



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 474

7314100001





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Schlesinger, Treasurer
New Yorkers for Koch Committee
425 Park Avenue
New York, New York 20463

Re: MUR 474(77)

Dear Mr. Schlesinger,

On February 15, 1978, the Federal Election Commission found no reasonable cause to believe that the New Yorkers for Koch Committee had violated 2 U.S.C. §441b(a) by knowingly accepting corporate contributions.

Enclosed for your information is a copy of the General Counsel's Report on MUR 474(77), and a copy of the certification of the Commission's determination.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



78040012303

730419130

MUR 474 Weissenborn

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

Show to whom and date delivered _____ c

Show to whom, date, and address of delivery _____ c

RESTRICTED DELIVERY

Show to whom and date delivered _____ c

RESTRICTED DELIVERY

Show to whom, date, and address of delivery S _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Stanley Schlesinger
 NYorkers for Koch
 Comm. Sec

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438242	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

3/6/78

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Schlesinger, Treasurer
New Yorkers for Koch Committee
425 Park Avenue
New York, New York 20463

Re: MUR 474(77)

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Sincerely,

William C. Oldaker
General Counsel

Enclosures

78040010397

NW
2/24/78



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Jablow
The William and Selma Frankel Foundation
Room 514, Warner Communications Building
75 Rockefeller Plaza
52nd Street
New York, New York 10020

Re: MUR 474(77)

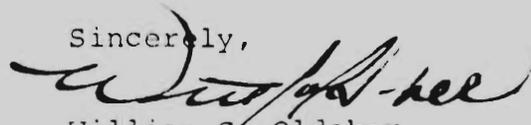
Dear Mr. Jablow,

On February 15, 1978, the Federal Election Commission decided to take no action relating to the apparent violation of 2 U.S.C. §441b(a) by The William and Selma Frankel Foundation in view of the substantial voluntary compliance achieved as a result of Mr. Cahill's reimbursing of the Foundation for the amount of the New Yorkers for Koch contributions.

Enclosed for your information is a copy of the General Counsel's Report in MUR 474(77) and a copy of the certification of the Commission's determination.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Sincerely,


William C. Oldaker
General Counsel

Enclosures



MUR 474 UNRECORDED

PS Form 3811, Jan. 1977

74 1107

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):

Show to whom and date delivered

Show to whom, date, and address of delivery

RESTRICTED DELIVERY Show to whom and date delivered

RESTRICTED DELIVERY Show to whom, date, and address of delivery \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Arthur Jablon
 The William & Selma
 Frankel Foundation

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438241	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: 3/8/77

5. ADDRESS (Complete only if requested):
 X Red Pt

6. UNABLE TO DELIVER BECAUSE: _____

CLERK'S INITIALS: _____

POST OFFICE
 1977
 USPS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Jablow
The William and Selma Frankel Foundation
Room 514, Warner Communications Building
75 Rockefeller Plaza
52nd Street
New York, New York 10020

Re: MUR 474(77)

Dear Mr. Jablow,

On February 15th 1978, the Federal Election Commission decided to take no action relating to the apparent violation of 2 U.S.C. §441b(a) by The William and Selma Frankel Foundation in view of the substantial voluntary compliance achieved as a result of Mr. Cahill's reimbursing of the Foundation for the amount of the New Yorkers for Koch contributions.

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If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

78040010400

AW
2/24/78



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

February 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Lankenau, Esquire
Lankenau, Kovner and Bickford
30 Rockefeller Plaza
New York, New York 10020

Re: MUR 474(77)

Dear Mr. Lankenau,

On February 15, 1978, the Federal Election Commission found no reasonable cause to believe that Lankenau, Kovner and Bickford had violated 2 U.S.C. §441b(a) by making a corporate contribution to the New Yorkers for Koch Committee.

Enclosed for your information is a copy of the General Counsel's Report on MUR 474(77) and a copy of the certification of the Commission's determination. As you requested, we are also returning the copy of your firm's partnership agreement which you submitted.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker

Enclosures



MUR 474 W. 5540 DORD

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one)		
<input type="checkbox"/> Show to whom and date delivered		
<input checked="" type="checkbox"/> Show to whom, date, and address of delivery		
<input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered		
<input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: <i>John C. Lankeau</i>		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438243</i>	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE	Address	Authorized agent
<i>[Signature]</i>		
4. DATE OF DELIVERY		POSTMARK
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

7804001040

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Lankenau, Esquire
Lankenau, Kovner and Bickford
30 Rockefeller Plaza
New York, New York 10020

Re: MUR 474(77)

Dear Mr. Lankenau,

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Enclosed for your information is a copy of the General Counsel's Report on MUR 474(77) and a copy of the certification of the Commission's determination. As you requested, we are also returning the copy of your firm's partnership agreement which you submitted.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

78040010403

BW
2/24/78

BEFORE THE FEDERAL ELECTION COMMISSION

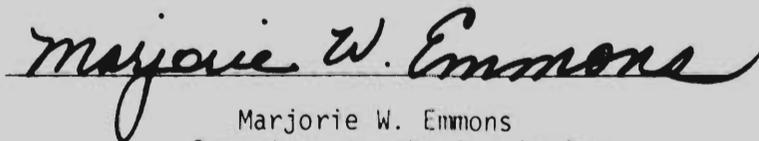
In the Matter of)
)
New Yorkers for Koch Committee,)
Lankenau, Kovner and Bickford,)
The William and Selma Frankel)
Foundation)

MUR 474 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 15, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe that the New Yorkers for Koch Committee and Lankenau, Kovner and Bickford violated 2 U.S.C. Section 441b(a).
2. Take no action as to the contributions made by the William and Selma Frankel Foundation, Inc., in view of the substantial voluntary compliance achieved by Frederick Cahill's reimbursement.
3. Send the draft letters attached to the General Counsel's report dated February 10, 1978.
4. Close the file in this matter.



Marjorie W. Emmons
Secretary to the Commission

78040010401

February 10, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 474 Team #3 Weissenborn

Please have the attached General Counsel's Report on MUR 474 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of February 15, 1978.

Thank you.

78040010405

BEFORE THE FEDERAL ELECTION COMMISSION

February 10, 1978

In the Matter of)
)
)
New Yorkers for Koch)
Committee) MUR 474(77)
Lankenau, Kovner and Bickford)
The William and Selma Frankel)
Foundation)

GENERAL COUNSEL'S REPORT

I. Summary of Allegations and Commission Action

73741010400
This action arose from findings made during the field audit of the New Yorkers for Koch Committee ("the Committee"). It appeared that the Committee had accepted contributions from a professional corporation, Lankenau, Kovner and Bickford, and from an incorporated foundation, The William and Selma Frankel Foundation, Inc. ("the Foundation"). The making and acceptance of corporate contributions would be in violation of 2 U.S.C. §441b(a). On December 19, 1977, the Commission found reason to believe that the Committee, Lankenau, Kovner and Bickford, and the Foundation had violated 2 U.S.C. §441b(a).

