



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 596

Date Filmed 5/14/80 Camera No. --- 2

Cameraman SPC

44-38861-1000-3034305

MUR 596

FEDERAL ELECTION COMMISSION

Documents pertaining to conciliation -
(including ^{internal} General Counsel's Reports and correspondence)

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 type="checkbox"/> (7) Investigatory files |
| <input checked="" type="checkbox"/> (3) Exempted by ⁹²⁰ 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 type="checkbox"/> (5) Internal Documents | |

Signed _____
 date _____

FEC 9-21-77



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 26, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael G. Bagneris, Esquire
Fine, Waltzer, Winters & Bagneris
335-337 Decatur Street
Vieux Carre
New Orleans, Louisiana 70130

Re: MURs 596 and 698

Dear Mr. Bagneris:

On March 20, 1980, the Commission accepted the signed conciliation agreements and a civil penalty in settlement of the violations of 2 U.S.C. § 433 and § 434. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreements

30047184307



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael G. Bagneris, Esquire
Fine, Waltzer, Winters & Bagneris
335-337 Decatur Street
Vieux Carre
New Orleans, Louisiana 70130

Re: MURs 596 and 698

Dear Mr. Bagneris:

On March 20, 1980, the Commission accepted the signed conciliation agreements and a civil penalty in settlement of the violations of 2 U.S.C. § 433 and § 434. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreements

js

30041134308

- B. Respondent made expenditures totaling \$7,500 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by 2 U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. 2 U.S.C. § 433 requires that each political committee which receives or spends in excess of \$1,000 during a calendar year shall file a statement of organization with the Federal Election Commission.
- III. Failure to file a statement of organization constitutes a violation of 2 U.S.C. § 433.
- IV. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.
- V. Respondent will comply with the following:
- 1) File a statement of organization as required.
 - 2) File reports of receipts and expenditures as required.

3004194310

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

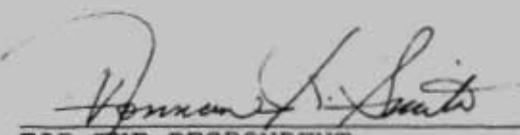
9001194311

26 March 1980
DATE



CHARLES N. STEELE
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

2/6/80
DATE



FOR THE RESPONDENT
TREME IMPROVEMENT POLITICAL SOCIETY

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 596 and 698
Treme Improvement Political)
Society ("TIPS"))

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 20, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MURs 596 and 698:

1. Approve the Conciliation Agreements for MURs 596 and 698 as attached to the Memorandum to the Commission dated March 17, 1980.
2. Close the file in MUR 596.
3. As to MUR 698, close the file as it relates to TIPS.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

3/20/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 3-17-80, 11:47
Circulated on 48 hour vote basis: 3-17-80, 4:00

2091134312

March 17, 1980

MEMORANDUM TO; Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 596 and 698

Please have the attached Memo distributed to the Commission
on a 48 hour tally basis. Thank you.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MUR 17 All: 47

March 17, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: Approval of Conciliation Agreements Regarding the
Treme Improvement Political Society - MURs 596 and
698

On April 6, 1979, the Commission found reasonable cause to believe that the Treme Improvement Political Society ("TIPS") violated 2 U.S.C. § 433 and § 434 for failure to register as a political committee and file reports of financial activity on behalf of Richard Tonry in the 1977 Louisiana special elections (MUR 698). On January 8, 1980, the Commission found probable cause to believe that the same violations occurred regarding TIPS' activity on behalf of Sanford Krasnoff in MUR 596. The Commission authorized civil suit against TIPS.

Our continual efforts to achieve compliance proved successful when TIPS submitted registration and disclosure reports covering finances relating to the Krasnoff campaign, followed by an amendment including the support for Tonry. TIPS recently returned signed Conciliation Agreements in each case, adding only the word "timely" to the "failure to file" violations. In addition, TIPS sent a check for \$200 in response to the Commission's proposed civil penalty of \$250 in MUR 698. No civil penalty was included in the earlier MUR 596.

As a result of the Committee's substantial compliance in these matters, we recommend that the Commission approve the attached Conciliation Agreements for MURs 596 and 698, and close the file in MUR 596. As to MUR 698, we recommend closing the file as it relates to TIPS (one respondent remains in this matter).

Attachments

I

II

BU 341

006242

Fine, Waltzer, Winters & Bagneris
Attorneys and Counsellors at Law

335-337 Decatur Street
Vieux Carre
New Orleans, Louisiana 70130

Lowell S. Fine
Bruce C. Waltzer
C. Michael Winters
Michael G. Bagneris
David R. Fine

504/561-5152

February 7, 1980

H322
0

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

RE: MUR 596
MUR 698

Dear Ms. Hagan:

Enclosed please find the Conciliation Agreements in connection with the above captioned matters. Please note that the only change made in the agreements was that the word "timely" was inserted in the first paragraph. I hope this will close both of our files.

If you are ever in New Orleans give me a call.

Very truly yours,

FINE, WALTZER, WINTERS & BAGNERIS

Michael Bagneris
Michael G. Bagneris

/ldb
enclosures

Attachment I p.1

30047184315

30 FEB 11 P 3:07
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Treme Improvement) MUR 596
Political Society)

CONCILIATION AGREEMENT

30077184316
This matter having been initiated by the Federal Election Commission in the ordinary course of carrying out its supervisory responsibilities and, after an investigation, the Commission having found reasonable cause to believe that Treme Improvement Political Society (hereinafter referred to as "Respondent") violated 2 U.S.C. § 433 and 434 of the Federal Election Campaign Act, ("the Act"), for failure to register and file reports of receipts and expenditures with the Federal Election Commission.

WHEREFORE, the Commission and Respondent having duly entered into conciliation as provided for in 2 U.S.C. § 437g (a) (5), do hereby agree as follows:

- I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in the case.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The pertinent facts in this matter are as follows:
 - A. Respondent received transfers totaling \$7,500 from the principal campaign committee of Sanford Krasnoff, a candidate for the U.S. House of Representatives.

AH. I p. 2

- B. Respondent made expenditures totaling \$7,500 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by 2 U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. 2 U.S.C. § 433 requires that each political committee which receives or spends in excess of \$1,000 during a calendar year shall file a statement of organization with the Federal Election Commission.
- III. Failure to file a statement of organization constitutes a violation of 2 U.S.C. § 433.
- IV. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.
- V. Respondent will comply with the following:
 - 1) File a statement of organization as required.
 - 2) File reports of receipts and expenditures as required.

30041131317

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia..
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

30011319

DATE _____

2/6/80
DATE

CHARLES N. STEELE
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION



FOR THE RESPONDENT
TREME IMPROVEMENT POLITICAL SOCIETY

Attachment I p. 4

\$4,000 from the principal campaign committee of Richard Tonry, a candidate for the U.S. House of Representatives.

- B. Respondent made expenditures totaling \$4,000 for the purpose of influencing Richard Tonry's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by 2 U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. 2 U.S.C. § 433 requires that each political committee which receives or spends in excess of \$1,000 during a calendar year shall file a statement of organization with the Federal Election Commission.
- III. 2 U.S.C. § 434 requires that political committees shall file with the Commission reports of receipts and expenditures.
- IV. Failure to file a statement of organization constitutes a violation of 2 U.S.C. § 433.

Att. I p.6

0001181310

- V. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.
- VI. Respondent will comply with the following:
- 1) File a statement of organization as required.
 - 2) File reports of receipts and expenditures as required.
 - 3) Pay a civil penalty of \$200.
- VII. It shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

Att. I p. 7

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

DATE

DATE

2/6/80

CHARLES N. STEELE
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION



FOR THE RESPONDENT
TREME IMPROVEMENT POLITICAL
SOCIETY

200-1718432

Attachment I p.8

Fine, Waltzer, Winters & Bagneris
Attorneys and Counsellors at Law

RECEIVED
FEDERAL RESERVE BANK
335-337 Decatur Street
Vieux Carré
New Orleans, Louisiana 70130
JAN 21 1980

Lowell S. Fine
Bruce C. Waltzer
C. Michael Winters
Michael G. Bagneris
David R. Fine

504/581-5152

January 17, 1980

Ms. Francis Hogan
Office of General Counsel
N.W. Washington, D.C. 20463

000000

RE: MUR 698
MUR 596

Dear Ms. Hogan:

Enclosed please find a check in the amount of \$200.00
in payment for the civil penalties involved in the
above captioned matter.

As per our conversation of this date, as soon as I
receive the Conciliation Agreement, I will get it signed
and offer a slightly different phrasology.

Very truly yours,

FINE, WALTZER, WINTERS & BAGNERIS

Michael Bagneris
Michael G. Bagneris

/ldb
enclosure

Attachment II p.1

Handwritten notes and stamps at the bottom right of the page, including a circular stamp and illegible text.

TREME IMPROVEMENT POLITICAL SOCIETY
1729 DUELS ST.
NEW ORLEANS, LA. 70119

GCOT 1011
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PAY TO THE ORDER OF

Federal Election Commission

15 Jan 19 80 14-210
650

Two Hundred dollars and no/100

\$ 200 00

DOLLARS

GENTILY BRANCH
Liberty Bank
AND TRUST CO.
NEW ORLEANS, LOUISIANA 70119

Carl R. Baptiste
Herman B. Smith

⑆065002108⑆ ⑈02 12 367 3⑈

Att. II p. 2

ACC#
3411

Fine, Waltzer, Winters & Bagneris
Attorneys and Counsellors at Law

335-337 Decatur Street
Vieux Carré
New Orleans, Louisiana 70130

Sewall L. Fine
Bruce G. Waltzer
C. Michael Winters
Michael G. Bagneris
David R. Fine

504/581-5152

February 7, 1980

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

RE: MUR 596
MUR 698

Dear Ms. Hagan:

Enclosed please find the Conciliation Agreements in connection with the above captioned matters. Please note that the only change made in the agreements was that the word "timely" was inserted in the first paragraph. I hope this will close both of our files.

If you are ever in New Orleans give me a call.

Very truly yours,

FINE, WALTZER, WINTERS & BAGNERIS

Michael Bagneris
Michael G. Bagneris

/ldb
enclosures

11 23:07

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Treme Improvement Political) MUR 596
Society)
H.E.L.P., Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 5, 1980, do hereby certify that the Commission determined by a vote of 6-0 to take the following actions in MUR 596:

1. Take no further action against H.E.L.P., Inc. for the violation of 2 U.S.C. §433 and §434.
2. Close the file as it relates to H.E.L.P., Inc.

Attest:

2-7-80

Date

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. 20461

MEMORANDUM TO: CHARLES STEELE *CS*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *MC*
DATE: FEBRUARY 1, 1980
SUBJECT: OBJECTION - MUR 596 - General Counsel's
Report dated 1-30-80; Received in OCS
1-30-80, 12:25

The above-named document was circulated on a 48
vote basis at 11:00, January 31, 1980.

Commissioner Harris has submitted an objection
thereby placing MUR 596 on the Amended Agenda for
February 5, 1980.

January 30, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM : Jane Colgrove
SUBJECT : MUR 596

Please have the Attached General Counsel's Report
on MUR 596 distributed to the Commission on a 48 hour
tally basis.

Thank you.

This was accomplished, however, through exhaustive efforts to aid compliance over many months. Counsel for T.I.P.S. has requested copies of the Commission's Conciliation Agreements in this case and in MUR 698. He has agreed to obtain signatures for the Agreements after a slight change in wording. He will also enclose a check to offer as civil penalty. We expect to receive the signed Agreements by January 28, 1980.

RECOMMENDATIONS

1. Take no further action against H.E.L.P., Inc. for the violation of 2 U.S.C. § 433 and § 434.
2. Close the file as it relates to H.E.L.P., Inc.

30 Jan 1980
Date



Charles N. Steele
General Counsel

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Fine, Waltzer, Winters & Bagneris
Attorneys and Counsellors at Law

395-397 Decatur Street
Vieux Carré

20 JAN 21 1980
New Orleans, Louisiana 70130

Lowell S. Fine
Bruce C. Waltzer
C. Michael Winters
Michael G. Bagneris
David R. Fine

504/581-5152

January 17, 1980

Ms. Francis Hogan
Office of General Counsel
N.W. Washington, D.C. 20463

RE: MUR 698
MUR 596

Dear Ms. Hogan:

Enclosed please find a check in the amount of \$200.00
in payment for the civil penalties involved in the
above captioned matter.

As per our conversation of this date, as soon as I
receive the Concilliation Agreement, I will get it signed
and offer a slightly different phrasology.

Very truly yours,

FINE, WALTZER, WINTERS & BAGNERIS

Michael Bagneris
Michael G. Bagneris

/ldb
enclosure

TREME IMPROVEMENT POLITICAL SOCIETY
1720 DUELS ST.
NEW ORLEANS, LA. 70119

6007 1011
138

PAY TO THE ORDER OF

Federal Election Commission

15 Jan 19 *80* $\frac{14-210}{650}$

Two Hundred dollars and no/100

\$ *200*⁰⁰

DOLLARS

GENTLY BRANCH
Liberty Bank
AND TRUST CO.
NEW ORLEANS, LOUISIANA 70119

Earl R. Baptiste
Norman B. Smith

⑆065002108⑆ ⑆02 12 367 3⑆

Waltzer, Winters & Bagneris
Attorneys and Counsellors at Law
335-337 Decatur Street
Vieux Carré
New Orleans, Louisiana 70130



MAIL LETTER
CARRIERS
SERVING AREA

JAN 21 11 37

OFFICE OF GENERAL COUNSEL
1325 K Street
N. W. Washington, D.C. 20463

ATTENTION: Ms. Francis Hogan

Note to file

1/18/80

MUR 698

MUR 596

Copies of Conciliation Agreements in MUR 596 and MUR 698
sent to Michael Bagneris, counsel for
Treme' Improvement Political Society —

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
H.E.L.P., Inc.,)
Treme Improvement Political Society)

MUR 596
AUG 6 12: 01

GENERAL COUNSEL'S REPORT

On April 11, 1979, the Commission found reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. § 434 by failing to file reports of its receipts and expenditures. The Commission also found reasonable cause to believe that Treme Improvement Political Society violated 2 U.S.C. § 433 and 434 by failing to register and report.

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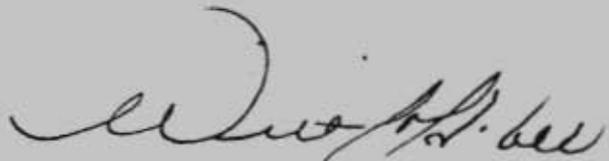
We have not as yet received any indication from H.E.L.P. Inc., that its reports are being prepared. Thus we propose an amended conciliation agreement containing a \$50 civil penalty for this organization.

RECOMMENDATION

Approve the amended conciliation agreement and letter for H.E.L.P., Incorporated.

8/6/79

DATE



William C. Oldaker
General Counsel

Attachments:
Letter to Ms. Berthey, Conciliation Agreement

1015335



FEDERAL ELECTION COMMISSION

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

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On , 1979, the Commission approved an amended conciliation agreement with respect to your organization's failure to file the reports of receipts and expenditures which we have repeatedly requested. This amended conciliation agreement contains a provision for a \$50 civil penalty. If we are unable to reach agreement with you and receive the reports we have requested, the Commission may, upon a finding of probable cause to believe that a violation has occurred, file civil suit against you. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find an amended conciliation agreement which has been approved by the Commission. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure





FEDERAL ELECTION COMMISSION

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

August 14, 1979

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On August 8, 1979, the Commission approved an amended conciliation agreement with respect to your organization's failure to file the reports of receipts and expenditures which we have repeatedly requested. This amended conciliation agreement contains a provision for a \$50 civil penalty. If we are unable to reach agreement with you and receive the reports we have requested, the Commission may, upon a finding of probable cause to believe that a violation has occurred, file civil suit against you. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find an amended conciliation agreement which has been approved by the Commission. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



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

- A. Respondent received transfers totaling \$1,390 from the principal campaign committee of Sanford Krasnoff, a candidate for the U.S. House of Representatives.
- B. Respondent made expenditures totaling \$1,390 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.

