YORK NY				
Name of Charge				
FLOWERS/PLANTS/GIFTS				
S/E # 5044107019				
TOTAL CHARGE AMOUNT				\$78.36

97043793335

SIGN & TRAVEL ITEM 001
UNITED AIRLINES # 0168535848890

\$325.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/15/92		0168535848890	
Passenger Name			Issuing Office		
O'DOYCKE/J			UNITED AIRLINES		
Travel Name			Issue Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
SAN FRANCISCO CA	UA	Y	325.00		
To			Amount Use Only		
NEWARK NJ			314220048834		
			003700		
			25 663144		
S E * 7882700099					

SIGN & TRAVEL ITEM 002
UNITED AIRLINES # 0168535847283

\$325.00

Cardmember Account No		Transaction Date		Ticket Number	
[REDACTED]		05/15/92		0168535847283	
Passenger Name			Issuing Office		
WICTOR/P			UNITED AIRLINES		
Travel Name			Issue Address		
LINDEN TRAVEL BUREAU			NEW YORK NY		
From	Carrier	Class	Transaction Amount		
O HARE FIELD IL	UA	Y	325.00		
To			Amount Use Only		
LAGUARDIA INTL L I			314220048835		
			003700		
			25 663144		
S E * 7882700099					

PRIVILEGES UPDATE

ENTERTAINMENT



Gold Card Events: "JVC Jazz Festival"

DATE: June 19 - 27, 1992
PLACE: New York City

Gold Cardmembers can catch the biggest names in jazz at the 1992 JVC Jazz Festival. Various performances at Carnegie Hall & Avery Fisher Hall. Call for details.

For information please call: 800-448-TKES

Subject to availability

PRIVILEGES UPDATE

ENTERTAINMENT



Gold Card Events: "Guys & Dolls"

DATE: TBD
PLACE: Martin Beck Theatre

Gold Cardmembers can get tickets for New York's new sensation, the long awaited return of one of Broadway's best loved musicals, "Guys & Dolls".

For information please call: 800-448-TKES

Subject to availability

PRIVILEGES UPDATE

LONG DISTANCE CONNECTIONS



Use The Card to call with Sprint!

One Card. One Bill. Use The Card as a calling card through Sprint, and receive up to 15 minutes of free long distance each month for six months! Call 800-755-1055 for details.

PRIVILEGES UPDATE

TRAVEL



American Express is your guide to fabulous destinations across the U.S.!

Cardmembers can call now to order "American Express Explores," a complimentary guide to travel destinations across the U.S. For a free copy, call Privileges On Callism; at 800-835-5000, extension 3742. Supplies are limited, so call today!

Allow 4 to 6 weeks for delivery

PRIVILEGES UPDATE

PRIVILEGES ON CALL



Take advantage of hundreds of special offers with Privileges on Callism.

As an American Express® Cardmember, savings on travel, shopping and dining are as close as the nearest telephone. Just call 800-835-5000, enter your Card number for identification, and let the savings begin!

PRIVILEGES UPDATE

MEMBERSHIP MILES



Earn valuable miles with the American Express® Card!

Enroll in the Membership Miles™ program and you can earn miles by charging with The Card. You can redeem miles into 5 airline frequent flyer programs, or use for vacation packages and more. Call for more details: 800-343-0330. \$25 annual program fee waived for first year of enrollment.

LEONIA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 800
NEW YORK, NY 10023

8800

1-337/260

10/21 92

1712.44

David Belmont

thousand seven hundred twelve $\frac{44}{100}$

AMALGAMATED BANK OF NEW YORK
125 Broadway New York, N.Y. 10019

mb-mc-harrance

NOT NEGOTIABLE
Faune

⑆006800⑆ ⑆026003379⑆ 3103154⑆

97043793337

TO: DAVID BELMONT

FR: CESAR CADABES

RE: WIRED MONEY / EXPENSES

TOTAL \$ WIRED VIA WESTERN UNION \$ 550.00

CAR RENTALS: 8/22/92 - 8/29/92
8/29/92 - 9/7/92

- 220.00

- 298.62

BAL - 31.38

GAS RECEIPTS: \$ 12.59

8.00

6.00

5.00

31.59

97043793338

2424 KALAKAUA AVENUE HONOLULU, HI 96815

CREDIT CARD/DIRECT BILL NO./P.O. NO./EXP. DATE		VI4444000930780362 298.62 593 506		RENTAL AGREEMENT		HNLAM5455376	
ARRIVAL DATE/METHOD/TIME/MP/CAR TYPE/C.A. OR U/RETURN DATE		08/29/92 1000 ECAR		RENTAL AGREEMENT		HON16	
RENTER		HEATHER C MARTIN		RENTAL AGREEMENT		ORIGINAL	
RESIDENCE		2225 23RD ST #211		RENTAL AGREEMENT		HON16	
CITY/STATE/ZIP		SAN FRANCISCO CA 94107		RENTAL AGREEMENT		217379 EWAR	
PHONE		415 824 2753		RENTAL AGREEMENT		TEMP HI	
LICENSE NO./EXP. DATE/STATE		10/05/92 CA		RENTAL AGREEMENT		MAX PAYLOAD	
COMPANY		REZ# 0008043014		RENTAL AGREEMENT		ME TRACR	
COMPANY PHONE NO./CORPORATE RATE NO.				RENTAL AGREEMENT		TIME	
LOCAL CONTACT/PHONE NO.		808 455 9193-760 HOOLUU ST PEARL CITY		RENTAL AGREEMENT		09/07/92 1008	
ADDITIONAL DRIVER/D.O.B.		CESAR CADABES 02/28/61		RENTAL AGREEMENT		TIME	
LICENSE NO./EXP. DATE/STATE		A5923898 02/28/93 CA		RENTAL AGREEMENT		08/29/92 1000	
REMARKS		+25YRS, MJCC, +SST E5816 PRE F LDW ADVD \$11.99/DYADDNL DRVR:CAESAR CA DABES, +25YRS ADVD OF \$2.50/DY E5816		RENTAL AGREEMENT		WK=6DAY MIN SMLWLKP	
				RENTAL AGREEMENT		RENTAL TIME	
				RENTAL AGREEMENT		WK=6DAY MI SARGRN ECA	
				RENTAL AGREEMENT		MIN/MAX RENTAL	
				RENTAL AGREEMENT		DY 3999	
				RENTAL AGREEMENT		DY 2999	
				RENTAL AGREEMENT		HR 900	
				RENTAL AGREEMENT		HR 900	
				RENTAL AGREEMENT		WK 8900 8900	
				RENTAL AGREEMENT		XW 2499 4999	
				RENTAL AGREEMENT		TOTAL TIME/MILEAGE	
				RENTAL AGREEMENT		13896	
				RENTAL AGREEMENT		DISCOUNT TOTAL	
				RENTAL AGREEMENT		NONE	
				RENTAL AGREEMENT		LDW @ 11.99 PER DAY	
				RENTAL AGREEMENT		@ 83.93 PER WEEK	
				RENTAL AGREEMENT		10791	
				RENTAL AGREEMENT		DR 2.50/DY	
				RENTAL AGREEMENT		2250	
				RENTAL AGREEMENT		TAX @ 4.170% ON 269.39	
				RENTAL AGREEMENT		1123	
				RENTAL AGREEMENT		STATE SURCHARGE TAX 2.00/DAY	
				RENTAL AGREEMENT		1800	
Signature of Renter				RENTAL AGREEMENT NO.		HNLAM5455376	
LOSS DAMAGE WAIVER (LDW) - Renter hereby agrees to accept or decline the optional LDW at the rate shown for each day or fraction thereof. Renter will be responsible for the FULL VALUE (or other amount written below) of any loss of or damage to the vehicle, except as provided in Paragraph 7 on the reverse side. If Renter selects LDW, Renter will not be responsible for such loss or damage EXCEPT AS PROVIDED IN PARAGRAPH 8 ON THE REVERSE SIDE. LDW IS NOT INSURANCE.		ACCEPTS LDW 11.99/DY 83.93/WK SLI 5.95/DY DECLINES		RENTAL AGREEMENT NO.		SUB TOTAL	
If offered, renter hereby agrees to accept or decline the rate shown: LDW for loss damage waiver, PAI for personal accident insurance, PEC for personal effects coverage, COI for cargo insurance, and SU for supplemental liability insurance. Renter also acknowledges at the time of rental that he/she understands the conditions and limitations of each coverage.		ACCEPTS PAI 4.00/DY DECLINES 28.00/WK PEC 1.25/DY DECLINES 8.75/WK		RENTAL AGREEMENT NO.		29862	
				BILLING TYPE/AMOUNT		LESS DEPOSIT	
				VI 298.62			
				NET DUE RENTER		NET DUE	
						29862	
RENTER'S SIGNATURE				CONTRACT CLOSED SUBJECT TO FINAL AUDIT		FORM # TX-114-3 (8/89)	
PREPARED BY 5366		CLOSED BY 3719					

DATE/TIME OUT: 1-11-81

CONTRACT

401

DUE BACK DATE/TIME: 1-11-81

TYPE OF DEPOSIT OUT: DATE

V.I.P. Car Rentals Inc.

234 BEACHWALK • HONOLULU, HAWAII 96815
TELEPHONE: (808) 922-4605 • OFFICE HOURS: 7:00 A.M. - 5:00 P.M.

DRIVER 1 CESAR S. COVARRUBIAS	CAR NO SW308	TIME IN	
RESIDENCE 2 2112 22 RD ST BIRTHDATE 2-28-44	LICENSE NO EJX 026	TIME OUT	11:30 AM
CITY 3 SAN FRANCISCO STATE	CAR MAKE NISSAN SENTRA	Add'l. Hours @	6:00
DRIVER'S LICENSE NO. [REDACTED] DATE EXPIRES 93	REPLACEMENT CAR MAKE	Days @	
LOCAL CONTRACT HOTEL & ROOM #	HOME PHONE [REDACTED]	Days @	
EMPLOYER 4 HECO HONOLULU BUSINESS PHONE NO.	CAR NO. LICENSE NO.	Weeks @	1 129.35
ADDRESS	DATE TIME	Months @	
ADDITIONAL DRIVER 5 [REDACTED]	MILES OUT 093173	SUB TOTAL	
ADDRESS BIRTH DATE	MILES IN	Damage Waiver (CDW)	76.65
DRIVER'S LICENSE NO. STATE DATE EXPIRES	IMPORTANT THIS VEHICLE MAY NOT BE USED OR DRIVEN BY ANYONE UNDER THE AGE OF 25. IF DRIVER IS NOT ON CONTRACT, ALL INSURANCE IS VOID.		Damages
COLLISION AND COMPREHENSIVE DAMAGE WAIVER FULL PROTECTION: By initialing, Renter agrees to pay PER DAY, or fraction thereof additional and VIP agrees to waive all claims against Renter for damage to vehicle, subject, however, to the terms of paragraph 5 on this agreement and provided it is operated or used in		SUB TOTAL 266.60	
		Tax 8.62	
		DEPOSITS	
		E W N F	
		Traffic Fines 14.00	
		Traffic Violations	
		TOTAL CHARGE 220.60	
		Less Deposit [REDACTED]	
		Net Due V.I.P. CASH	
		Net Due Driver 120.00	

EMERGENCY NIGHT DROP

CARS SHOULD BE RETURNED DURING OPEN HOURS ONLY!

IN AN EMERGENCY ONLY, YOU MAY PARK CAR IN HOTEL ACROSS STREET OR ANY GARAGE ON THIS STREET (BEACH WALK).

- 1) YOU MUST PAY PARKING FEE - ATTACH RECEIPT TO KEY RING.
- 2) DRAW A MAP OF EXACTLY WHERE YOU LEFT CAR (IF WE CAN'T FIND IT, YOU WILL BE CHARGED THE DAILY RENTAL RATE UNTIL WE DO.) DROP KEY IN SLOT UNDER COUNTER.
- 3) TAKE THE RESPONSIBILITY OF CALLING VIP CAR RENTAL DURING OPEN HOURS TO BE SURE WE FOUND THE CAR!
- 4) THERE WILL BE A \$50.00 CHARGE IF CAR IS FOUND PARKED ON LOT.

by the terms and conditions listed on both sides and to return vehicle to VIP on or before due

PLEASE READ CAREFULLY: If there is no use restrictions in paragraph 3 on reverse side of and any authorized driver shall, while operating provided with liability coverage in accordance with the provisions under chapter 294 of the Hawaii revised statutes. the time of this printing being, 35,000 Bodily Injury and 15,000 Person Injury protection (no fault benefits) and Damage liability.

This coverage will automatically conform to the basic requirements of any no fault law which may be applicable.

Renter waives all other optional coverage under no fault provisions.

I have read the above and understand its contents.

Customer Signature

THANK YOU,
MANAGER

- IMMEDIATE POLICE REPORT ESSENTIAL ON DAMAGE WAIVER (CDW) VOID!
- DRIVING ON UNPAVED ROADS PROHIBITED AND VOIDS CDW.
- KEY LEFT IN CAR VOIDS CDW.
- BY SIGNING THIS RENTAL AGREEMENT, RENTER AUTHORIZES VIP TO PROCESS A CREDIT CARD VOUCHER FOR ANY CHARGES INCURRED.
- CUSTOMER IS LIABLE FOR PARKING AND TRAFFIC VIOLATIONS.

9704379334C

7043793341

Your Receipt

09/04/92 FRI 04:15 PM No. 23731
Pump No. 07 Grade 1 \$1.529/GAL

GAL 3.239 \$ 5.00

Attended THANK YOU

Your Receipt

09/11/92 TUE 12:57:10 PM No. 236647
Pump No. 08 Grade \$1.529/GAL

GAL 3.921 \$ 6.00

Attended THANK YOU

UNIVERSITY
HONOLULU HI 96818
STATION #09466708

CUSTOMER SALES RECEIPT

#0129
02:37 PM 08-26-92

PUMP #.....	08
PRODUCT.....	1
PER GALLON.....	\$1.459
GALLONS.....	008.628
TOTAL SALE...	\$0012.59
AMT PREPAID...	\$0020.00
REFUND.....	\$ 0007.41

THANK YOU
COME AGAIN

WED. 10/7/92

TO: FRAN MILLER

FR: DAVID BELMONT

RE: WESTERN UNION MONEY TRANSFER TO KENTUCKY

Please find attached to this memo a receipt for money that I wired to Robert Conroy as re-imbusement for a \$500 check that he wrote to the Secretary of State of Kentucky on August 27, 1992 as payment of the filing fee for Lenora B. Fulani to gain access to the ballot in that state.

97043793342

Kentucky Filing Fee

To send money

WESTERN UNION MONEY TRANSFER

The fastest way to send money

Dollar amount in words: Five Hundred

Dollar amount: \$ 500

Do not write in shaded area

Pay to: Robert Conroy

Sender's name: David Belmont

Sender's telephone (area code) 212 number 79-2100

Sender's address: 403BP 200 W 72nd St NY 10023

City: NY State: NY

Additional services available at additional cost. Check services desired:

Send this message with money.

I want Western Union to telephone the recipient. (area code) number

I want a check delivered to the following address:

City: State: Street: 1012 W 27th St

Test question: Who's running for President? Answer: Lenora B. Fulan

Use test question ONLY if recipient has no I.D. documents. Special requirements may apply.

Customer's signature: [Signature]

Agency: 1440 BROADWAY, YORK, N.Y. 10018

Operator number: [Blank]

Sent time and date: [Blank]

Money Transfer control number: 9347525358

Amount: 500-

Charge: 40-

Telephone or delivery charge: [Blank]

Message: [Blank]

Total amount received: 540-

Agent's signature: [Signature]

THE TERMS AND CONDITIONS ON WHICH THE SERVICE IS PROVIDED ARE SET OUT ON THE REVERSE SIDE OF THIS FORM. BY SIGNING THIS FORM, I ACKNOWLEDGE THAT I HAVE READ, UNDERSTOOD AND ACCEPTED THOSE TERMS AND CONDITIONS. FBI 72 (R 11-90)

97043793343



ROBERT E. CONROY
211 E. PATTERSON 447-1968
COLUMBUS, OH 43202

816

Aug 27 1992 25-84/440

Pay to the order of Kentucky State Treasurer \$ 500.00
Five hundred dollars and 00/100 ~~DOLLARS~~

Society

Society Bank
National Association
Columbus, Ohio
Clintonville Office

6-90-484

Memo Fulani

Robert E. Conroy



97043793344

329.00 -
 329.00 -
 329.00 -
 59.00 -
 178.00 +
 795.00 -
 10.85 -
 108.30 -
 163.90 -
 275.30 -
 277.71 -
 202.50 -
 241.31 -
 121.90 -
 145.72 +
 50.01 +
 361.93 +
 403.02 +
 149.78 +
 186.27 +
 4.12 +
 4.12 +
 103.00 -
 155.00 +
 400.00 +
 110.00 -
 127.00 -
 15.00 -
 173.00 -
 90.00 -
 35.00 -
 20.00 -

LENDRA B. PULANI FOR PRESIDENT
 200 WEST 72ND STREET, SUITE 30
 NEW YORK, NY 10023

4901

1.331/280

American Express
Ten thousand two hundred forty three and 1/100

5/18 92
 10243.11



AMALGAMATED BANK OF NEW YORK
 110 Broadway, New York, N.Y. 10018

#00140 IT# 1:886003379: 310315411#

NOT NEGOTIABLE
Specimen

9 7 0 4 3 7 9 3 3 4 5



The Gold Card Summary of Account

Please retain this portion for your files

Card Member Name
ELEANOR FAIN

Account Number

Closing Date
04-24-92

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days).
FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT
1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. Page 1 of 7

Previous Balance	Credits/Payments	New Charges	New Balance
\$11,585.12	\$11,864.92	\$12,480.82	\$12,200.82

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
CARD ██████████ TRANSACTIONS				
835108-0		PAYMENT RECEIVED - THANK YOU 04/17		10,097.92
663092-1		TRANS WORLD AIRLINES # 01524185119759		721.00
501108-1	001	COMPUSERVE COLUMBUS OH 210527387 COMP ACCESS 7666002253 04/11/92	76.48	
TOTAL FOR CARD 100			76.48	10,818.92
CARD ██████████ TRANSACTIONS				
663094-1		NORTHWEST AIRLINES # 01213769282199		329.00
663094-1		NORTHWEST AIRLINES # 01213769282219		329.00
663094-1		NORTHWEST AIRLINES # 01213769282239		329.00
663102-1		NORTHWEST AIRLINES # 01275018471059		59.00
149097-1	002	CHELSEA RACQUET CLUB INC NEW YORK NY INV#671579	29.75	
663092-1	003	CONTINENTAL AIRLINES NEW YORK NY TKT# 0058553229577 03/12	629.00	
663092-1	004	NORTHWEST AIRLINES NEW YORK NY TKT# 0121376928219 03/11	1,627.00	
663092-1	005	NORTHWEST AIRLINES NEW YORK NY TKT# 0121376928221 03/11	1,627.00	
663092-1	006	NORTHWEST AIRLINES NEW YORK NY TKT# 0121376928223 03/11	1,627.00	
663094-1	007	ALASKA AIRLINES NEW YORK NY TKT# 0278553229595 03/27	460.00	
PAGE TOTAL			6,076.23	11,864.92

partial refund ↑

Payments or credits received after closing date above will appear on next month's statement.