II. Evidence

On December 27, 1977, we received a response from John C. Lankenau of Lankenau, Kovner and Bickford, stating that that law firm operates as a partnership and that the

contribution check was drawn on a partnership, not a corporate, account. A letter from the Bank of New York dated December 22, 1977, was enclosed to confirm that the contribution check was drawn on a partnership account and that the firm has no corporate account with that bank. In his letter Mr. Lankenau acknowledged the existence of a professional corporation with the same name as the partnership, but he stated that "(a)t no time has a bank account been opened for that corporate entity nor has that corporate entity ever engaged in any business whatsoever."

On January 26, 1978, we wrote again to the firm requesting evidence of the existence of the partnership and information about the relationship between the partnership and the corporate entity, and asking if there had ever been a transfer of funds between the two entities. On February 1, 1978, Mr. Lankenau responded, stating that there is no relationship between the partnership and the corporation, that the corporation has never engaged in business, and that there has been no transfer of funds between the partnership and the corporation. We have also seen a copy of the firm's partnership agreement.

We believe that the evidence provided by Lankenau, Kovner and Bickford indicates that the contribution was made by the partnership and not by a corporate entity.

In the case of the William and Selma Frankel Foundation, Inc., the two contributions, dated May 25 and October 14, 1976, were made by checks drawn on the Foundation's account but with the names of Frederick and Linda Cahill typed onto the check above the name of the Foundation. (See Attachment I). The Foundation's initial response to the Commission, dated January 6, 1978, and sent via the Committee, stated that these checks were issued as personal checks, not as Foundation checks, and that the fact that the names were typed onto the checks showed the Cahills to be the intended payors. (See Attachment II). No explanation of the relationship between the Cahills and the Foundation was given. On January 30, 1978, in response to further inquiries, we received a letter from an accountant for the Foundation enclosing a copy of a cancelled check made payable to the Foundation by Frederick Cahill in the amount of \$550, which was explained as reimbursement for the two Foundation checks sent to the Committee plus an additional \$100 contributed by the Foundation to a state campaign. (See Attachment III). We note that nearly two months appear to have elapsed between the date of the check, December 31, 1976, and the date it was deposited by the Foundation, February 23, 1977; nevertheless, the Office of the General Counsel believes the reimbursement was sufficiently timely to constitute substantial voluntary compliance. We recommend

2374101101

that the Commission take no action as to the Foundation's involvement in this matter.

On January 9, 1978, we received a response from the Committee's treasurer which enclosed an affidavit from the person responsible for having initially accepted contributions. The affidavit sets forth the procedure used by the Committee to screen out corporate contributions and states that contributions were in fact returned to corporate contributors. With regard to the checks from the Foundation, it is stated that the checks were accepted in the belief that they were personal contributions, a belief apparently based upon the typewritten names in addition to the printed name of the payor on the checks, and to the fact that the Cahills had made previous contributions. Reports submitted to the Commission listed the checks as coming from the Cahills.

We believe that the evidence submitted by the Committee, Lankenau, Kovner and Bickford, and the Foundation establish that the Committee did not knowingly accept contributions from corporate sources.

III. Recommendations

1. Find no reasonable cause to believe that the New Yorkers for Koch Committee and Lankenau, Kovner and Bickford violated 2 U.S.C. §441b(a).

2. Take no action as to the contributions made by The William and Selma Frankel Foundation, Inc., in view of the substantial voluntary compliance achieved by Frederick Cahill's reimbursement.

3. Send attached letters.

10 Feb 1978
DATE


WILLIAM C. OLDAKER
GENERAL COUNSEL

7804111411

OK file

January 6, 1978

Mr. Stanley Schlesinger
Treasurer of Koch Campaign
For Congress
425 Park Avenue
New York, New York 10022

Dear Mr. Schlesinger:

I am the Accountant for The William & Selma Frankel Foundation, Inc. In connection with the two checks issued to New Yorkers for Koch in 1976, respectively in the amounts of \$200 by Mr. and Mrs. Frederick and Linda Cahill and \$250 by Mr. Frederick Cahill, this will confirm that when these checks were issued they were issued as personal checks by the Cahills, and not as the Foundation's checks, and the Koch Committee was so informed. In fact, each check shows the name typed thereon as intended payor.

Very truly yours,

THE WILLIAM & SELMA FRANKEL
FOUNDATION, INC.

By _____
Arthur Jablow

I confirm the statements made
above by Arthur Jablow as true
and correct.

FREDERICK CAHILL

7314111411

7 3 1 4 1 1 1 1 1 1



FREDERICK P. CAHILL
 LINDA E. CAHILL
 165 FIFTH AVENUE
 NEW YORK, N.Y. 10011

1157

31 December 1976

55-32
212

PAY TO THE ORDER OF *William & Selma Thacker Fund. 5550*

Five hundred fifty and no/100 DOLLARS

GARDEN STATE NATIONAL BANK, I.
 100 WALL STREET
 NEW YORK, N.Y. 10038

John

⑆0212⑆0032⑆001 1 05714 0⑆000000000000⑆

MUR 474

Attachment III



FEDERAL ELECTION COMMISSION

125 K STREET, N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Lankenau, Esquire
Lankenau, Kovner and Bickford
30 Rockefeller Plaza
New York, New York 10020

Re: MUR 474(77)

Dear Mr. Lankenau,

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If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker

Enclosures





FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON DC 20463

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New Yorkers for Koch Committee
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Sincerely,

William C. Oldaker
General Counsel

Enclosures



73041011415



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
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Mr. Arthur Jablow
The William and Selma Frankel Foundation
Room 514, Warner Communications Building
75 Rockefeller Plaza
52nd Street
New York, New York 10020

Re: MUR 474(77)

Dear Mr. Jablow,

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Sincerely,

William C. Oldaker
General Counsel

Enclosures



SOC 2617
NRN

LANKENAU KOVNER & BICKFORD
ATTORNEYS AT LAW
100 ROCKEFELLER PLAZA
NEW YORK, N. Y. 10020

JOHN LANKENAU
VICTOR A. KOVNER
NATHANIEL J. BICKFORD
HEATHER GRANT FLORENCE
ROBERT F. BICKFORD

TELEPHONE
1-212-880-8000
TELEX
100220
FEB 1 1978

February 1, 1978

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 474

Dear Mr. Oldaker:

This will acknowledge receipt of your letter of January 26, 1978 requesting additional information.

Although I regard it as an unwarranted invasion of the affairs of my firm, I am enclosing a copy of the existing partnership agreement. Kindly return this copy of the partnership agreement to us after you have completed your examination of its terms.

As to the relationship between the partnership and the professional corporation, there is no relationship whatsoever. If the professional corporation commences the conduct of business, the partnership will cease its activities as a law firm. As my letter of December 23, 1977 stated, the professional corporation has never engaged in business, has never had a bank account, and has never received or disbursed any funds. There has been no transfer of funds between the two entities.