- III. Respondent will file reports of receipts and expenditures as required.
- IV. Respondent will pay a civil penalty in the amount of FIFTY (\$50) DOLLARS to the United States Treasury pursuant to 2 U.S.C. § 437g(a) (5) (B).

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a) (1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated. it may institute civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a) (5) (A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

H.E.L.P., Inc.

Miss Dorothy Bartney
I.E.O.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Bartney:

On _____, 1979, the Commission approved an amended conciliation agreement with respect to your organization's failure to fill the reports of receipts and expenditures which we have repeatedly requested. This amended conciliation agreement contains a provision for a \$33 civil penalty. If we are unable to reach agreement with you and receive the reports we have requested, the Commission may, upon a finding of probable cause to believe that a violation has occurred, file civil suit against you. 2 U.S.C. § 437c(a)(3)(3).

Enclosed please find an amended conciliation agreement which has been approved by the Commission. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clara Lindsay at (504) 388-4866 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

80040194344

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



CLAIM CHECK NO.
190825

HOLD

DATE
10/25

BY NOTICE
10/29

NO NOTICE
11/8

RETURN

Download from
FD Form 3868-A
Feb. 1978



GENTILLY STATION

NOV 16 1979

UNCLAIMED
GENTILLY STATION
NEW ORLEANS, LA.

UNCLAIMED
GENTILLY STATION
NEW ORLEANS, LA.

UNCLAIMED
GENTILLY STATION
NEW ORLEANS, LA.

H.E.L.P. 145-10122
All Paris Avenue
New Orleans, Louisiana

70122

CERTIFIED

945111

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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. _____
 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:
Dorothy Bentley
HELP, Inc.

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 _____ | *945111* | _____

(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 _____

FBH mur596



FEDERAL ELECTION COMMISSION

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

August 14, 1979

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On August 8, 1979, the Commission approved an amended conciliation agreement with respect to your organization's failure to file the reports of receipts and expenditures which we have repeatedly requested. This amended conciliation agreement contains a provision for a \$50 civil penalty. If we are unable to reach agreement with you and receive the reports we have requested, the Commission may, upon a finding of probable cause to believe that a violation has occurred, file civil suit against you. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find an amended conciliation agreement which has been approved by the Commission. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



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

- A. Respondent received transfers totaling \$1,390 from the principal campaign committee of Sanford Krasnoff, a candidate for the U.S. House of Representatives.
- B. Respondent made expenditures totaling \$1,390 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by U.S.C. § 431(d); assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.

- III. Respondent will file reports of receipts and expenditures as required.
- IV. Respondent will pay a civil penalty in the amount of FIFTY (\$50) DOLLARS to the United States Treasury pursuant to 2 U.S.C. § 437g(a) (5) (B).

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a) (1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a) (5) (A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

H.E.L.P., Inc.



FEDERAL ELECTION COMMISSION

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

MUR 596

MEMO TO FILE

Our letter to Norman Smith of Treme Political Action Society containing conciliation agreement was originally mailed certified to 4653 Tulip Street but returned unclaimed. It was remailed on May 15 by regular mail to 615 St. Philip St., New Orleans, 70116.

MISSION

CLAIM CHECK NO.
124876

HOLD

DATE
4-20-79
SET NOTICE

4/20
RETURN

Detached from
PS Form 3840-A
July 1977

No Response WS 79

POSTAGE AND FEES PAID



Treme Improvement Political
Action Society
c/o Norman Smith
4653 Tulip Street
New Orleans, Louisiana 70126

UNCLAIMED
No such add
No such office
Do not return

CERTIF
943379



FEDERAL ELECTION COMMISSION

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

April 16, 1979

Treme Improvement Political Action
Society
c/o Norman Smith
4653 Tulip Street
New Orleans, Louisiana 70126

Re: MUR 596

Dear Mr. Smith:

On April 11, 1979, the Commission found reasonable cause to believe that the Treme Improvement Political Action Society violated 2 U.S.C. §§ 433 and 434 by failing to register with the Commission and file reports showing the expenditure of \$7,500 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



PS Form 3811, Aug. 1978

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:
Michael Bogaris
TIPS, New Orleans, LA

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *943623* | |

(Always obtain signature of addressee or agent)

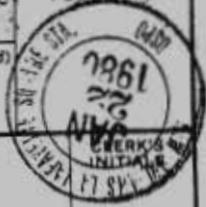
I have received the article described above.
 SIGNATURE Addressee Authorized agent
Gene Wald *GW*

4. DATE OF DELIVERY *NOV 22 1980* POSTMARK *NOV 22 1980*

5. ADDRESS (Complete only if requested):
NOV 22 1980

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



MUR 596, 698 FBH

U.S. POSTAL SERVICE

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- B. Respondent made expenditures totaling \$7,500 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by 2 U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. 2 U.S.C. § 433 requires that each political committee which receives or spends in excess of \$1,000 during a calendar year shall file a statement of organization with the Federal Election Commission.
- III. Failure to file a statement of organization constitutes a violation of 2 U.S.C. § 433.
- IV. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.
- V. Respondent will comply with the following:
 - 1) File a statement of organization as required.
 - 2) File reports of receipts and expenditures as required.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

for the Respondent
Treme Improvement Political Society

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MEMORANDUM TO FILE
MUR 596

May 30, 1979

Letter and Conciliation Agreement to Dorothy Berthey of
HELP, Inc., were returned to the FEC unclaimed.

The same letter and conciliation agreement were mailed again
today by regular mail to the same address.

1 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



POSTAGE AND FEES PAID
SERVING AMERICANS

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

UNCLAIMED
GENTILLY STATION,
NEW ORLEANS, LA

DATE APR 20 1979
POST OFFICE
MAIL NOTICE
RETURN S-4
CLAIM CHECK NO. 184432
Doubles

CERTIFIED
943377

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PS Form 3811, Apr. 1977

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:
*Dr. Ortho Earthy
 H. E. L. M. Inc.
 3411 Paris Avenue
 New Orleans, Louisiana*

3. ARTICLE DESCRIPTION: _____
 REGISTERED NO. _____ CERTIFIED NO. *70122* INSURED NO. _____
943377

(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** _____

REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811-0-249-506



FEDERAL ELECTION COMMISSION

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

April 16, 1979

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On April 11, 1979, the Commission found reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. § 434 for failure to file reports showing the expenditure of \$1,390 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosure



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

- A. Respondent received transfers totaling \$1,390 from the principal campaign committee of Sanford Krasnoff, a candidate for the U.S. House of Representatives.
- B. Respondent made expenditures totaling \$1,390 for the purpose of influencing Sanford Krasnoff's campaign for Federal office during the 1977 Louisiana special elections.
- C. Respondent became a political committee as defined by U.S.C. § 431(d), assuming registration and reporting obligations under the Act by receiving and expending funds in excess of \$1,000 in support of a candidate for Federal office.

WHEREFORE, Respondent agrees that:

- I. Respondent is a political committee as defined by 2 U.S.C. § 431(d).
- II. Failure to file reports of receipts and expenditures constitutes a violation of 2 U.S.C. § 434.

- III. Respondent will file reports of receipts and expenditures as required.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement of any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.
- III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

H.E.L.P., Inc.



FEDERAL ELECTION COMMISSION

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

April 16, 1979

Mr. Oliver W. White, Treasurer
D.A.W.N.
3413 Press Street
New Orleans, Louisiana

Re: MUR 596

Dear Mr. White:

On April 11, 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 16, 1979

Mr. Matt Suarez
Political Action Caucus
1538 North Tonti Street
New Orleans, Louisiana 70119

Re: MUR 596

Dear Mr. Suarez:

On April 11, 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Oldaker".

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 16, 1979

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Parkway
New Orleans, Louisiana 70122

Re: MUR 596

Dear Mr. Duplessis:

On April 11, 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William G. Oldaker".

William G. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 16, 1979

Mr. Nils Douglas
Martin Luther King Political Club
418 Common Street
New Orleans, Louisiana 70130

Re: MUR 596

Dear Mr. Douglas:

On April 11, 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 16, 1979

Mr. Robert Spears
COPE
2313 Gallier Street
New Orleans, Louisiana 70117

Re: MUR 596

Dear Mr. Spears:

On April 11, 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel



Mr. Robert Spears
COPE
2313 Gallier Street
New Orleans, Louisiana 70117

Re: MUR 596

Dear Mr. Spears:

On March , 1979, the Commission voted to take no further action with regard to your committee.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Mr. Nils Douglas
Martin Luther King Political Club
418 Common Street
New Orleans, Louisiana 70130

Re: MUR 596

Dear Mr. Douglas:

On March 1, 1979, the Commission voted to take no further action with regard to your committee.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Parkway
New Orleans, Louisiana 70122

Re: MUR 596

Dear Mr. Duplessis:

On March , 1979, the Commission voted to take no further action with regard to your committee.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

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Mr. Matt Suarez
Political Action Caucus
1538 North Tonti Street
New Orleans, Louisiana 70119

Re: MUR 596

Dear Mr. Suarez:

On March , 1979, the Commission voted to take no further action with regard to your committee.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

90040194371

Mr. Oliver W. White, Treasurer
D.A.W.N.
3413 Press Street
New Orleans, Louisiana

Re: MUR 596

Dear Mr. White:

On March , 1979, the Commission voted to take no further action with regard to your committee.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

30047184372

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On ~~March~~ , 1979, the Commission found reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. § 434 for failure to file reports showing the expenditure of \$1,390 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437c(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Bidaker
General Counsel

Enclosure

30010181373

Treme Improvement Political Action
Society
c/o Norman Smith
4653 Tulip Street
New Orleans, Louisiana 70126

Re: MUR 596

Dear Mr. Smith:

On April , 1979, the Commission found reasonable cause to believe that the Treme Improvement Political Action Society violated 2 U.S.C. §§ 433 and 434 by failing to register with the Commission and file reports showing the expenditure of \$7,500 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437a(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. §437a(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4900 to discuss your objections to this agreement.

Sincerely,

William C. Clusker
General Counsel

Enclosure

3001194374

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The Martin Luther King
Political Club
Sons of Desire
C.O.P.E.
Political Action Caucus
H.E.L.P., Inc.
Treme Improvement Political
Society
D.A.W.N.

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MUR 596

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 11, 1979, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated April 6, 1979, regarding the above-captioned matter:

1. Take no further action with regard to the Martin Luther King Political Club, Sons of Desire, C.O.P.E., Political Action Caucus and D.A.W.N.
2. Find reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. §434 by failing to file reports of its receipts and expenditures. Find reasonable cause to believe that Treme Improvement Political Society violated 2 U.S.C. §§433 and 434 by failing to register and report.

Continued

90741131375

MUR 596
General Counsel's Report
Dated April 6, 1979
CERTIFICATION

Page 2

3. Send the letters and conciliation agreements attached to the above-named report.

Attest:

4/12/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

90040134376

Received in Office of Commission Secretary: 4-9-79, 10:43
Circulated on 48 hour vote basis: 4-9-79, 4:30

April 9, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached General Counsel's Report on MUR 596 distributed to the Commission on a 48 hour tally basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

7-1-78 HQ: 43

In the Matter of)	
)	
The Martin Luther King)	
Political Club)	
Sons of Desire)	
C.O.P.E.)	MUR 596
Political Action Caucus)	
H.E.L.P., Inc.)	
Treme Improvement Political)	
Society)	
D.A.W.N.)	

GENERAL COUNSEL'S REPORT

On October 4, 1978, the Commission found reason to believe that the Martin Luther King Political Club, the Treme Improvement Political Society, Community Organization for Political Education, ("C.O.P.E."), H.E.L.P., Inc., Sons of Desire, Inc., Development Association for Wards, ("D.A.W.N."), and the Political Action Caucus violated 2 U.S.C. §§ 433 and 434 by failing to register and report with the Commission.

The Martin Luther King Political Club, the Political Action Caucus, D.A.W.N., the Sons of Desire, and C.O.P.E. have submitted statements of organization and reports to this Office. Consequently, we recommend no further action in their regard.

As of this report, the Office of General Counsel has received a statement of organization from H.E.L.P. but no

9001184378

reports. This Office has received neither reports nor a statement of organization from the Treme Improvement Political Society. We, therefore, recommend that the Commission find reasonable cause to believe that H.E.L.P. has violated 2 U.S.C. § 434 by failing to file reports of receipts and expenditures and that the Commission find reasonable cause to believe that the Treme Improvement Political Society has violated 2 U.S.C. § 433 and 434 by failing to register and report with the Commission. We further recommend that the Commission approve the attached conciliation agreements which are modeled upon conciliation agreements approved in connection with MUR 615 which concerns similar committees and expenditures.

Recommendations

1. Take no further action with regard to the Martin Luther King Political Club, Sons of Desire, C.O.P.E., Political Action Caucus and D.A.W.N.
2. Find reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. § 434 by failing to file reports of its receipts and expenditures. Find reasonable cause to believe that Treme Improvement Political Society violated 2 U.S.C. §§ 433 and 434 by failing to register and report.

8004 : 134379

3. Send attached letters and conciliation agreements.

4/6/79
Date

William C. Oldaker
General Counsel

Attachments:

Letters to: Martin Luther King Political Club,
Sons of Desire, C.O.P.E., Political
Action Caucus, D.A.W.N., H.E.L.P.,
Inc., Treme Improvement Political
Society

Conciliation Agreements to: H.E.L.P., Inc.,
Treme Improvement
Political Society

90011184390



FEDERAL ELECTION COMMISSION

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

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Parkway
New Orleans, Louisiana 70122

Re: MUR 596

Dear Mr. Duplessis:

On April , 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

Mr. Robert Spears
COPE
2313 Gallier Street
New Orleans, Louisiana 70117

Re: MUR 596

Dear Mr. Spears:

On April , 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

Mr. Matt Suarez
Political Action Caucus
1538 North Tonti Street
New Orleans, Louisiana 70119

Re: MUR 596

Dear Mr. Suarez:

On April , 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel



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FEDERAL ELECTION COMMISSION

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

Mr. Oliver W. White, Treasurer
D.A.W.N.
3413 Press Street
New Orleans, Louisiana

Re: MUR 596

Dear Mr. White:

On April , 1979, the Commission voted to take no further action with regard to your committee in MUR 596.

Copies of relevant materials in this case will be placed in the public disclosure file for this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

Miss Dorothy Berthey
H.E.L.P., Inc.
3411 Paris Avenue
New Orleans, Louisiana 70122

Re: MUR 596

Dear Miss Berthey:

On April , 1979, the Commission found reasonable cause to believe that H.E.L.P., Inc., violated 2 U.S.C. § 434 for failure to file reports showing the expenditure of \$1,390 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure





FEDERAL ELECTION COMMISSION

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

Treme Improvement Political Action
Society
c/o Norman Smith
4653 Tulip Street
New Orleans, Louisiana 70126

Re: MUR 596

Dear Mr. Smith:

On April , 1979, the Commission found reasonable cause to believe that the Treme Improvement Political Action Society violated 2 U.S.C. §§ 433 and 434 by failing to register with the Commission and file reports showing the expenditure of \$7,500 on behalf of Sanford Krasnoff in 1977.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at (202) 523-4060 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



30040184337

January 19, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached Interim Invest Report on
MUR 596 distributed to the Commission.