Did you know you can get cash from over 47,000 ATM'S around the world? Call 1-800-CASH-NOW and sign up for Express Cash today.

Please see reverse side for important information regarding certain types of charges.

97043793346



Amax Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
495098-1	008	AMTRAK ACH WASHINGTON DC 096031440 TKT# 0926905026718	04/01/92 178.00	
663101-1	009	CONTINENTAL AIRLINES NEW YORK TKT# 0058553229600	NY 03/30 626.00	
501103-1	010	FOOT LOCKER NEW YORK 082451322 ATHLETIC FOOTWEAR	NY 04/11/92 75.76	
TOTAL FOR CARD 101			6,879.51	1,046.00
CARD ██████████ TRANSACTIONS				
053111-1	011	THE LIMO CENTER LTD PITTSBURGH PA INV#892133	795.00	
130114-1	012	OMNI NETHERLAND PLAZA CINCINNATI OH INV#380109	10.85	
501085-1	013	SHERATON BOSTON HOTE BOSTON MA 430594380 LODGING	03/22/92 108.30	
501085-1	014	SHERATON BOSTON HOTE BOSTON MA 430594380 LODGING	03/22/92 163.90	
501088-1	015	HYATT REGENCY WASHIN WASHINGTON DC 001600490 LODGING	03/26/92 276.36	
501088-1	016	HYATT REGENCY WASHIN WASHINGTON DC 001600480 LODGING	03/26/92 277.70	
499107-1	017	HOLIDAY INN PHILADELPHIA PA 04154722 LODGING	04/15/92 202.64	
499107-1	018	HOLIDAY INN PHILADELPHIA PA 04154723 LODGING	04/15/92 241.31	
499108-1	019	HOLIDAY INN PHILADELPHIA PA 04164150 LODGING	04/16/92 121.90	
499108-1	020	HOLIDAY INN PHILADELPHIA PA 04164151 LODGING	04/16/92 145.72	
501108-1	021	HYATT PITTSBURGH PITTSBURGH PA 001900100 LODGING	04/15/92 50.01	
501108-1	022	HYATT PITTSBURGH PITTSBURGH PA 001900090 LODGING	04/15/92 361.93	
501108-1	023	HYATT PITTSBURGH PITTSBURGH PA 001900080 LODGING	04/15/92 403.02	
501109-1	024	OMNI AMBASSADOR EAST CHICAGO IL 237838 LODGING	04/16/92 149.78	
501109-1	025	OMNI AMBASSADOR EAST CHICAGO IL 237839 LODGING	04/16/92 186.27	
501109-1	026	GTE AIRPHONE, OAK BROOK IL 021624540 TO TEL NO. 800-950-1022	04/15/92 4.12	
501109-1	027	GTE AIRPHONE, OAK BROOK IL 021624541 TO TEL NO. 212-799-2100	04/15/92 4.12	
501112-1	028	HYATT ON CAPITOL SQ COLUMBUS OH 001200050 LODGING	04/19/92 103.77	
501112-1	029	HYATT ON CAPITOL SQ COLUMBUS OH 001200060 LODGING	04/19/92 155.46	
TOTAL FOR CARD 103			3,762.16	.00
CARD ██████████ TRANSACTIONS				
926087-1	030	DAYS INN OF BUFFALO CHEEKTOWAGA NY INV#522444	469.75	
019099-1	031	GOLDEN TYPEWRITER & NEW YORK NY INV#512188	118.47	
130114-1	032	OMNI NETHERLAND PLAZA CINCINNATI OH INV#579852	127.42	
501088-1	033	AMEXCO CREDIT CD REGISTRY PMC920326 1 YEAR MEMBERSHIP FEE	03/26/92 15.00	
499108-1	034	HOLIDAY INN PHILADELPHIA PA 04164182 LODGING	04/16/92 173.44	
501109-1	035	HYATT PITTSBURGH PITTSBURGH PA 001900100 LODGING	04/16/92 503.04	
600111-1	036	US AIR COLUMBUS OH TKT# 0372156838155	04/19 45.00	
501113-1	037	HYATT ON CAPITOL SQ COLUMBUS OH 001200040 LODGING	04/20/92 310.35	
TOTAL FOR CARD 104			1,762.47	.00
PAGE TOTAL			6,404.39	.00
ACCOUNT TOTAL			\$12,480.62	\$11,864.92

97043793347



The Gold Card Card Member Name
ELEANOR FAIN

Account Number

Closing Date Page 3 of 7

FB80130

04-24-92

S4

3440

ITEM 001
COMPUSERVE COLUMBUS OH \$76.48

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/11/92	210527387	
Service Establishment and Location			
COMPUSERVE	COLUMBUS	OH	
Record of Charge			
COMP ACCESS 7886002253			
S/E # 3348570542			
TOTAL CHARGE AMOUNT			\$76.48

ITEM 002
CHELSEA RACQUET CLUB INC NEW YORK NY \$29.75

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/92 THRU 01/95	89	11
Service Establishment and Location			
FRAN MILLER			
LULLSLA RACQUET CLUB INC NL - YORK, NY 6316564354			
TOTAL			29.75
00 671579			American Express® Cards

ITEM 003
CONTINENTAL AIRLINES NEW YORK NY \$629.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/12/92	00585532295774
Passenger Name	Traveling Airline	
HELM/C	CONTINENTAL AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
LAGUARDIA INTL A/P		
To	CC	Y
CLEVELAND OH		
To	CC	Y
LAGUARDIA INTL A/P		
To	Amex Use Only 309210003100 003700 26 094000	
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY S/E # 7992400085		

ITEM 004
NORTHWEST AIRLINES NEW YORK NY \$1,627.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/11/92	01213789282191
Passenger Name	Traveling Airline	
FULANI/L	NORTHWEST AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
LAGUARDIA INTL A/P		
To	NW	Y
MINNEAPOLIS MN		
To	NW	Y
AUSTIN TX		
To	VO	
HOUSTON TX		
To	NW	BN
DETROIT MI-WAYNE CO		
Amex Use Only 309210006150 003700 00 094000		
PASSENGER TICKET S/E # 7992700104		

ITEM 005
NORTHWEST AIRLINES NEW YORK NY \$1,627.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/11/92	01213789282213
Passenger Name	Traveling Airline	
HINMAN/L	NORTHWEST AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
LAGUARDIA INTL A/P		
To	NW	Y
MINNEAPOLIS MN		
To	NW	Y
AUSTIN TX		
To	VO	
HOUSTON TX		
To	NW	BN
DETROIT MI-WAYNE CO		
Amex Use Only 309210006151 003700 00 094000		
PASSENGER TICKET S/E # 7992700104		

ITEM 006
NORTHWEST AIRLINES NEW YORK NY \$1,627.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/11/92	01213789282235
Passenger Name	Traveling Airline	
SULLIVAN/J	NORTHWEST AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
LAGUARDIA INTL A/P		
To	NW	Y
MINNEAPOLIS MN		
To	NW	Y
AUSTIN TX		
To	VO	
HOUSTON TX		
To	NW	BN
DETROIT MI-WAYNE CO		
Amex Use Only 309210006152 003700 00 094000		
PASSENGER TICKET S/E # 7992700104		

ITEM 007
ALASKA AIRLINES NEW YORK NY \$460.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/27/92	02785532295951
Passenger Name	Traveling Airline	
CARPATIOS/C	ALASKA AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
PORTLAND OR		
To	AS	Y
SAN FRANCISCO CA		
To	Amex Use Only 309320045053 003700 00 085000	
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY S/E # 7992400108		

ITEM 008
AMTRAK ACH WASHINGTON DC \$178.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/01/92	095031440	
Service Establishment and Location			
AMTRAK NEW YORK PENNY			
Record of Charge			
TICKET-ID 0926905026718 NEW YORK PENN WASHINGTON			
NEW YORK PENN			
S/E # 7992300319			TOTAL CHARGE AMOUNT \$178.00

97043793348



The Gold Card
 Card Member Name
 ELEANOR FAIN

Account Number [REDACTED] Closing Date Page 4 of 7 FBB0130
 04-24-92 S4 3441

ITEM 009
 CONTINENTAL AIRLINES NEW YORK NY \$828.00

Cardmember Account No	Transaction Date	Ticket Number
[REDACTED]	03/30/92	00585532298008
Passenger Name	Issuing Airline	
RONNER/R	CONTINENTAL AIRLINES	
Issuer Name	Issuer Address	
LINDEN TRAVEL BUREAU	NEW YORK NY	
From	Carrier	Class
DETROIT MI-WAYNE CO		
To	CO	A
DENVER CO		
To	CO	A
SAN FRANCISCO CA		
To		
Transaction Amount		
626.00		
Airfare Use Only		
310020015414		
003700		
00 102000		
MISC CHARGE ORDER/PREPAID TICKET AUTHORITY		
S/E # 7992400085		

ITEM 010
 FOOT LOCKER NEW YORK NY \$75.76

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/11/92	082451322	
Service Establishment and Location			
FOOT LOCKER NEW YORK NY			
Record of Charge			
ATHLETIC FOOTWEAR			
S/E # 8315348635			
TOTAL CHARGE AMOUNT			\$75.76

ITEM 011
 THE LIMO CENTER LTD PITTSBURGH PA \$795.00

American Express® Cards	
01/92 THRU 01/95 89	AI State No. Dept. No. Subsequent Register No. Approval Code
LLENORA B FULANI	APAI Dept. Chm. Article
414-92 11220033-321-4223-23-0538-22	Limo Service 662.50
THE LIMO CTR	604 132.50
4902 W 19th St	Thank you 60.40
PGH PA 15229	
00 892133	TOTAL 795.00

ITEM 012
 OMNI NETHERLAND PLAZA CINCINNATI OH \$10.85

01/92 THRU 01/95 89	AI State No. Dept. No. Subsequent Register No. Approval Code
LLENORA B FULANI	APAI Dept. Chm. Article
441000573207	041792
63110110022076	
3340105345 OH	
00 380109	TOTAL 10.85

ITEM 013
 SHERATON BOSTON HOTEL BOSTON MA \$108.30

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/22/92	430594380	
Service Establishment and Location			
SHERATON BOSTON HOTEL BOSTON MA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
03/21/92	03/22/92	01	
ROC NUMBER 08596			
S/E # 2200102812			TAX \$0.55
TOTAL CHARGE AMOUNT			\$108.30

ITEM 014
 SHERATON BOSTON HOTEL BOSTON MA \$163.90

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/22/92	430594380	
Service Establishment and Location			
SHERATON BOSTON HOTEL BOSTON MA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
03/21/92	03/22/92	01	
ROC NUMBER 08595			
S/E # 2200102812			TAX \$11.54
TOTAL CHARGE AMOUNT			\$163.90

ITEM 015
 HYATT REGENCY WASHIN WASHINGTON DC \$276.36

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/26/92	001600490	
Service Establishment and Location			
HYATT REGENCY WASHIN WASHINGTON DC			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
03/24/92	03/25/92	01	
ROC NUMBER 368532			
S/E # 4080100844			TOTAL CHARGE AMOUNT
			\$276.36

97043793349



ITEM 018
HYATT REGENCY WASHINWASHINGTON DC \$277.70

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/28/92	001800480	
Service Establishment and Location HYATT REGENCY WASHINWASHINGTON DC			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
03/24/92	03/25/92	01	
ROC NUMBER 368529			
S/E # 4080100944			
TOTAL CHARGE AMOUNT			\$277.70

ITEM 017
HOLIDAY INN PHILADELPHIA PA \$202.64

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	04154722	
Service Establishment and Location HOLIDAY INN PHILADELPHIA PA			
Record of Charge			
LODGING			
S/E # 2370106098			
TOTAL CHARGE AMOUNT			\$202.64

ITEM 018
HOLIDAY INN PHILADELPHIA PA \$241.31

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	04154723	
Service Establishment and Location HOLIDAY INN PHILADELPHIA PA			
Record of Charge			
LODGING			
S/E # 2370106098			
TOTAL CHARGE AMOUNT			\$241.31

ITEM 019
HOLIDAY INN PHILADELPHIA PA \$121.90

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	04164150	
Service Establishment and Location HOLIDAY INN PHILADELPHIA PA			
Record of Charge			
LODGING			
S/E # 2370106098			
TOTAL CHARGE AMOUNT			\$121.90

ITEM 020
HOLIDAY INN PHILADELPHIA PA \$145.72

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	04164151	
Service Establishment and Location HOLIDAY INN PHILADELPHIA PA			
Record of Charge			
LODGING			
S/E # 2370106098			
TOTAL CHARGE AMOUNT			\$145.72

ITEM 021
HYATT PITTSBURGH PITTSBURGH PA \$50.01

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	001900100	
Service Establishment and Location HYATT PITTSBURGH PITTSBURGH PA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/12/92	04/14/92	02	
ROC NUMBER 120931			
S/E # 2370101826			
TOTAL CHARGE AMOUNT			\$50.01

ITEM 022
HYATT PITTSBURGH PITTSBURGH PA \$361.93

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	001900090	
Service Establishment and Location HYATT PITTSBURGH PITTSBURGH PA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/12/92	04/14/92	02	
ROC NUMBER 120930			
S/E # 2370101826			
TOTAL CHARGE AMOUNT			\$361.93

ITEM 023
HYATT PITTSBURGH PITTSBURGH PA \$403.02

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	001900080	
Service Establishment and Location HYATT PITTSBURGH PITTSBURGH PA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/12/92	04/14/92	02	
ROC NUMBER 120932			
S/E # 2370101826			
TOTAL CHARGE AMOUNT			\$403.02

97043793350



The Gold Card ELEANOR FAIN

Card Member Name

Account Number

Closing Date 04-24-92

Page 6 of 7

FB801300

\$4

3443

ITEM 024 OMNI AMBASSADOR EASTCHICAGO IL \$149.78

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	237838	
Service Establishment and Location OMNI AMBASSADOR EASTCHICAGO IL			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/16/92	04/17/92	01	
ROC NUMBER	237838		
S/E # 3120103866			
TOTAL CHARGE AMOUNT			\$149.78

ITEM 025 OMNI AMBASSADOR EASTCHICAGO IL \$186.27

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	237839	
Service Establishment and Location OMNI AMBASSADOR EASTCHICAGO IL			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/16/92	04/17/92	01	
ROC NUMBER	237839		
S/E # 3120103866			
TOTAL CHARGE AMOUNT			\$186.27

ITEM 026 GTE AIRPHONE, OAK BROOK IL \$4.12

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	021624540	
Service Establishment and Location GTE AIRPHONE, OAK BROOK IL			
Record of Charge			
TO TEL NO. 800-950-1022 001 MINS \$04.12 FROM UNITED			
S/E # 3126525112			
TOTAL CHARGE AMOUNT			\$4.12

ITEM 027 GTE AIRPHONE, OAK BROOK IL \$4.12

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/15/92	021624541	
Service Establishment and Location GTE AIRPHONE, OAK BROOK IL			
Record of Charge			
TO TEL NO. 212-799-2100 001 MINS \$04.12 FROM UNITED			
S/E # 3126525112			
TOTAL CHARGE AMOUNT			\$4.12

ITEM 028 HYATT ON CAPITOL SQUICOLUMBUS OH \$103.77

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/19/92	001200050	
Service Establishment and Location HYATT ON CAPITOL SQUICOLUMBUS OH			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/17/92	04/18/92	01	
ROC NUMBER	238867		
S/E # 3340104371			
TOTAL CHARGE AMOUNT			\$103.77

ITEM 029 HYATT ON CAPITOL SQUICOLUMBUS OH \$155.46

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/19/92	001200050	
Service Establishment and Location HYATT ON CAPITOL SQUICOLUMBUS OH			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/17/92	04/18/92	01	
ROC NUMBER	238867		
S/E # 3340104371			
TOTAL CHARGE AMOUNT			\$155.46

ITEM 030 DAYS INN OF BUFFALO CHEEKTONAGA NY \$489.75

03/92 THRU 03/95 89	AI	Type of Card
CATHT STEWART	0200954	Address City
4410134	031992	Approval Code
DAYS INN BUFFALO		
Signature on file		
469278		
00 522444	American Express® Cards	

ITEM 031 GOLDEN TYPEWRITER & NEW YORK NY \$118.47

03/92 THRU 03/95 89	AI	Type of Card
CATHT STEWART	040292	Address City
631 489 90104	040292	Approval Code
02 049124		118.47
GOLDEN		
NEW YORK NY		
Signature on file		
469278		
00 512168	American Express® Cards	

97043793351



ITEM 032 \$127.42
OMNI NETHERLAND PLAZA CINCINNATI OH

03/92 THRU 03/95	Approval Code	Type of Debit Card
CATY STEWART	3123	AMEX or Debit Card
041692	854577	13742
TOTAL		151.07
00 579852		American Express® Cards

ITEM 033 \$15.00
AMEXCO CREDIT CD REGISTRY

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/26/92	PMC92C326	
Service Establishment and Location CREDIT CARD REGISTRY			
Record of Charge			
1 YEAR MEMBERSHIP FEE			
S/E #	1267800100	TOTAL CHARGE AMOUNT	\$15.00

ITEM 034 \$173.44
HOLIDAY INN PHILADELPHIA PA

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	04184182	
Service Establishment and Location HOLIDAY INN PHILADELPHIA PA			
Record of Charge			
LODGING			
S/E #	2370106088	TOTAL CHARGE AMOUNT	\$173.44

ITEM 035 \$503.04
HYATT PITTSBURGH PITTSBURGH PA

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/16/92	001900100	
Service Establishment and Location HYATT PITTSBURGH PITTSBURGH PA			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/12/92	04/15/92	03	
ROC NUMBER 120985			
S/E #	2370101826	TOTAL CHARGE AMOUNT	\$503.04

ITEM 036 \$45.00
US AIR COLUMBUS OH

Cardmember Account No.	Transaction Date	Ticket Number
[REDACTED]	04/19/92	03721568381554
Passenger Name	Traveling Airline	
STEWART/CMS	US AIR	
Issue Office	Issue Address	
USAIR	COLUMBUS OH	
From	Class	Transaction Amount
COLUMBUS OH		45.00
To	US H	
To	LAGUARDIA INTL A/P	
To		Airfare Use Only
To		041992OH
To		000164
To		111000
ADDITIONAL COLLECTION		
S/E # 7992400218		

ITEM 037 \$310.35
HYATT OH CAPITOL SQUCOLUMBUS OH

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/20/92	001200040	
Service Establishment and Location HYATT OH CAPITOL SQUCOLUMBUS OH			
Record of Charge			
ARRIVAL DATE	DEPARTURE DATE	# OF NIGHTS	
04/17/92	04/19/92	02	
ROC NUMBER 238770			
S/E #	3340104371	TOTAL CHARGE AMOUNT	\$310.35

97043793352

PRIVILEGES UPDATE



MEMBERSHIP MILES

Earn valuable miles with the American Express(R) Card!