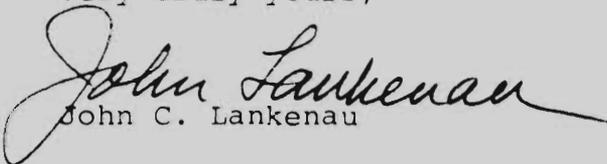
Inasmuch as my prior letter unequivocally established that the contribution made to The New Yorkers for Koch Committee was made by my law firm, which is a partnership, I would be interested in

William C. Oldaker, Esq.
Federal Election Commission

being informed of the grounds for the statement that "the Federal Election Commission has found reason to believe that Lankenau Kovner & Bickford may have violated the Federal Election Campaign Act of 1971, as amended, by making a corporate contribution." No corporate contribution was ever made, as was clearly shown by my prior letter and submission.

Kindly advise us of the disposition of your investigation.

Very truly yours,


John C. Lankenau

JCL:M
Enc.

73141110410

FEDERAL ELECTION
COMMISSION

NO FEB 7 PM 1:20

LANKENAU KOVNER & BICKFORD
ATTORNEYS AT LAW
30 ROCKEFELLER PLAZA
NEW YORK, N. Y. 10020

To William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

FIRST CLASS MAIL

FIRST CLASS MAIL

78040010420

ACC 25-45

RECEIVED

RECEIVED
FEDERAL ELECTION
COMMISSION

January 29, 1978 AM 9:53

Mr. Solomon M. Weiss, CPA
75 Rockefeller Plaza
31st Floor
New York, New York 10019

Ms. Anne Wiessenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

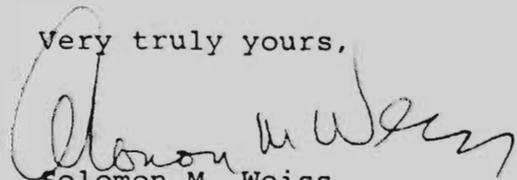
Dear Ms. Weissenborn:

Pursuant to our telephone conversation of January 23, 1978, I am enclosing a copy of Form 4720, Return of Excise Taxes on Private Foundations, Foundation Managers, and Disqualified Persons, which was made a part of Form 990 and filed with the Internal Revenue Service, setting forth on page 4 the reason why it was necessary to include this schedule with Form 990.

Attached hereto is a copy of a cancelled personal check which was issued by Mr. Cahill to refund the \$550.00 to the Foundation. Also enclosed are copies of the two checks in question, along with all of the correspondence we have had in connection with this matter to date.

If you have any additional questions, please do not hesitate to contact the writer, (212) 484-6504.

Very truly yours,



Solomon M. Weiss
Certified Public Accountant

SMW/lr
Encls.

79041011421



FEDERAL ELECTION COMMISSION

135 K STREET N.W.
WASHINGTON, D.C. 20463

January 13, 1978

Handwritten: 1/13/78 [Signature]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Jablow, Accountant
The William & Selma Frankel
Foundation, Inc.
Room 514 - Warner Communications
Building
75 Rockefeller Plaza
52nd Street
New York, NY 10020

Re: MUR 474(77)

Dear Mr. Jablow:

We understand that you have been informed by Mr. Stanley Schlesinger, treasurer of the New Yorkers for Koch Committee, of the Federal Election Commission's finding of reason to believe that the William and Selma Frankel Foundation, Inc. may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). We attempted to notify the Foundation directly by means of a letter to Mr. Andrew Frankel; however, the letter was returned as undeliverable at the address we had been given.

The information available to the Commission indicates that the Foundation is a corporation and that two checks drawn on a Foundation bank account were received by the New Yorkers for Koch Committee in the amounts of \$200 and \$250. Contributions to Federal candidates from corporations are prohibited by 2 U.S.C. §441b(a).

7304101421



We have received from Mr. Schlesinger your letter of January 6, 1978, in which you state that the checks in question were issued as personal checks by Frederick and Linda Cahill. In order to resolve this matter, we will need to receive from you copies of the cancelled checks plus an explanation of the relationship between the Cahills and the Foundation with regard to the account upon which these checks were drawn. Please submit any additional factual or legal materials which you believe are relevant to the Commission's analysis. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

78-0477-1143

Send
copies of
cancelled checks
to
a. Fredrick
Linda
4720

For the calendar year 1976 or other taxable year beginning, 1976 and ending, 19

Name of private foundation
William & Selma Frankel Foundation, Inc. Employer identification number
13-6167961

Number and street **c/o Arthur Jablow**
75 Rockefeller Plaza - 30th Floor

City or town, State and ZIP code
New York, New York 10019

- A. Is the foundation a foreign private foundation within the meaning of section 4948(b)? Yes No
- B. Has corrective action been taken with respect to any transaction which resulted in Chapter 42 taxes being reported on this form? Yes No
- If "Yes," attach a detailed documentation and description of the corrective action taken and, if applicable, enter the Fair Market Value of any property recovered as a result of the correction \$ **550** (for any uncorrected acts, attach explanation) **\$550 was reimbursed to the Foundation**

Part I.—Initial Taxes on Private Foundation by a Foundation Manager

1. Tax on undistributed income—Schedule B, line 4	
2. Tax on excess business holdings—Schedule C, line 12	
3. Tax on investments that jeopardize charitable purpose—Schedule D, Part I, col. 5	
4. Tax on taxable expenditures—Schedule E, Part I, col. 7	55.
5. Total	55.

Part II.—Initial Taxes on Self-dealers and Foundation Managers

1. Name and address of person subject to tax				2. Taxpayer identifying number
(a)				
(b)				
(c)				
(d)				
3. Tax on self-dealing—Schedule A, Part II, col. 4 and Part III, col. 4	4. Tax on investments that jeopardize charitable purpose—Schedule D, Part II, col. 4	5. Tax on taxable expenditures—Schedule E, Part II, col. 4	6. Total tax—total of cols. 3, 4, and 5	
(a)				
(b)				
(c)				
(d)				
Total				

Part III.—Summary of Taxes (See General Instruction H)

1. Enter total from line 5, Part I	55.
2. Enter here the total of those taxes listed in column 6, Part II, which apply to foundation managers and disqualified persons who sign this form. If all sign, enter the total from column 6, Part II	
3. Total tax—total of lines 1 and 2. Pay in full with return. (Make check or money order payable to Internal Revenue Service.) (See general instruction H)	55.