Thank you.

3004013439

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Krasnoff for Congress)
Committee, et al.)

MUR 596

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on January 18, 1979, the Commission meeting in an executive session at which a quorum was present, determined by a vote of 5-0 to adopt the recommendation of the General Counsel to find probable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C. §§437b(a)(1) and 432(b) and authorize the Office of the General Counsel to file suit in this matter.

Commissioners Aikens, McGarry, Springer, Thomson and Tiernan were present and voted affirmatively for this determination. Commissioner Harris was not present.

Attest:

1/19/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

30043184370

January 16, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

30740184321
Please have the General Counsel's Report on MUR 596, which was approved by the Commission on January 12, 1979, placed on the compliance agenda for January 18, 1979. The report should have been placed on the agenda originally and not circulated on a 48 hour tally basis.

Thank you.

January 19, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached General Counsel's
Report distributed to the Commission on a 48 hour
tally basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
CLERK
BY

In the Matter of)
)
Krasnoff for Congress)
Committee, et al.)

79 JAN 10 AM 11:04
MUR 596

GENERAL COUNSEL'S REPORT

On October 4, 1978, the Commission found reasonable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account; and 2 U.S.C. § 432(b) by commingling campaign funds with the personal funds of the candidate. At the same time the Commission also found reason to believe that the Martin Luther King Political Club, Tremé Improvement Political Society, Community Organization for Political Education, HELP, Inc., Sons of Desire, Inc., Development Association for Wards and the Political Action Caucus violated 2 U.S.C. §§ 433 and 434 by failing to register and report with the Commission.

As of the date of this report, the Office of General Counsel has received no response from Mr. Krasnoff concerning the conciliation agreement he has received. Several telephone calls have been made to his offices; however, the staff has been unable to speak with him. Mr. Krasnoff has not returned calls as requested except that, in one instance, his secretary called to say that he would soon be in contact with this office but that he had been sick for some time. Due to the respondent's failure to cooperate with the conciliation efforts of this Office, the Office of General Counsel

3004184394

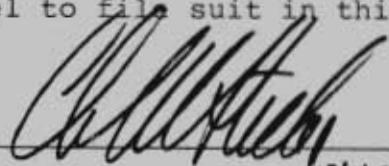
recommends that the Commission find probable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C. §§ 437b(a)(1) and 432(b).

Insofar as the other respondents in this matter are concerned, the Office of General Counsel makes no recommendation at this time. The Martin Luther King Political Club and the Sons of Desire have sent reports to this office which, although deficient in some respects, do substantially demonstrate their good faith efforts to comply. This Office has been in frequent contact with the remaining committees (except for one which this office has been unable to reach by mail or telephone) all of whom are preparing the reports we have requested. These respondents have pledged to submit reports by the first week of January. If these respondents do not submit reports by then, this Office plans to recommend that the Commission find reasonable cause to believe they have violated 2 U.S.C. §§ 433 and 434.

RECOMMENDATION

Find probable cause to believe that Krasnoff for Congress Committee violated 2 U.S.C. §§ 437b(a)(1) and 432(b) and authorize the Office of General Counsel to file suit in this matter.

9 January 1979
Date



William C. Oldaker
General Counsel

3001194395

RECEIVED
POLITICAL ACTION CAUCUS

Dear Ms Lindsey

79 JUN 10 PM 11:33

The Balance of money after campaign expenses in Mr Krasnoff behalf was four hundred + fifty four dollars.

Of that sum four hundred + thirty five was contributed to the Close Up Foundation sponsoring one highschool student on a work-study trip to Wash, D. C.

I have enclosed a copy of the check for records. This may also be verified with the Close Up Foundation, Headquartered in Wash, D. C. Please feel free to contact me should you require any additional information.

3001184309

Respectfully

900147

Mr. Seary

Political Action Caucus

11

81377

846216

PAY TO THE ORDER OF

Close Up Foundation

Nov 26 19 *77* ¹⁴⁻²¹⁰ ₆₅₀

\$ *435.00*

The sum of

DOLLARS

GENTILLY OFFICE
Liberty Bank
AND TRUST CO.
1008 GENTILLY BLVD. NEW BRUNSWICK, N.J. 08901

FOR

Work Study (Amy...) *Matthew Suarez*
Down...

⑆0650⑉0210⑆ 02 11 274-5 "0000043500"

3081378

CANK. P.O.
RICHMOND
0003-3

FOR DEPOSITION ONLY

DEC 06 1977

USE UP FOUR

DONATIONS A/C
NBW # 4 631 003

1977

PAY AND BANK. P.O.
RICHMOND
0010-0003-3

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N.D.C.
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K. BRIAN

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FRS ASSOCIATION
0570-000

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).
 (See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed POLITICAL ACTION CAUCUS	2 Identification Number
(b) Address (number and street) 1538 N. TONTI ST.	3 Date 12/30/78 ELECTION 8/27/77
(c) City, State and ZIP code N.O., LA. 70119	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:
 (a) This committee has been designated as the principal campaign committee for **SANFORD KRASNOFF** (Name of Candidate)
 a candidate for **U.S. HOUSE OF REPRESENTATIVE** in the **8/27/77** Election (Year of election)
 to be held in the State of **LOUISIANA** (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by **SANFORD KRASNOFF** (Name of Candidate)
 to receive contributions and make expenditures with respect to the **GENERAL** Election(s)
 held in **8/27/77** (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, **N/A** (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2)

(c) This committee supports only one candidate **SANFORD KRASNOFF** but is not an authorized committee. (Name of Candidate)
 (d) This committee supports more than one Federal candidate and is not a party committee.
 (e) This committee is a **CITY** committee of the **N/A** Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
NONE		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
 Corporation Labor organization Membership organization Trade association Cooperative
 Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

3371194373

Statement of Organization ~~F~~ a Committee

FEC Form 1
 July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

(Page 3)

Name of Committee **POLITICAL ACTION CAUCUS**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
MRS. DONNA SWANSON	1858 BRUTUS ST.	CHAIR PERSON
MRS. GWENDOLYN CARRIERE	4400 ALLEN ST.	SECRETARY
MR. IRAN MARTIN	3015 DUMAINE ST.	TREASURER

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
 (If "Yes" for how long? N/A)

13 In the event of dissolution, what disposition will be made of residual funds? GIVEN TO A CHARITABLE ORGANIZATION IN NEW ORLEANS

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:
LIBF

Name of bank, repository, etc.	Mailing address and ZIP code
LIBERTY BANK & TRUST	3939 TULANE AVE. N.O., LA. 70119

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
NONE			

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.
Math A. Moore 12-30-77
 (Signature of Treasurer) PRESIDENT (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441j (see instructions).

For further information contact: Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

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Statement of Organization For a Committee

(Page 2)

Name of Committee **POLITICAL ACTION CAUCUS**

- 7 Area, Scope and Jurisdiction of Committee:
- (a) Will this committee operate in more than one State? Yes No
 - (b) Will it operate on a statewide basis in one State? Yes No
 - (c) Will it primarily support candidates seeking State or local office? Yes No
 - (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
SANFORD KRASNOFF	4964 CHRYSLER ST. N.O., LA 70127	HOUSE OF REPRESENTATIVE	INDEPENDENT

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
N/A			

9 If this committee is supporting the entire ticket of a party, give name of party **NO**

10 Identify by name, address and position, the person in possession of committee books and records.

Full name	Mailing address and ZIP code	Title or position
MR. MATT SUAREZ	1538 N. TONTI ST. N.O., LA. 70119	PRESIDENT

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
<p>SANFORD ^{KRASNOFF} KRASNOFF</p>			
<p>Full Name, Mailing Address and ZIP Code</p> <p>SANFORD KRASNOFF 4964 CHRYSLER ST. N.O., LA. 70127</p>	<p>Principal Place of Business</p> <p>LAW OFFICE 4030 CANAL ST. N.O., LA. 70119</p> <p>Occupation</p> <p>ATTORNEY AT LAW</p>	<p>Date (month, day, year)</p> <p>8/77</p>	<p>Amount of each Receipt this Period</p> <p>2800.00</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input checked="" type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>Receipt for</p> <p><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other</p>	<p><input type="checkbox"/> Check if Contributor is self-employed</p> <p>Aggregate Year-To-Date . . . \$</p>		
<p>Full Name, Mailing Address and ZIP Code</p>	<p>Principal Place of Business</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of each Receipt this Period</p>
<p>SUBTOTAL of receipts this page (optional)</p>			\$
<p>TOTAL this period (last page this line number only)</p>			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Name of Candidate or Committee in Full			
POLITICAL ACTION CAUCUS			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
GENOVESE PRINTING Co. 1300 FRENCHMAN ST. N.O., LA.	PRINTING Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/77	1100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
HAC P. WINN	T-SHIRTS FOR POLL WATCHERS Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/77	106.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
180 DIFFERENT WORKERS	CANVASSER & POLL WORKERS Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/77	950.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MRS. DONNA SWANSON 1858 BRUTUS ST. N.O., LA.	GAS & TRANSPORTATION COST Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/77	100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MR. MATT SUAREZ 1538 N. TONTI ST. N.O., LA. 70119	TRANSPORTATION COST Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/77	100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$

REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 POLITICAL ACTION CHUCUS

Name of Candidate or Committee (in full)

1538 N. TONTI ST.

Address (number and street)

NEW ORLEANS, LA. 70119

City, State and ZIP Code

Check if address is different than previously reported.

2 I.D. No. _____

Candidate/Committee

3 U.S. HOUSE OF REPRESENTATIVES

Office Sought, State/District (if applicable)

Year of Election 1977

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report

Tenth day report preceding _____ election
 (primary, general or convention)

Termination Report

July 10 Quarterly Report

on _____ in the State of _____
 (date)

Amendment for:

October 10 Quarterly Report

Thirtieth day report following _____ election
 (primary, general or convention)

(which report)

January 31 Annual Report

Monthly Report _____
 (month)

on _____ in the State of _____
 (date)

This is a report for

Primary Election

General Election

Primary and General

Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5 Covering Period <u>8/27/77</u> Through _____	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 _____		\$ _____
7 Cash on hand at beginning of reporting period	\$ <u>2800.00</u>	
8 Total receipts (from line 19)	\$ <u>2800.00</u>	\$ _____
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ _____	\$ _____
9 Total expenditures (from line 25)	\$ <u>2356.00</u>	\$ _____
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>444.00</u>	\$ _____
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ <u>- 0 -</u>	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ <u>- 0 -</u>	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ <u>- 0 -</u>	

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

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAIL SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
POLITICAL ACTION CAUCUS	FROM: GENERAL ELECTION	TO: 8/27/77
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$ 2800.00	
(b) Unitemized	\$	
(c) Sales and collections included above: List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions from individuals	\$ 2800.00	\$
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount)	\$ -0-	
(b) Funds from other committees (Itemize on Schedule A regardless of amount)	\$	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)	\$ -0-	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	\$
16. Other Income:		
(a) Itemized (use Schedule A)	\$ -0-	
(b) Unitemized	\$	
(c) Subtotal of other income	\$ -0-	\$
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ -0-	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$ -0-	\$
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns of deposits	\$ -0-	\$
19. Total Receipts	\$ 2800.00	\$
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ 2356.00	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
22. Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount)	\$	
(b) To other committees (Itemize on Schedule B regardless of amount)	\$	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)	\$	
(d) Subtotal of transfers out	\$	\$
23. Independent Expenditures (use Schedule E)	\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)	\$	\$
25. Total Expenditures	\$ 2356.00	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$ 2800.00	
27. Transfers In (from line 15(a))	\$ -0-	
28. Net Receipts (Subtract line 27 from line 26)	\$ 2800.00	
29. Total Expenditures (from line 25)	\$ 2356.00	
30. Transfers Out (from line 22(a))	\$	
31. Net Expenditures (Subtract line 30 from line 29)	\$ 2356.00	

D Action Caucus
Columbus St
New Orleans, La. 70119



PM
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Federal Election Commission
1325 K street, N.W
attn Claire Lindsey
Washington D.C.
20463

79 JAN 10 04 11:33

REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

600-4
6089

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 Development Association of Lake & Neighborhoods
 Name of Candidate or Committee (in full)
3305 Montague St
 Address (number and street)
New Orleans, La. 70124
 City, State and ZIP Code

2 I.D. No. 596
 Candidate/Committee
 3 House of Representatives
 Office Sought, State/District (if applicable)
 Year of Election 1977

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report
 July 10 Quarterly Report on _____ in the State of _____ (date)
 October 10 Quarterly Report
 January 31 Annual Report
 Monthly Report _____ on _____ in the State of _____ (month) (date)
- Tenth day report preceding _____ election (primary, general or convention)
 Thirtieth day report following _____ election (primary, general or convention)
- Termination Report
 Amendment for: _____ (which report) 900000
- This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>7-1-77</u> Through <u>9-30-77</u>		
6 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ <u>7.14</u>	
8 Total receipts (from line 19)	\$ <u>7534.00</u>	\$ <u>7534.00</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>7541.14</u>	\$ <u>7541.00</u>
9 Total expenditures (from line 25)	\$ <u>7469.00</u>	\$ <u>7469.00</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>72.14</u>	\$ <u>72.14</u>
11 Value of contributed items on hand to be liquidated (Attach itemized list) <u>\$ none</u>		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ <u>- 0</u>	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ <u>- 0</u>	

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

1-2-79
 (Date)

Oliver W. White
 (Typed Name of Treasurer or Candidate)

Oliver W. White
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

3071184407

ITEMIZED INDEPENDENT EXPENDITURES
FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full <i>Development Association of Wards & Neighborhoods</i>	I.D. No. <i>590</i>
Full Name, Mailing Address and ZIP Code <i>Edward W. White 3305 Monticourt St New Orleans La 70126</i>	Is this a Separate Report by a Committee filing on FEC Form 3a? <i>no</i>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.				
Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
<i>Victor King 3005 Beech St. New Orleans, La. 70126</i>	<i>supervising workers in 9th Ward</i>	<i>8-26-77</i>	<i>\$300.00 CK # 534</i>	
<i>Sally Lee 2915 Alton St. New Orleans, La. 70126</i>	<i>Preparing T and on election day</i>	<i>8-26-77</i>	<i>\$150.00 CK # 535</i>	
<i>George Jackson New Orleans, La. 70126</i>	<i>Printing of hand signs and buttons on election day</i>	<i>7-10-77 8-15-77 8-20-77</i>	<i>\$25.00 T.C. \$25.00</i>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
<i>Mrs. Louis Butler</i>	<i>Printing</i>	<i>8-26-77</i>	<i>\$150.00 CK # 535</i>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
<i>Summit Printing Co. 2401 Orleans Ave. New Orleans, La.</i>	<i>Printing</i>	<i>9-2-77</i>	<i>\$150.00 CK # 535</i>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
<i>Mrs. Jane New Orleans La.</i>	<i>Printing and computer materials</i>	<i>9-3-77</i>	<i>\$130.00 CK # 643</i>	
<i>Alton Gibson 2201 Caffin Ave. New Orleans, La.</i>	<i>For Rent 3048 Alton St.</i>	<i>9-15-77</i>	<i>\$250.00 CK # 649</i>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose
<i>South Central Bell Co. Inc. Accurate Data Systems N.O. La.</i>	<i>Telephone service</i>	<i>9-14-77</i>	<i>\$200.00 CK # 648</i>	
<i>Doris Turner - sub off at N.O. La.</i>	<i>Printing</i>	<i>9-15-77</i>	<i>\$375.00 CK # 653</i>	
<i>Mrs. Betty Lewis</i>	<i>Phone fabric</i>	<i>9-15-77</i>	<i>\$414.00 CK # 654</i>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
<i>Trinidad Sorrento</i>	<i>Telephone work</i>	<i>9-17-77</i>	<i>\$150.00 CK # 656</i>	
	<i>supervising workers for ward 9th ward and 5th ward</i>	<i>9-20-77</i>	<i>\$200.00 CK # 660</i>	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			<i>\$3364.00</i>	
(b) SUBTOTAL of Unitemized Independent Expenditures			<i>\$4105.00</i>	
(c) TOTAL Independent Expenditures			<i>\$7469.00</i>	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this *26th* day of