Enroll in the Membership Miles(sm) program and you can earn miles by charging with The Card. You can redeem miles into 5 airline frequent flyer programs, or use for vacation packages and more. Call for more details 800-343-0330. \$25 annual program fee waived for first year of enrollment.

Minimum \$5000 annual Card spending required.

PRIVILEGES UPDATE



Be My Guest(R) Restaurant Certificates

Treat someone special with a Be My Guest(R) Restaurant Certificate. It's the perfect gift for Mother's Day, Secretary's Day, graduations and weddings. Your guest will enjoy a fine dining experience at any restaurant that accepts The Card. Call 800-535-GIFT to order.

LENORA B. FULANI FOR PRESIDENT
250 WEST-57TH STREET, SUITE 317
NEW YORK, NY 10019

2384

11/21 91

1-337/280

American Express
Two thousand ninety five + 25/100

209524

AB AMALGAMATED BANK OF NEW YORK
1719 Broadway, New York, N.Y. 10019

Grigley

James B. NOT NEGOTIABLE

⑆002384⑆ ⑆026003379⑆ 31031541⑆

97043793353

Detach here and return upper portion with check or money order.

Summary of Corporate Card Account



Retain this portion for your files.

Corporate Cardmember Name
LAWRENCE A GRIGSBY

Corporate Account Number
[REDACTED]

Statement Closing Date
10-22-91

Previous Balance	New Charges	Other Debits	Payments Received	Other Credits	Balance Due
\$43.27	\$2,780.32	\$55.00	\$43.27	\$.00	\$2,835.32

Reference Number	Item Number	Description of Monthly Activity	Charges	Credits
		PREVIOUS BALANCE	\$43.27	
831275		PAYMENT RECEIVED - THANK YOU 10/02		43.27
823291		MEMBERSHIP FEE ADJUSTMENT 10/18	55.00	
070278	1	BONANZA GENERAL STORE LAS VEGAS NV INV#044978	35.47	
041282	2	SHERATON SAN PEDRO HOTEL SAN PEDRO CA INV#996983	10.50	
501272	3	TONY ROMAS INGLEWOOD CA 348010006 FOOD/BEV 09/27/91	23.17	
501272	4	LAS VEGAS HILTON LAS VEGAS NV 5 RESTAURANT 09/28/91	63.78	
501273	5	LAS VEGAS HILTON LAS VEGAS NV 985247 LODGING 09/29/91	205.24	
495286	6	HERTZ CAR RENTAL LOS ANGELES CA R/A# 229215372 HERTZ CAR RENTAL 09/02/91	1,832.92	
495288	7	HERTZ CAR RENTAL LOS ANGELES CA R/A# 229817652 HERTZ CAR RENTAL 10/11/91	262.33	
501295	8	RAMADA INNS LONG BEACH CA 84111194 LODGING 10/20/91	346.91	
		TOTAL CHARGES AND CREDITS	\$2,835.32	\$43.27
		BALANCE DUE	\$2,835.32	

Payments or credits received after closing date above will appear on next month's statement.

FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE LINE AT 1(800)292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. IF YOU HAVE ANY QUESTIONS ABOUT YOUR ACCOUNT, CALL 1-800-528-2122 (24 HOURS 7 DAYS) OR WRITE US AT P.O. BOX 53779, PHOENIX, AZ 85072-3779.
 Lease a new 1992 car and save up to 20 percent through the Small Business FleetPlan(SM). Call 1-800-451-3796 for more information.

980005001
1892

Please see reverse side for important information regarding certain types of charges.

Fran.

Here's Grigsby's bill.
 Please pay asap. The bill is dated 10/22/91. Charges are due within 30 days. Make ✓ payable to Lawrence or Amex, send the ✓ to Lawrence.
 Brenda

97043793354



LAWRENCE GRIGSBY

CDP: 11782

71 LUMINA EURO NSP CA 2X06187

01198/8296188

RES: 79121031377

RES CLS: F

ACCEPTED AT \$ 4.30 /DAY
ACCEPTED AT \$ 5.99 /DAY
PAI, PEC DECLINED

MILEAGE IN: 3904
MILEAGE OUT: 3412
MILES DRIVEN: 592

MILES ALLOWED:
MILES CHARGED:

PLAN: LMT3 RATE CLS: F
\$ 749.99 / MONTH
\$ / DAY
\$ 40.00 / XDAY
\$ 17.00 / HOUR
\$ / MILE

DAYS 3 \$ 194.97
EX HOURS \$
EX DAYS \$
WEEKS \$
MILEAGE CHG \$
DISCOUNT 5% \$ 9.74
SUBTOTAL \$ 185.23
INTER CITY (TX) \$
ADDL CHARGES (TX) \$
LDM (NT) \$ 27.00
LTS (NT) \$ 17.85
PAI, PEC (NT) \$
FUEL PURCH OPT (TX) \$ 15.00
TAXABLE SUBTOTAL \$ 200.91
TAX .08250 \$ 16.57
TOTAL CHARGES \$ 262.33
MISC \$
VOUCHER \$
RENTAL CERT \$
DEPOSIT \$
NET DUE \$ 1832.92

RENTAL FORM OF PAYMENT: AMX 378362941621003
RETURN FORM OF PAYMENT: AMX 378362941621003
PREPARED BY: 1926 COMPLETED BY: 2748
STATEMENT OF CHARGES - NOT VALID FOR RENTAL

CC APP: \$1236.00/ 000032
CC APP: \$597.00/ 25

RENTAL RECORD 229215372

97043793355



RENTAL: 10/11/91 22:17
RETURN: 10/14/91 22:06

LOS ANGELES INT'L A/P
LOS ANGELES INT'L A/P

0110115 #01 RN
0110115

LAWRENCE GRIGSBY

CDP: 11782

71 LUMINA EURO NSP CA 2X06187

01198/8296188

LDM ACCEPTED AT \$ 9.00 /DAY
LTS ACCEPTED AT \$ 5.95 /DAY
PAI, PEC DECLINED

MILEAGE IN: 7354
MILEAGE OUT: 6964
MILES DRIVEN: 390

MILES ALLOWED:
MILES CHARGED:

PLAN: S000 RATE CLS: F
\$ / WEEK
\$ 64.99 / DAY
\$ / XDAY
\$ / HOUR
\$ / MILE

DAYS 3 \$ 194.97
EX HOURS \$
EX DAYS \$
WEEKS \$
MILEAGE CHG \$
DISCOUNT 5% \$ 9.74
SUBTOTAL \$ 185.23
INTER CITY (TX) \$
ADDL CHARGES (TX) \$
LDM (NT) \$ 27.00
LTS (NT) \$ 17.85
PAI, PEC (NT) \$
FUEL PURCH OPT (TX) \$ 15.00
TAXABLE SUBTOTAL \$ 200.91
TAX .08250 \$ 16.57
TOTAL CHARGES \$ 262.33
MISC \$
VOUCHER \$
RENTAL CERT \$
DEPOSIT \$
NET DUE \$ 262.33

RENTAL FORM OF PAYMENT: AMX 378362941621003
RETURN FORM OF PAYMENT: AMX 378362941621003
PREPARED BY: 2748 COMPLETED BY: 7351
STATEMENT OF CHARGES - NOT VALID FOR RENTAL

CC APP: \$260.00/ 28

RENTAL RECORD 229817652

LENORA B. FULANI FOR PRESIDENT
200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

6527

1 337/200

*Margaret Calder -
One hundred thirty six*

7/2 42



AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

NOT NEGOTIABLE

with photo of you

⑆006527⑆ ⑆026003379⑆ 31031541⑆

9470437933556

LENORA B. FULANI FOR PRESIDENT
REQUEST FOR REIMBURSEMENT

Date Submitted: 9/1 Amount \$ 136.3 ✓
Name: Marge Golden
Address: 251 Pierce St
SF

State where expense occurred: _____

Purpose (give brief description): _____
telephone charges re: field operation

(Receipts must be attached for reimbursement)

.....
for office use only

ck# _____

Date: _____

97043793357

Fran please send check to me & I will
pay bill with my portion included.
Thanks - Marge

Account Number
Statement Date

[REDACTED] 8
Aug 19, 1992

Page 2

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

Service Area 1 Calls	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Jul20	1158A	8	SD	SAN FRAN CA - 386 9451 From SAN FRAN CA Calling Card	1.26
	2	Jul20	238P	4	SD	BERKELEY CA 510 526 9999 From SAN FRAN CA Calling Card	.98
	3	Jul20	344P	5	SD	SAN FRAN CA - 282 5300 From SAN FRAN CA Calling Card	1.05
	4	Jul20	728P	2	SE	BERKELEY CA 510 486 9035 From SAN FRAN CA Calling Card	.76
	5	Jul20	821P	3	SE	SAN FRAN CA - 753 9723 From SAN FRAN CA Calling Card	.81
	6	Jul21	112P	6	SD	BERKELEY CA 510 540 9507 From MT VIEW CA Calling Card	2.01
	7	Jul21	548P	7	SE	BERKELEY CA 510 525 4300 From MT VIEW CA Calling Card	1.74
	8	Jul21	637P	4	SE	SAN RAFAEL CA - 459 9426 From MT VIEW CA Calling Card	1.36
	9	Jul22	131P	7	SD	SAN FRAN CA - 641 8522 From BERKELEY CA Calling Card	1.19
	10	Jul22	240P	7	SD	SAN FRAN CA - 986 9307 From BERKELEY CA Calling Card	1.19
	11	Jul22	256P	10	SD	SAN FRAN CA - 753 9920 From BERKELEY CA Calling Card	1.70
	12	Jul22	412P	4	SD	OAKLAND CA 510 987 2722 From SAN RAFAEL CA Calling Card	1.21
	13	Jul22	729P	1	SE	BERKELEY CA 510 525 4300 From SAN RAFAEL CA Calling Card	.75
	14	Jul23	1134A	1	SD	OAKLAND CA 510 987 2722 From SAN FRAN CA Calling Card	.77
	15	Jul23	1255P	4	SD	PALO ALTO CA - 853 9223 From SAN FRAN CA Calling Card	1.45
	16	Jul23	333P	1	SD	SNCRSBLMNT CA - 595 9733 From SAN FRAN CA Calling Card	.85
	17	Jul23	337P	3	SD	LOS GATOS CA 408 354 9797 From SAN FRAN CA Calling Card	1.44
	18	Jul23	349P	3	SD	SNCRSBLMNT CA - 595 9942 From SAN FRAN CA Calling Card	1.17
	19	Jul23	741P	11	SE	MT VIEW CA - 940 9581 From SAN FRAN CA Calling Card	2.35
	20	Jul23	749P	1	SE	SNCRSBLMNT CA - 595 9942 From SAN FRAN CA Calling Card	.77
	21	Jul24	1125A	7	SD	OAKLAND CA 510 987 2722 From SAN FRAN CA Calling Card	1.19
	22	Jul24	200P	3	SD	NOVATO CA - 897 9768 From SAN FRAN CA Calling Card	1.17
	23	Jul24	225P	5	SD	BERKELEY CA 510 486 1218 From SAN FRAN CA Calling Card	1.05
	24	Jul24	241P	3	SD	NOVATO CA - 897 9768 From SAN FRAN CA Calling Card	1.17
	25	Jul24	715P	2	SE	SAN FRAN CA - 346 4586 From SAN FRAN CA Calling Card	.76
	26	Jul24	816P	1	SE	HAYWARD CA 510 733 9723 From SAN FRAN CA Calling Card	.77
	27	Jul24	819P	4	SE	SAN FRAN CA - 753 9723 From SAN FRAN CA Calling Card	.86
	28	Jul25	1017A	3	SN	OAKLAND CA 510 547 9383 From SAN FRAN CA Calling Card	.72
	29	Jul25	1229P	5	SN	BERKELEY CA 510 486 9601 From BERKELEY CA Calling Card	.78

97043793359

Account Number
Statement Date

Aug 19, 1992

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

Service Area 1 Calls Continued	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Jul25	422P	15	SN	SAN FRAN CA - 255 7664 From	1.06
						RICHMOND CA Calling Card	
	2	Jul25	517P	8	SN	SUNNYVALE CA 408 746 9404 From	1.43
						RICHMOND CA Calling Card	
	3	Jul25	919P	1	SN	SAN FRAN CA - 255 3103 From	.66
						BERKELEY CA Calling Card	
	4	Jul27	335P	2	SD	SNCRSBLMNT CA - 595 9942 From	1.01
						SAN FRAN CA Calling Card	
	5	Jul27	338P	3	SD	SAN FRAN CA - 928 9327 From	.91
						SAN FRAN CA Calling Card	
	6	Jul27	617P	5	SE	BERKELEY CA 510 525 4300 From	1.02
						SAN FRAN CA Calling Card	
	7	Jul27	622P	3	SE	BERKELEY CA 510 843 6438 From	.88
						SAN FRAN CA Calling Card	
	8	Jul27	626P	3	SE	BERKELEY CA 510 843 6438 From	.88
						SAN FRAN CA Calling Card	
	9	Jul27	632P	6	SE	SAN FRAN CA - 398 9102 From	.96
						SAN FRAN CA Calling Card	
	10	Jul28	228P	5	SD	SAN FRAN CA - 753 9806 From	1.05
						SAN FRAN CA Calling Card	
	11	Jul28	521P	1	SE	SAN FRAN CA - 664 3321 From	.77
						HAYWARD CA Calling Card	
	12	Jul28	522P	1	SE	SAN FRAN CA - 664 3321 From	.77
						HAYWARD CA Calling Card	
	13	Jul28	527P	4	SE	SAN FRAN CA - 753 9414 From	1.11
						HAYWARD CA Calling Card	
	14	Jul29	731P	3	DE	SNCRSBLMNT CA - 595 9942	.39
	15	Jul29	1057A	3	SD	SAN FRAN CA - 255 7664 From	.91
						SAN FRAN CA Calling Card	
	16	Jul29	1202P	3	SD	OAKLAND CA 510 987 2722 From	.91
						SAN FRAN CA Calling Card	
	17	Jul30	643P	4	SE	SAN FRAN CA - 441 9371 From	.86
						SAN FRAN CA Calling Card	
	18	Jul31	458P	3	S1	SAN FRAN CA - 255 4799 From	.88
						SAUSALITO CA Calling Card	
	19	Jul31	629P	5	SE	BERKELEY CA 510 525 4300 From	1.11
						MILLVALLEY CA Calling Card	
	20	Jul31	643P	1	SE	BERKELEY CA 510 525 4300 From	.75
						MILLVALLEY CA Calling Card	
	21	Aug 1	1015A	2	SN	PALO ALTO CA - 323 1719 From	.78
						ORINDA CA Calling Card	
	22	Aug 1	1017A	1	SN	BERKELEY CA 510 525 4300 From	.66
						ORINDA CA Calling Card	
	23	Aug 1	1028A	6	SN	BERKELEY CA 510 525 4300 From	.80
						ORINDA CA Calling Card	
	24	Aug 1	331P	1	SN	BERKELEY CA 510 526 9918 From	.66
						ORINDA CA Calling Card	
	25	Aug 2	1127A	1	SN	BERKELEY CA 510 525 4300 From	.66
						SAN FRAN CA Calling Card	
	26	Aug 2	501P	10	SN	ORINDA CA 510 254 9848 From	1.15
						SAN FRAN CA Calling Card	
	27	Aug 3	122P	1	SD	OAKLAND CA 510 428 9533 From	.77
						ORINDA CA Calling Card	
	28	Aug 3	124P	6	SD	OAKLAND CA 510 428 9533 From	1.12
						ORINDA CA Calling Card	
	29	Aug 3	626P	2	SE	PALO ALTO CA - 329 0461 From	.92
						ORINDA CA Calling Card	
	30	Aug 3	733P	3	SE	SAN FRAN CA - 255 6975 From	.88

9704379336C

Account Number
Statement Date

Aug 19, 1992

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

Service Area 1 Calls Continued	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Aug 3	736P	4	SE	ORINDA CA Calling Card	.95
						SAN FRAN CA - 255 6975 From	
	2	Aug 4	409P	8	SD	OAKLAND CA 510 987 2722 From	2.45
						SUNNYVALE CA Calling Card	
	3	Aug 4	426P	5	SD	SAN FRAN CA - 991 9776 From	1.79
						SUNNYVALE CA Calling Card	
	4	Aug 4	558P	5	SE	SAN FRAN CA - 861 9730 From	1.43
						SUNNYVALE CA Calling Card	
	5	Aug 4	709P	4	SE	SAN FRAN CA - 255 6975 From	1.27
						SUNNYVALE CA Calling Card	
	6	Aug 4	935P	1	SE	SAN FRAN CA - 255 3103 From	.83
						CAMPBELL CA Calling Card	
	7	Aug 5	1101A	1	SD	SAN FRAN CA - 255 3103 From	.77
						SAN FRAN CA Calling Card	
	8	Aug 5	1230P	6	SD	SAN FRAN CA - 255 4799 From	1.30
						ORINDA CA Calling Card	
	9	Aug 5	122P	4	SD	SAN FRAN CA - 255 6975 From	1.10
						ORINDA CA Calling Card	
	10	Aug 5	330P	1	SD	OAKLAND CA 510 987 2722 From	.77
						ORINDA CA Calling Card	
	11	Aug 5	747P	8	SE	SAN MATEO CA - 574 9715 From	1.55
						ORINDA CA Calling Card	
	12	Aug 6	1141A	4	SD	HAYWARD CA 510 881 9531 From	1.10
						REDWOOD CY CA Calling Card	
	13	Aug 6	1230P	2	SD	OAKLAND CA 510 987 2722 From	.99
						LGTOS CA Calling Card	
	14	Aug 6	411P	3	SD	PALO ALTO CA - 323 1719 From	.88
						LGTOS CA Calling Card	
	15	Aug 6	424P	1	SD	SAN FRAN CA - 255 6975 From	.74
						LGTOS CA Calling Card	
	16	Aug 6	632P	5	SE	SAN FRAN CA - 255 6975 From	1.33
						LGTOS CA Calling Card	
	17	Aug 6	637P	1	SE	SAN FRAN CA - 255 6975 From	.63
						LGTOS CA Calling Card	
	18	Aug 7	1250P	4	SD	BERKELEY CA 510 486 1218 From	1.21
						SAN RAFAEL CA Calling Card	
	19	Aug 7	1254P	1	SD	OAKLAND CA 510 987 2722 From	.82
						SAN RAFAEL CA Calling Card	
	20	Aug 7	245P	13	SD	SAN FRAN CA - 255 7664 From	2.00
						SAN RAFAEL CA Calling Card	
	21	Aug 7	321P	3	SD	SAN FRAN CA - 255 4799 From	1.00
						SAN RAFAEL CA Calling Card	
	22	Aug 7	404P	16	SD	CORTEMADRA CA - 924 5850 From	1.82
						CORTEMADRA CA Calling Card	
	23	Aug 7	425P	7	SD	SAN FRAN CA - 255 4799 From	1.40
						CORTEMADRA CA Calling Card	
	24	Aug 7	440P	3	SD	SAN FRAN CA - 255 4799 From	1.00
						CORTEMADRA CA Calling Card	
	25	Aug 7	443P	1	SD	SAN FRAN CA - 255 7664 From	.80
						CORTEMADRA CA Calling Card	
	26	Aug 7	1004P	2	SE	SAN FRAN CA - 824 2753 From	.76
						SAN FRAN CA Calling Card	
	27	Aug 8	902A	1	SN	SAN FRAN CA - 431 4089 From	.66
						SAN FRAN CA Calling Card	
	28	Aug 8	1033A	1	SN	PALO ALTO CA - 329 9097 From	.48
						LGTOS CA Calling Card	
	29	Aug 8	1037A	2	SN	SAN FRAN CA - 255 7664 From	.63