Under penalties of perjury I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Arthur Jablow
 Signature of officer or trustee of foundation Title Date

 Signature (and organization name if applicable) of disqualified person or foundation manager Date

 Signature (and organization name if applicable) of disqualified person or foundation manager Date

 Signature (and organization name if applicable) of disqualified person or foundation manager Date

 Signature (and organization name if applicable) of disqualified person or foundation manager Date

Laura Shanley
 Signature of individual or firm preparing the return

ARTHUR YOUNG & COMPANY
 Address of preparer
277 PARK AVENUE
NEW YORK, N.Y. 10017
12-5554208

5-16-77
 Date

78040010421

SCHEDULE A.—Initial Taxes on Self-dealing (Section 4941)

Part I.—Acts of Self-dealing and Tax Computation

1. Act No.	2. Date of Act	3. Description of Act	4. Question No. from Form 990-PF, Part V, or Form 5227, Part V, applicable to the Act	5. Amount involved in Act	6. Initial tax on self-dealing (5% of col. 5)	7. Tax on foundation managers (if applicable) (lesser of \$10,000 or 2 1/2% of col. 5)
1						
2						
3						
4						
5						

Part II.—Summary of Tax Liability of Disqualified Persons and Proration of Payments

1. Names of disqualified persons liable for tax	2. Act No. from Part I, col. 1	3. Amount of Tax from col. 6, Part I or prorated amount	4. Disqualified person's total tax liability (Total of amounts in col. 3)

Part III.—Summary of Tax Liability of Foundation Managers and Proration of Payments

1. Names of foundation managers liable for tax	2. Act No. from Part I, col. 1	3. Amount of tax from col. 7, Part I or prorated amount	4. Manager's total tax liability (total of amounts in col. 3)

SCHEDULE B.—Tax on Undistributed Income (Section 4942)

1. Undistributed income for years prior to 1975, from Part XI, Form 990-PF (or Part X, Form 5227) for 1976.	
(a) Enter year	
(b) Enter year	
(c) Enter year	
2. Undistributed income for 1975, from Part XI, Form 990-PF (or Part X, Form 5227) for 1976 . . .	
3. Total undistributed income as of end of current taxable year beginning in 1976 and subject to tax under section 4942 (add lines 1(a), (b), (c), and 2)	
4. Tax under section 4942—15% of amount on line 3	

SCHEDULE E.—Taxes on Taxable Expenditures (Section 4945)

Part I.—Expenditures and Computation of Tax

1. Item number	2. Amount	3. Date paid or incurred	4. Name and address of recipient	5. Description of expenditure and purposes for which made
1	450.	1976	New Yorkers for Koch	Contribution to political campaign
2				
3	100	1976	Hinchly Re-Election Committee	Contribution to political campaign
4				
5				
6. Question number from Form 990-PF, Part V, or Form 5227, Part V, applicable to the expenditure		7. Tax imposed on foundation (10% of col. 2)		8. Tax imposed on foundation managers (if applicable)—lesser of \$5,000 or 2 1/2% of col. 2
1(c)		45.		None*
1(c)		10.		None*
Total				

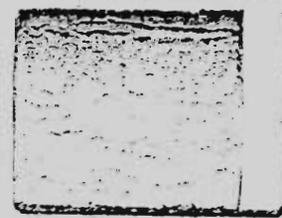
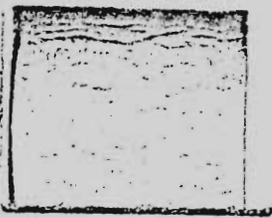
Part II.—Summary of Tax Liability of Foundation Managers and Proration of Payments

1. Names of foundation managers liable for tax	2. Item No. from Part I, col. 1	3. Amount of tax from col. 8, Part I or prorated amount	4. Manager's total tax liability (Total of amounts in col. 3)

* The Foundation Managers were unaware that these contributions constituted taxable expenditures and took corrective action immediately upon being so advised. The act was not "willful" or "knowing" as defined by Treasury Reg. 53.4941(a)-1.

731411

7 8 0 4 1 0 1 1 4 2 1



FREDERICK P. CAHILL
 LINDA E. CAHILL
 1035 FIFTH AVENUE
 NEW YORK, N.Y. 10029

1157

31 December 1976 55-32
 212

PAY TO THE ORDER OF *William & Selma Frankel Prod. 550*

Five hundred fifty and no/100 DOLLARS

GARDEN STATE NATIONAL BANK J.
 PARAMOUNT, NEW JERSEY
 MAIN AND BRANCH OFFICE
 HACKENSACK, N.J. 07601

MEMO

⑆0212⑆0032⑆001 1 03714 0⑆ ⑆0000055000⑆

MUR 474

2550

William and Selma
Frankel Fund.

For deposit only

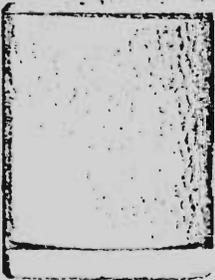
04543--32 833

010181
5540
02724
02724

027

02724

78041710421



Linda & Fred Cahill

No. 375

1-2
210

THE WILLIAM AND SELMA FRANKEL FOUNDATION INC. 0000270

May 25, 1976

Pay to the order of New Yorkers for Koch

\$ 200.00

Two hundred ----- Dollars

THE CHASE MANHATTAN BANK NATIONAL ASSOCIATION

MADISON AVE. AT 26TH ST. NEW YORK N.Y. 10010

Arthur J. Jablo

⑆0210⑆0002⑆027⑆1⑆045403⑆

⑆0000020000⑆

79141011451

FREDERICK CAHILL THE WILLIAM AND SELMA FRANKEL FOUNDATION INC.

408

1-2
210

68110003792 October 14, 1976

Pay to the order of NEW YORKERS FOR KOCH

\$250.00

TWO HUNDRED FIFTY 00/100----- Dollars

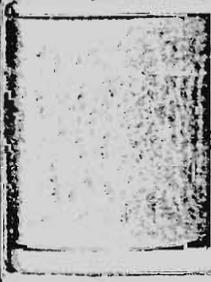
THE CHASE MANHATTAN BANK NATIONAL ASSOCIATION

MADISON AVE. AT 26TH ST. NEW YORK N.Y. 10010

Arthur J. Jablo

⑆0210⑆0002⑆027⑆1⑆045403⑆

⑆0000025000⑆



OK file

January 6, 1978

Mr. Stanley Schlesinger
Treasurer of Koch Campaign
for Congress
425 Park Avenue
New York, New York 10022

Dear Mr. Schlesinger:

I am the Accountant for The William & Selma Frankel Foundation, Inc. In connection with the two checks issued to New Yorkers for Koch in 1976, respectively in the amounts of \$200 by Mr. and Mrs. Frederick and Linda Cahill and \$250 by Mr. Frederick Cahill, this will confirm that when these checks were issued they were issued as personal checks by the Cahills, and not as the Foundation's checks, and the Koch Committee was so informed. In fact, each check shows the name typed thereon as intended payor.

Very truly yours,

THE WILLIAM & SELMA FRANKEL
FOUNDATION, INC.

By _____
Arthur Jablow

I confirm the statements made
above by Arthur Jablow as true
and correct.