December, 1977

My Commission expires:

C. J. Carter

Herbert A. Cole
NOTARY PUBLIC

Edward W. White

Signature

1-2-78

Date

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE
Development Association of West & Northbrook

REPORT COVERING THE PERIOD
FROM: *4-1-77* TO: *9-30-77*

84139
3071

RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$	<i>7,534.00</i>	
(b) Unitemized	\$	<i>0</i>	
(c) Sales and collections included above: List by event on memo Schedule D (\$ _____)	\$		
(d) Subtotal of contributions from individuals	\$	<i>7,534.00</i>	\$
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount)	\$	<i>0</i>	
(b) Funds from other committees (Itemize on Schedule A regardless of amount)	\$	<i>0</i>	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)	\$	<i>0</i>	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	<i>0</i>	\$
16. Other Income:			
(a) Itemized (use Schedule A)	\$	<i>0</i>	
(b) Unitemized	\$	<i>0</i>	
(c) Subtotal of other income	\$	<i>0</i>	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$	<i>0</i>	
(b) Unitemized	\$	<i>0</i>	
(c) Subtotal of loans and loan repayments received	\$	<i>0</i>	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$	<i>0</i>	
(b) Unitemized	\$	<i>0</i>	
(c) Subtotal of refunds, rebates, returns of deposits	\$	<i>0</i>	\$
19. Total Receipts	\$	<i>7,534.00</i>	\$
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$	<i>3,364.00</i>	
(b) Unitemized	\$	<i>4,105.00</i>	
(c) Subtotal of operating expenditures	\$	<i>7,469.00</i>	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$	<i>0</i>	
(b) Unitemized	\$	<i>0</i>	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	<i>0</i>	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount)	\$	<i>0</i>	
(b) To other committees (Itemize on Schedule B regardless of amount)	\$	<i>0</i>	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)	\$	<i>0</i>	
(d) Subtotal of transfers out	\$	<i>0</i>	\$
23. Independent Expenditures (use Schedule E)	\$	<i>0</i>	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)	\$	<i>0</i>	\$
25. Total Expenditures	\$	<i>7,469.00</i>	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$	<i>7,534.00</i>	
27. Transfers In (from line 15(a))	\$	<i>0</i>	
28. Net Receipts (Subtract line 27 from line 26)	\$	<i>7,534.00</i>	
29. Total Expenditures (from line 25)	\$	<i>7,469.00</i>	
30. Transfers Out (from line 22(a))	\$	<i>0</i>	
31. Net Expenditures (Subtract line 30 from line 29)	\$	<i>7,469.00</i>	

Development Association of White & neighborhoods

ID 596

Sanford Krasnoff Campaign

Expenditures more than \$100.00

1. Victor Day. 3008 pres. St. New Orleans, La. 70126
Check # 534 - \$300.00; supervising workers in upper 9th
ward. 8-26-77.
2. Mrs. Sallie Lee 2918 Alvar St. New Orleans, La. 70126
Check # 535, 8-26-77 \$150.00; Preparing food for
workers on election day.
3. George Jackson
8-26-77, 9-10-77, 9-15-77; Putting up yard signs
putting out posters in upper 9th ward, Lower 9th ward
and 8th ward. over a period of 30 days \$525.00 Total
- 4 Mrs. Louise Butler
Check # 539, 8-26-77, \$150.00 Preparing food for workers
on election day.
- 5 Summit Printing Co. 2401 Orleans Ave. New Orleans
La. Check # 642, 661, \$150.00, \$460.00; 9-2-77, 9-21-77
- 6 Mrs. Mary Jones
Check # 643, \$130.00, 9-3-77; Passing out campaign
materials.
7. Alton Glasgow 2201 Caffin Ave. New Orleans
La. Check # 649, \$250.00, 9-15-77; Rent at 2644
Delius St.

Oliver W. White

1-2-79

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Development Association of Wards & Neighborhoods

ID 596

(Sanford Krasnoff Campaign

Expenditures more than \$100.00

(8. South Central Bell, New Orleans, La. Check # 645
9-14-77, \$200.00 Telephone Service.

9. Accurate Data Systems New Orleans La.
Check # 651 \$375.00; 9-15-77

Printing

10. Dixie Forms - Webb offset New Orleans, La.
1403 Annunciation St. Check # 654, \$414.00; 9-15-77
(for Sun labels.

11. Mrs. Betty Lewis New Orleans, La.
Check # 656; \$150.00; 9-19-77: For telephone work
during campaign.

12. Timothy Howard. New Orleans, La.
Check # 660 \$200.00; 9-20-77: For supervising leafletting
upper 9th ward & 8th ward.

(O. Lewis W. White

1-7-79

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
<i>Development Association of Ward 7 neighborhoods</i>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>Sanford Krasnoff 4030 Canal St. P.O. Box 19758 N.O. La. 70119</i>	<i>4030 Canal St.</i>	<i>8-17-77</i>	<i>7500.00</i>
Receipt for:	<input checked="" type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$ <i>7500</i>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional) ...			0
TOTAL this period (last page this line number only) ...			<i>\$7500.00</i>

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed <i>Development Association of Uptown Neighborhoods</i>	2 Identification Number 596 <i>596</i>
(b) Address (number and street) <i>3305 Montezut</i>	3 Date <i>1-2-79</i>
(c) City, State and ZIP code <i>New Orleans La. 70126</i>	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ (Federal office sought) in the _____ (Year of election) Election to be held in the State of _____ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ (General, Primary, Runoff, etc) Election(s) held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate *Sanford Krasnick* (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ (National, State, county, city) committee of the _____ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
<i>naul</i>		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Labor organization Membership organization Trade association Cooperative

Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

3307184414

Name of Committee
Development Association of Wardens' Neighborhoods

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
<i>Rev. Laurence Gault</i>	<i>1928 Pauline St. 70117</i>	<i>Chairman</i>
<i>Chas. W. White</i>	<i>3305 Montegut St. 70126</i>	<i>Treasurer</i>
<i>Mrs. Shirley Jefferson</i>	<i>3213 Arce St. 70126</i>	<i>Secretary</i>

12 Does this committee plan to stay in existence beyond the current calendar year? Yes, No
 if "Yes" for how long? Indefinite

13 In the event of dissolution, what disposition will be made of residual funds?

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
<i>The Bank of New Orleans and Trust Co.</i>	<i>P.O. Box 52499 New Orleans La. 70152</i>

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
<i>Reporting Officials - Election Campaign - Louisiana No.</i>	<i>30 days after election</i>	<i>L.R. Burris Legislative Auditor</i>	<i>P.O. Box 44364 Capital Station, Baton Rouge, La. 70804</i>

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

Chas. W. White

(Signature of Treasurer)

1-2-79

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441; (see instructions)

For further information contact:



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

30710194415

Name of Committee
Development Association of Wards and Neighborhoods

- 7 Area, Scope and Jurisdiction of Committee:
- (a) Will this committee operate in more than one State? Yes No
 - (b) Will it operate on a statewide basis in one State? Yes No
 - (c) Will it primarily support candidates seeking State or local office? Yes No
 - (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
Sanford Krasneff Sanford Krasneff	4964 Chrysler St. ^{apartment} 4030 Canal St. ^{office} N.E. Dist 19798 N.C. No. 70119	House of Rep.	Independent

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
none			

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
72201		

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization, indicate in the appropriate section above when information is continued on separate page(s).

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ver W. White
ontegut Street
eans, IA. 70126

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JUN 4

1979
JUN 4

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Federal Election Commission
1375 E. Street N.E.
Washington, D.C. 20463

Mod. 5/16
Lindsey

600-
5814

RECEIVED
COMMUNITY

Sons of Desire
3309 Desire Parkway
New Orleans, LA 70125 9:38
947-6629

808294

Dear Sir:

Here is a list of names of persons who worked for our organization during the campaign.

- | | |
|-----------------------|------------------------|
| 1. Sidney Duplessis | 23. Charlene Baker |
| 2. Leonard Ceasar | 24. Lillian Bernard |
| 3. Edward Allen | 25. Silesia Duplessis |
| 4. Evelyn Dixon | 26. Lloyd Shepard |
| 5. Seitha Duplessis | 27. Melvina Kemp |
| 6. Cindy Duplessis | 28. Alphonse Stevenson |
| 7. Freddie Thomas | 29. Melvin Paul |
| 8. Cedric Duplessis | 30. Henn Robinson |
| 9. Yvonne Hebert | 31. James Howard |
| 10. Randolph Vicent | 32. Tyrone Williams |
| 11. Leonard Hebert | 33. Larry Duroseau |
| 12. Gregory Moses | 34. Yvette Joseph |
| 13. Roginald Moses | 35. Carol Thomas |
| 14. Yvette Johnson | 36. Aria Tilbert |
| 15. Rose Taylor | 37. Robert LeBlanc |
| 16. Cyril Duplessis | 38. Westley Phillips |
| 17. Stanley Bernard | 39. Caldin McElveen |
| 18. Rosta Richardson | 40. Ronald Ceasar |
| 19. Willie Henderson | 41. Dorothy Smith |
| 20. Bernard Duplessis | 42. Gilliam Donaldson |
| 21. Robin Spears | 43. Clarence Williams |
| 22. Joyce Smith | 44. Herbert Braggs |

8001134419

*Sidney
Duplessis*

Sons of Desire
3309 Desire Pky.
New Orleans, LA 70126
947-6629

Dear Mr. Krasnoff:

At our present board meeting of the Sons of Desire, the organization decided to support you as its candidate for the First Congressional District for the upcoming election to be held on Saturday, August 27, 1977.

Here is a schedule of events, work structure and budget. At your approval, we will begin work immediately.

1. Voter Registration Drive - August 18 and 19.
2. Two community house meeting with you in attendance.
(date to be scheduled at your convenience)
3. One (1) mass community rally with you in attendance.
(date to be scheduled at your convenience), music and refreshment.

WORK LOAD & BUDGET

Two (2) secretaries \$400.00

Put up posters on lawn, post, resident houses and windows in District #101. 30 workers - \$600.00

Canvassing District #101 on Saturday, August 13, 1977 and Saturday, August 20, 1977.

Canvassing Gentilly Shopping Center, Schwegmann's Bro. Supermarket.

50 workers at \$20.00 a day - 2 days	\$1000.00
Telephone Bank - 6 people 24 hrs. each	500.00
Mail out	500.00
Bailot	500.00
2 vans for transporting people to the polls on election day	100.00
	<hr/>
	2600.00

99017194419

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).
 (See Reverse Side For Instructions.)

FILED
 FEDERAL ELECTION
 COMMISSION

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

18 DEC 7 AM 9:39

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed <i>Sons of Pleisic</i>	2 Identification Number
--	--------------------------------

(b) Address (number and street) <i>New 3309 Pleisic Pkwy</i>	3 Date <i>Nov 29 1978</i>
--	-------------------------------------

(c) City, State and ZIP code <i>New Orleans, La 70126</i>	4 Is this an amended statement <input type="checkbox"/> Yes <input type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE
---	--

5 Check one:

(a) This committee has been designated as the principal campaign committee for *Sandy Kraftnoff* (Name of Candidate) a candidate for *Congressman* (Federal office sought) in the *1976* (Year of election) Election to be held in the State of *Louisiana* (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by *Sandy Kraftnoff* (Name of Candidate) to receive contributions and make expenditures with respect to the *Primary* (General, Primary, Runoff, etc) Election(s) held in *Louisiana* (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, *Sons of Pleisic* (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate *Sandy Kraftnoff* (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ committee of the _____ Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Labor organization Membership organization Trade association Cooperative
 Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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Statement of Organization For a Committee

(Page 2)

Name of Committee

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
- (b) Will it operate on a statewide basis in one State? Yes No
- (c) Will it primarily support candidates seeking State or local office? Yes No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

30347184421

Name of Committee

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
<i>Sidney Kuylessan</i>	<i>3309 Reside 70124</i>	<i>President</i>
<i>Leonard Bean</i>	<i>3254 Reside 70126</i>	<i>Vice President</i>
<i>Esther Johns</i>		<i>Secretary</i>

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
 If "Yes" for how long? *10 years or more*

13 In the event of dissolution, what disposition will be made of residual funds? _____

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
<i>Liberty Bank</i>	<i>Hentley and Greenwood</i>

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

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

Sidney Kuylessan
 (Signature of Treasurer)

Nov 29, 1978
 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441; (see instructions)

For further information contact:



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

87001341002



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS
DATE: DECEMBER 6, 1978
SUBJECT: MUR 596 - Interim Conciliation Report
dated 12-4-78; Received in
OCS: 12-4-78, 5:20

The above-named document was circulated on a 24
hour no-objection basis at 12:00, December 5, 1978.

The Commission Secretary's Office has received
no objections to the Interim Conciliation Report as of
1:00 this date.

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December 4, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached Interim Concil Report on
MUR 596 distributed to the Commission.

Thank you.

3 2 2 1 3 4 2 3

was actually sent in 1977. The remaining organizations, with the exception of one for which no current address or telephone listing can be located, have explained that they are in the process of assembling records from which to construct the reports we have requested.

This Office has been unable to reach Mr. Krasnoff to discuss the conciliation agreement which he was sent in October. We have reminded him in a letter dated November 21, 1978, of the Commission's power to file suit if this matter is not settled through conciliation. Mr. Krasnoff has not responded to that letter.

If we are unable to initiate conciliation with the Respondent within the near future, this Office will recommend that the Commission find probable cause in connection with this Respondent.

12/4/78
Date

William C. Oydaker
William C. Oydaker
General Counsel

5000134425



FEDERAL ELECTION COMMISSION

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

November 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sanford Krasnoff
4030 Canal Street
Post Office Box 19798
New Orleans, Louisiana 70119

Re: MUR 596

Dear Mr. Krasnoff:

This letter is to inform you that the Federal Election Commission is empowered to find probable cause to believe that:

- (1) the Krasnoff for Congress Committee violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account; and
- (2) that the Krasnoff for Congress Committee violated 2 U.S.C. § 432(b) by commingling campaign funds with your personal funds.

Upon making a finding of probable cause to believe these violations have occurred, the Commission may, under 2 U.S.C. § 437g(a)(5)(B), institute a civil suit against you.

You have been informed of these violations of the Act by our Audit Division in a letter of audit findings dated March 8, 1978. On June 13, 1978, you were informed by the Office of General Counsel that the Commission had found reason to believe that you violated the above-named sections of the Act. In a letter dated October 6, 1978, the Office

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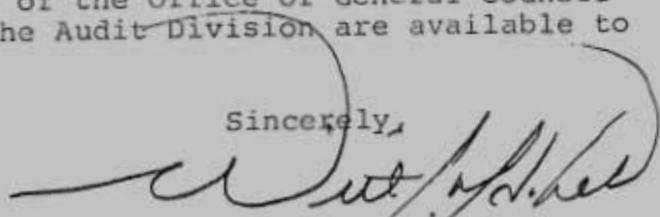
of General Counsel informed you that the Commission had found reasonable cause to believe that you had violated these sections of the Act. A conciliation agreement was enclosed with that letter which further specified the violations in question and the action to be taken by you to bring yourself into compliance.

