



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 483

718040012097



FEDERAL ELECTION COMMISSION

VANCE INVESTIGATIVE MEMO

OLDAKER REFERRAL MEMO

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input checked="" type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

date

John G. Kelt
3/20/78

78040012093



FEDERAL ELECTION COMMISSION

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

Treasurer
AMBIPAC
712 Ridgely Bldg.
Fifth and Monroe Streets
Springfield, Illinois 62701

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Sir or Madame:

This letter is prompted by the Commission's interest in assisting candidates and committees who have reporting responsibilities under the Federal Election Campaign Act, as amended. Upon review of the Report of Receipts and Expenditures filed on behalf of the Good Government Committee (GGC), we noted that your committee received contributions from GGC as follows:

- 1) \$300 on May 7, 1976
- 2) \$1,000 on October 6, 1976

We also noted that you have not filed a Statement of Organization (FEC Form 1) as required by Section 433 of Title 2, United States Code.

The Act requires political committees which anticipate receiving contributions or making expenditures in an aggregate amount exceeding \$1,000 during the calendar year in support of Federal candidates to file such a statement within ten (10) days after its organization or within ten (10) days after the date on which it becomes subject to the disclosure provisions of 2 U.S.C. §434. If AMBIPAC supported one or more candidates for Federal office, it should have registered and filed periodic reports with the Federal Election Commission as required by Sections 433 and 434.



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Please indicate within ten (10) days whether AMBIPAC supported or supports any candidates for Federal office, together with the names and addresses of those candidates, if any. In addition, please state whether or not you are affiliated, in any way, with the Good Government Committee.

If you have any questions, please do not hesitate to call _____, the staff member assigned to this matter.

Sincerely,

78040012101

FEDERAL ELECTION COMMISSION
1525 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR # 483(77)
DATE COMPLAINT RECEIVED
BY OGC _____

STAFF MEMBER Kellett

SOURCE Internally generated
OGC Review of Reports

RESPONDENT'S NAME: AMBIPAC
712 Ridgely Bldg.
Fifth and Monroe Streets
RELEVANT STATUTE: Springfield, Illinois 62701
2 U.S.C. §§433, 434

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED:

BACKGROUND

The Office of General Counsel conducted a project to determine the extent and accuracy of reporting of affiliation, if any, between and among various political committees who have transferred funds to one another. We selected the PAC's of financial institutions, beginning with a PAC that was nationwide in scope and with a broad based membership. The examination led to the following two PAC's and the questions set out in this report.

SUMMARY OF ALLEGATIONS

On its July 10th Quarterly report of Receipts and Expenditures the Good Government Committee (GGC) listed a \$300 contribution to AMBIPAC on May 7, 1976.

On its 10 Day Pre-election report of Receipts and Expenditures GGC listed a \$1,000 contribution to AMBIPAC on October 6, 1976.

A check of the Commission's records revealed that no committee by that name (or similar name) had registered or filed any reports with the Commission.

PRELIMINARY LEGAL ANALYSIS

2 U.S.C. §433 requires that each political committee which anticipates receiving contributions or making expenditures in excess of \$1,000 for a calendar year file a statement of organization with the Commission, within 10 days of its organization or that date when

it has cause to anticipate surpassing the \$1,000 threshold. There is no record indicating that AMBIPAC filed such a statement, despite its receipt of \$1,300 from GGC.

2 U.S.C.§434 requires the periodic reporting of receipts and expenditures by political committees supporting one or more candidates for Federal office. There are no Commission records indicating that AMBIPAC filed any reports.

RECOMMENDATION

Direct the referral of this matter to the Disclosure Division for followup. A suggested letter to AMBIPAC requesting additional information, is attached.

78040012103

March 3, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 483

Please have the attached revised 7 day report on MUR 483 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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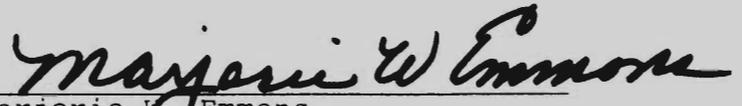
MUR 483(77)

AMBIPAC

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that at an Executive Session of the Federal Election Commission held on February 23, 1978, at which a quorum was present, the Commission determined by a vote of 6-0 to refer back to the Office of the General Counsel the First General Counsel's Report, dated February 10, 1978; circulated to the Commission for initial consideration on February 10, 1978 to which objection was raised, the above-captioned matter.

78040042105



Marjorie W. Emmons,
Secretary to the Commission

DATED: February 24, 1978



FEDERAL ELECTION COMMISSION

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

February 14, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS
SUBJECT: OBJECTIONS TO MURs 477 (77), 480 (77), 481 (77),
482 (77), 483 (77), and 498 (77)

The above-mentioned MURs were circulated to the Commissioners on February 10, 1978 at 4:00.

On February 13, 1978 at 4:30 Commissioner Aikens submitted objections to all of the MURs listed above thereby placing them on the Executive Session Agenda for February 23, 1978.



February 10, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 483

Please have the attached 7 day report on MUR 483 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040042107



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

Treasurer
AMBIPAC
712 Ridgely Bldg.
Fifth and Monroe Streets
Springfield, Illinois 62701

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 483(77)

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The Act requires political committees which anticipate receiving contributions or making expenditures in an aggregate amount exceeding \$1,000 during the calendar year in support of Federal candidates to file such a statement within ten (10) days after its organization or within ten (10) days after the date on which it becomes subject to the disclosure provisions of 2 U.S.C. §434. If AMBIPAC supported one or more candidates for Federal office, it should have registered and filed periodic reports with the Federal Election Commission as required by Sections 433 and 434.



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Please indicate within ten (10) days whether AMBIPAC supported or supports any candidates for Federal office, together with the names and addresses of those candidates, if any. In addition, please state whether or not you are affiliated, in any way, with the Good Government Committee.

If you have any questions, please do not hesitate to call Philip Kellett (202-523-4001), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL FEB 10 1978
BY OGC TO THE COMMISSION _____

MUR # 483(77)
DATE COMPLAINT RECEIVED
BY OGC _____

STAFF MEMBER Kellett

COMPLAINANT'S NAME: OGC Review of Reports

RESPONDENT'S NAME: AMBIPAC
712 Ridgely Bldg.
Fifth and Monroe Streets
RELEVANT STATUTE: Springfield, Illinois 62701

2 U.S.C.§433
2 U.S.C.§434

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED:

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2 U.S.C.§434 requires the periodic reporting of receipts and expenditures by political committees supporting one or more candidates for Federal office. There are no Commission records indicating that AMBIPAC filed any reports.

RECOMMENDATION

Send attached letter to request additional information.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 483

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