Frederick Cahill

7 9 0 4 3 0 1 0 4 3 1

7 8 0 4 0 0 4 0 4 3 3

Mr. Solomon M. Weiss, CPA
75 Rockefeller Plaza
31st Floor
New York, New York 10019

RECEIVED
FEDERAL ELECTION
COMMISSION

1978 JAN 30 AM 9:52

Ms. Anne Wiessenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

1978 JAN 30 AM 9:53

COMMISSION

MUR 474 Weisenborn

PS Form 3811, Apr 1977

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):

- Show to whom and date delivered _____¢
- Show to whom, date, and address of delivery _____¢
- RESTRICTED DELIVERY
Show to whom and date delivered _____¢
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
John C Lankford
30 Rockefeller Plaza
New York, NY 10020

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944283	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

A. Kaplan

4. DATE OF DELIVERY: 2-1-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 26, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John C. Lankenau, Esquire
Victor A. Kovner, Esquire
Lankenau, Kovner & Bickford
30 Rockefeller Plaza
New York, NY 10020

Re: MUR 474

Dear Sirs:

Thank you for your letter of December 23, 1977, and your telephone call of January 6, 1978, in response to our notification that the Federal Election Commission has found reason to believe that Lankenau, Kovner and Bickford may have violated the Federal Election Campaign Act of 1971, as amended, by making a corporate contribution to the New Yorkers for Koch Committee.

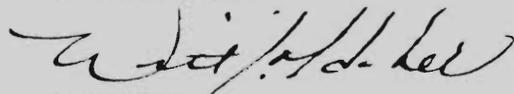
In your letter of December 23 you state that your law firm has operated since its inception as a partnership. You also state that although a professional corporation bearing the name of "Lankenau Kovner and Bickford, P.C." exists under the laws of the State of New York, that corporate entity has never engaged in business and a bank account has never been opened in its name.

The letter which you enclosed from the Bank of New York stating that your firm's account with that bank is a partnership account is helpful. We will, however, also need to obtain from you a copy of your partnership agreement or a copy of any certificate of partnership filed with the State or County, before we can conclude our investigation. Additionally, we



request that you explain the relationship between the Lankenau, Kovner and Bickford partnership and the Lankenau, Kovner and Bickford professional corporation, and whether there have ever been any transfers of funds between the two entities.

Sincerely,



William C. Oldaker
General Counsel

78040010430

January 18, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 474 Team #3 Weissenborn

Please have the attached Interim Status Report on MUR 474 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of January 18, 1978.

Thank you.

78040010437

BEFORE THE FEDERAL ELECTION COMMISSION

January 10, 1978

In the Matter of)
New Yorkers for Koch) MUR 474(77)
Committee)

INTERIM STATUS REPORT

79041010433
During the Audit Division's review of the Committee's contribution records, it was learned that three contribution checks had been received from two corporations, the William and Selma Frankel Foundation, Inc., and Lankenau, Kovner and Bickford, a professional corporation comprised of attorneys engaged in the practice of law. The Commission found reason to believe that these contributions constituted violations of 2 U.S.C. §441b on the parts of the Committee and the two corporations.

Letters were sent to the Committee and corporations on December 20, 1977, informing them of the Commission's finding and requesting information relevant to the Commission's analysis of this matter. The letter to the Frankel Foundation was returned as undeliverable. A new address has been secured and the letter has been re-mailed.

7 9 1 4 1 0 1 0 4 3)

A written reply has been received from Mr. John Lankenau of Lankenau, Kovner and Bickford in which he explains that the firm operates as a partnership although "a professional corporation bearing the name of 'Lankenau Kovner and Bickford, P.C.' exists under the laws of the State of New York." He states that the corporate entity has never engaged in any business whatsoever.

Mr. Lankenau enclosed a letter to the FEC from the Bank of New York stating that the check from Lankenau, Kovner and Bickford made payable to "New Yorkers for Koch" was drawn on a partnership account with that bank and that no corporate account is maintained by that law firm with the bank. We are in the process of confirming that the contribution came from the partnership and not the corporation.

The treasurer of the New Yorkers for Koch Committee has contacted the office of the General Counsel by telephone and we expect a written response shortly.

1/11/78
Date

William C. Oldaker
William C. Oldaker
General Counsel

MUR 474 Wessenborn

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one)
- Show to whom and date delivered _____ c
 - Show to whom, date, and address of delivery _____ c
 - RESTRICTED DELIVERY
Show to whom and date delivered _____ c
 - RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____ c
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Mr. Arthur Jablow
 Room 514-Warner Comm. Bldg
 53rd Street
 New York, NY 10020

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944145	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY	POSTMARK
1-23	

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

11111004007



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

January 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Jablow, Accountant
The William & Selma Frankel
Foundation, Inc.
Room 514 - Warner Communications
Building
75 Rockefeller Plaza
52nd Street
New York, NY 10020

Re: MUR 474(77)

Dear Mr. Jablow:

We understand that you have been informed by Mr. Stanley Schlesinger, treasurer of the New Yorkers for Koch Committee, of the Federal Election Commission's finding of reason to believe that the William and Selma Frankel Foundation, Inc. may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). We attempted to notify the Foundation directly by means of a letter to Mr. Andrew Frankel; however, the letter was returned as undeliverable at the address we had been given.

The information available to the Commission indicates that the Foundation is a corporation and that two checks drawn on a Foundation bank account were received by the New Yorkers for Koch Committee in the amounts of \$200 and \$250. Contributions to Federal candidates from corporations are prohibited by 2 U.S.C. §441b(a).



We have received from Mr. Schlesinger your letter of January 6, 1978, in which you state that the checks in question were issued as personal checks by Frederick and Linda Cahill. In order to resolve this matter, we will need to receive from you copies of the cancelled checks plus an explanation of the relationship between the Cahills and the Foundation with regard to the account upon which these checks were drawn. Please submit any additional factual or legal materials which you believe are relevant to the Commission's analysis. Where appropriate, statements should be submitted under oath.

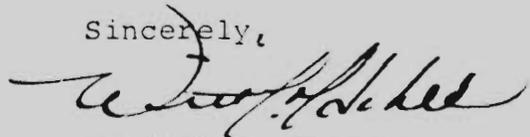
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

731411111111

ACC 2921

RECEIVED
FEDERAL ELECTION
COMMISSION

NEW YORKERS FOR KOCH (Congressional Committee)
Stanley Schlesinger, Treasurer
425 Park Avenue
New York, New York 10022

'78 JAN 9 PM 1:50

January 6, 1978

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

2-10003

Attention: Anne Weissenborn, Esq.

Re: MUR 474(77)

Dear Mr. Oldaker:

In response to your letter of December 20, 1977, received by my office on December 23, 1977, and further communication and correspondence with your office extending the time to answer same because of my absence on vacation to January 12, 1978, I enclose the following:

1. Affidavit of Helen N. Goodman, my secretary, dated January 5, 1978 which sets forth relevant information for the Commission.
2. Letter from Arthur Jablow, accountant, and Frederick Cahill, contributor, dated January 5, 1978 which is self-explanatory.
3. Copy of letter dated December 22, 1977 from The Bank of New York, signed by Richard W. Peterson, Vice President, to the Federal Election Commission with regard to check No. 1048 of Lankenau, Kovner & Bickford, a copy of which is also enclosed.

Very truly yours,

Stanley Schlesinger
Stanley Schlesinger

SS:hg

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7304771111



WARNER COMMUNICATIONS INC.