We advise you, therefore, to submit within 7 days of receipt of this letter the materials we have requested; that is, a copy of a cancelled check for \$500 from Steven Plotkin, a copy of a Bank of New Orleans certified check to the Postmaster for \$2,300, identification of the source of \$33,911.09 in receipts deposited to your personal checking account and finally an amended report showing a \$3,000 expenditure to D.A.W.N. on August 16, 1977.

Failure to comply with this request may result in the Office of General Counsel making a recommendation to the Commission that probable cause to believe be found in this connection and that a civil suit be instituted against you.

Both Clare Lindsay of the Office of General Counsel and Russell Bruner of the Audit Division are available to assist you.

Sincerely,



William C. Oldaker
General Counsel

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LAW OFFICES
DOUGLAS, NABONNE & WILKERSON
418 COMMON STREET
NEW ORLEANS, LOUISIANA 70180

NILS R. DOUGLAS
RONALD P. NABONNE
WALTER J. WILKERSON
OKLA JONES, II
IVAN L. R. LEMELLE

NOV 6 A10:00

AREA CODE 504
TELEPHONE 528-5197

November 1, 1978

807652

Attn. Clara Lindsay
Federal Election Commission
1325 K. Street N.W.
Washington, D.C.

RE: MUR 596

Dear Ms. Lindsay:

Enclosed please find photo of report which we sent to your office some time ago. Please let me know whether this satisfies your requirements.

Sincerely,


Nils R. Douglas

NRD/amg

30010134419

of a Political Committee
other than a Principal Campaign Committee

(See reverse side for instructions)

Note: Committees authorized to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate (in full) SANFORD KRASNOFF	2 Identification Number (Commission use only) NOV 6 1977	3 Party Affiliation Independent - Democrat
(b) Address (number and street) 4964 Chrysler St.	4 Office Sought Representative First Congressional/	District District
(c) City, State and ZIP code New Orleans, La. 70127	5 District and State of Candidate New Orleans, La.	

6 I hereby authorize the following named political committee to receive contributions and make expenditures on my behalf in support of my candidacy in the General election(s) held in 1977
(General, Primary, Runoff) (Year of election)

(a) Name of Committee (in full) Martin Luther King Political Club
(b) Address (number and street) 418 Common Street, New Orleans, La.
(c) City, State and ZIP code New Orleans, La. 70113

7 I hereby designate the following national and/or State bank(s) as campaign depository(ies) to be used by the above political committee.

(a) Name of Bank (in full)	(a) Name of Bank (in full)
(b) Address (number and street)	(b) Address (number and street)
(c) City, State and ZIP code	(c) City, State and ZIP code
(a) Name of Bank (in full)	(a) Name of Bank (in full)
(b) Address (number and street)	(b) Address (number and street)
(c) City, State and ZIP code	(c) City, State and ZIP code

8 This committee's receipts and expenditures will be filed with _____ (Name of Principal Campaign Committee)
_____, my designated principal campaign committee for the above election(s)

Sanford Krasnoff (Signature of Candidate) 12-6-77 (Date)

For further information contact: Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Notice

A candidate for Federal office must complete this Statement of Authorization for each committee, other than a principal campaign committee, which is authorized by the candidate to receive contributions and make expenditures on his behalf.

One copy of the statement should be maintained by the Principal Campaign Committee, one by the treasurer of the authorized committee and one copy should be filed with the Commission, the Clerk of the House, or the Secretary of the Senate, as appropriate.

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed</p> <p>Martin Luther King Political Club</p> <p>(b) Address (number and street)</p> <p>418 Common Street</p> <p>(c) City, State and ZIP code</p> <p>New Orleans, Louisiana 70130</p>	<p>2 Identification Number</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election? Run-Off on 8/27/77</p> <p>(general, primary, runoff) (date)</p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input type="checkbox"/> Amendment For _____ (Which report)</p> <p>(b) <input type="checkbox"/> April 10 Quarterly Report</p> <p>(c) <input type="checkbox"/> July 10 Quarterly Report</p> <p>(d) <input type="checkbox"/> October 10 Quarterly Report</p> <p>(e) <input type="checkbox"/> January 31 Year-End Report</p> <p>(f) <input type="checkbox"/> Monthly Report _____ (Month)</p> <p>(g) <input checked="" type="checkbox"/> Termination Report</p> <p>(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ (date) in the State of _____ (primary, general or convention)</p> <p>(i) <input type="checkbox"/> Thirtieth day report following _____ election on 8/27/77 (date) in the State of Louisiana (primary, general or convention)</p>	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From _____ Through **September 20, 1977**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		\$ 0
7 Cash on hand at beginning of reporting period	\$ 0	
8 Total receipts (from line 19)	\$ 7,500.00	\$ 7,500.00
(a) Subtotal (Add lines 7 and 8)	\$ 7,500.00	\$ 7,500.00
9 Total expenditures (From line 25)	\$ 7,207.00	\$ 7,207.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 293.00	\$ 293.00
11 Contributed items on hand to be liquidated (attach itemized list)	\$ _____	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$ _____	\$ _____
13 Refunds and Rebates (from line 17)	\$ _____	\$ _____
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$ _____	\$ _____
(b) Expenditures from prior years subject to limitation		\$ _____
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$ _____

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

 (Date) **9/20/77**

(Typed Name of Treasurer or Candidate) _____ (Signature of Treasurer or Candidate) _____

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g or §441 (See reverse side of form)

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

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Election Commission
Street, N.W.
ton, D.C. 20463

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM:	TO:
PART I - RECEIPTS	Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:		
(a) Itemized (use Schedule A)	\$ 7,500.00	
(b) Unitemized	\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$		
(d) Subtotal of contributions and other income	\$ 7,500.00	\$ 7,500.00
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$ 7,500.00	\$ 7,500.00
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$ 7,207.00	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$ 7,207.00	\$ 7,207.00
21 Independent Expenditures (use Schedule E)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$ 7,207.00	\$ 7,207.00
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$ 7,500.00	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$ 7,500.00	
31 Total Expenditures (from line 25)	\$ 7,207.00	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$ 0	

Schedule A

1976
Federal Election Commission
1100 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17, and/or 18 of FEC Form-3**
(see instructions on back)

Page 1 of 1 for

LINE NUMBER 15a

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
MARTIN LUTHER KING POLITICAL CLUB			
Full Name, mailing address and ZIP code			
Sandy Krasnoff		8/19/77	5,000.00
Principal place of business		8/23/77	2,500.00
Occupation (Candidate for Attorney Congress)			
<input checked="" type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$ 7,500.00			
Full Name, mailing address and ZIP code			
Principal place of business			
Occupation			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$			
Full Name, mailing address and ZIP code			
Principal place of business			
Occupation			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$			
Full Name, mailing address and ZIP code			
Principal place of business			
Occupation			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$			
Full Name, mailing address and ZIP code			
Principal place of business			
Occupation			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$			
Full Name, mailing address and ZIP code			
Principal place of business			
Occupation			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date \$			
Subtotal of receipts this page (optional)			\$ 7,500.00
Total this period (last page this line number only)			\$ 7,500.00

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(Use separate schedule(s) for each numbered line)

(See Instructions on back)

Name of Candidate or Committee in full

MARTIN LUTHER KING POLITICAL CLUB

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Post Office New Orleans, La.	Permit, meter & Calendar year fees Postage	8/23/77 8/23/77	\$100.00 \$2,250.00
City of New Orleans	Voter Service	8/23/77	\$420.00
Al Torregano 2424 N. Miro Street New Orleans, Louisiana	Printing of Campaign Literature	8/23/77 8/26/77	\$954.00 \$588.00
Election Day Expense	Campaign Canvassers, Food & Transportation	8/27/77	\$2,545.00
Telephone Operators	Phoning voters	8/27/77	\$350.00
Subtotal of expenditures this page (optional)			\$ 7,207.00
Total this period (last page this line number only)			\$ 7,207.00

L. Ashby (X) 5431

57125 Montegut St.
New Orleans, La. 70126

'79 NOV 1 DE 22:213, 1978

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

Re: MUR 596

807550

Mr. William C. Elaker
General Counsel

Dear Sir:

In reply to your letter of Oct. 6, 1978 regarding the S. A. W. N. Organization and the Krasnoff for Congress Committee.

The Krasnoff Comm. did give Organization # 7,500 in August of 1977. We did work for Mr. Krasnoff's election.

We were under the impression that we would report to the Krasnoff Comm. and, in turn would report to the Commission.

We are anxious to clear up the misunderstanding as soon as possible.

Please advise the steps to be taken.

Yours truly

E. L. White

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Obispo W. White
3305 Montegut St.
New Orleans, La. 70121



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

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: OCTOBER 30, 1978
SUBJECT: MUR 596 Interim Report dated 10-26-78
 Received in Office of Commission
 Secretary: 10-27-78, 2:24

The above-named document was circulated on a 24
hour no-objection basis at 4:30, October 27, 1978.

The Commission Secretary's Office has received
no objections to Interim Report as of 4:30 this date.

30740131437

October 27, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

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Please have the attached Interim Report on MUR 596 distributed to the Commission.

Thank you.

RECEIVED
OFFICE OF THE

In the Matter of)
Krasnoff for Congress, et.al)

MUR 596

78 OCT 27 P 2: 24

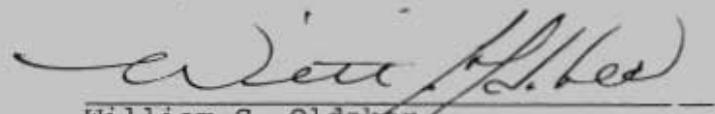
INTERIM REPORT

On October 4, 1978, the Commission found reasonable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C §437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account; 2 U.S.C. § 432(b) by commingling campaign funds with the personal funds of the Candidate. The Commission also found reason to believe that the Martin Luther King Political Club, Treme Improvement Political Society, Community Organization for Political Education, HELP, Inc., Sons of Desire, Inc., Development Association for Wards and the Political Action Caucus violated 2 U.S.C. §§ 433 and 434 by failing to register and report with the Commission.

Several of the respondent political organizations have received their letters of notification as evidenced by the return receipt cards. The treasurer of the Community Organization for Political Educaiton has called this office and expressed his desire to cooperate and file reports.

This office has attempted to reach Sanford Krasnoff to discuss conciliation however he has not as yet returned our calls.

10/26/78
Date


William C. Oldaker
General Counsel

30740134433



FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank Spears
COPE
2313 Gallier Street
New Orleans, LA 70117

Re: MUR 596

Dear Mr. Spears:

This letter is to notify you that on the basis of information received in the normal course of carrying out its regulatory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report contributions to a political committee.

It has come to the attention of the Community Organization for Political Education, received \$2,600 and \$1,500 from the Krasnoff for Congress Committee on August 17, 1977 and August 26, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose to canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Community Organization for Political Education, are obligated under 2 U.S.C. §§ 433 and §434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

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If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30040134441

C. Lindsay *MUR 596*

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. 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: *Mr. Frank Spears*
COPE
2313 Gallier Street
New Orleans, La. 70117

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943705</i>	

*(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. *Frank A. Spears*

DATE OF DELIVERY *10/21/78*

5. ADDRESS (Complete only if requested)

2313 Gallier St

6. UNABLE TO DELIVER BECAUSE

POSTMARK: *8/61 1978*

CLERK'S INITIALS: *SS*

☆GPO: 1977-0-240-096

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank Spears
COPE
2313 Gallier Street
New Orleans, LA 70117

Re: MUR 596

Dear Mr. Spears:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that Community Organization for Political Education received \$2,000 and \$1,500 from the Krasnoff for Congress Committee on August 17, 1977 and August 26, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose to canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Community Organization for Political Education, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30010184412

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30010184443



FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Political Action Caucus
1538 N. Tonti Street
New Orleans, LA 70119

Re: MUR 596

Dear Sir:

This letter is to notify you that on the basis of information available to the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization in violation of 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, "FECA", has acted as a political committee.

It has come to the attention of the Federal Election Commission that the Political Action Caucus received \$2,000 and \$1,000 from the Krsdnoff for Congress Committee on August 13, 1977 and August 26, 1977 respectively and expended this money on behalf of the Krsdnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Political Action Caucus, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30040184444

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Political Action Caucus
1538 N. Tobti Street
New Orleans, EA 70119

Re: MUR 596

Dear Sir:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that Political Action Caucus received \$2,000 and \$850 from the Krasnoff for Congress Committee on August 13, 1977 and August 26, 1977 respectively and expended this money on behalf of the Krsdnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under ~~the~~ Act, such as Political Action Caucus, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30043134416

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30710134417



FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Parkway
New Orleans, LA 70122

Re: MUR 596

Dear Mr. Duplessis:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has been determined that Sons of Desire, Inc. received \$2,000 on 8-29-77 from the Krasnoff for Congress Committee on August 19, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Sons of Desire, Inc., are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30740131413

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Parkway
New Orleans, LA 70122

Re: MUR 596

Dear Mr. Duplessis:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that Sons of Desire, Inc. received \$2,000 and \$600 from the Krasnoff for Congress Committee on August 19, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Sons of Desire, Inc., are obligated under 2 U.S.C. §§ 433 and §434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

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If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miss Dorothy Berthey
HELP, Inc.
3411 Paris Avenue
New Orleans, LA 70122

Re: MUR 596

Dear Miss Berthey:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434. The Federal Election Commission has determined that you have failed to register and report your activities as a political committee.

It has been determined that your organization has received \$500, \$500 and \$500 from the Krasnoff for Congress Committee on August 21, 1977, August 25, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as HELP, Inc., are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30940131452

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If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30740184453

C. Lindsay *MUR 596*

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Also 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: *Miss Dorothy Berthel*
HELP, Inc.
3411 Paris Avenue
New Orleans, LA 70122

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 443706

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
OCT 23 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE OF _____ CLERK'S INITIALS _____

NEW ORLEANS, LA 70119
 OCT 23 1978

★SPC 1977-0-249-006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miss Dorothy Berthey
HELP, Inc.
3411 Paris Avenue
New Orleans, EA 70122

Re: MUR 596

Dear Miss Berthey:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that HELP, Inc. received \$300, \$600 and \$400 from the Krasnoff for Congress Committee on August 21, 1977, August 26, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as HELP, Inc., are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

37013434

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30041184455



FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treme Improvement Society
c/o Norman Smith
1615 St. Philip Street
New Orleans, LA 70116

Re: MUR 596

Dear Mr. Smith:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 431 and 434 of the Federal Election Campaign Act of 1971, by failing to disclose on its campaign activities and political activities.

It has come to our attention that the Treme Improvement Society received \$5,000 and \$1,500 from the Krasnoff for Congress Committee in August, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Treme Improvement Society, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30040134456

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

30040194457

C. Lindsay *MUR 596*

PS Form 3811, Nov 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 \$
 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: *Trane Improvement Society c/o Norman Smith*
1615 St. Philip Street
New Orleans, LA 70116

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943702

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
OCT 23 1978 *NEW ORLEANS, LA OCT 23 1978*

5. ADDRESS: (Complete only if registered)
1715 St. Philip St.

6. UNABLE TO DELIVER BECAUSE
 CARRIERS CLERK'S INITIALS

★ Form 3811-0-249-606

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treme Improvement Society
c/o Norman Smith
1615 St. Philip Street
New Orleans, LA 70116

Re: MUR 596

Dear Mr. Smith:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that Treme Improvement Society received \$6,000 and \$1,500 from the Krasnoff for Congress Committee on August 16, 1977 and August 25, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Treme Improvement Society, are obligated under 2 U.S.C. §§ 433 and §434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

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If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

30040184459



FEDERAL ELECTION COMMISSION

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

October 19, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nils Douglas
Martin Luther King Political Club
418 Common Street
New Orleans, LA 70130

Re: MUR 596

Dear Mr. Douglas:

This letter is to notify you that on the basis of information received in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your political committee, Martin Luther King Political Club of the City of New Orleans, Louisiana, 1709 Poydras Street, New Orleans, Louisiana, by failing to register and report your political committee's activities.