97043793361

Account Number
Statement Date

Aug 19, 1992

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

Service Area 1 Calls Continued	Itm	Date	Time	Min	*	Place and Number Called	Charge
						LGTOS CA Calling Card	
	1	Aug 8	1128A	3	SN	PACIFICA CA - 355 9846 From	.73
						LGTOS CA Calling Card	
	2	Aug 8	1131A	7	SN	SAN FRAN CA - 285 4621 From	1.13
						LGTOS CA Calling Card	
	3	Aug 8	1218P	3	SN	OAKLAND CA 510 987 2722 From	.73
						LGTOS CA Calling Card	
	4	Aug 8	148P	5	SN	PACIFICA CA - 355 9846 From	1.07
						CAMPBELL CA Calling Card	
	5	Aug 8	442P	1	SN	SAN FRAN CA - 255 6975 From	.73
						CAMPBELL CA Calling Card	
	6	Aug 8	543P	1	SN	BERKELEY CA 510 525 4300 From	.73
						CAMPBELL CA Calling Card	
	7	Aug 8	613P	6	SN	BERKELEY CA 510 525 4300 From	1.23
						CAMPBELL CA Calling Card	
	8	Aug 8	618P	5	SN	SAN FRAN CA - 255 6975 From	1.13
						CAMPBELL CA Calling Card	
	9	Aug 8	656P	1	SN	LOS GATOS CA 408 354 0810 From	.66
						CAMPBELL CA Calling Card	
	10	Aug 8	700P	1	SN	BERKELEY CA 510 525 4300 From	.73
						CAMPBELL CA Calling Card	
	11	Aug 9	1231P	5	SN	BERKELEY CA 510 525 4300 From	.84
						SAN FRAN CA Calling Card	
	12	Aug 10	104P	7	SD	SAN FRAN CA - 753 9119 From	1.81
						HALFMOONBY CA Calling Card	
	13	Aug 10	130P	2	SD	BERKELEY CA 510 486 1218 From	1.07
						HALFMOONBY CA Calling Card	
	14	Aug 10	148P	1	SD	PACIFICA CA - 355 9846 From	.80
						HALFMOONBY CA Calling Card	
	15	Aug 10	151P	1	SD	PACIFICA CA - 355 9846 From	.80
						HALFMOONBY CA Calling Card	
	16	Aug 10	330P	1	SD	SAN FRAN CA - 255 4799 From	.85
						HALFMOONBY CA Calling Card	
	17	Aug 10	333P	7	SD	BERKELEY CA 510 486 9601 From	2.02
						HALFMOONBY CA Calling Card	
	18	Aug 10	400P	1	SD	SAN FRAN CA - 255 4799 From	.85
						HALFMOONBY CA Calling Card	
	19	Aug 10	415P	12	SD	SAN FRAN CA - 255 4799 From	2.61
						HALFMOONBY CA Calling Card	
	20	Aug 10	524P	8	SE	BERKELEY CA 510 486 1218 From	1.72
						HALFMOONBY CA Calling Card	
	21	Aug 10	720P	5	SE	SAN FRAN CA - 753 9722 From	1.22
						HALFMOONBY CA Calling Card	
	22	Aug 10	731P	1	SE	SAN FRAN CA - 495 9340 From	.77
						HALFMOONBY CA Calling Card	
	23	Aug 10	733P	1	SE	SAN FRAN CA - 255 6975 From	.77
						HALFMOONBY CA Calling Card	
	24	Aug 10	750P	7	SE	SAN FRAN CA - 255 6975 From	1.44
						HALFMOONBY CA Calling Card	
	25	Aug 11	209P	8	SD	ORINDA CA 510 253 1017 From	2.69
						CAMPBELL CA Calling Card	
	26	Aug 11	243P	7	SD	SAN FRAN CA - 255 4799 From	2.44
						CAMPBELL CA Calling Card	
	27	Aug 11	351P	4	SD	OAKLAND CA 510 987 2722 From	1.69
						CAMPBELL CA Calling Card	
	28	Aug 11	516P	7	SE	SAN FRAN CA - 753 9441 From	1.88
						CAMPBELL CA Calling Card	
	29	Aug 11	658P	9	SE	SAN FRAN CA - 255 7664 From	2.23

97043793362

Account Number
Statement Date

Aug 19, 1992

Page 6

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

97043793363

Service Area 1 Calls Continued	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Aug11	854P	1	SE	CAMPBELL CA Calling Card BERKELEY CA 510 525 4300 From	.83
	2	Aug12	810A	2	DD	CAMPBELL CA 408 559 5750	.59
	3	Aug12	206P	2	SD	OAKLAND CA 510 987 2722 From	.90
	4	Aug12	240P	1	SD	HAYWARD CA Calling Card BERKELEY CA 510 525 4300 From	.82
	5	Aug12	241P	3	SD	HAYWARD CA Calling Card OAKLAND CA 510 987 2722 From	1.00
	6	Aug12	311P	2	SD	LOS GATOS CA 408 395 6363 From	1.13
	7	Aug12	313P	1	SD	HAYWARD CA Calling Card LOS GATOS CA 408 395 6363 From	.91
	8	Aug12	314P	1	SD	HAYWARD CA Calling Card LOS GATOS CA 408 358 3454 From	.91
	9	Aug12	345P	3	SD	REDWOOD CY CA - 366 6832 From	1.00
	10	Aug12	546P	7	SE	HAYWARD CA Calling Card PALO ALTO CA - 853 9073 From	1.16
	11	Aug12	654P	12	SE	HAYWARD CA Calling Card MT VIEW CA - 967 7107 From	1.75
	12	Aug12	812P	2	SE	HAYWARD CA - 255 4799 From	.88
	13	Aug12	813P	1	SE	HAYWARD CA Calling Card BERKELEY CA 510 525 4300 From	.75
	14	Aug13	740P	4	SE	SUNNYVALE CA 408 746 9227 From	.86
	15	Aug14	934A	1	DD	CAMPBELL CA 408 559 9344	.34
	16	Aug17	427P	2	SD	OAKLAND CA - 255 7664 From	.84
	17	Aug17	430P	1	SD	OAKLAND CA Calling Card OAKLAND CA 510 987 2722 From	.77
	18	Aug17	430P	1	SD	OAKLAND CA Calling Card BERKELEY CA 510 525 7300 From	.77
	19	Aug17	431P	3	SD	OAKLAND CA Calling Card BERKELEY CA 510 525 4300 From	.91
	20	Aug17	600P	1	SE	OAKLAND CA - 255 6975 From	.71
	21	Aug17	601P	2	SE	OAKLAND CA Calling Card SAN FRAN CA - 255 6975 From	.76
	22	Aug18	553P	4	SE	OAKLAND CA Calling Card CAMPBELL CA 408 559 5750 From	1.36

* See Rate Key on Reverse

Service Area Call Subtotal \$149.78

Zone 3 Calls

Itm	Date	Time	Min	* Zone	Place and Number Called	Charge
23	Jul30	124P	1	DD 3	SAN MATEO - 578 7276	.10
* See Rate Key on Reverse						
Zone 3 Call Subtotal						\$.10

Account Number [REDACTED]
Statement Date

Page 7

Aug 19, 1992

PACIFIC BELL

Questions For billing questions call: No Charge 811-6100

Regulated Monthly Charges and Credits	Itm	Charge
	Basic Service	
	1 Residence Service Flat Rate	8.35
	Optional Service(s)	
	1 Inside Wire/Jack Repair and Trouble Isolation Plan	.60
	Custom Calling Services:	
	1 Call Waiting	3.50
	1 3-Way Calling	3.50
	1 Monthly Service Aug 19, 1992 thru Sep 18, 1992	15.95
	--DISCOUNTS--	
	2 15% off \$7.00 From Aug 19 thru Sep 18 for Custom Calling Services on 1 Line(s)	1.06 ^α
	Regulated Monthly Charges and Credits Subtotal	14.89
	3 Charges for Network Access for Interstate Calling, Imposed by Federal Communications Commission	3.50
	4 Universal Lifeline Telephone Service Surcharge.	5.99
	5 Rate Surcharge	12.79 ^α
	6 State Regulatory Fee	.15
	7 Communication Devices Funds for Deaf and Disabled	.46
	8 Tax: Fed: 4.87 911: 1.11	5.98
	Regulated Monthly Charges and Credits Subtotal	\$18.18
Total	Pacific Bell Current Charges	\$168.06

97043793364

Account Number

[REDACTED]

Page 8

Statement Date

Aug 19, 1992

PACIFIC BELL

Information Services

Questions	For billing questions call:	No Charge	811-6100
Monthly Charges and Credits	Itm		Charge
	Monthly Service(s)		
	1 Message Center Call Answering	5.95	
	1 Monthly Service Aug 19, 1992 thru Sep 18, 1992		5.95
	Monthly Charges and Credits Subtotal		\$5.95
Total	Pacific Bell Information Services Current Charges		\$5.95

97043793365

Account Number

[REDACTED] 8

Page 9

Statement Date

Aug 19, 1992



Questions For AT&T billing questions on this page call: No Charge 1 800 222-0300

Calls	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Aug13	514P	2	SE	SAN DIEGO CA 619 224 3655 FromI LOS GATOS CA Calling Card	.83
	2	Aug13	745P	3	SE	NEW YORK NY 212 956 5550 FromI CAMPBELL CA Calling Card	1.28
	3	Aug16	802P	1	SN	SAN FRAN CA - 255 6975 FromI SAN DIEGO CA Calling Card	.68
	4	Aug16	1042P	6	SN	SAN FRAN CA - 255 6975 FromI LA JOLLA CA Calling Card	1.20
	5	Aug16	1049P	1	SN	SAN FRAN CA - 641 8522 FromI LA JOLLA CA Calling Card	.68
	6	Aug16	1050P	3	SN	SAN FRAN CA - 255 7664 FromI LA JOLLA CA Calling Card	.89
* See Rate Key on Reverse I AT&T Telephone Calls charged to a Pacific Bell Card							
Call Subtotal							\$5.56

Monthly Charges and Credits	Itm	Charge
	7 Universal Lifeline Telephone Service Surcharge.	.17
	8 Communication Devices Funds for Deaf and Disabled	.01
	9 Tax: Fed: .17 911: .03	.20
Monthly Charges and Credits Subtotal		\$.38

Total	AT&T Current Charges	\$5.94
-------	----------------------	--------

This portion of your bill is provided as a service to AT&T. There is no connection between Pacific Bell and AT&T. You may choose another company for your long distance calls while still receiving your local telephone service from Pacific Bell.

97043793366

Account Number [REDACTED]
Statement Date

[REDACTED] 3
Aug 19, 1992



Questions	For billing questions call:		No Charge	811-6100			
Calls	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Aug 7	1010P	3		SE SACRAMENTO CA 916 448 0750 From SAN FRAN CA Calling Card	.89
	* See Rate Key on Reverse						
	Call Subtotal						\$.89
Monthly Charges and Credits	Itm						Charge
	2	Universal Lifeline Telephone Service Surcharge.					.04
	3	Tax: Fed:	.03	911:	.01		.04
	Monthly Charges and Credits Subtotal						\$.08
Total	Sprint Current Charges						\$.97

97043793367

Account Number

Page 11

Statement Date

Aug 19, 1992



Questions For billing questions call: No Charge 1 800 875-9235

Calls	Itm	Date	Time	Min	*	Place and Number Called	Charge
	1	Jul30	323P	1		DD LOSANGELES CA 213 356 9687	.15
	* See Rate Key on Reverse						
	Call Subtotal						\$.15

Monthly Charges and Credits	Itm	Charge
	2 Universal Lifeline Telephone Service Surcharge.	.01
	3 Tax:	.00
	Monthly Charges and Credits Subtotal	\$.01

Total	Excel Telecommunication Current Charges	\$.16
--------------	--	---------------

97043793368

LENORA B. ANI FOR PRESIDENT

200 WEST 42ND STREET, SUITE 30
NEW YORK, NY 10023

5617

1-337/260

7/10 92

733.52

Handwritten note:
New balance that I...



AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

3731 410377 4001

Signature
NOT NEGOTIABLE

⑆005617⑆ ⑆026003379⑆ 31031541⑆

97043793369



Summary of Account

Please keep this portion for your files.

Cardmember Name
MARGARET E GOLDEN

Account Number
[REDACTED]

Closing Date
06-22-92

For fast balance and payment information, call our automated service line at 1-800-292-AMEX using a touch tone phone. Please have your account number ready. If you have a question about your account, call 1-800-528-4800 (24 hours/7 days).

Page 1 of 2

Previous Balance	Credits/Payments	New Charges	New Balance
\$161.47	\$169.66	\$933.52	\$925.33

Amax Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
831163-0		PAYMENT RECEIVED - THANK YOU 06/11		169.66
501153-1	001	TARGET STORES SAN LEANDRO CA		
		327152075 GENERAL MERCHANDISE 05/31/92	142.83	
501153-1	002	Office Depot Inc. SAN LEANDRO CA		
		860017572 OFFICE PROD. & SUPPLIES 05/31/92	80.45	
501155-1	003	BUDGET RENT A CAR SAN FRANCISCO CA		
		002002893 BUDGET RENT A CAR 06/01/92	272.34	
501167-1	004	TARGET STORES SAN LEANDRO CA		
		327186081 GENERAL MERCHANDISE 06/14/92	173.12	
501167-1	005	Office Depot Inc. SAN LEANDRO CA		
		860028494 OFFICE PROD. & SUPPLIES 06/14/92	118.91	
501174-1	006	TARGET STORES SAN LEANDRO CA		
		327173088 GENERAL MERCHANDISE 06/21/92	75.73	
501174-1	007	Office Depot Inc. SAN LEANDRO CA		
		860044422 OFFICE PROD. & SUPPLIES 06/21/92	70.14	
ACCOUNT TOTAL			\$933.52	\$169.66

Payments or credits received after closing date above will appear on next month's statement.

AMERICAN EXPRESS GIFT CHEQUES - THERE'S NO BETTER WAY TO GIVE THE GIFT OF MONEY - APPRECIATED & APPROPRIATE FOR EVERY OCCASION. Your account renews next month. We look forward to providing you with the benefits of Cardmembership in the coming year.

Please see reverse side for important information.



9704379337C



ITEM 001
TARGET STORES SAN LEANDRO CA \$142.83

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	05/31/92	327152075	
Service Establishment and Location			
TARGET STORES SAN LEANDRO CA			
Record of Charge			
GENERAL MERCHANDISE			
ROC NUMBER 03310			
S/E # 5045718008			
TOTAL CHARGE AMOUNT			\$142.83

ITEM 002
Office Depot Inc. SAN LEANDRO CA \$80.45

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	05/31/92	860017572	
Service Establishment and Location			
Office Depot Inc. SAN LEANDRO CA			
Record of Charge			
OFFICE PROD. & SUPPLIES			
ROC NUMBER 860017572			
S/E # 5045789781			
TOTAL CHARGE AMOUNT			\$80.45

ITEM 003
BUDGET RENT A CAR SAN FRANCISCO CA \$272.34

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/01/92	02002893	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 05/17/92 1245	002002893	
RETURN SAN FRANCISCO	CA 06/01/92	TR# 132146	
801			
S/E # 5043933134 GOLDEN MARGARET			
TOTAL CHARGE AMOUNT			\$272.34

ITEM 004
TARGET STORES SAN LEANDRO CA \$173.12

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/14/92	327166081	
Service Establishment and Location			
TARGET STORES SAN LEANDRO CA			
Record of Charge			
GENERAL MERCHANDISE			
ROC NUMBER 03907			
S/E # 5045718008			
TOTAL CHARGE AMOUNT			\$173.12

ITEM 005
Office Depot Inc. SAN LEANDRO CA \$118.91

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/14/92	860028494	
Service Establishment and Location			
Office Depot Inc. SAN LEANDRO CA			
Record of Charge			
OFFICE PROD. & SUPPLIES			
ROC NUMBER 860028494			
S/E # 5045789781			
TOTAL CHARGE AMOUNT			\$118.91

ITEM 006
TARGET STORES SAN LEANDRO CA \$75.73

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/21/92	327173088	
Service Establishment and Location			
TARGET STORES SAN LEANDRO CA			
Record of Charge			
GENERAL MERCHANDISE			
ROC NUMBER 04791			
S/E # 5045718008			
TOTAL CHARGE AMOUNT			\$75.73

ITEM 007
Office Depot Inc. SAN LEANDRO CA \$70.14

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/21/92	860044422	
Service Establishment and Location			
Office Depot Inc. SAN LEANDRO CA			
Record of Charge			
OFFICE PROD. & SUPPLIES			
ROC NUMBER 860044422			
S/E # 5045789781			
TOTAL CHARGE AMOUNT			\$70.14

97043793371

LENORA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

6698

9/22 92

1-3372801

American Express

Five thousand seven hundred eleven + 76/100

5711.76

FRANCIS & T. MCGRAW BANK OF NEW YORK
170 Broadway, New York, N.Y. 10018

579639-04005

NOT NEGOTIABLE
Francis & T. McGraw

006648 026003379 31031541

97043793372



The Gold Card Summary of Account

Please retain this portion for your files

Card Member Name
MARGARET E TANZOSH

Account Number
[REDACTED]

Closing Date
08-26-92

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days).
FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT
1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. Page 1 of 6

Previous Card Balance	Card Payments/Credits	New Card Charges	New Card Balance (A)	Sign & Travel Minimum Payment (B)	Minimum Amount Due (A)
\$2,335.25	\$2,335.25	\$5,806.88	\$5,806.88	\$31.00	\$5,837.88

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
		CARD [REDACTED] TRANSACTIONS		
831237-0		1,872.10 PYMT RECVD - THANK YOU 08/24		
		32.00 APPLIED TO SIGN & TRAVEL		
831237-0		PAYMENT RECEIVED - THANK YOU 08/24		1,840.10
831237-0		PAYMENT RECEIVED - THANK YOU 08/24		256.88
				238.2
495212-4	001	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		FD247050 NATIONAL CAR RENTAL 07/15/92	322.59	
495212-4	002	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		FD247083 NATIONAL CAR RENTAL 07/15/92	322.59	
501222-4	003	FEDERAL EXPRESS LOS ANGELES CA		
		482035027 1 STANDARD LETTER 08/04/92	9.00	
495232-4	004	AVIS RENT-A-CAR LOS ANGELES CA		
		R/A# 865874472 AVIS RENT-A-CAR 08/17/92	169.74	
495233-4	005	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		F1936335 NATIONAL CAR RENTAL 08/12/92	195.04	
499233-4	006	RADIO SHACK 01-3178SEAL BEACH CA		
		000065803 ELECTRONIC ACCESSORIES 08/19/92	75.37	
495234-4	007	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		F1931866 NATIONAL CAR RENTAL 07/29/92	322.59	
495234-4	008	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		F1931870 NATIONAL CAR RENTAL 07/29/92	335.58	
495239-4	009	NATIONAL CAR RENTAL MINNEAPOLIS MN		
		F1936324 NATIONAL CAR RENTAL 08/12/92	312.82	
		TOTAL FOR CARD 400	2,065.32	2,335.25
		CARD [REDACTED] TRANSACTIONS		
026209-1	010	NATIONAL CAR RENTAL ANCHORAGE AK	1,207.92	
176219-1	011	NATIONAL CAR RENTAL ANCHORAGE AK	290.40	
		PAGE TOTAL	3,563.64	2,335.25

Payments or credits received after closing date above will appear on next month's statement.