January 6, 1978

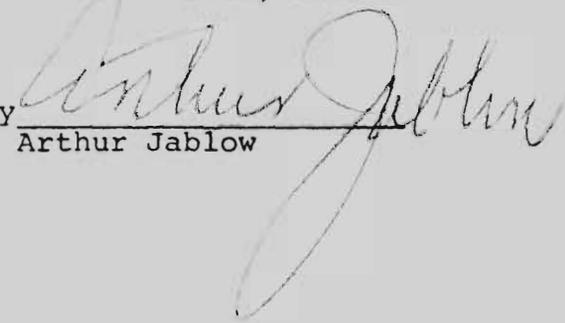
Mr. Stanley Schlesinger
Treasurer of Koch Campaign
for Congress
425 Park Avenue
New York, New York 10022

Dear Mr. Schlesinger:

I am the Accountant for The William & Selma Frankel Foundation, Inc. In connection with the two checks issued to New Yorkers for Koch in 1976, respectively in the amounts of \$200 by Mr. and Mrs. Frederick and Linda Cahill and \$250 by Mr. Frederick Cahill, this will confirm that when these checks were issued they were issued as personal checks by the Cahills, and not as the Foundation's checks, and the Koch Committee was so informed. In fact, each check shows the name typed thereon as intended payor.

Very truly yours,

THE WILLIAM & SELMA FRANKEL
FOUNDATION, INC.

By 
Arthur Jablow

I confirm the statements made
above by Arthur Jablow as true
and correct.



Frederick Cahill

7 9 1 4 1 3 1 0 4 1 0

and the fact that they had made prior contributions. Ms. Menschel confirmed that the Cahills were known to Mr. Koch and stated that it was in order to accept that check since it was a personal check. I may have reported this to Mr. Schlesinger although I cannot be certain as to this, as often he was out of the city or out of the office on business conferences. I am quite sure that I would not have checked with either Ms. Menschel or Mr. Schlesinger as to the second check received from Mr. Cahill on or about October 15, 1976 which was for \$250. in payment of two sponsors' tickets to the dinner given in honor of Mr. Koch in October, 1976 at the Tavern-on-the-Green in view of the approval of the first check but, again, I am not certain.

I might add that we received approximately 850 contributions and kept xerox copies of all checks in amounts over \$100.00. Amongst them were some from corporations or associated partnerships. On a number of occasions I telephoned or wrote to these contributors explaining that we could not accept the checks as drawn. There were instances where they were replaced by individual checks and some that were not, and the contributions were forfeited.

I make this affidavit of my own volition for the purpose of clearing up the procedure that was followed.

Sworn to before me this
5th day of January, 1978.

Miriam E. Pearson

Helen N. Goodman

Helen N. Goodman

WALTER C. PEARSON
NOTARY PUBLIC, STATE OF NEW YORK
No. 03-8-02500
Qualified in Bronx County
Commission Expires March 26, 1978

THE BANK OF NEW YORK
NEW YORK'S FIRST BANK FOUNDED 1784 BY ALEXANDER HAMILTON

51 WEST 52ND STREET, NEW YORK, N. Y. 10019

RICHARD W. PETERSON, JR.
VICE PRESIDENT

December 22, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Gentlemen:

This is to advise you that our records indicate the law firm under the name of Lankenau, Kovner & Bickford is a partnership and that their check No. 1048 to the order of "New Yorkers for Koch," dated October 6, 1976 was drawn on account No. 05-3694, a partnership account.

We also wish to advise you that the law firm, Lankenau, Kovner & Bickford does not maintain any corporate accounts with our bank.

If you need any further information pertaining to this name, kindly get in touch with the undersigned.

Very truly yours,


Richard W. Peterson
Vice President

RWP/1a

731490111

LANKENAU, KOVNER & BICKFORD
REGULAR ACCOUNT
30 ROCKEFELLER PLAZA
NEW YORK, N.Y. 10020

*For Ten Tickets
to Couples*

210
1048

PAY *THE SUM* **700** DOLLARS

DATE: *10-6-76* TO THE ORDER OF: *New Yorkers for Kich*

CHECK AMOUNT
700 00

[Signature]

THE BANK OF NEW YORK
51 WEST 52ND STREET, NEW YORK, N.Y. 10019

⑈001048⑈ ⑆0210⑈000⑆ 05 3694⑈ ⑆0000070000⑆



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

8 18 JAN 9 PM 1:50

FEDERAL ELECTION COMMISSION

CERTIFIED

No. 538871

MAIL

Attention: Anne Weissenborn, Esq.

ACC 2337

LANKENAU KOVNER & BICKFORD
ATTORNEYS AT LAW

30 ROCKEFELLER PLAZA
NEW YORK, N.Y. 10020

RECEIVED
FEDERAL ELECTION
COMMISSION

TELEPHONE
212 469-8230

TELEX
237522 AB

CABLE ADDRESS
LANKOFORT

'77 DEC 27 AM 11:43

JOHN E. LANKENAU
WALTER A. KOVNER
MICHAEL J. BICKFORD
HEATHER LUNN
WILLIAM C. BICKFORD

December 23, 1977

718

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 474 (77)

Dear Mr. Oldaker:

This letter will acknowledge receipt of your letter of inquiry dated December 20, 1977, concerning a \$700.00 contribution which my firm made to the New Yorkers for Koch Committee on October 14, 1976.

Your letter indicates your concern that the contribution was made by an incorporated entity. The contribution in question was made by my law firm which is a partnership by check #1048 dated October 6, 1976, payable to New Yorkers for Koch, and drawn on Account #05 3694 at The Bank of New York, 51 West 52nd Street, New York, New York. Enclosed is a copy of our check (front and back). This check was drawn on my firm's account, which is, of course, a partnership account and not a corporate account.

As further evidence of this fact, we enclose a letter from The Bank of New York dated December 22, 1977, signed by Richard W. Peterson, Vice President, confirming these facts.

Since its inception, my law firm has operated as a partnership. At the present time a professional corporation bearing the name "Lankenau Kovner & Bickford, P.C." exists under the laws of the State of New York. At no time has a bank account been opened for that corporate entity nor has that corporate entity ever engaged in any business whatsoever.

I hereby certify as an attorney at law, and under the penalties of perjury, that the foregoing statements are true.

If you require any further information, kindly communicate with the undersigned. We stand ready to fully cooperate with you in this matter.

Very truly yours,


John C. Lankenau

JCL:p
Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7 0 1 4 1 4 1 0 2

THE BANK OF NEW YORK

NEW YORK'S FIRST BANK FOUNDED 1784 BY ALEXANDER HAMILTON

51 WEST 52ND STREET, NEW YORK, N. Y. 10019

RICHARD W. PETERSON, JR.
VICE PRESIDENT

December 22, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Gentlemen:

This is to advise you that our records indicate the law firm under the name of Lankenau, Kovner & Bickford is a partnership and that their check No. 1048 to the order of "New Yorkers for Koch," dated October 6, 1976 was drawn on account No. 05-3694, a partnership account.