It has come to our attention that Martin Luther King Political Club received \$2,500 and \$3,000 from the Krasnoff for Congress Committee on August 25, 1977 and August 17, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Martin Luther King Political Club, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

30741194130

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

30041184151

Lindsay *MUR-596*

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: *Mr. MLK Douglas*
Martin Luther King Political
418 Common Street
New Orleans LA. 70130

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *943701* CERTIFIED NO. _____ INSURED NO. _____
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *10/24* POSTMARK *NEW ORLEANS LA 10/24*

5. ADDRESS (complete only if registered)
418 Common Street
New Orleans LA 70130

6. UNABLE TO DELIVER BECAUSE _____
 CLERK'S INITIALS _____

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

★GPO: 1977-0-245-585

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nils Douglas
Martin Luther King Political Club
418 Common Street
New Orleans, LA 70130

Re: MUR 596

Dear Mr. Douglas:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that Martin Luther King Political Club received \$2,500 and \$5,000 from the Krasnoff for Congress Committee on August 25, 1977 and August 17, 1977 respectively and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distribution of literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.

Political committees as defined under the Act, such as Martin Luther King Political Club, are obligated under 2 U.S.C. §§ 433 and 434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

300181433

If you have any questions please contact Clare Lindsay,
the staff member assigned to this matter at 202-523-4006.

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

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

October 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oliver W. White, Treasurer
D.A.W.N.
3413 Press Street
New Orleans, Louisiana

Re: MUR 596

Dear Mr. White:

This letter is to notify you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that your organization has violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act, ("the Act") as amended, by failing to register and report your activities as a political committee.

It has come to our attention that D.A.W.N. received \$7,500 from the Krasnoff for Congress Committee in August 9, 1977 and expended this money on behalf of the Krasnoff for Congress Committee for the purpose of canvassing, and distributing literature and yard signs.

Under 2 U.S.C. § 431(d) a political committee is any committee, club association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000 for the purpose of influencing the nomination for election, or election, of any person to Federal office.



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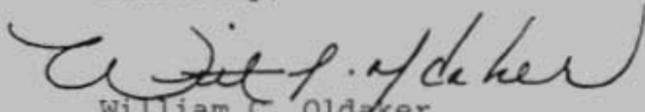
Political committees as defined in the Act, such as D.A.W.N., are obligated under 2 U.S.C. §§ 433 and §434 to register and report their activity to the Federal Election Commission.

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. Failure to respond to this letter may cause the Commission to take further action based on the information at hand.

If you have any questions please contact Clare Lindsay, the staff member assigned to this matter at 202-523-4006.

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

Sincerely,


William C. Oldaker
General Counsel

cc: Sanford Krasnoff
4030 Canal Street
P.O. Box 19798
New Orleans, Louisiana 70119

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MJR 596 LINDSAY

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. _____ \$
 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:
 SANFORD KRASNOFF
 # 030 CANAL ST.
 NEW ORLEANS LA 70119

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943514

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO: 1977-0-249-595

MJR 596 LINDSAY

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. _____ \$
 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:
 OLIVER W. WHITE
 P.A.W.N.
 3413 PRESS ST. N.O. LA

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
 10-16-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO: 1977-0-249-595



FEDERAL ELECTION COMMISSION

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

October 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sanford Krasnoff
4030 Canal Street
P.O. Box 19798
New Orleans, LA 70119

Re: MUR 596

Dear Mr. Krasnoff:

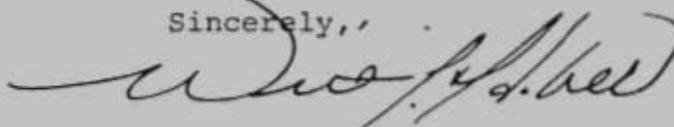
This letter is to notify you that on October 5, 1978, the Commission found reasonable cause to believe the Krasnoff for Congress Committee violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account. The Commission also found reasonable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C. § 432(b) by commingling campaign funds with your personal funds.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

3 7 7 4) 1 3 4 4 6 7

Enclosed, please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at 800-424-9530, ext. 50, to discuss your objections to this agreement.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

30047134469

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Krasnoff for Congress Committee) MUR 596
)
)
)

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Krasnoff for Congress Committee (hereinafter referred to as "Respondent",) violated: 1) 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account; and 2) 2 U.S.C. § 432(b) by commingling campaign funds with the Candidate's personal funds.

WHEREFORE, the Commission and Respondent having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

300181459

A. Respondent was informed of the above-mentioned instances of non-compliance with the Federal Election Campaign Act, ("the Act"), at the close of audit field work on January 5, 1978, in a letter dated March 8, 1978 from the Federal Election Commission's Audit Division and again in a letter dated June 13, 1978 from the Commission's Office of General Counsel.

B. For each time the Respondent was notified of a finding of non-compliance of the Act, the Respondent was permitted extensions of time in which to submit relevant documentation.

C. Respondent has submitted, as requested: 1) a copy of a check for \$1,500 for a campaign related expense drawn on an account other than the campaign account; 2) a copy of a refund check for \$596 which was deposited into an account other than the designated campaign account; 3) documentation in support of two expenditures to Edwards Printing totaling \$2,005.02 and documentation in support of two expenditures to D.A.W.N. totaling \$7,500; 4) evidence, in the form of letters, of Respondent's attempts to obtain a copy of a Bank of New Orleans cashier's check for \$2,300 payable to the postmaster and a copy of a \$500 contribution check from Mr. Plotkin which was not deposited in the campaign depository; 5) evidence, in the form of letters, of the Respondent's attempts to obtain documentation for 30 expenditures totaling \$45,613.82.

D. Respondent has not yet submitted any information concerning \$33,911.09 in receipts which are claimed to be not campaign related but which were deposited into the designated campaign account.

3001134473

Respondent has not yet submitted a copy of a Bank of New Orleans cashiers check for \$2,300 for a copy of a contribution check for \$500 from Mr. Plotkin.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 437b(a)(1) each principal campaign committee of a candidate shall maintain a single checking account and such other accounts as the committee determines to maintain at its discretion at a depository designated by the candidate and shall deposit any contributions received by such committee into such account,... No expenditure may be made by any such committee on behalf of a candidate or to influence his election except by check drawn on such account.... Failure of the Respondent to: 1) deposit a contribution of \$500 from Steven R. Plotkin into the designated campaign depository; 2) make a \$1,500 expenditure to Bob Cole and Associates, Inc. and a \$2,300 expenditure to the Postmaster on checks drawn from the designated campaign checking account constitute violations of 2 U.S.C. § 437b(a)(1).

II. Under 2 U.S.C. § 432(b) all funds of a political committee shall be segregated from and may not be commingled with, any personal funds of officers, members or associates of such committee. Inasmuch as the personal checking account of the Candidate/Chairman of the Krasnoff for Congress Committee was used as the account into which the Committee's receipts were deposited and out of which committee expenditures were made, the Respondent has violated 2 U.S.C. § 432(b).

300184471

III. Respondent will pay a civil penalty in the amount of Fifteen Thousand (\$15,000) Dollars to the United States Treasury pursuant to 2 U.S.C. § 437g(a)(5)(B).

IV. Respondent will comply with the recommendations of the auditors as stated in their letter of March 8, 1978, and revised by the Office of General Counsel this date, as follows:

- 1) Provide a copy of the cancelled check for \$500 from Steven Plotkin which will identify into which bank account this contribution was deposited. Provide a copy of a Bank of New Orleans certified check to the Postmaster for \$2,300.
- 2) Identify the source of \$33,911.09 in receipts deposited into the Respondent's personal checking account/campaign depository.
- 3) Amend the committee's reports to reflect a \$3,000 expenditure to DAWN on August 16, 1977, which was not reported. Provide a cancelled check for same.

General Conditions

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

30010184472

II. It is further agreed that this conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date: _____

William C. Oldaker
General Counsel

Date: _____

Sanford Krasnoff

30040134473



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

DATE: OCTOBER 2, 1978

SUBJECT: OBJECTION - 596 - General Counsel's Report
Received in Office of Commission
Secretary: 9-28-78, 11:37

The above-named document was circulated on a 48 hour
vote basis at 3:30, September 28, 1978.

Commissioner Aikens submitted an objection thereby
placing MUR 596 on the Amended Agenda for October 4, 1978.

cc: Commissioner Aikens

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September 28, 1978

MEMORANDUM TO: Marge Emons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached General Counsel's Report on MUR 596 distributed to the Commission on a 48 hour tally basis.

Thank you.

3777:184475

RECEIVED
OFFICE OF THE
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

78 SEP 20 AM: 57

In the Matter of

Krasnoff for Congress

)
)
)

MUR 596

General Counsel's Report

On June 9, 1978, the Commission found reason to believe that Krasnoff for Congress: violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain campaign expenditures from the designated campaign checking account; violated 2 U.S.C. § 432(b) by commingling campaign funds with the Candidate's personal funds; and violated 2 U.S.C. § 432(d) by failing to keep adequate documentation for expenditures aggregating in excess of \$100 per year to individual payees.

The auditors requested additional information in regard to these violations at the close of audit field work on January 5, 1978 and again in a letter dated March 8, 1978. The respondent was notified of the Commission's finding of reason to believe in a letter dated June 13, 1978.

On June 28, 1978, the respondent notified the Office of General Counsel that he required additional time to produce materials as he had been ill for an extended period and needed to organize his affairs.

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With regard to the commingling question, the respondent has since explained that his was essentially a "one man campaign", financed almost exclusively with his own funds. Krasnoff had no real campaign committee other than his wife and himself and he reported only \$1,700 in contributions. He was under the impression that it was permissible to use his personal account for purposes of the campaign as long as all receipts and expenditures of this account were shown to the auditors. No information, however, concerning \$33,911.09 in deposits to the respondent's personal checking account has been furnished to the auditors, except that these monies were not campaign-related.

The auditors requested that the respondent provide copies of deposit slips to verify the receipts of his personal checking account during the time that it was used as the campaign account. The respondent will not however incur the cost to obtain these deposit slips because, although the bank will furnish them, it will not estimate beforehand the cost of gathering this material but does require that the respondent guarantee to pay the costs of the search. The Office of General Counsel does not believe that there is anything further to be gained from production of deposit slips (which would be charged to the respondent,) if the respondent admits commingling in violation of 2 U.S.C. § 432(b) and pays a civil penalty as required in the proposed conciliation agreement.

Per the auditor's other requests, the respondent has submitted a copy of a letter to a contributor requesting a copy of a cancelled check needed to verify into which account this money was deposited by the respondent. This contribution was apparently

not deposited into the designated campaign depository. The respondent has also submitted a copy of a letter to the Bank of New Orleans requesting a copy of a cashier's check payable to the Postmaster for campaign postage. Neither of these checks have yet been supplied.

The auditors also requested that the respondent provide documentation in support of 29 expenditures totaling \$42,613.82. In March, 1978, the respondent furnished copies of letters to vendors requesting additional documentation for 8 expenditures totaling \$9,962.06. Again in August and September, the respondent provided to the Office of General Counsel letters to vendors, committee agents and political clubs requesting documentation for 30 expenditures totaling \$45,613.82, including one expenditure for \$3,000 which was not reported by the respondent (and for which a cancelled check and amended report are requested in the attached conciliation agreement.). Documentation for 2 expenditures totaling \$7,500 to a political club for canvassing, poll watchers etc., was also submitted, which provided a sketchy breakdown of how this money was spent. This office has also received documentation for 2 expenditures totaling \$2,005.02 to a vendor.

Of the \$45,613.82 in expenditures for which the respondent attempted to obtain documentation, \$37,340.00 in expenditures were made to 8 political clubs or organizations, (each received in excess of \$1,000 from the Krasnoff for Congress Committee,) for purposes of canvassing, distribution of yard signs and literature on behalf of Sanford Krasnoff. See attached Exhibit I.

Consistent with other investigations ongoing in this Office

30941194479

the General Counsel recommends that the Commission find reason to believe that of these 8 clubs, 7 violated 2 U.S.C. §§ 433 and 434 by failing to register and report their expenditures on behalf of Sanford Krasnoff which qualified them as political committees. The one remaining committee, SOUL, is a registered, reporting committee.

As political committees, these entities would bear the responsibility for reporting the ultimate disbursement of funds given to them by Mr. Krasnoff. Further, this finding would relieve the respondent of the obligation to document these disbursements. Under this analysis, the respondent would be required to produce documentation for \$6,268.80 in expenditures, (6% of the Committee's total dollar expenditures,) to vendors and committee agents. For most of these expenditures the respondent has submitted two letters per vendor and agent requesting documentation. This Office believes the respondent has shown best efforts to obtain this documentation.

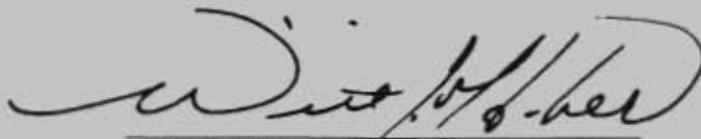
RECOMMENDATIONS

1. Find reasonable cause to believe that the Krasnoff for Congress Committee violated: 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain campaign expenditures from the designated campaign checking account; and, 2 U.S.C. § 432(b) by commingling campaign funds with the personal funds of the Candidate. Find that the Krasnoff for Congress Committee has made best efforts to obtain documentation for its expenditures and take no further action with regard to a finding of a violation of 2 U.S.C. § 432(d).
2. Send attached conciliation agreement to the Krasnoff for Congress Committee.
3. Find reason to believe that the Martin Luther King Political Club, Treme Improvement Political Society, Community Organization for Political Education, HELP, Inc., Sons of Desire, Inc., Development Association for Wards and Political Action Caucus violated 2 U.S.C. §§ 433 and 434 by failing to register and report with the Commission.

3001184430

4. Send attached letters.

9/27/78
Date


William C. Oldaker
General Counsel

ATTACHMENTS:

- Conciliation Agreement
- Letter to S. Krasnoff
- Letter Oliver W. White
- Certification.

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<u>Organization</u>	<u>Amount of Receipt</u>	<u>Date</u>	<u>Purpose</u>
Martin Luther King Political Club	\$2,500 \$5,000	8/25/77 8/17/77	Canvassing, yard signs, distribu- tion of materials.
Treme Improvement Society	\$6,000 \$1,500	8/16/77 8/25/77	" " "
Community Organization for Political Education	\$2,000 \$1,500	8/17/77 8/26/77	" " "
HELP, Inc.	\$390 \$600 \$400	8/21/77 8/26/77 8/25/77	" " "
Sons of Desire, Inc.	\$2,000 \$600	8/19/77 8/25/77	" " "
Development Association for Wards	\$3,000 (unreported) \$4,500	8/16/77 8/17/77	" " "
Political Action Caucus	\$2,000 \$850	8/18/77 8/26/77	" " "

3004134482



FEDERAL ELECTION COMMISSION

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

September 22, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sanford Krasnoff
4030 Canal Street
P.O. Box 19798
New Orleans, Louisiana 70119

Re: MUR 596

Dear Mr. Krasnoff:

This letter is to notify you that on September , 1978 the Commission found reasonable cause to believe the Krasnoff for Congress Committee violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain expenditures from the designated campaign checking account. The Commission also found reasonable cause to believe that the Krasnoff for Congress Committee violated 2 U.S.C. § 432(b) by commingling campaign funds with your personal funds.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission, may upon a finding of probable cause to believe that a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).