Enroll in ConnectPlus(SM) with MCI to use the Card as calling card and get a \$5 bonus credit. Call MCI at 1-800-688-0052 today!

Please see reverse side for important information regarding certain types of charges.

97043793373



The Gold Card

Card Member Name

MARGARET E TANZOSH

Account Number

Closing Date

Page 2 of 8

EB80120

08-26-92

838

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
038234-1	012	RENT A WRECK OF PORTLAND TIGARD OR INV#109246	437.85	
064237-1	013	HAMPTON INN OMAHA/CENTRAL OMAHA NE INV#507420	113.74	
600217-1	014	ALASKA AIRLINES ANCHORAGE AK TKT# 0272105435089 07/30	426.00	
501226-1	015	VILLAGE INN PORTLAND OR 000170601 FOOD-BEV 08/13/92	10.75	JW
600230-1	016	DELTA AIRLINES PORTLAND OR TKT# 0062162527823 08/17	303.00	
600230-1	017	DELTA AIRLINES PORTLAND OR TKT# 0062162527824 08/17	303.00	
499233-1	018	ALAMO RENT-A-CAR INC OMAHA NE 548424494 ALAMO RENT-A-CAR INC 08/19/92	327.48	
499234-1	019	ALAMO RENT-A-CAR INC OMAHA NE 548424494 ALAMO RENT-A-CAR INC 08/20/92	.46	
499234-1	020	ALAMO RENT-A-CAR INC OMAHA NE 548424563 ALAMO RENT-A-CAR INC 08/20/92	320.96	
TOTAL FOR CARD 101			3,741.56	.00
PAGE TOTAL			2,243.24	.00
ACCOUNT TOTAL			\$5,806.88	\$2,335.25

97043793374



The Gold Card

Card Member Name
MARGARET E TANZOSH

Account Number

Closing Date
6-92

Page 3 of 6

EBB0120

839

American Express
Gold Bank CardSM
Line of Credit Activator

Activator Exp. Date 021000306
09-24-92

19

001-0030
0210

Pay to the Order of American Express Travel Related Services Company, Inc. \$

Dollars

Please be sure the amount you fill in does not exceed the amount available in your line of credit. Your Line of Credit at CHEMICAL BANK NY, NY.

Amount must be greater than \$100.

will be charged the amount you have filled in above. 0000 2 040388 5217984009521801

X _____
Card Member Signature

To use Line of Credit Activator, please detach the above, complete, sign and return in remittance envelope.

Important Gold Card Line of Credit Activator Information

What is a Line of Credit Activator ?

You can pay all or a portion of your Gold Card bill by taking an advance from your Line of Credit. By returning the above form to American Express you are authorizing us to debit your Line of Credit for the amount indicated. Your Gold Card financial institution will bill you directly for the advance in accordance with the terms previously disclosed to you by that institution.

How to use the Line of Credit

- Determine and fill-in the amount of the bill you wish to transfer to your Line of Credit. You may use the Activator to pay all or a portion of your Gold Card bill. If using the activator to pay a portion of your bill, enclose a personal check to pay the balance. NOTE: The activator amount cannot exceed the amount available in your Line of Credit. Contact the financial institution listed on the activator to confirm the amount available.
- Sign the Activator.
- If using the activator to pay a portion of your Gold Card bill, enclose a check for the difference.
- Return the top portion of the activator, your personal check (if partial payment) and remittance portion of your statement to American Express.

- The activator must be submitted before the expiration date printed thereon.
- Record the transaction below to update your available Line of Credit.

Register

o Date _____

o Line of Credit Balance _____

o Activator Amount _____

o Available Balance _____

Dishonored Activators

If this Activator is not honored by your financial institution, the amount will be rebilled to your Gold Card account. Your Gold Card account may also be charged a \$15.00 fee to cover collection costs, except where otherwise provided by applicable law.

Please be sure to sign the Activator before you send it back.

Statement of Sign & Travel[®] Account

HAVE YOUR TRAVEL AGENT TYPE OR KEY "E" FOR SIGN & TRAVEL.

Account No: _____

Creditor: AMERICAN EXPRESS CENTURION BANK

Closing Date: 08-26-92

Previous Balance		Payments/Credits		New Charges		FINANCE CHARGE		New Balance		
1,132.85		32.00		.00		14.42		1,115.27		
Reference Number	Item No.	Posting Date	Description of Transaction	Charges		Credits				
831237-4		08/24	PAYMENT RECEIVED - THANK YOU			32.00				
Balance(s) to Which Rate Applies			Finance Charge Schedule		ANNUAL PERCENTAGE RATE		Minimum Payment Includes		Payment Due Date: 09-20-92	
ALL			Average Daily Balance 1116.33 Monthly Periodic Rate 1.29%		15.50%		Past Due Amount .00 This Month's Payment 31.00		Minimum Payment \$31.00	

Important Sign & Travel Account Information

Amendment to Minimum Payment Terms

Prior to January 1, 1990, the Sign & Travel Account Agreement (the "Agreement") required a Minimum Payment of 1/24th of the New Balance of your Sign & Travel Account, but not less than \$20 or the entire New Balance if less than \$20. After January 1, 1990, the Agreement is amended to require a Minimum Payment of 1/36th of the New Balance, but not less than \$20 or the entire New Balance if less than \$20. If you wish, you can always pay more than the Minimum Payment.

Finance Charge

To calculate the Finance Charge, we multiply the Daily Periodic Rate by the Average Daily Balance during the billing period. Then we multiply the product by the number of days in the billing cycle. To get the Average Daily Balance, we take the beginning balance of the Sign & Travel Account each day, add any new Sign & Travel Charges and accrued and unpaid Finance Charges (except such Finance Charges will not be included for residents of CO, IA, ME, NC and PR), and subtract any payments or credits. Then we add up the daily balance for the billing period and divide by the number of days in the billing period. This gives us the Average Daily Balance. This method of computation of the Average Daily Balance results in compound interest (except for residents of CO, IA, ME, NC and PR).

Payments

Mail your payment in the enclosed envelope or to the address for payments listed on the back of your Card Account statement. Remember, your payment each month should be for at least the Minimum Amount Due or the Total Amount Due, whichever appears on the Card Account Statement. Either amount includes the Sign & Travel Minimum Payment shown above and the balance due on your Card Account. If you want to pay more than the Minimum Payment (up to the entire Sign & Travel New Balance), make your payment for the larger amount and the excess will be applied to your Sign & Travel Account.

How to avoid additional Finance Charge

You have the right to pay the entire New Balance of your Sign & Travel Account at any time without penalty. No Finance Charge will be assessed in any billing period in which there are no new Sign & Travel Charges, and payments or credits received before the Payment Due Date equal or exceed the previous balance. The Payment Due Date is 25 days after the Closing Date of the Sign & Travel Statement.

Finance Charge Information for Certain Cardmembers

If (i) as of 5/30/88 the creditor for your Sign & Travel Account was not American Express Centurion Bank and you have not thereafter reduced your Sign & Travel Account to zero ("Specified Accounts") and (ii) a Sign & Travel Charge has not been posted to your Specified Account on or after 7/1/88 (9/1/88 for billing addresses in IA and NJ, 10/1/88 for CO and OK, 12/1/88 for IL, KS, and WY, 5/1/89 for WI), then (x) no additional Finance Charge will be assessed if you pay the entire New Balance before the Payment Due Date and (y) no Finance Charge will be assessed in any billing period in which there is no previous balance.

Billing Inquiries

For all billing inquiries concerning your Sign & Travel Account, contact American Express, Gold Card Customer Service Department, 777 American Expressway, Ft. Lauderdale, Florida 33377 or 1-800-828-8800. See the reverse side of the first page of your Sign & Travel Account statement for more information.

97043793375



The Gold Card

Card Member Name
MARGARET E TANZOSH

Account Number

Closing Date Page 4 of 6 EBB012

08-26-92

\$1.94

ITEM 001
NATIONAL CAR RENTAL MINNEAPOLIS MN \$322.59

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/15/92	0000000	
Service Establishment and Location			
NATIONAL CAR RENTAL MINNEAPOLIS MN			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELES	CA	07/15/92	AGREEMENT FD247050
RETURN LOS ANGELES	CA	07/29/92	TR# 212302
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$322.59

ITEM 002
NATIONAL CAR RENTAL MINNEAPOLIS MN \$322.59

Cardmember account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/15/92	0000000	
Service Establishment and Location			
NATIONAL CAR RENTAL MINNEAPOLIS MN			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELES	CA	07/15/92	AGREEMENT FD247083
RETURN LOS ANGELES	CA	07/29/92	TR# 212302
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$322.59

ITEM 004
AVIS RENT-A-CAR LOS ANGELE CA \$169.74

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	08/17/92		
Service Establishment and Location			
AVIS RENT-A-CAR LOS ANGELE CA			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELE	CA	08/14/92	AGREEMENT 888874472
RETURN LOS ANGELES AP CA	CA	08/17/92	TR# 230300
S/E # 5043700129 TANZOSH, MARGARET	TOTAL CHARGE AMOUNT		\$169.74

ITEM 005
NATIONAL CAR RENTAL MINNEAPOLIS MN \$195.04

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	08/12/92	0000000	
Service Establishment and Location			
NATIONAL CAR RENTAL MINNEAPOLIS MN			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELES	CA	08/12/92	AGREEMENT F1936335
RETURN LOS ANGELES	CA	08/19/92	TR# 2333C2
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$195.04

ITEM 007
NATIONAL CAR RENTAL MINNEAPOLIS MN \$322.59

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/29/92	0000000	
Service Establishment and Location			
NATIONAL CAR RENTAL MINNEAPOLIS MN			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELES	CA	07/29/92	AGREEMENT F1931866
RETURN LOS ANGELES	CA	08/12/92	TR# 227302
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$322.59

ITEM 008
NATIONAL CAR RENTAL MINNEAPOLIS MN \$335.58

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/29/92	0000000	
Service Establishment and Location			
NATIONAL CAR RENTAL MINNEAPOLIS MN			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL LOS ANGELES	CA	07/29/92	AGREEMENT F1931870
RETURN LOS ANGELES	CA	08/12/92	TR# 227302
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$335.58

97043793376



The Gold Card

Card Member Name
MARGARET E TANZOSH

Account Number

Closing Date
08-26-92

Page 6 of 8

EBB01

ITEM 013
HAWAIIAN INN OMAHA/CENTRAL OMAHA NE

\$113.74

05/91 THRU 03/94 77		Normal Code	Type of Discount Clg
JEFF WILLIAMSON		Check or Bill Number	Am. of Discount Clg
HAWAIIAN INN OMAHA/CENTRAL OMAHA NE		091792	Amount Due
32600500700			
<i>Jeff Williamson</i>		TOTAL	113.74
00 507420		American Express® Cards	

ITEM 014
ALASKA AIRLINES ANCHORAGE AK \$426.00

Cardmember Account No	Transaction Date	Ticket Number
	07/30/92	02721054350895
Passenger Name	Traveling Airline	
WILLIAMSON, JEFFMR	ALASKA AIRLINES	
Issuer Name	Issuer Address	
ALASKA AIRLINES INC	ANCHORAGE AK	
From	Carrier	Class
ANCHORAGE AK		
To	AS	YA
SEATTLE WA		
To	AS	YA
PORTLAND OR		
Transaction Amount		426.00
American Use Only		018730 000165 ** 218000
PASSENGER TICKET S/E # 7992400168		

ITEM 015
DELTA AIRLINES PORTLAND OR \$303.00

Cardmember Account No	Transaction Date	Ticket Number
	08/17/92	00621825278234
Passenger Name	Traveling Airline	
WILLIAMSON/JEFF	DELTA AIRLINES	
Issuer Name	Issuer Address	
DELTA AIR LINES INC.	PORTLAND OR	
From	Carrier	Class
PORTLAND OR		
To	DL	BO
SALT LAKE CITY UT		
To	DL	BO
LAS VEGAS NV		
Transaction Amount		303.00
American Use Only		23029948 000150 30 230000
PASSENGER TICKET S/E # 7992701284		

ITEM 017
DELTA AIRLINES PORTLAND OR \$303.00

Cardmember Account No	Transaction Date	Ticket Number
	08/17/92	00621825278245
Passenger Name	Traveling Airline	
KNAPP/CHUCK	DELTA AIRLINES	
Issuer Name	Issuer Address	
DELTA AIR LINES INC.	PORTLAND OR	
From	Carrier	Class
PORTLAND OR		
To	DL	BO
SALT LAKE CITY UT		
To	DL	BO
LAS VEGAS NV		
Transaction Amount		303.00
American Use Only		23029962 000150 30 230000
PASSENGER TICKET S/E # 7992701264		

ITEM 018
ALAMO RENT-A-CAR INC OMAHA NE \$327.48

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	08/19/92	081992	
Service Establishment and Location			
ALAMO RENT-A-CAR INC OMAHA NE			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL OMAHA	NE 00/00/00	548424494	
RETURN	08/19/92	TR# 233515	
S/E # 1263901340			TOTAL CHARGE AMOUNT \$327.48

ITEM 019
ALAMO RENT-A-CAR INC OMAHA NE \$0.46

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	08/20/92	082092	
Service Establishment and Location			
ALAMO RENT-A-CAR INC OMAHA NE			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL OMAHA	NE 00/00/00	548424494	
RETURN	08/20/92	TR# 234515	
S/E # 1263901340			TOTAL CHARGE AMOUNT \$0.46

ITEM 020
ALAMO RENT-A-CAR INC OMAHA NE \$320.96

Cardmember Account No	Date of Charge	Reference Code	Approval Code
	08/20/92	082092	
Service Establishment and Location			
ALAMO RENT-A-CAR INC OMAHA NE			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL OMAHA	NE 00/00/00	548424583	
RETURN	08/20/92	TR# 234515	
S/E # 1263901340			TOTAL CHARGE AMOUNT \$320.96

97043793377



The Gold Card

Card Member Name MARGARET E TANZOSH

Account Number

Closing Date Page 5 of 8

EBB012

08-26-92

\$1

B4

ITEM 009 NATIONAL CAR RENTAL MINNEAPOLIS MN \$312.82

Statement Account No	Date of Charge	Reference Code	Approval Code
	08/12/92	0000000	
Service Description and Location NATIONAL CAR RENTAL MINNEAPOLIS MN			
Vehicle or Unit #		DATE/TIME	
LOCATION		DATE/TIME	
RENTAL LOS ANGELES	CA 08/12/92	AGREEMENT F1936324	
RETURN LOS ANGELES	CA 08/25/92	TRF 238302	
S/E # 7223820044	TOTAL CHARGE AMOUNT		\$312.82

ITEM 010 NATIONAL CAR RENTAL ANCHORAGE AK \$1,207.92

5815315

DATE 07/22/92 TIME 08:12:08
AMERICAN EXPRESS
NATIONAL CAR RENTAL ANCHORAGE AK
ACCT: 00550280047
EXP: 03/94
INT: 2.0% '92
APPR: APPROVE 27

QTY	CLASS	DESCRIPTION	AMOUNT
1		SALES DRAFT	1277.92
TOTAL			1277.92

SALES DRAFT TOTAL 1277.92

AMERICAN EXPRESS
CUSTOMER SIGNATURE
RETAIN THIS COPY FOR YOUR RECORDS
MERCHANT/AMERICAN EXPRESS COPY

ITEM 011 NATIONAL CAR RENTAL ANCHORAGE AK \$290.40

5315439

DATE 07/20/92 TIME 08:12:11H
AMERICAN EXPRESS
NATIONAL CAR RENTAL ANCHORAGE AK
ACCT: 00550280047
EXP: 03/94
INT: 2.0% '92
APPR: APPROVE 26

QTY	CLASS	DESCRIPTION	AMOUNT
1		SALES DRAFT	290.40
TOTAL			290.40

SALES DRAFT TOTAL 290.40

AMERICAN EXPRESS
CUSTOMER SIGNATURE
RETAIN THIS COPY FOR YOUR RECORDS
MERCHANT/AMERICAN EXPRESS COPY

ITEM 012 RENT A WRECK OF PORTLAND TIGARD OR \$437.85

American Express Cards

05/91 THRU 03/94 77 AX Card No. 455060
JEFF WILLIAMSON Card No. M-13083
073192
RENT A WRECK
PORTLAND WEST
065963734
5363900093 OR
00 109246

437.85
437.85
TOTAL 437.85

97043793378

LENOBA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

5000

7/24 92

1-337/

American Express
Three thousand one hundred ninety + 97/100

3,909.97



AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019



Jan NOT NEGOTIABLE

⑆005909⑆ ⑆026003379⑆ 31031541⑆

97043793379

0.
0.
318.01
318.01
192.14
192.14
192.14
175.07
62.20
169.37
234.36
234.36
234.36
234.36

079



The Gold Card Summary of Account

Please retain this portion for your files

Cardmember Name
MARSHA PLAFKIN

Account Number
[REDACTED]

Closing Date
07-08-92

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days).
FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT
1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. Page 1 of 4

Previous Balance	Credits/Payments	New Charges	New Balance
\$2,844.56	\$2,844.56	\$3,239.92	\$3,239.92

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
831190-0		PAYMENT RECEIVED - THANK YOU 07/08		2,844.56
501167-1	001	BUDGET RENT A CAR SAN FRANCISCO CA		
		002003838 BUDGET RENT A CAR 06/12/92	318.01	
501167-1	002	BUDGET RENT A CAR SAN FRANCISCO CA		
		002003839 BUDGET RENT A CAR 06/12/92	318.01	
501167-1	003	BUDGET RENT A CAR SAN FRANCISCO CA		
		002004550 BUDGET RENT A CAR 06/12/92	192.14	
501167-1	004	BUDGET RENT A CAR SAN FRANCISCO CA		
		002004551 BUDGET RENT A CAR 06/12/92	192.14	
501167-1	005	BUDGET RENT A CAR SAN FRANCISCO CA		
		002004552 BUDGET RENT A CAR 06/12/92	192.14	
501167-1	006	BUDGET RENT A CAR SAN FRANCISCO CA		
		002004553 BUDGET RENT A CAR 06/12/92	175.41	
501168-1	007	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005542 BUDGET RENT A CAR 06/15/92	62.29	
501171-1	008	800 FLOWERS INC WESTBURY NY		
		65507 512 GIFT ITEMS 06/18/92	48.95	
501175-1	009	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005538 BUDGET RENT A CAR 06/22/92	167.37	
501181-1	010	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005535 BUDGET RENT A CAR 06/26/92	234.36	
501181-1	011	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005537 BUDGET RENT A CAR 06/26/92	234.36	
501181-1	012	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005540 BUDGET RENT A CAR 06/26/92	234.36	
501181-1	013	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005544 BUDGET RENT A CAR 06/26/92	234.36	
501181-1	014	BUDGET RENT A CAR SAN FRANCISCO CA		
		002005940 BUDGET RENT A CAR 06/26/92	234.36	
PAGE TOTAL			2,538.26	2,844.56

Payments or credits received after closing date above will appear on next month's statement.