We also wish to advise you that the law firm, Lankenau, Kovner & Bickford does not maintain any corporate accounts with our bank.

If you need any further information pertaining to this name, kindly get in touch with the undersigned.

Very truly yours,


Richard W. Peterson
Vice President

RWP/1a

7004001045

LANKENAU, KOVNER & BICKFORD
REGULAR ACCOUNT
30 ROCKEFELLER PLAZA
NEW YORK, N.Y. 10020

REMITTANCE ADVISE			
For Ten tickets			
(S. Longley)			

11
210
1048

THE BANK OF NEW YORK
NEW YORK, N.Y. 10019
700.00

PAY
DATE

TO THE ORDER OF

DOLLARS

AMOUNT
700.00

10-6-76 New Yorkers for Kisch

[Signature]

THE BANK OF NEW YORK
51 WEST 52ND STREET, NEW YORK, N.Y. 10019

⑆001048⑆ ⑆0210⑆00010⑆ 05 3691⑆ ⑆000000⑆00000⑆

WILLIAM C. OLDAKER

NEW YORK
DEC 2 1977

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

1002344

NEW YORKERS FOR KOCH COMMITTEE (Congressional)
STANLEY SCHLESINGER, Treasurer

XXXXXXXXXXXXXXXXXX

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 DEC 27 AM 9:16

425 PARK AVENUE
NEW YORK, NEW YORK 10022
(212) 371-5400

December 23, 1977

Anne Weissenborn, Esq.
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 474(77)

Dear Ms. Weissenborn:

This afternoon I received a letter dated December 20, 1977 from William C. Oldaker, General Counsel, addressed to Mr. Stanley Schlesinger, which letter states that his response should be submitted within ten days after its receipt.

Since Mr. Schlesinger is out of the country, I telephoned your office, in accordance with said letter, to notify you of that fact and to request a short extension to allow Mr. Schlesinger to reply. However, your telephone did not answer.

Mr. Schlesinger is expected to return to the office on Tuesday, January 3rd, and I expect that he will either telephone or write you then.

Very truly yours,

Helen Goodman
Helen Goodman, Secretary
to Mr. Stanley Schlesinger

1002344

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



not listed

The William and Selma Frankel
Foundation, Inc.
c/o Andrew J. Frankel
10 Rockefeller Plaza
New York, NY 10020

CERTIFIED
943865

RECEIVED
NOV 10 1964
DO NOT WRITE IN THESE SPACES
NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



MUR 474 Weissenborn

PS Form 3811, Apr. 1977

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- Show to whom and date delivered. c
 - Show to whom, date, and address of delivery. c
 - RESTRICTED DELIVERY
Show to whom and date delivered. c
 - RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$ ____
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*The William & Selma Kronke Fund.
 10 Rockefeller Plaza
 New York, NY 10020*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943865	

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4.	DATE OF DELIVERY	POSTMARK
	5. ADDRESS (Complete only if requested)	

6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS
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RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 20, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The William and Selma Frankel
Foundation, Inc.
c/o Andrew J. Frankel
10 Rockefeller Plaza
New York, NY 10020

Re: MUR 474(77)

Dear Sir:

The Federal Election Commission has received information which gives it reason to believe that the William and Selma Frankel Foundation, Inc., has violated the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that the Foundation is a corporation and made two contributions to the New Yorkers for Koch Committee in the amounts of \$200 and \$250. Contributions to Federal candidates from corporations are prohibited by 2 U.S.C. §441b(a). We have numbered this matter MUR 474(77).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.



If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

78040310451

MUR 474 Weissenborn

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

Show to whom and date delivered _____ c

Show to whom, date, and address of delivery _____ c

RESTRICTED DELIVERY

Show to whom and date delivered _____ c

RESTRICTED DELIVERY

Show to whom, date, and address of delivery \$ _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Lanthenou, Kouney + Bickford
30 Rockefeller Plaza
New York, NY 10020

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943863	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

M. Frankel

4. DATE OF DELIVERY	POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

December 20, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lankenau, Kovner and Bickford
30 Rockefeller Plaza
New York, NY 10020

Re: MUR 474(77)

Dear Sir:

The Federal Election Commission has received information which gives it reason to believe that Lankenau, Kovner and Bickford may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). Specifically, it appears that your firm made a \$700 contribution to the New Yorkers for Koch Committee on October 14, 1976. Contributions from incorporated entities are prohibited by 2 U.S.C. §441b (a). We have numbered this matter MUR 474(77).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

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If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely, .



William C. Oldaker
General Counsel

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MUR 474 Weissenborn

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items:
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

Show to whom and date delivered _____c

Show to whom, date, and address of delivery _____c

RESTRICTED DELIVERY
Show to whom and date delivered _____c

RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Stanley Schksinger
425 Park Ave. 13th Floor
New York, NY 10024

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943864	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. *Neven Gille*

DATE OF DELIVERY 12/23	POSTMARK
---------------------------	----------

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

7304001145



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 20, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Schlesinger
Treasurer
New Yorkers for Koch Committee
425 Park Avenue - 13th Floor
New York, NY 10024

Re: MUR 474(77)

Dear Mr. Schlesinger:

The Federal Election Commission has received information which gives it reason to believe that your Committee may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your Committee accepted contributions from two corporations, the William and Selma Frankel Foundation, Inc. and Lankenau, Kovener and Bickford. Knowing acceptance of corporate contributions would be a violation of 2 U.S.C. §441b(a). We have numbered this matter MUR 474.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

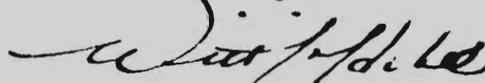


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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 20, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The William and Selma Frankel
Foundation, Inc.
c/o Andrew J. Frankel
10 Rockefeller Plaza
New York, NY 10020

Re: MUR 474(77)

Dear Sir:

The Federal Election Commission has received information which gives it reason to believe that the William and Selma Frankel Foundation, Inc., has violated the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that the Foundation is a corporation and made two contributions to the New Yorkers for Koch Committee in the amounts of \$200 and \$250. Contributions to Federal candidates from corporations are prohibited by 2 U.S.C. §441b(a). We have numbered this matter MUR 474(77).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

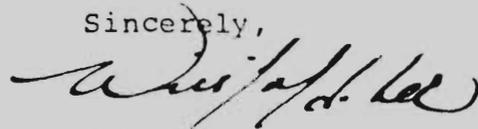


If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
New Yorkers for Koch Committee (Committee)) MUR 474 (77)
William and Selma Frankel Foundation, Inc.)
Lankenau, Kovner and Bickford)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 19, 1977, the Commission approved the following staff recommendations in the above-captioned matter:

1. Find reason to believe that the New Yorkers for Koch Committee violated 2 U.S.C., §441b.
2. Find reason to believe that the William and Selma Frankel Foundation, Inc., violated 2 U.S.C §441b.
3. Find reason to believe that Lankenau, Kovner and Bickford violated 2 U.S.C. §441b.