9 9 7 4 0 1 8 4 4 8 3

Enclosed, please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within 10 days of your receipt of this letter. If not, please contact Clare Lindsay at 800-424-9530, ext. 50, to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

30040184484

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF

4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

Sept. 15, 1978

RECEIVED

3 SEP 19 12:39

GR
~~806274~~
4926
806274

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

ATTENTION: Claire Lindsey

Re: MUR 596

Dear Miss Lindsey:

Enclosed is copy of a letter received from
DAWN who itemize their expenditures of the 1977
Campaign.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

SK/mk
Enc.

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3413 P. Ave. St.
New Orleans La
Sept. 16, 1978

Attorney Sanford Krasnoff
4530 Canal St.

P.O. Box 12728

New Orleans La. 70119

Dear Sir:

Please find enclosed the items you
requested, regarding the disbursement of
the \$7500 from the E! A UNWA 1977
campaign for the benefit of African
children.

Disbursements	\$ 42.00
Office & postage	2.00
Receipts, return & bank	17.50
	<hr/>
	\$ 61.50

Yours truly,
[Signature]

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80040181487

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



78 SEP 19 A12:30

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

ATTENTION: Claire Lindsey
MUR 596

Exp#
4856

SANFORD KRASNOFF
J. TERRILL HEATH

LAW OFFICES
SANFORD KRASNOFF
4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702
September 8, 1978

11-6

806125

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

Re: MUR 596

ATTENTION: Claire Lindsey

Dear Ms. Lindsey:

Enclosed please find a copy of a check I received from Bob Cole & Associates, Inc. As you can see, the check was deposited back into my law office account at the Century National Bank.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

SK/bl
Enc.

30940134433

BOB COLE & ASSOC., INC.
PUBLIC RELATIONS, ADVERTISING
POLITICAL MANAGEMENT

123 ATHANIA PKWY.
METAIRIE, LA. 70001

2738

PAY
TO THE
ORDER OF

Sanford KRASOFF

8-29 1976 14-203
650

\$596.⁰⁹/₁₀₀

Five Hundred & Ninety Six ⁰⁹/₁₀₀

DOLLARS

cnb CENTURY NATIONAL BANK
IN NEW ORLEANS

BOB COLE & ASSOC., INC.
PUBLIC RELATIONS, ADVERTISING
POLITICAL MANAGEMENT

FOR *Concession Refund*

Robert Cole

⑆096808 ⑆05 ⑆13 ⑆000059859⑆

30947184

65001

PAID BY CHECK
1472

Sanford Krasoff

5004319490

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



FL
SEP 12 11:56

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

ATTENTION: Claire Lindsey

Sept. 8, 1978

SEP 12 11:36

Mr. Wils Douglas
Attorney at Law
Martin Luther King Political Club
418 Common Street
New Orleans, La. 70130

Dear Sir:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign:

On 8/17/77 I paid you the amount of \$5,000.00

On 8/25/77 I paid you the amount of \$1,500.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission ✓

30049184491

8001018492

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



SEP 19 1978

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

ATTENTION: Claire Lindsey
MR 596

GDC-4765

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF

RECEIVED
FEDERAL ELECTION
COMMISSION

4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

SEP 5 P 1:12

August 31, 1978

673047

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

ATTENTION: Ms. Claire Lindsey

Re: MUR 596

Dear Ms. Lindsey:

Enclosed is a copy of a check written to Bob Cole & Associates, Inc. with a copy of the rear of the check showing the endorsement. Also on the same page is a copy of the file copy of the check which describes what the check was written for. The person who signed these checks was my Office Manager at the time. Also enclosed is a copy of a check from my Construction Account which was a checking account being used for the remodeling of my law office.

Mr. Guillory apparently had one check in the amount of \$1500.00 made out and deposited into my law office General Account to cover the \$1500.00 payment made to Bob Cole & Associates, Inc.

I am also enclosing a copy of a second check made out by Mr. Guillory in the amount of \$2000.00. As you can see from the rear of the check it was deposited into my personal account apparently to cover the \$2000.00 payment made to Bob Cole & Associates, Inc. Bob Cole & Associates, Inc. was apparently paid a total of \$3500.00. I was apparently reimbursed by Bob Cole & Associates, Inc. in the amount of \$596.09.

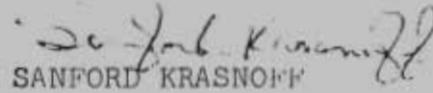
I am enclosing copies of letters I have sent to Bob Cole & Associates, Inc. and to Steven R. Plotkin in an attempt to determine where their checks were deposited regarding my personal and/or office accounts. As soon as I receive this information from them I will forward it on to you.

I am enclosing a copy of a letter that I sent to the Bank of New Orleans asking them to forward me a copy of the Cashier's check that was made out to the U. S. Postmaster.

3001184493

Please advise me as to what further information you still need from me.

Very truly yours,


SANFORD KRASNOW

SK/mk
Enc.

P.S. Enclosed are copies of three documents that I just received from Edwards Printing, Inc.

30040184494

LAW OFFICE
SANFORD KRASNOFF
GENERAL ACCOUNT
400 CANAL ST.
NEW ORLEANS, LA 70119

30043191473 No

1793

July 14

76

14-203
650

Rob Cole and Associates, Inc.

1,500.00*

One Thousand Five Hundred and No/100-----



CENTURY NATIONAL BANK
NEW ORLEANS

COPY -- NOT NEGOTIABLE

Michael Stagg Guillay

⑆0650⑉0203⑆ 024 205 5⑈

CHECKED BY
LAW OFFICE OF SANFORD KRASNOFF

DATE	DESCRIPTION	AMOUNT
7-14-76	SK Draw Ad. & printing campaign kick off, July 14, 1976 week	\$1500.00

LAW OFFICE
SANFORD KRASNOFF
GENERAL ACCOUNT
400 CANAL ST.
NEW ORLEANS, LA 70119

No 1793

July 14

19 76

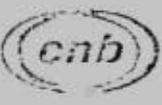
14-203
650

PAY TO THE ORDER OF Rob Cole and Associates, Inc.

\$1,500.00*

One Thousand Five Hundred and No/100-----

DOLLARS



CENTURY NATIONAL BANK
NEW ORLEANS

Michael Stagg Guillay

⑆0650⑉0203⑆ 024 205 5⑈

⑈0000150000⑈

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SANFORD KRASSOFF
CONSTRUCTION ACCOUNT
4040 CANAL ST.
NEW ORLEANS, LA. 70119

103

July 14 1976

14-203
650
00

PAY TO THE ORDER OF

Sanford Krassoff General Account \$1500.
One Thousand Five Hundred and ⁷⁰/₁₀₀

DOLLARS

cnb CENTURY NATIONAL BANK
NEW ORLEANS

SK draw

Michael Stagg Guillay

⑆0640⑉0203⑆

129 622 1⑈

⑈0000150000⑈

Sanford Krassoff

104

SANFORD KRASNOFF
CONSTRUCTION ACCOUNT
4030 CANAL ST.
NEW ORLEANS, LA. 70119

July 14 1976 14-203
650

Sanford Krasnoff
Two Hundred and 00/100 \$2000.⁰⁰

DOLLARS

cnb CENTURY NATIONAL BANK
NEW ORLEANS, LA.

SK draw *Michael Stagg Guillory*

⑆03650⑉0203⑆ 129 622 1⑈ ⑈0000200000⑈

*no deposit on hand of
Sanford Krasnoff
acct # 62 3000241*

129 622 1

EDWARDS

printing, inc.

3412 washington ave.

822-1338

new orleans, louisiana 70125

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2
8

STATEMENT

DATE	OUR INVOICE NUMBER	BALANCE
3 0 0 4 0		

80040184499

Stock _____
 1) Cut stock _____
 _____ out of _____ size _____
 _____ sheets of _____
 set sheets _____ chipboard _____
 2) Cut stock _____
 _____ out of _____ size _____
 _____ sheets of _____
 set sheets _____ chipboard _____

Date Rec'd. 1/35 1977 - Date Promised _____ 19____

Customer Order No. _____ Job No. _____ - Invoice copies _____

NAME: Fandy Krasnoff
 ADDRESS: _____

ATTENTION OF: _____

3) Cut stock _____
 _____ out of _____ size _____
 _____ sheets of _____
 set sheets _____ chipboard _____

Quantity	Description	Price
<u>514</u>	<u>Factors</u>	<u>507.00</u>
	<u>Plus \$60.00 overtime</u>	<u>60.00</u>

Changes	Price
Linotype setup _____	
IBM setup _____	
Rule _____	
Line Negatives _____	
Half-tone Negatives _____	
Plates _____	
Stock _____	
Finning _____	
Trimming _____	
Ass'y. - Binding _____	
Numbering _____	
Perforating _____	
Folding _____	
Addressing _____	
Punch _____	
Postage _____	

Composition		
Linotype - Metal Plate _____		
IBM - Plastic Plate _____		
- Metal Plate _____		
		Tax <u>34.00</u>
		Total <u>661.00</u>

Bindery	Press Work
Number from _____ to _____	Finished pieces _____ Run _____ up _____
Assemble 1) _____ 2) _____ 3) _____	Keep in _____
4) _____ 5) _____	INK COLOR - 1st run _____
Pad - 1) top _____ jog _____	2nd run _____ 3rd run _____
2) _____ side _____ jog _____	4th run _____

Handwritten notes:
 Pd
 1/35/77
 1800
 391

0054810408

Stock

1) Cut stock

out of

sheets of

chipboard

2) Cut stock

out of

sheets of

chipboard

3) Cut stock

out of

sheets of

chipboard

Charges

Price

Linotype setup

IPM setup

Rule

Line Negatives

Half-tone Negatives

Plates

Stock

Running

Trimming

Asy.-Binding

Numbering

Perforating

Folding

Addressing

Punch

Postage

Date Rec'd. 1/17 1977

Date Promised

19

Customer Order No.

Job No.

- Invoice copies

NAME: Family Transmitt

ADDRESS:

ATTENTION OF: 2145-1076

2145-7503

Quantity

Description

Price

5000 *Plates - 2 plates*

567.00

set sheets

Charges

Price

Linotype setup

IPM setup

Rule

Line Negatives

Half-tone Negatives

Plates

Stock

Running

Trimming

Asy.-Binding

Numbering

Perforating

Folding

Addressing

Punch

Postage

Composition

Linotype - Metal Plate

IBM - Plastic Plate

- Metal Plate

Bindery

Press Work

Total

Tax

34.00
101.00

Finished pieces Run up

Keep in

INK COLOR - 1st run

2nd run 3rd run

4th run

Number from

to

Assemble 1) -2) -3)

4) 5)

Pad - 1) top Job

2) side-Job

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF

4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

August 24, 1978

Bank of New Orleans & Trust Co.
1010 Common Street
New Orleans, Louisiana 70112

Dear Sir:

On August 16, 1977, your bank made a loan to me for \$60,000.00. On August 25, 1977, your bank loaned me an additional \$20,000.00. The Federal Election Commission is requiring that I account to them for monies expended in my campaign.

On August 25, 1977 the Bank of New Orleans had a check made out to me in the amount of \$17,700.00 which was for partial payment of the \$20,000.00 loan. Additionally the bank had a check made out in the amount of \$23,000.00 to the U. S. Postmaster as the remainder of the \$40,000.00 additional loan.

The Federal Election Commission is requiring that I furnish them with a copy of the \$2300.00 check made out to the U. S. Postmaster. This check, as I remember was a Cashiers check and I have no record or copies of the check or the check number. I have requested copies of this check from your bank on several previous occasions and would appreciate it very much if you could furnish me with any records pertaining to this Cashiers check in the amount of \$2300.00 made out to the U. S. Postmaster so that I can furnish a copy of the same to the Federal Election Commission.

I wish to thank you in advance for your assistance and cooperation.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

PE/nk

30040194501

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF
4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

August 24, 1978

Mr. Steven R. Plotkin
Attorney at Law
305 Baronne St.
New Orleans, La. 70112

Dear Steve:

During July, August or September, 1976, you made a \$500.00 donation to my campaign. The Federal Election Commission is requiring proof of where I deposited your check and my records do not reflect what I did with your check. I probably deposited it into my personal checking account or my law office account as I had no other accounts open.

I would appreciate it very much if you could send me a Xerox copy of both the front and rear of the cancelled check so that I can send a copy of the same to the Federal Election Commission. If you could have this done immediately it would be greatly appreciated.

Very truly yours,

S. Krasnoff
SANFORD KRASNOFF

SK/mk

30717184502

SANFORD KRASNOFF
J. FERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF

4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

August 24, 1978

Bob Cole & Associates, Inc.
123 Athalia Parkway
Metairie, La. 70001

Dear Bob:

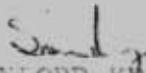
In July of 1976, I paid you \$3500.00 for printing, advertising, etc. You refunded me \$596.09. The Federal Election Commission wants me to account for the amount you refunded to me and my records do not indicate where I deposited your check.

I would appreciate it very much if you would send me a copy of both the front and rear of the cancelled check so that I could forward the same to the Federal Election Commission.

Your immediate assistance will be greatly appreciated.

Thanks.

Very truly yours,


SANFORD KRASNOFF

SK/mk

907134503

80040134504

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



18 SEP 81 11:21

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

FEDERAL ELECTION COMMISSION

ATTENTION: Ms. Claire Hansey

4007
4632

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF
4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702
August 21, 1978

10 AUG 24 AM 8:53

01581

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

ATTENTION: Ms. Claire Lindsey

Re: MR 596

Dear Ms. Lindsey:

Enclosed are copies of letters which we sent out in an attempt to obtain receipts to furnish the Federal Election Commission. As soon as we receive replies to these letters we will notify you as to the outcome.

In the meantime we are in the process of obtaining other information that had been requested by the Federal Election Commission.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

SK/mk
Enc.

30001184505

August 18, 1978

Snider's Poster Process Co. Inc.
2638 St. Louis St.
New Orleans, La. 70119

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 7/5/77 I paid you the amount of \$536.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040184506

August 18, 1978

Mr. Frank King
2638 St. Louis St.
New Orleans, La. 70119

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 7/5/77	I paid you the amount of \$	243.80
8/6/77		400.00
8/12/77		400.00
8/18/77		600.00
8/20/77		1000.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30047134507

August 18, 1978

Edwards Printing Company
3412 Washington Ave.
New Orleans, La. 70125

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/3/77	I paid you the amount of \$	601.02
8/23/77	" " " " " "	1404.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040131509

August 18, 1978

Mr. Boyd F. Zitzman
Box 65
St. Bernard, La.