Frequent Travelers - Earn more miles faster. For information on enrolling in the Membership Miles(SM) program call 1-800-338-4978.

Please see reverse side for important information regarding certain types of charges

9704379338C

maisha's



Amex Ref No.	Item No.	Listing of Charges and Credits	Charges	Credits
501181-1	015	BUDGET RENT A CAR SAN FRANCISCO CA 002005941 BUDGET RENT A CAR 06/26/92	234.36	
501181-1	016	BUDGET RENT A CAR SAN FRANCISCO CA 002006693 BUDGET RENT A CAR 06/26/92	66.92	
501181-1	017	BUDGET RENT A CAR SAN FRANCISCO CA 002006695 BUDGET RENT A CAR 06/26/92	66.92	
501182-1	018	BUDGET RENT A CAR SAN FRANCISCO CA 002007067 BUDGET RENT A CAR 06/28/92	33.46	
PAGE TOTAL			401.66	.00
ACCOUNT TOTAL			\$3,239.92	\$2,844.56

ITEM 001
BUDGET RENT A CAR SAN FRANCISCO CA \$318.01

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02003838	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 05/24/92 1941	002003838	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 PLAFKIN			TOTAL CHARGE AMOUNT \$318.01

ITEM 002
BUDGET RENT A CAR SAN FRANCISCO CA \$318.01

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02003838	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 05/24/92 1946	002003838	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 PLAFKIN MARSHA			TOTAL CHARGE AMOUNT \$318.01

ITEM 003
BUDGET RENT A CAR SAN FRANCISCO CA \$192.14

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02004550	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 06/01/92 807	002004550	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 GOLDEN M			TOTAL CHARGE AMOUNT \$192.14

ITEM 004
BUDGET RENT A CAR SAN FRANCISCO CA \$192.14

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02004551	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 06/01/92 809	002004551	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 GOLDEN M			TOTAL CHARGE AMOUNT \$192.14

ITEM 005
BUDGET RENT A CAR SAN FRANCISCO CA \$192.14

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02004552	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 06/01/92 811	002004552	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 GOLDEN M			TOTAL CHARGE AMOUNT \$192.14

ITEM 006
BUDGET RENT A CAR SAN FRANCISCO CA \$175.41

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/12/92	02004553	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO	CA 06/01/92 814	002004553	
RETURN SAN FRANCISCO	CA 06/12/92 162146	TR#	
			901
S/E # 5043933134 PLAFKIN MARSHA			TOTAL CHARGE AMOUNT \$175.41

97043793381



ITEM 007 BUDGET RENT A CAR SAN FRANCISCO CA \$62.29

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/15/92	02005542	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 926	002005542	
RETURN SAN FRANCISCO CA	06/15/92	TR# 158146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$62.29	
PLAFKIN MARSHA			

ITEM 008 800 FLOWERS INC WESTBURY NY \$48.95

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/18/92	85507512	
Service Establishment and Location			
800 FLOWERS INC WESTBURY NY			
Record of Charge			
GIFT ITEMS			
ROC NUMBER 0099609924			
S/E # 6316742162	TOTAL CHARGE AMOUNT	\$48.95	

ITEM 009 BUDGET RENT A CAR SAN FRANCISCO CA \$167.37

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/22/92	02005538	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 922	002005538	
RETURN SAN FRANCISCO CA	06/22/92	TR# 170146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$167.37	
PLAFKIN MARSHA			

ITEM 010 BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/26/92	02005535	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 918	002005535	
RETURN SAN FRANCISCO CA	06/26/92	TR# 178146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$234.36	
PLAFKIN MARSHA			

ITEM 011 BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/26/92	02005537	
Service Establishment and Location			
* BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 921	002005537	
RETURN SAN FRANCISCO CA	06/26/92	TR# 178146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$234.36	
PLAFKIN MARSHA			

ITEM 012 BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/26/92	02005540	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 925	002005540	
RETURN SAN FRANCISCO CA	06/26/92	TR# 178146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$234.36	
PLAFKIN MARSHA6			

ITEM 013 BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/26/92	02005544	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/12/92 928	002005544	
RETURN SAN FRANCISCO CA	06/26/92	TR# 178146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$234.36	
PLAFKIN MARSHA			

ITEM 014 BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
	06/26/92	02005940	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME	AGREEMENT	
RENTAL SAN FRANCISCO CA	06/15/92 825	002005940	
RETURN SAN FRANCISCO CA	06/26/92	TR# 178146	
901			
S/E # 5043933134	TOTAL CHARGE AMOUNT	\$234.36	
MARSHA PLAFKIN			

97043793382



The Gold Card

Card Member Name

MARSHA PLAFKIN

Account Number

Closing Date Page 4 of 4

F88012

07-08-92

393

ITEM 015
BUDGET RENT A CAR SAN FRANCISCO CA \$234.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/26/92	02006941	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL SAN FRANCISCO	CA	06/15/92 830	AGREEMENT 002006941
RETURN SAN FRANCISCO	CA	06/26/92	TR# 176146
		901	
S/E #	5043933134	TOTAL CHARGE AMOUNT	\$234.36
M PLAFKIN			

ITEM 016
BUDGET RENT A CAR SAN FRANCISCO CA \$66.92

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/26/92	02006693	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL SAN FRANCISCO	CA	06/22/92 911	AGREEMENT 002006693
RETURN SAN FRANCISCO	CA	06/26/92	TR# 176146
		901	
S/E #	5043933134	TOTAL CHARGE AMOUNT	\$66.92
PLAFKIN MARSHA			

ITEM 017
BUDGET RENT A CAR SAN FRANCISCO CA \$66.92

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/26/92	02006695	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL SAN FRANCISCO	CA	06/22/92 913	AGREEMENT 002006695
RETURN SAN FRANCISCO	CA	06/26/92	TR# 176146
		901	
S/E #	5043933134	TOTAL CHARGE AMOUNT	\$66.92
PLAFKIN MARSHA			

ITEM 018
BUDGET RENT A CAR SAN FRANCISCO CA \$33.46

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	06/28/92	02007067	
Service Establishment and Location			
BUDGET RENT A CAR SAN FRANCISCO CA			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL SAN FRANCISCO	CA	06/26/92 1143	AGREEMENT 002007067
RETURN SAN FRANCISCO	CA	06/28/92	TR# 176146
		1001	
S/E #	5043933134	TOTAL CHARGE AMOUNT	\$33.46
PLAFKIN MARSHA			

97043793383

W/S Name	W/S Vch No	W/S Cont Inc	W/S Cont Date	W/S Cont Calc Dte	W/S Contr Inc Amt	W/S O/S Amt	W/S Exp Cde	W/S Date Reimb	W/S Day O/S	W/S Contr Amt	W/S Run Contr Bal	W/S Excess Amount	W/S Exc Bal Aft Reimb
Mersha Plafkin	17	05/15/91	05/15/91		50.00	50.00	7		0	50.00	-950.00		
	18	08/14/91	08/14/91		35.00	85.00	7		0	35.00	-915.00		
	29	09/04/91	09/04/91		10.00	95.00	5	10/04/91	30	0.00	-915.00		
	34	09/11/91	09/11/91		50.20	145.20	4	10/04/91	23	50.20	-864.80		
	34	09/17/91	09/17/91		16.19	161.39	4	10/04/91	17	16.19	-848.61		
	13	09/17/91	09/17/91		77.99	239.38	4	11/08/91	52	77.99	-770.62		
	16	09/26/91	09/26/91		1386.66	1626.04	4	01/17/92	113	1386.66	616.04	616.04	
	13	10/04/91	10/04/91		-77.99	1548.05	1		0	0.00	548.05	548.05	548.05
	29	10/15/91	10/15/91		75.97	1624.02	4	01/28/92	105	75.97	624.02	624.02	
	34	10/16/91	10/16/91		75.97	1699.99	4	01/28/92	104	75.97	699.99	699.99	
	29	11/08/91	11/08/91		-85.97	1614.02	1		0	0.00	614.02	614.02	614.02
	19	11/08/91	11/08/91		200.00	1814.02	7		0	200.00	814.02	814.02	
	1	11/11/91	11/11/91		997.26	2811.28	4	01/28/92	78	997.26	1811.28	1811.28	
	20	11/14/91	11/14/91		25.00	2836.28	7		0	25.00	1836.28	1836.28	
	34	11/20/91	11/20/91		6.50	2842.78	4	01/28/92	69	6.50	1842.78	1842.78	
	21	11/22/91	11/22/91		25.00	2867.78	7		0	25.00	1867.78	1867.78	
	22	11/27/91	11/27/91		76.00	2943.78	7		0	76.00	1943.78	1943.78	
	26	12/02/91	12/02/91		25.00	2968.78	7		0	25.00	1968.78	1968.78	
	2	12/09/91	01/08/92		990.72	3959.50	6	02/22/92	45	0.00	1968.78	1968.78	
	23	12/11/91	12/11/91		15.00	3974.50	7		0	15.00	1983.78	1983.78	
	24	12/12/91	12/12/91		75.00	4049.50	7		0	75.00	2058.78	2058.78	
	14	12/13/91	12/13/91		38.96	4088.46	4	02/22/92	71	38.96	2097.74	2097.74	
	30	12/16/91	12/16/91		90.39	4178.85	4	02/22/92	68	90.39	2188.13	2188.13	
	25	12/16/91	12/16/91		31.75	4210.60	7		0	31.75	2219.88	2219.88	
	2	12/19/91	01/08/92		178.53	4389.13	6	02/22/92	45	0.00	2219.88	2219.88	
	14	12/26/91	12/26/91		-38.96	4350.17	1		0	0.00	2180.92	2180.92	2180.92
	30	01/03/92	01/03/92		-90.39	4259.78	1		0	0.00	2090.53	2090.53	2090.53
	34	01/03/92	01/03/92		11.00	4270.78	4	02/22/92	50	11.00	2101.51	2101.51	
	27	01/03/92	01/03/92		15.00	4285.78	7		0	15.00	2116.53	2116.53	
	31	01/06/92	01/06/92		61.16	4346.94	4	02/22/92	47	61.16	2177.69	2177.69	
	1	01/07/92	01/07/92		-997.26	3349.68	1		0	0.00	1180.43	1180.43	1180.43
	3	01/07/92	01/07/92		51.85	3401.53	4	02/29/92	53	51.85	1232.28	1232.28	
	2	01/07/92	01/08/92		47.20	3448.73	6	02/29/92	52	0.00	1232.28	1232.28	
	3	01/07/92	02/08/92		402.69	3851.42	6	02/29/92	21	0.00	1232.28	1232.28	
	3	01/08/92	02/08/92		106.67	3958.09	6	02/29/92	21	0.00	1232.28	1232.28	
	16	01/14/92	01/14/92		-150.00	3808.09	1		0	0.00	1082.28	1082.28	1082.28
	3	01/15/92	02/08/92		177.53	3985.62	6	02/29/92	21	0.00	1082.28	1082.28	1082.28
	34	01/17/92	01/17/92		-159.86	3825.76	1		0	0.00	922.42	922.42	922.42
	3	01/19/92	01/19/92		277.12	4102.88	4	02/29/92	41	277.12	1199.54	1199.54	
	3	01/19/92	02/08/92		277.12	4380.00	6	02/29/92	21	0.00	1199.54	1199.54	
	3	01/21/92	02/08/92		277.12	4657.12	6	02/29/92	21	0.00	1199.54	1199.54	
	2	01/28/92	01/28/92		-1216.45	3440.67	1		0	0.00	103.23	103.23	103.23
	31	01/31/92	01/31/92		-61.16	3379.51	1		0	0.00	103.23	103.23	103.23
	3	02/04/92	02/04/92		298.77	3678.28	4	02/29/92	25	298.77	402.00	402.00	
	3	02/04/92	02/08/92		298.77	3977.05	6	02/29/92	21	0.00	402.00	402.00	
	32	02/05/92	02/05/92		86.00	4063.05	6	02/29/92	24	0.00	402.00	402.00	
	3	02/06/92	02/08/92		135.16	4198.21	6	03/31/92	52	0.00	402.00	402.00	
	15	02/18/92	02/18/92		93.04	4291.25	4	03/31/92	42	93.04	495.04	495.04	
	16	02/22/92	02/22/92		-1236.66	3054.59	1		0	0.00	246.33	246.33	246.33
	3	02/29/92	02/29/92		-2302.80	751.79	1		0	0.00	-334.21		
	33	03/03/92	03/03/92		10.43	762.22	4	03/31/92	28	10.43	-323.78		
	4	03/09/92	03/09/92		373.01	1135.23	6	05/01/92	53	0.00	-323.78		
	5	03/18/92	03/18/92		234.36	1369.59	4	05/01/92	44	234.36	-89.42		
	5	03/18/92	03/18/92		234.36	1603.95	4	05/01/92	44	234.36	144.94	144.94	
	5	03/18/92	04/08/92		234.36	1838.31	6	05/01/92	23	0.00	144.94	144.94	
	4	03/31/92	03/31/92		-373.01	1465.30	1		0	0.00	41.47	41.47	41.47

97043793384

W/S Name	W/S Vch No	W/S Cont Inc	W/S Cont Date	W/S Cont Calc	W/S Cont Dte	W/S Contr Inc Amt	W/S O/S Amt	W/S Exp Cde	W/S Date Reimb	W/S Day O/S	W/S Contr Amt	W/S Run Contr Bal	W/S Excess Amount	W/S Exc Bal Aft Reimb
Marsha Plarkin	5	04/01/92	04/01/92			262.57	1727.87	4	05/01/92	30	262.57	304.04	304.04	
	5	04/01/92	04/01/92			262.57	1990.44	4	05/01/92	30	262.57	566.61	566.61	
	5	04/01/92	04/08/92			262.57	2253.01	6	06/01/92	54	0.00	566.61	566.61	
	32	04/03/92	04/03/92			-86.00	2167.01	1		0	0.00	566.61	566.61	566.61
	6	04/15/92	04/15/92			262.57	2429.58	4	06/01/92	47	262.57	829.18	829.18	
	6	04/15/92	04/15/92			262.57	2692.15	4	06/01/92	47	262.57	1091.75	1091.75	
	6	04/15/92	05/08/92			262.57	2954.72	6	06/01/92	24	0.00	1091.75	1091.75	
	5	05/01/92	05/01/92			-1490.79	1463.93	1		0	0.00	97.89	97.89	97.89
	6	05/01/92	05/01/92			290.78	1754.71	4	06/01/92	31	290.78	388.67	388.67	
	6	05/01/92	05/01/92			290.78	2045.49	4	06/01/92	31	290.78	679.45	679.45	
	6	05/01/92	05/08/92			290.78	2336.27	6	07/03/92	56	0.00	679.45	679.45	
	7	05/20/92	06/07/92			500.00	2836.27	6	07/03/92	26	0.00	679.45	679.45	
	7	05/24/92	05/24/92			465.47	3301.74	4	07/03/92	40	465.47	1144.92	1144.92	
	7	05/24/92	05/24/92			465.47	3767.21	4	07/03/92	40	465.47	1610.39	1610.39	
	7	05/24/92	06/07/92			465.47	4232.68	6	07/03/92	26	0.00	1610.39	1610.39	
	33	05/29/92	05/29/92			-10.43	4222.25	1		0	0.00	1610.39	1610.39	1610.39
	28	05/29/92	05/29/92			10.00	4232.25	7		0	10.00	1620.39	1620.39	
	6	06/01/92	06/01/92			-1660.05	2572.20	1		0	0.00	513.69	513.69	513.69
	7	06/01/92	06/01/92			644.49	3216.69	4	07/03/92	32	644.49	1158.18	1158.18	
	7	06/01/92	06/07/92			166.49	3383.18	6	07/03/92	26	0.00	1158.18	1158.18	
	7	06/07/92	06/07/92			137.17	3520.35	6	07/10/92	33	0.00	1158.18	1158.18	
	8	06/12/92	06/12/92			1387.85	4908.20	4	07/24/92	42	1387.85	2546.03	2546.03	
	8	06/15/92	06/15/92			62.29	4970.49	4	07/24/92	39	62.29	2608.32	2608.32	
	8	06/22/92	06/22/92			167.37	5137.86	4	07/24/92	32	167.37	2775.69	2775.69	
	8	06/26/92	06/26/92			1540.00	6677.86	4	07/24/92	28	1540.00	4315.69	4315.69	
	8	06/28/92	06/28/92			33.46	6711.32	4	07/24/92	26	33.46	4349.15	4349.15	
	7	07/03/92	07/03/92			-2844.56	3866.76	1		0	0.00	2773.72	2773.72	2773.72
	9	07/07/92	07/07/92			184.10	4050.86	4	09/04/92	59	184.10	2957.82	2957.82	
	15	07/10/92	07/10/92			-93.04	3957.82	1		0	0.00	2957.82	2957.82	2957.82
	9	07/10/92	07/10/92			234.36	4192.18	4	09/04/92	56	234.36	3192.18	3192.18	
	9	07/10/92	07/10/92			1406.16	5598.34	4	09/04/92	56	1406.16	4598.34	4598.34	
	9	07/23/92	07/23/92			1522.92	7121.26	4	09/04/92	43	1522.92	6121.26	6121.26	
	8	07/24/92	07/24/92			-3190.97	3930.29	1		0	0.00	2930.29	2930.29	2930.29
	9	07/24/92	07/24/92			451.92	4382.21	4	09/04/92	42	451.92	3382.21	3382.21	
	10	08/06/92	08/06/92			217.56	4599.77	4	09/04/92	29	217.56	3599.77	3599.77	
	9	08/06/92	08/06/92			1640.50	6240.27	4	10/19/92	74	1640.50	5240.27	5240.27	
	10	08/13/92	08/13/92			133.91	6374.18	4	10/19/92	67	133.91	5374.18	5374.18	
	10	08/20/92	08/20/92			1288.98	7663.16	4	10/19/92	60	1288.98	6663.16	6663.16	
	10	09/01/92	09/01/92			425.01	8088.17	4	10/19/92	48	425.01	7088.17	7088.17	
	10	09/03/92	09/03/92			468.72	8556.89	4	10/19/92	46	468.72	7556.89	7556.89	
	9	09/04/92	09/04/92			-5440.00	3116.89	1		0	0.00	2116.89	2116.89	2116.89
	11	09/16/92	09/16/92			937.44	4054.33	4	10/25/92	39	937.44	3054.33	3054.33	
	11	10/01/92	10/01/92			251.10	4305.43	4	10/25/92	24	251.10	3305.43	3305.43	
	11	10/03/92	10/03/92			33.46	4338.89	4	10/25/92	22	33.46	3338.89	3338.89	
	12	10/15/92	10/15/92			468.72	4807.61	4	12/06/92	52	468.72	3807.61	3807.61	
	10	10/19/92	10/19/92			-2534.18	2273.43	1		0	0.00	1273.43	1273.43	1273.43
	11	10/25/92	10/25/92			-1221.96	1051.47	1		0	0.00	51.47	51.47	51.47
	12	11/02/92	11/02/92			602.66	1654.13	4	12/06/92	34	602.66	654.13	654.13	
	12	12/06/92	12/06/92			-1071.38	582.75	1		0	0.00	-417.25	-417.25	

97043793385

LENORA B. FULANI FOR PRESIDENT
250 WEST 57TH STREET, SUITE 317
NEW YORK, NY 10019

3039

1/24 92
1-31/290
1680.58

American Express

One thousand six hundred eighty + ⁵⁸/₁₀₀



AMERICAN BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

Number 3710-920113-71004

NOT NEGOTIABLE
Fulani

⑆003039⑆ ⑆026003379⑆ 31031541⑆

97043793386

97043793387

Cardmember [Redacted]

CARDMEMBER USE **EXPIRATION DATE CHECKED**

Cardmember Name: *Bob Self* 302

Approval Code: _____ Type of Delayed Chg: _____

Check or Bill Number: _____ Amt. of Delayed Chg: _____

Date of Charge: _____ Revised Total: _____

1010692

MERCHANT/SERVICES	
TAXES	
FIREMISC	
TOTAL	1142870

WRITE FIRMLY

Member

Merchandise and/or service purchased on this card shall not be resold or returned for cash refund. Establishment agrees to transmit to American Express Travel Related Services Co., Inc. or authorized representative for payment.