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 19, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 474 (77) - First General Counsel's Report

The above-mentioned MUR was circulated to the Commissioners on December 15, 1977 at 12:30.

As of 10:00 a.m., this date, no objections have been received to the recommendation that Reason to Believe be found in MUR 474 (77).

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PC

December 14, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 474

Please have the attached 7 Day Report on MUR 474 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040040472

FEDERAL ELECTION COMMISSION
1325 K Street N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 474
DATE COMPLAINT RECEIVED
BY OGC _____
ATTORNEY Browning/
Weissenborn

COMPLAINANT'S NAME:

RESPONDENT'S NAME: New Yorkers for Koch Committee (Committee)
William and Selma Frankel Foundation, Inc.
Lankenau, Kovner and Bickford

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Committee's records

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

During the Audit Division's review of the Committee's contribution records, it was learned that three contribution checks totaling \$1,150 had been received from two corporations: the William and Selma Frankel Foundation, Inc., and Lankenau, Kovner and Bickford, a professional corporation comprised of attorneys engaged in the practice of law (See Attachment I).

PRELIMINARY LEGAL ANALYSIS

The prohibition on corporate contributions in 2 U.S.C. §441b applies broadly to "any corporation whatever." Here, two of the checks were drawn on the account of "William and Selma Frankel Foundation, Inc.," but they were reported as representing contributions from Fred and Linda Cahill. The third check was drawn on the Lankenau, Kovner and Bickford regular account and was reported as being from Lankenau, Kovner and Bickford (attorneys).

The fact that the checks were written on corporate accounts indicates that the Committee may have knowingly accepted corporation contributions in violation of 2 U.S.C. §441b.

RECOMMENDATIONS

1. Find reason to believe that the New Yorkers for Koch Committee violated 2 U.S.C. §441b.
2. Find reason to believe that the William and Selma Frankel Foundation, Inc., violated 2 U.S.C. §441b.
3. Find reason to believe that Lankenau, Kovner and Bickford violated 2 U.S.C. §441b.
4. Send attached letters.

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MUR 474

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ATTACHMENT I



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

October 12, 1977

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM: *AC* BOB COSTA/JOANNE MCSORLEY *Joanne*

SUBJECT: ILLEGAL CONTRIBUTIONS RECEIVED
BY THE NEW YORKERS FOR KOCH COMMITTEE

A review of the Committee's contribution records disclosed seven (7) contributions were received from six (6) business entities. Verification with the New York Secretary of State's Office revealed two (2) of these entities were incorporated in the State of New York.

1) Two (2) contributions of \$200 and \$250, respectively, were received by checks drawn on the William and Selma Frankel Foundation, Inc. These contributions were reported as being received from Fred and Linda Cahill.

2) One (1) contribution of \$700 was received by check, drawn on the LANKENAU KOVNER AND BICKFORD regular account. This contribution was reported as being received from Lankenau Kovner and Bickford (attorneys).

This matter is referred to your office for treatment as a possible MUR. If you have any questions, please contact Tom Nurthen or Joanne McSorley on Extension 3-4155.



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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Schlesinger
Treasurer
New Yorkers for Koch Committee
425 Park Avenue - 13th Floor
New York, NY 10024

Re: MUR 474(77)

Dear Mr. Schlesinger:

The Federal Election Commission has received information which gives it reason to believe that your Committee may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your Committee accepted contributions from two corporations, the William and Selma Frankel Foundation, Inc. and Lankenau, Kovener and Bickford. Knowing acceptance of corporate contributions would be a violation of 2 U.S.C. §441b(a). We have numbered this matter MUR 474.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.



If you have any questions, please contact Anne Weissenborn, the attorney assigned to this matter, at 202-523-4039.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The William and Selma Frankel
Foundation, Inc.
c/o Andrew J. Frankel
10 Rockefeller Plaza
New York, NY 10020

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Under the Act you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.



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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lankenau, Kovner and Bickford
30 Rockefeller Plaza
New York, NY 10020

Re: MUR 474(77)

Dear Sir:

The Federal Election Commission has received information which gives it reason to believe that Lankenau, Kovner and Bickford may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). Specifically, it appears that your firm made a \$700 contribution to the New Yorkers for Koch Committee on October 14, 1976. Contributions from incorporated entities are prohibited by 2 U.S.C. §441b (a). We have numbered this matter MUR 474(77).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

November 16, 1977

MEMORANDUM TO: Bob Costa

THROUGH: Orlando B. Potter

FROM: William C. Oldaker *WCO*

SUBJECT: Apparent corporate contributions received
by New Yorkers for Koch Committee--Your
Memo of October 12, 1977

Your memorandum indicates that three contributions from two sources were received by the Koch Committee on checks drawn on corporate accounts. Two contributions of \$200 and \$250 attributed to Fred and Linda Cahill were drawn on the checking account of an incorporated foundation. The third contribution of \$700 was drawn on an account of a professional corporation comprised of attorneys engaged in the practice of law. The aggregate amount of the contributions in question is \$1,150.

Although the prohibition in 2 U.S.C. §441b applies broadly to virtually all types of corporations including incorporated foundations and professional corporations, we believe that in this case further information should be sought by your division from the Koch Committee as to whether the contributions in question were intended as personal contributions from individuals who were the only (or principal) recipients of income or distributions made by the respective corporations. We believe the type of corporations in question here, coupled with the amounts involved and the potential for getting further information from the Koch Committee, do not warrant MUR treatment at this time.

For example, as a result of your further inquiry to the Committee, information may be obtained indicating that Fred and Linda Cahill are beneficiaries of a trust administered by the foundation in question and were making contributions to the Committee from funds distributed to them by the foundation.



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In the case of the professional corporation, the attorneys involved may have intended to make individual contributions attributed in some proportion to each attorney practicing under the firm name. Alternatively, information may be developed that would justify treating the contribution as though it were made from the separate segregated fund of the professional corporation as an incorporated membership organization. 11 CFR 114.7.

If your further inquiry does not produce information establishing that the contributions may be attributed to persons other than corporations, an opportunity should be given for the Committee to refund the amounts in question to the contributors. If refunds are to be made, your division should follow-up to see that they are in fact made and duly reflected on the reports.

This office will advise you informally, if desired on the content of any letters you send to the Committee seeking relevant information. Ann Weissenborn or Bradley Litchfield are available for such assistance.

7804001043



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

October 12, 1977

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM: *AC* BOB COSTA/JOANNE MCSORLEY *Joanne*

SUBJECT: ILLEGAL CONTRIBUTIONS RECEIVED
BY THE NEW YORKERS FOR KOCH COMMITTEE

780 010 181

A review of the Committee's contribution records disclosed seven (7) contributions were received from six (6) business entities. Verification with the New York Secretary of State's Office revealed two (2) of these entities were incorporated in the State of New York.

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This matter is referred to your office for treatment as a possible MUR. If you have any questions, please contact Tom Nurthen or Joanne McSorley on Extension 3-4155.





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 474