Cards 170380 **Cardmember Copy**

Invoice Number

Dollars \$ 5 Cents

Holiday Inn

INVOICE

97043793388

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/04	LNG DIST L001-212	2.05		
	FROM 5543 SALIT, CA			
01/04	LNG DIST L001-212	.50		
	FROM 5543 SALIT, CA			
01/04	ROOM 1105, 1	80.00		
	FROM 5547 SALIT, CA			
01/04	RM TAX 1105, 1	6.40		
	FROM 5547 SALIT, CA			
01/04	ROOM 1206, 1	80.00		
	FROM 5545 SALIT, CA			
01/04	RM TAX 1206, 1	6.40		
	FROM 5545 SALIT, CA			
01/04	ROOM 1208, 1	195.00		
01/04	RM TAX 1208, 1	15.60		
01/04	LNG DIST L001-212	1.81		
	FROM 5547 SALIT, CA			
01/04	LNG DIST L001-212	2.20		
	FROM 5547 SALIT, CA			
01/04	TRANSIT	80.00		
	FROM 5559 BRAUN, BE			
01/04	RM TAX	6.40		
	FROM 5559 BRAUN, BE			
01/04	LNG DIST L001-212	2.05		
	FROM 5547 SALIT, CA			
01/04	LNG DIST L001-212	1.81		
	FROM 5545 SALIT, CA			
01/04	LNG DIST L001-212	1.81		
	FROM 5545 SALIT, CA			
01/04	LNG DIST L001-212	1.81		
	FROM 5545 SALIT, CA			
01/04	LNG DIST L001-317	1.81		
	FROM 5545 SALIT, CA			
01/04	LNG DIST L001-713	1.81		
	FROM 5545 SALIT, CA			

I agree that my liability for this bill shall remain undiminished and jointly and severally imposed upon the person, company, or association here to pay for any or the full amount of these charges. I also agree that all charges contained in this invoice are correct and any disputes or requests for copies of charges must be received within two days after my departure.

PLEASE LEAVE
YOUR ROOM KEY

signature X _____



Holiday Inn

The [unclear]
A [unclear]

INVOICE

1000 STREET
SANTA ANITA, CA 95050
TEL: (415) 352-1111

ROOM	DATE	RATE	TAXES	CHARGES	TOTAL
[unclear]	[unclear]	[unclear]	[unclear]	[unclear]	[unclear]

[REDACTED]

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/04	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/04	LNG DIST L001-212	3.77		
	FROM 5543 SALIT,CA			
01/04	LNG DIST L001-212	2.70		
	FROM 5543 SALIT,CA			
01/05	CAFE CHG 225270	12.67		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-212	1.75		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-212	1.75		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-212	2.88		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-603	1.20		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	1.15		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-212	4.30		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-212	1.75		
	FROM 5547 SALIT,CA			
01/05	LNG DIST 22220873	0.77		
01/05	CAFE CHG 225483	13.07		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-212	1.75		
	FROM 5542 SALIT,CA			
01/05	LNG DIST L001-212	1.75		
	FROM 5547 SALIT,CA			

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

PLEASE LEAVE YOUR ROOM KEY SIGNATURE X _____

97043793389



INVOICE

1000 W. STREET
 SAN JOSE, CALIF. 95128
 TEL. (415) 281-1000

The Inn

A LOUISIANA HOTEL

NAME: _____
 ROOM NO: _____
 RATE: _____
 TAX: _____
 TOTAL: _____
 [REDACTED]

9704379339C

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/05	LNG DIST 29415900	3.14		
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-212	1.77		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-215	1.75		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
01/05	CAFE CHG 225652	8.98		
	FROM 5545 SALIT,CA			
01/05	LNG DIST L001-212	6.32		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-212	1.96		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-617	1.77		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-212	6.32		
	FROM 5543 SALIT,CA			

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five (5) days after my departure.

PLEASE LEAVE
 YOUR ROOM KEY

SIGNATURE X _____



INVOICE

10001 STREET
 DOWNTOWN ST. NEW HAMPSHIRE 03101
 TEL. 603-875-1000

Resort

A sign up with

ROOM	NAME	DATE	AMOUNT	TAX
	NO. OF PERSON	NO. OF	AMOUNT	TAX
	NO. OF	NO. OF	AMOUNT	TAX



DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/05	LNG DIST L001-603	.50		
	FROM 5547 SALIT,CA			
01/05	LNG DIST L001-212	4.13		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-603	.50		
	FROM 5543 SALIT,CA			
01/05	CAFE CHG 225922	136.17		
	FROM 5543 SALIT,CA			
01/05	LNG DIST L001-718	1.77		
	FROM 5559 BRAUN,BE			
01/05	LNG DIST L001-718	1.75		
	FROM 5559 BRAUN,BE			
01/05	LNG DIST L001-603	.50		
01/05	LNG DIST L001-215	1.77		
01/05	LNG DIST L001-212	1.75		
01/05	LNG DIST L001-212	2.53		
	FROM 5559 BRAUN,BE			
01/05	LNG DIST L001-212	1.75		
	FROM 5559 BRAUN,BE			
01/05	LNG DIST L001-212	2.43		
01/05	LNG DIST L001-212	2.39		
01/05	LNG DIST L001-603	.50		
01/05	LNG DIST L001-212	1.75		
01/05	LNG DIST L001-603	.50		
01/05	LNG DIST L001-212	1.92		
	FROM 5543 SALIT,CA			
01/05	MISC INC 23COPIES	4.70		
01/05	ROOM 1105, 1	37.00		
	FROM 5547 SALIT,CA			
01/05	GR TAX 1105, 1	5.10		
	FROM 5547 SALIT,CA			
	1109, 1			
	FROM 5559 BRAUN,BE			
	1109, 1			
	FROM 5559 BRAUN,BE			

97043793391

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or organization fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

PLEASE LEAVE YOUR ROOM KEY

#DATE X

Holiday Inn

INVOICE

14555 STREET
 HOTEL HOLIDAY INN SALITRE, CA
 SALITRE, CA 94967

97043793392

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/05	ROOM 1208 1	80.00		
	FROM 5545 SALIT, CA			
01/05	RM TAX 1208 1	6.40		
	FROM 5545 SALIT, CA			
01/05	ROOM 1208 1	195.00		
01/05	RM TAX 1208 1	15.60		
01/06	COMSAT 2MOVIES	13.90		
	FROM 5547 SALIT, CA			
01/06	COMSAT	6.95		
	FROM 5545 SALIT, CA			
01/06	COMSAT 3MOVIES	20.85		
	FROM 5543 SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-212	1.75		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			
01/06	TRANSFER GL 5615	94.48		
	FROM SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			
01/06	CALL SENT	5.00		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-212	1.75		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-201	1.75		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-212	1.75		
	FROM 5547 SALIT, CA			
01/06	LNG DIST L001-603	.50		
	FROM 5547 SALIT, CA			

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or credit card fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

PLEASE LEAVE
 YOUR ROOM KEY

Signature: X



INVOICE

100 ELM STREET
SANTA ANA, CALIF. 92701-3400
714/241-1000

The Suites

A LUXURY HOTEL

ROOM	TAXES	RATE	TOTAL	TAXES



DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/06	LNG DIST - L001-212 FROM 5543 SALIT,CA	1.75		
01/06	LNG DIST - L001-313 FROM 5547 SALIT,CA	1.77		
01/06	LNG DIST - L001-201 FROM 5547 SALIT,CA	1.77		
01/06	LNG DIST - L001-215 FROM 5547 SALIT,CA	4.59		
01/06	LNG DIST - L001-202 FROM 5547 SALIT,CA	1.82		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	2.47		
01/06	LNG DIST - L001-718 FROM 5547 SALIT,CA	1.81		
01/06	LNG DIST - L001-718 FROM 5547 SALIT,CA	1.81		
01/06	LNG DIST - L001-603 FROM 5543 SALIT,CA	.50		
01/06	LNG DIST - L001-718 FROM 5547 SALIT,CA	2.43		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	3.05		
01/06	LNG DIST - L001-212 FROM 5543 SALIT,CA	2.83		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	2.84		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	1.81		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	1.81		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	1.81		
01/06	LNG DIST - L001-212 FROM 5547 SALIT,CA	1.81		

97043793393

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and my disputes of liability for copies of charges must be made within five days after my departure.

PLEASE LEAVE YOUR ROOM KEY

SIGNATURE X _____



Holiday Inn

The Center

A LUXURY HOTEL

INVOICE

1000 WEST 10TH AVENUE
DENVER, CO 80202

ROOM	DATE	START	END	TAX
101	01/06	12:00	06:00	12.00
[REDACTED]				

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
01/06	LNG DIST LG 1-212	3.27		
	FROM 5543 SALIT-CA			
01/06	LNG DIST LG 01-112	1.86		
	FROM 5547 SALIT-CA			
01/06	LNG DIST LG 01-998	1.86		
	FROM 5547 SALIT-CA			
01/06	LNG DIST LG 01-603	.50		
	FROM 5547 SALIT-CA			
01/06	CR CD-AX		1422.70	
				.00

97043793394

I agree that my liability for this bill is not waived and agree to be held personally responsible in the event that the indicated person, company or association fails to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

PLEASE LEAVE
YOUR ROOM KEY

SIGNATURE X _____

W/S Name	VCH No	W/S Cont	Inc Date	W/S Cont	W/S Cont	W/S Amt	W/S Cde	W/S Date	W/S Day	W/S Cont	W/S Run	W/S Excess	W/S Exc Bal
		Inc	Calc	Die	Inc Amt	O/S Amt		Reimb	O/S	Amts	Contr Bal	Amount	A/c Reimb
Fred Newnan	2	12/30/91	12/30/91		250.00	250.00	7		0	250.00	-750.00	672.70	
	1	01/06/92	01/06/92		1422.70	1672.70	4	01/24/92	18	1422.70	672.70	930.58	
	1	01/11/92	01/11/92		<u>257.88</u>	1930.58	4	01/24/92	13	257.88	930.58	930.58	
	1	01/24/92	01/24/92		-1680.58	250.00	1		0	0.00	-750.00	<u>930.58</u>	

97043793395
6236724076

LENORA B. FULANI FOR PRESIDENT
200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

4250

3/26 92

1 337/260

American Express

3351.44

Three thousand three hundred fifty four + $\frac{44}{100}$



AMALGAMATED BANK OF NEW YORK
1718 Broadway, New York, N.Y. 10019



Janane NOT NEGOTIABLE

⑆001250⑆ ⑆026003379⑆ 31031541⑆

97043793396



Summary of Account

Please retain this portion for your files.

Cardmember Name
JEANNINE HAHN

Account Number
[REDACTED]

Closing Date
03-18-92

For fast balance and payment information, call our automated service line at 1-800-292-AMEX using a touch tone phone. Please have your account number ready. If you have a question about your account, call 1-800-528-4800 (24 hours/7 days).

Page 1 of 2

Previous Balance	Credits/Payments	New Charges	New Balance
\$.00	\$.00	\$3,389.07	\$3,389.07

Amex Ref. No.	Item No.	Listing of Charges and Credits	Charges	Credits
CARD [REDACTED] TRANSACTIONS				
495068-1	001	HERTZ CAR RENTAL NEW YORK NY R/A# 810081086 HERTZ CAR RENTAL 01/11/92	2,743.18	
TOTAL FOR CARD 100			2,743.18	.00
CARD [REDACTED] TRANSACTIONS				
874063-1	002	LIMBO NEW YORK NY INV#973808	34.63	
501055-1	003	HARRY SINGH NEW YORK NY		
501059-1	004	MOBIL OIL GAS OR OTHER TGA1897 02/21/92 MATLES FLORIST NEW YORK NY	395.00	
501065-1	005	059454868 FLOWERS/PLANTS/GIFTS 02/27/92 THE AUTO CIRCLE CTR NEW YORK NY 910740036 AUTO SERVICES 03/04/92	145.90 70.36	
TOTAL FOR CARD 101			645.89	.00
ACCOUNT TOTAL			\$3,389.07	\$.00

970437933

Payments or credits received after closing date above will appear on next month's statement.

RECEIVE \$5 OF FREE CALLING WITH MCI CONNECT PLUS. CALL 800-456-0545

Please see reverse side for important information.



ITEM 001
HERTZ CAR RENTAL NEW YORK NY \$2,743.18

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	01/11/92	035208	
Service Establishment and Location			
HERTZ CAR RENTAL NEW YORK NY			
Record of Charge			
LOCATION	DATE/TIME		
RENTAL NEW YORK	NY 01/11/92	AGREEMENT	810081088
RETURN NEW YORK	NY 03/08/92	TR#	068301
S/E # 699362000		TOTAL CHARGE AMOUNT	
HAHN / JEANNINE		\$2,743.18	

ITEM 002
LIMBO NEW YORK NY \$34.83

American Express® Cards	
01/92 THU 01-95 92 41	Dist. Dept. Address Register No. Approval Code
JESS CI MASSIO	Dist. Dept. Address
44 55290001 2173022592	0630874-301-6058-7-0085-AA
6315258061	SHIP TO
	Address
	City, State, Zip
00 973808	TOTAL 34.83

ITEM 003
HARRY SINGH NEW YORK NY \$395.00

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	02/21/92	MOBIL OIL	
Service Establishment and Location			
HARRY SINGH NEW YORK NY			
Record of Charge			
GAS OR OTHER TGA1897 ROC NUMBER TGA1902			
S/E # 3248400319		TOTAL CHARGE AMOUNT	
		\$395.00	

ITEM 004
MATLES FLORIST NEW YORK NY \$145.90

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	02/27/92	058454888	
Service Establishment and Location			
MATLES FLORIST NEW YORK NY			
Record of Charge			
FLOWERS/PLANTS/GIFTS			
S/E # 5044107019		TOTAL CHARGE AMOUNT	
		\$145.90	

ITEM 005
THE AUTO CIRCLE CTR NEW YORK NY \$70.36

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	03/04/92	910740036	
Service Establishment and Location			
THE AUTO CIRCLE CTR NEW YORK NY			
Record of Charge			
AUTO SERVICES ROC NUMBER 0000000036			
S/E # 8318403922		TOTAL CHARGE AMOUNT	
		\$70.36	

PRIVILEGES UPDATE



FAMILY
Check this month's issue of
For Members Only!

This month, For Members Only, the American Express(R) Cardmember newsletter, brings you news on card services like Connect Plus(sm) and Global Assist(sm) Hotline, plus savings on sporting goods and trips to golf and tennis resorts. Check the newsletter for details!

W/S Name	W/S Vch No	W/S Cont Inc Date	W/S Cont Calc Dte	W/S Contr Inc Amt	W/S O/S Amt	W/S Exp Cde	W/S Date Reimb	W/S Day O/S	W/S Contr Amt	W/S Run Contr Bal	W/S Excess Amount	W/S Exc Bal Aft Reimb
Jeannine Nahn	2	08/02/91	08/02/91	119.49	119.49	4	09/11/91	40	119.49	-880.51		
	20	08/07/91	08/07/91	50.00	169.49	7		0	50.00	-830.51		
	1	08/30/91	08/30/91	112.60	282.09	5	09/11/91	12	0.00	-830.51		
	2	09/11/91	09/11/91	-119.49	162.60	1		0	0.00	-950.00		
	1	09/11/91	09/11/91	-112.60	50.00	1		0	0.00	-950.00		
	21	09/11/91	09/11/91	40.00	90.00	7		0	40.00	-910.00		
	3	09/25/91	09/25/91	-261.00	-171.00	1		0	0.00	-910.00		
	6	10/08/91	10/08/91	129.29	-41.71	4	09/25/91	0	0.00	-910.00		
	4	10/10/91	10/10/91	-275.00	-316.71	1		0	0.00	-910.00		
	5	10/10/91	10/10/91	-105.40	-422.11	1		0	0.00	-910.00		
	5	10/10/91	10/10/91	105.40	-316.71	4	09/25/91	0	0.00	-910.00		
	4	10/10/91	10/10/91	275.00	-41.71	5	10/10/91	0	0.00	-910.00		
	22	10/11/91	10/11/91	25.00	-16.71	7		0	25.00	-885.00		
	23	10/25/91	10/25/91	25.00	8.29	7		0	25.00	-860.00		
	24	10/25/91	10/25/91	35.00	43.29	7		0	35.00	-825.00		
	25	10/31/91	10/31/91	75.00	118.29	7		0	75.00	-750.00		
	6	11/07/91	11/07/91	-129.29	-11.00	1		0	0.00	-750.00		
	7	11/14/91	11/14/91	246.00	235.00	5	11/07/91	0	0.00	-750.00		
	7	11/27/91	11/27/91	-246.00	-11.00	1		0	0.00	-750.00		
	8	12/02/91	12/02/91	99.00	88.00	5	11/27/91	0	0.00	-750.00		
	8	12/06/91	12/06/91	-99.00	-11.00	1		0	0.00	-750.00		
	11	12/25/91	12/25/91	133.50	122.50	5	11/27/91	0	0.00	-750.00		
	9	01/10/92	01/10/92	105.00	227.50	5	12/06/91	0	0.00	-750.00		
	9	01/13/92	01/13/92	-105.00	122.50	1		0	0.00	-750.00		
	10	01/13/92	01/13/92	25.81	148.31	4	01/13/92	0	0.00	-750.00		
	10	01/13/92	01/13/92	174.19	322.50	5	01/14/92	1	0.00	-750.00		
	10	01/14/92	01/14/92	-200.00	122.50	1		0	0.00	-750.00		
	11	01/24/92	01/24/92	-133.50	-11.00	1		0	0.00	-750.00		
	13	02/21/92	02/21/92	395.00	384.00	4	03/26/92	34	134.00	-616.00		
	13	02/27/92	02/27/92	145.90	529.90	4	03/26/92	28	145.90	-470.10		
	13	03/04/92	03/04/92	70.36	600.26	4	03/26/92	22	70.36	-399.74		
	13	03/06/92	03/06/92	2743.18	3343.44	4	03/26/92	20	2743.18	2343.44	2343.44	
	13	03/26/92	03/26/92	-3354.44	-11.00	1		0	0.00	-750.00		
	14	04/04/92	04/04/92	86.60	75.60	4	03/26/92	0	0.00	-750.00		
	15	04/17/92	04/17/92	103.92	179.52	4	03/26/92	0	0.00	-750.00		
	14	05/05/92	05/05/92	-86.60	92.92	1		0	0.00	-750.00		
	15	05/11/92	05/11/92	254.28	347.20	4	06/02/92	22	97.20	-652.80		
	14	05/11/92	05/11/92	270.63	617.83	4	06/02/92	22	270.63	-382.17		
	12	05/18/92	05/18/92	683.73	1301.56	5	08/01/92	75	422.73	40.56	40.56	
	16	05/22/92	05/22/92	162.32	1463.88	4	08/01/92	71	162.32	202.88	202.88	
	15	06/02/92	06/02/92	-628.83	835.05	1		0	0.00	-164.95		
	16	07/01/92	07/01/92	-162.32	672.73	1		0	0.00	-327.27		
	17	07/01/92	07/01/92	97.37	770.10	4	09/01/92	62	97.37	-329.90		
	17	07/09/92	07/09/92	22.50	792.60	4	09/01/92	54	22.50	-207.40		
	18	07/10/92	07/10/92	580.00	1372.60	4	09/01/92	53	580.00	372.60	372.60	
17	07/11/92	07/11/92	27.24	1399.84	4	09/01/92	52	27.24	399.84	399.84		
17	07/14/92	07/14/92	362.92	1762.76	4	09/01/92	49	362.92	762.76	762.76		
18	07/17/92	07/17/92	455.92	2218.68	4	09/16/92	61	455.92	1218.68	1218.68		
17	08/01/92	08/01/92	-510.03	1708.65	1		0	0.00	708.65	708.65		
18	08/07/92	08/07/92	53.04	1761.69	4	09/16/92	40	53.04	761.69	761.69	708.65	
18	09/01/92	09/01/92	-1088.96	672.73	1		0	0.00	-327.27			
19	09/15/92	09/15/92	17.33	690.06	4	09/16/92	1	17.33	-309.94			
19	09/15/92	09/15/92	1715.67	2405.73	4	10/04/92	19	1715.67	1405.73	1405.73		
12	09/16/92	09/16/92	-683.73	1722.00	1		0	0.00	722.00	722.00		
3	09/23/92	09/23/92	261.00	1983.00	4	10/04/92	11	261.00	983.00	983.00	722.00	
19	10/04/92	10/04/92	-1733.00	250.00	1		0	0.00	-750.00			

9704379399

LENORA B. FULANI FOR PRESIDENT

200 WEST 72ND STREET, SUITE 30
NEW YORK, NY 10023

4704

5/1

92

1-337/260

American Express

1384.78

One thousand three hundred eighty four & ⁷⁸/₁₀₀



AMALGAMATED BANK OF NEW YORK
1710 Broadway, New York, N.Y. 10019

mobile phone rental - manager

NOT NEGOTIABLE

Stanford

00470

026003379

31031541

97043793400

MEMBER ID	MEMBER NAME	PERIOD	AMOUNT
942078-2	013	360410419 DOMESTICS	35.00
501090-2	014	360410419 DOMESTICS	108.25
501094-2	015	360410419 DOMESTICS	1,050.00
501094-2	016	360410419 DOMESTICS	1,000.00
501094-2	017	360410419 DOMESTICS	1,384.78
TOTAL FOR CARD 202			2,578.03
PAGE TOTAL			2,571.02
ACCOUNT TOTAL			\$4,308.80

[Handwritten signature]

97043793401

MEMBER ID		360410419	
MEMBER NAME		TELAIRE-CONIC INC FREEPORT NY	
Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	04/02/92	360410419	
Service Establishment and Location			
TELAIRE-CONIC INC FREEPORT NY			
Reason of Charge			
DOMESTICS			
S/E # 6314228503		TOTAL CHARGE AMOUNT \$1,384.78	

W/S Name	W/S No	W/S Cont	W/S Calc	W/S Cont	W/S Inc Amt	W/S O/S Amt	W/S Exp Cde	W/S Date Reimb	W/S Day O/S	W/S Cont Amt	W/S Cont Amt	W/S Run Cont Dtl	W/S Excess Amount	W/S Exc Bal Att Reimb
Robert Levy	8	11/22/91	11/22/91	200.00		200.00	7		0	200.00		-800.00		
	1	12/16/91	12/16/91	285.00		485.00	6	01/22/92	37	0.00		-800.00		
	7	12/19/91	12/19/91	2.00		487.00	7		0	2.00		-798.00		
	9	12/19/91	12/19/91	50.00		537.00	7		0	50.00		-748.00		
	1	01/22/92	01/22/92	-265.00		272.00	7		0	0.00		-748.00		
	2	01/30/92	01/30/92	158.09		410.09	6	02/15/92	16	0.00		-748.00		
	3	02/01/92	02/28/92	296.00		706.09	6	03/10/92	10	0.00		-748.00		
	3	02/05/92	02/28/92	512.54		1218.63	6	03/10/92	10	0.00		-748.00		
	3	02/05/92	02/28/92	917.74		2136.37	6	03/10/92	10	0.00		-748.00		
	2	02/15/92	02/15/92	-158.09		1978.28	1		0	0.00		-748.00		
	3	03/10/92	03/10/92	-1726.28		252.00	1		0	0.00		-748.00		
	5	03/21/92	03/21/92	922.49		1174.49	6	04/09/92	19	0.00		-748.00		
	4	03/21/92	03/30/92	1545.18		2719.67	6	05/01/92	32	0.00		-748.00		
	6	04/02/92	04/02/92	1384.78		4104.45	4	05/07/92	35	1384.78		-748.00		
	4	04/09/92	04/09/92	-1545.18		2559.27	1		0	0.00		-748.00		
	6	05/01/92	05/01/92	-1384.78		1174.49	1		0	0.00		-748.00		
	5	05/07/92	05/07/92	-922.49		252.00	1		0	0.00		-748.00		
	10	05/22/92	05/22/92	10.00		262.00	7		0	10.00		-748.00		
	11	07/27/92	07/27/92	10.00		272.00	7		0	10.00		-748.00		

Highest Excessive Balance 4/18/94 0.**

- #1. Stewart 2,837.08R
 - #5. Esimant 25,919.48R
 - #9. Fris 22,867.92R
 - #12. Shuman 930.58R
 - #13. Oplyke 8,340.14R
 - #14. J. Ross 2,841.75R
 - #16. Haid 2,343.44R
 - #18. Brennan 1,452.81R
 - #20. Grigby 1,345.25R
 - #21. Trivett 8,933.27R
 - #24. Golden 1,307.42R
 - #27. Flaflin 7,556.89R
 - #30. N Ross 19,759.23R
 - #32. Levy 636.78R
- 014
- 107,072.04**

97043793402

636.78

636.78
174.49

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

MAR 4 3 10 PM '97

In the Matter of)

) 28 U.S.C. § 2462

) Statute of Limitations

)
)
)
)
)
)
)
SENSITIVE

MAR 11 1997

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

I. INTRODUCTION

On December 26, 1996, the United States Court of Appeals for the Ninth Circuit issued a decision in *Federal Election Commission v. Williams*, No. 95-55320 (9th Cir. Filed Dec. 26, 1996). That decision held, *inter alia*, that the five-year statute of limitations for filing suit to enforce a civil penalty established at 28 U.S.C. § 2462 applies not only to judicial proceedings to enforce civil penalties already imposed, but also to proceedings seeking the imposition of these penalties, including the Commission's law enforcement suits under 2 U.S.C. § 437g(a)(6).

As noted in the memorandum regarding the filing of a petition for rehearing, the Office of General Counsel believes that the Commission should accept the court's core application of 28 U.S.C. § 2462 to its enforcement suits as the current state of the law. See Memorandum to the Commission, *Petition for Rehearing, and Suggestion for Rehearing En Banc, In Federal Election Commission v. Williams*, dated January 10, 1997. As also noted, however, we have sought further review of the court's decision

97043793403

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
MAR 11 11 41 AM '97

relating to issues of equitable relief and equitable tolling.¹ *Id.* See also *FEC v. NRSC*, 877 F. Supp. 15, 21 (D.D.C. 1995).

This General Counsel's Report discusses the impact of 28 U.S.C. § 2462 on the Office of General Counsel's enforcement caseload.² This Report describes the active and inactive enforcement matters which are potentially affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462, and makes recommendations for each of the potentially affected matters. This Report addresses all cases where the statute of limitations potentially expires, or partially expires, by the end of calendar year 1997 (December 31, 1997).

The Office of General Counsel is recommending that

18 matters be closed at this time. By doing so, this Office believes that it will be able to devote more resources toward more recent activity, particularly those matters that arose from the 1996 election cycle. To avoid potential statute of limitations problems in the future, this Office will track its cases against the relevant statute of limitations and will perform regular reviews of its caseload. In addition, this Office will be making periodic recommendations to the Commission with respect to matters that may be affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462.

¹ Pending the court's decision, issues such as equitable relief, equitable tolling and ongoing violations, will remain open. In some instances, although issues such as equitable tolling and equitable relief may still be viable, this Office has cited other factors to support our recommendation to close the matter. See, e.g., cases involving apparent violations of 2 U.S.C. § 441a(f).

² This Report addresses enforcement matters assigned to the Public Financing, Ethics & Special Projects ("PFESP") and Enforcement areas.

9 7 0 4 3 7 9 3 4 0 4

III. RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

A. Decline to open a MUR, close the file, and approve the appropriate letters in Pre-MUR 344.

B. Take no action, close the file and approve the appropriate letters in the following matters:

1. MUR 4267
2. MUR 4370
3. MUR 4392
4. MUR 4432
5. MUR 4468
6. MUR 4591
7. MUR 4614

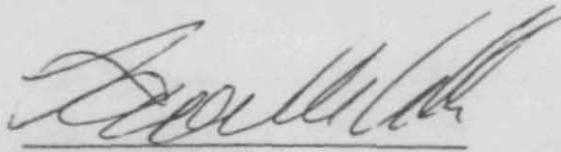
C. Take no further action, close the file and approve the appropriate letters in the following matters:

1. MUR 3351
2. MUR 3571
3. MUR 3582
4. MUR 3586
5. MUR 3838
6. MUR 3841
7. MUR 3969
8. MUR 4091
9. MUR 4183
10. MUR 4209

97043793405

97043793406

3/4/97
Date



Lawrence M. Noble
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document #X97-15
28 U.S.C. § 2462,)
Statute of Limitations)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission took the following actions with respect to Agenda Document #X97-15:

1. Decided by a vote of 5-0 to -

A. Decline to open a MUR, close the file, and approve the appropriate letters in Pre-MUR 344.

B. Take no action, close the file, and approve the appropriate letters in the following matters:

1. MUR 4267;
2. MUR 4370;
3. MUR 4392;
4. MUR 4432;
5. MUR 4468;
6. MUR 4591;
7. MUR 4614.

(continued)

97043793407

C. Take no further action, close the file, and approve the appropriate letters in the following matters:

1. MUR 3351;
2. MUR 3571;
3. MUR 3582;
4. MUR 3586;
5. MUR 3838;
6. MUR 3841;
7. MUR 3969;
8. MUR 4091;
9. MUR 4183;
10. MUR 4209.

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

(continued)

97043793408

Federal Election Commission
Certification: Agenda Document
#X97-15
March 11, 1997

Page 3

97043793409

Attest:

3-12-97
Date

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

MUR 3969 (Fulani for President)
(audit referral) ('92 cycle)
PFESP Team I

On May 24, 1996, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions through staff advances and that the staff members violated 2 U.S.C. § 441a(a)(1)(A) by making the contributions (totaling \$105,114.82). The Commission also offered to enter into conciliation with the Committee prior to a finding of probable cause to believe. The Commission took no further action against the individual contributors. The Commission also took no action with respect to certain transactions between the Committee and one of its vendors, the International Peoples' Law Institution in light of the concurrent 11 C.F.R. § 9039.3 investigation of the Committee.

This Office recommends that the Commission exercise its prosecutorial discretion and take no further action, and close the file with respect to this matter. Most of the activity at issue occurred prior to September 1992. Thus, even though some of the activity is still not time-barred under 28 U.S.C. § 2462, this Office believes that pursuing those violations that occurred less than five years ago would, at this stage of the enforcement process, be an inefficient use of the agency's limited resources.

9704379341C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Marsha Plafkin
125 West 106th Street # 5B
New York, New York 10025

RE: MUR 3969
Marsha Plafkin

Dear Ms. Plafkin:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793411



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Fred Newman
175 West 72nd Street
New York, New York 10023

RE: MUR 3969
Fred Newman

Dear Mr. Newman:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793412



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Eleanor Fain
390 Riverside Drive
New York, New York 10025-1834

RE: MUR 3969
Eleanor Fain

Dear Ms. Fain:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793413



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Jeanine Hahn
210 West 101 Street
Apartment 11-C
New York, New York 10025-5059

RE: MUR 3969
Jeanine Hahn

Dear Ms. Hahn:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793414



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Margaret Golden
180 Napoleon Street
San Francisco, California 94124

RE: MUR 3969
Margaret Golden

Dear Ms. Golden:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793415



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Nancy Ross
c/o Ross & Green
1010 Vermont Avenue, N.W.
Washington D.C. 20005

RE: MUR 3969
Nancy Ross

Dear Ms. Ross:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793416



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Cathy Stewart
240 Cabrini Boulevard
New York, New York 10033

RE: MUR 3969
Cathy Stewart

Dear Ms. Stewart:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793417



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Lawrence Grigsby
4116 Don Diablo Drive
Los Angeles, California 90008-4306

RE: MUR 3969
Lawrence Grigsby

Dear Mr. Grigsby:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793418



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

James Ross
RD 2
Box 540
Middlebury, Vermont 05753-9315

RE: MUR 3969
James Ross

Dear Mr. Ross:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793419



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Margert Tanzosh
285 Avenue C
New York, New York 10009

RE: MUR 3969
Margert Tanzosh

Dear Ms. Tanzosh:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793420



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

John Opdyke
4313 Larchwood
Philadelphia, Pennsylvania 19104

RE: MUR 3969
John Opdyke

Dear Mr. Opdyke:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793421



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Robert Levy
250 West 57th Street
New York, New York 10019

RE: MUR 3969
Robert Levy

Dear Mr. Levy:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793422



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 21, 1997

David Belmont
5 West 107th Street
Apartment 5-B
New York, New York 10025

RE: MUR 3969
David Belmont

Dear Mr. Belmont:

This is to advise you that this matter is now closed. 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.

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

Sincerely,

Craig D. Reffner
Attorney

97043793423



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Jini Berman
210 West 101st Street
New York, New York 10025-5059

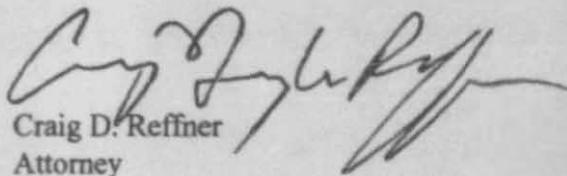
RE: MUR 3969
Jini Berman

Dear Ms. Berman:

This is to advise you that this matter is now closed. 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.

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

Sincerely,


Craig D. Reffner
Attorney

97043793424



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1997

Arthur R. Block, Esq.
14 Wall Street
28th Floor
New York, New York 10005-2101

RE: MUR 3969
Lenora B. Fulani for President and
Francine Miller, as treasurer
International Peoples' Law Institution

Dear Mr. Block:

On June 7, 1996, you were notified that the Federal Election Commission (the "Commission") found reason to believe that Lenora B. Fulani for President and Francine Miller, as treasurer (collectively referred to as the "Committee"), violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). On August 2, 1997, you submitted a response on behalf of your clients to the Commission's reason-to-believe finding. After considering the circumstances of this matter, the Commission, on March 11, 1997, determined to exercise its prosecutorial discretion and take no further action against the Committee. *See* enclosed narrative.

In addition, please note that the Audit Division also referred an additional apparent violation of the Act to the Office of the General Counsel for possible enforcement action. That referral, which also emanated from an audit of the Committee undertaken pursuant to 26 U.S.C. § 9033(a)(3), concerned an apparent excessive contribution that the Committee received from the People's Law Institution. The Commission, after considering the circumstances of this matter, has also determined to exercise its prosecutorial discretion and to take no action against the Committee. Accordingly, the Commission closed the file in this matter on March 11, 1997. *See* enclosed narrative.

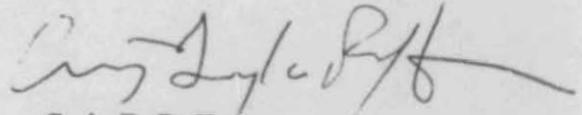
The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

97043793425

Arthur R. Block, Esq.
Page 2

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

Sincerely,



Craig D. Reffner
Attorney

Enclosure

97043793426

**MUR 3962 (Fulani for President)
(audit referral) ('92 cycle)
PFESP Team I**

On May 24, 1996, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions through staff advances and that the staff members violated 2 U.S.C. § 441a(a)(1)(A) by making the contributions (totaling \$105,114.82). The Commission also offered to enter into conciliation with the Committee prior to a finding of probable cause to believe. The Commission took no further action against the individual contributors. The Commission also took no action with respect to certain transactions between the Committee and one of its vendors, the International Peoples' Law Institution in light of the concurrent 11 C.F.R. § 9039.3 investigation of the Committee.

This Office recommends that the Commission exercise its prosecutorial discretion and take no further action, and close the file with respect to this matter. Most of the activity at issue occurred prior to September 1992. Thus, even though some of the activity is still not time-barred under 28 U.S.C. § 2462, this Office believes that pursuing those violations that occurred less than five years ago would, at this stage of the enforcement process, be an inefficient use of the agency's limited resources.

97043793427



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3969

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JM H

97043793428