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/7/77	I paid you the amount of \$	100.00
8/12/77		100.00
8 /19/77		100.00
8/25/77		100.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040134509

August 18, 1978

Rev. Lawrence Gaines, Pres.,
DAWN
3413 Press St.
New Orleans, La. 70126

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/16/77 I paid you the amount of \$ 3,000.00
8/17/77 4,500.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30047134510

August 18, 1978

Treme Improvement Society
c/o Norman Smith
1615 St. Philip St.
New Orleans, La. 70116

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/16/77 I paid you the amount of \$ 6,000.00
8/25/77 1,500.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30047184511

August 18, 1978

Mr. Frank Spears
COPE
2313 Gallier St.
New Orleans, La. 70117
Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/17/77 I paid you the amount of \$ 2,000.00
8/26/77 1,500.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040184512

August 18, 1978

Political Action Caucus
1538 N. Tonti St.
New Orleans, La. 70119

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/18/77 I paid you the amount of \$ 2,000.00
8/25/77 850.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040184513

August 18, 1978

Brazil Printing Company
c/o Curtis Johnson
3011 Press Court
New Orleans, La. 70126

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/19/77 I paid you the amount of \$ 2,000.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040184514

August 18, 1978

Mr. Sidney Duplessis
Sons of Desire, Inc.
3309 Desire Pkwy
New Orleans, La. 70126

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On $\begin{matrix} 8/10/77 \\ 8/25/77 \end{matrix}$ I paid you the amount of \$ $\begin{matrix} 2,000.00 \\ 600.00 \end{matrix}$

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040134515

August 18, 1978

Miss Dorothy Berthey
HELP, INC.
3411 Paris Avenue
New Orleans, La. 70122

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/21/77	I paid you the amount of \$	390.00
8/26/77		600.00
8/25/77		400.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040194515

August 18, 1978

Mr. Don Hubbard
SOUL
4848 Rosemont Place
New Orleans, La. 70126

Dear Sirs:

The Federal Election Commission has asked me to furnish them with itemized bills, invoices, paid receipts, etc. for certain expenditures I made during my campaign.

On 8/25/77 I paid you the amount of \$ 4,500.00

I would appreciate it very much if you would furnish me with documentation for this expenditure. I have been unable to locate a bill, invoice or paid receipt in my records.

I wish to thank you in advance for your cooperation.

Very truly yours,

SANFORD KRASNOFF

SK/mk
cc-Federal Election Commission

30040134517

800431919

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



78 AUG 24 11 0 : 58

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

ATTENTION: Ms. Claire Lindsey



FEDERAL ELECTION COMMISSION

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

August 17, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sanford Krasnoff
P.O. Box 19798
New Orleans, LA 70119

Re: MUR 596

Dear Mr. Krasnoff:

Our office is in receipt of your letter dated August 1, 1978 and we thank you for this correspondence.

The Commission is anxious to see this matter resolved and in this regard we are in need of the documentation for expenditures and cancelled checks which you have told our staff that you will provide.

As this case has been active for several months we are obligated to take some further action in the near future. We therefore advise you to submit the documentation we require or evidence of your best efforts to locate same within 10 days of receipt of this letter. Otherwise, further action will be taken on the basis of the information at hand.

Please do not hesitate to call Clare Lindsay, the staff member handling this matter, if you have any questions. (Tel. 800-424-9530, ext. 50.)

Sincerely,

William C. Oldaker
General Counsel

30010184519



3 0 0 4 0 1 3 4 5 2 0

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MOR 596 CL ✓

● 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:
 Songora Kpangbo
 4330 Canal St. V8
 New Orleans, LA. 70119

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 438108 | |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
 Don G. [Signature]

4. DATE OF DELIVERY: 8-22-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES
SANFORD KRASNOFF

4030 CANAL STREET
P. O. BOX 19798
NEW ORLEANS, LA. 70119
AREA CODE 504 TELEPHONE 482-5702

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 AUG 8 AM 11:54

August 1, 1978

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

005164

ATTENTION: Ms. Claire Lindsay

Re: MUR 596
432E

Dear Ms. Lindsay:

My secretary has now returned to work from her two weeks vacation and was able to locate my file pertaining to the Federal Election Commission. I have started to contact the various persons and/or organizations that I made expenditures to and were the twenty some odd expenditures that we discussed over the telephone. Now that I have qualified as a candidate to run for Congress again I believe that these people will be responsive to furnishing me invoices to satisfy the Federal Election Commission. As I told you during our telephone conversation these people had failed to answer my phone and written requests in the past. I believe that now since they will be looking for business from me and/or looking to support me in this up and coming election that they will be responsive to my requests for invoices, etc.

As I told you in our conversation my personal checking account was used apparently because of a misunderstanding. We were under the impression that it would be alright to use our personal checking account and in fact would show each and every bill that I paid whether they were connected to my campaign or whether they were just my own personal bills that I pay on a monthly basis. As I informed you during our telephone conversation my campaign was really a one man campaign. My wife was appointed as the Treasurer solely because there was no one else to appoint. Therefore, she was appointed in name only because we were informed somewhere along the line by the Federal Election Commission that I could not be a candidate without appointing someone. However, we again apparently misunderstood the assistance we got from the Federal Election Commission because we at first thought that no reports would have to be filed by the campaign committee, since in fact there was none, but that they would only have to be filed by me as an individual. Somewhere, I do not know how, this got confused and we filed reports for first one and then the other and then were informed by the Federal Election Commission that it was not necessary to do both.

194521

We are attempting to find out where the \$1,500.00 check that was paid to Bob Cole and Associates came from but as of this time we have been unable to determine that. Bob Cole informed me that he is certain that it was paid by a check and I feel that it might have been paid by a check from another one of my own checking accounts that was used to remodel my law offices. I have contacted my CPA and he is returning those checks to me and I will see if there is a check paid to Bob Cole and if so will send a copy of same to you.

I have also contacted the Bank of New Orleans and they have informed me that they will dig out a copy of the certified check that was paid to the United States Post Master. As I informed you during our telephone conversation the Post Master had to be paid within a thirty minute period so the bank just made out a check in the amount of \$2,300.00 at the same time that they gave me a check for the loan in the amount of \$20,000.00 that I made from them on August 25, 1977. In addition they gave me a check in the amount of \$17,700.00 to make up the balance of the \$20,000.00 loan that I made from them. As soon as they send me a copy of the certified check to the United States Post Master I will forward that on to you immediately. As far as the return of the \$596.00 that was refunded from Bob Cole and Associates and as far as the \$500.00 that was received from Mr. Steven R. Plotkin we are attempting to have those checks tracked down by those individuals. Both of those individuals have been out of town on vacations and their offices have informed me that as soon as they return they will try to have their checks pulled and to see which one of my accounts those checks were deposited into. As soon as I receive that information I will forward it on to you immediately.

As I told you during our telephone conversation I had gone into the hospital on several occasions during the last part of my campaign and then subsequently had to go back into the hospital after the campaign and undergo an operation. I was laid up for approximately six or seven months. Additionally, my wife also was put in the hospital on several occasions near the end of the campaign and after the campaign. It appears to us that some of our friends who assisted us in our campaign and helping my wife clean up our den in which our campaign was run from, might have disposed of many of the invoices and other documents. They apparently assisted my wife during the time I was in the hospital

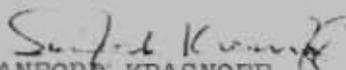
30040134522

and also during the time while she was at home sick. We are attempting to reconstruct everything and furnish all of the documentation that we can to the Federal Election Commission. I would like to point out that my entire election was not only a one man run campaign but was also almost singlely financed by me. I only received five or six campaign donations from several of my friends and/or clients-friends. I believe that these donations totaled only slightly over \$1,000.00. As I also told you over the telephone the reason why these donations were not deposited timely was because that they had been mailed into my law office and my law office had held the checks for a long period of time trying to determine whether the checks were for fees and if so for what fees. After the law office finally determined that the checks were not for fees rendered to the clients but were for my campaign they were then deposited.

I hope to be sending you some information to support your previous requests in this matter in the coming weeks.

I wish to thank you in advance for your assistance and cooperation in this matter.

Very truly yours,


SANFORD KRASNOFF

SK/bl

30742184523

8 0 0 1 0 1 3 2 4

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119

RECEIVED
FEDERAL ELECTION
COMMISSION



1978 AUG 8 AM 11:54

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

ATTENTION: Ms. Claire Lindsay



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: AUGUST 7, 1978
SUBJECT: MUR 596 - Interim Report
Dated: August 2, 1978
Received in Office of
Commission Secretary:
8-3-78, 12:14

The above-named document was circulated on a 24
hour no-objection basis at 2:30 p.m. on August 3, 1978.

The Commission Secretary's Office has received
no objections to the Interim Report as of 9:00 a.m.
this date.

10743194525

August 3, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached Interim Report on MUR 596 distributed to the Commission.

Thank you.

3001184525



FEDERAL ELECTION COMMISSION

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

July 11, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 596 - Interim Report dated 7-7-78
Received in Office of Commission
Secretary 7-7-78, 3:47

The above-mentioned document was circulated on a 24
hour no-objection basis at 10:00 a.m., July 10, 1978.

As of 10:30 a.m. this date, no objections have been
received in the Office of Commission Secretary to the
Interim Report.

30041134523

JULY 7, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached Interim report distributed to the Commission on a 24 hour no-objection basis.

Thank you.

30040134529

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Krasnoff for Congress

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)

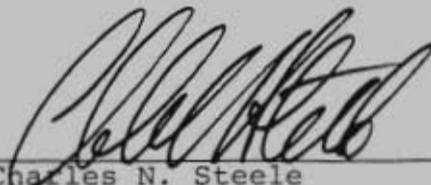
MUR 596

INTERIM REPORT

3 0 0 4) 1 8 4 5 3 0
On June 9, 1978 the Commission found reason to believe that the Krasnoff for Congress Committee violated 2 U.S.C. §437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain campaign expenditures from the designated campaign checking account; violated 2 U.S.C. §432(b) by commingling campaign funds with the personal funds of the candidate; violated 2 U.S.C. §432(d) by failing to keep adequate documentation for certain expenditures.

3 0 0
A member of the General Counsel's Office staff has been in contact with the respondent who is attempting to assemble materials which pertain to this matter.

7 July 1978
Date



Charles N. Steele
Associate General Counsel

SANFORD KRASNOFF
J. TERRELL HEATH

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA 70119

AREA CODE 504 TELEPHONE 482-5702

June 28, 1978

804165

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

Re: MUR 596

ATTENTION: Clare Lindsay

Dear Ms. Lindsay:

We are asking for additional time to demonstrate that no action should be taken against me and/or Dorothy Luckow Krasnoff, the sole member of the Krasnoff for Cpngrss Committee. Both my wife and I have been out sick for a long period of time. I will be returning to work full time in the coming week and will contact you to see what can be done to satisfy the Federal Election Commission in this matter.

Very truly yours,

Sanford Krasnoff
SANFORD KRASNOFF

SK/bl

3004134531

LAW OFFICES

SANFORD KRASNOFF

4030 CANAL STREET

P. O. BOX 19798

NEW ORLEANS, LA. 70119



FEDERAL ELECTION
COMMISSION

JUL 3 PM 1:38

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

ATTENTION: Clare Lindsay

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FEDERAL ELECTION COMMISSION

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

June 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Dorothy L. Krasnoff, Treasurer
Krasnoff for Congress
4964 Chrysler St.
New Orleans, LA 70127

Re: MUR 596

Dear Mrs. Krasnoff:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that Krasnoff for Congress (the "Committee") has violated the Federal Election Campaign Act, as amended (the "Act"), in that the Committee:

1. Failed to deposit certain campaign receipts in designated accounts and failed to make certain campaign expenditures therefrom in violation of 2 U.S.C. § 437b(a)(1) as interpreted by 11 C.F.R. § 103.3(a).
2. Commingled campaign funds with the personal funds of the candidate in violation of 2 U.S.C. § 432(b).
3. Failed to keep adequate documentation for 29 expenditures totaling \$42,613.82 (61.70% of total number of itemizable expenditures and 38.99% of total dollar value of itemizable expenditures) as required by 2 U.S.C. § 432(d).

These instances of non-compliance are outlined in more detailed fashion in a letter to you dated March 8, 1978 from the Commission's audit division.

3004)134533

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action should be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202/523-4040 or toll free 800/424-9530, ext 50).

Sincerely yours,

William C. Oldaker

William C. Oldaker
General Counsel

3004184534

3004184534

73 Form 3811, Nov. 1977

MUR 596 CHRYSLER

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:
 DOROTHY C. KRASNOFF
 4964 CHRYSLER ST.
 NEW ORLEANS LA.

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943226

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 6-17-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

POSTMARK
 NEW ORLEANS, LA. CHECK
 JUN 17 1978
 CLERK

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Dorothy L. Krasnoff, Treasurer
Krasnoff for Congress
4964 Chrysler St.
New Orleans, LA

Re: MUR 596

Dear Mrs. Krasnoff:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that Krasnoff for Congress (the "Committee") has violated the Federal Election Campaign Act, as amended (the "Act"), in that the Committee:

1. Failed to deposit certain campaign receipts in designated accounts and failed to make certain campaign expenditures therefrom in violation of 2 U.S.C. § 437b(a)(1) as interpreted by 11 C.F.R. § 103.3(a).
2. Commingled campaign funds with the personal funds of the candidate in violation of 2 U.S.C. § 432(b).
3. Failed to keep adequate documentation for 29 expenditures totaling \$42,613.82 (61.70% of total number of itemizable expenditures and 38.99% of total dollar value of itemizable expenditures) as required by 2 U.S.C. § 432c.

These instances of non-compliance are outlined in more detailed fashion in a letter to you dated March 8, 1978 from the Commission's audit division.

30041184535

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action should be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202/523-4040 or toll free 800/424-9530, ext 50).

Sincerely yours,

William C. Oldaker
General Counsel

3004181535

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Krasnoff for Congress)

MUR 596 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 9, 1978, the Commission approved by a vote of 5-0 the recommendations in the General Counsel's Report dated June 8, 1978 to take the following actions in the above-captioned matter:

1. Find reason to believe the Respondent Committee violated 2 U.S.C. §437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain campaign expenditures from the designated campaign checking account.
2. Find reason to believe that the Respondent Committee commingled campaign funds with the personal funds of the Candidate in violation of 2 U.S.C. §432(b).
3. Find reason to believe that the Respondent Committee failed to keep adequate documentation for expenditures aggregating in excess of \$100 per year to individual payees in violation of 2 U.S.C. §432(d).
4. Send the letters attached to the General Counsel's Report dated June 8, 1978.

Commissioner Tiernan was not present during the time of the vote.

Marjorie W. Emmons

Date: June 12, 1978

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 6-8-78, 1:22
Circulated on 48 hour vote basis: 6-8-78, 3:00

3074181537

June 8, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 596

Please have the attached 7 day report on MUR 596 distributed to the Commission on a 48 hour tally basis.

Thank you.

3004181539

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUN 8 1978

MUR NO. 596
STAFF MEMBER(S) _____

LINDSAY

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Krasnoff for Congress ("the Committee")

RELEVANT STATUTE: 2 U.S.C. § 432(b), § 432(d), and § 437b(a)(1) as
interpreted by 11 C.F.R. § 103.3(a)

INTERNAL REPORTS CHECKED: Audit findings

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

Referred to Office of General Counsel from the Audit Division as
a result of a random audit of the Respondent Committee.

SUMMARY OF ALLEGATIONS

That Respondent Committee violated 2 U.S.C. § 437b(a)(1) by failing
to deposit certain receipts in designated accounts and failing to make
certain expenditures from designated campaign checking account. That
Respondent Committee violated 2 U.S.C. § 432(b) by commingling campaign
funds with the personal funds of the candidate. That Respondent Committee
violated 2 U.S.C. § 432(d) by failing to keep adequate documentation for
expenditures aggregating in excess of \$100 per year to individual payees.

PRELIMINARY LEGAL ANALYSIS

During the course of auditing Krasnoff for Congress ("the Committee")
the auditors found the following instances of non-compliance with the
provisions of the Federal Election Campaign Act:

1. A \$500 contribution, reported as a receipt, was not deposited
in the Committee's designated campaign depository (the Candidate's
personal checking account) as required by 2 U.S.C. § 437b(a)(1). The
candidate has not yet disclosed the identity of the account in which the
contribution was deposited despite the auditor's requests.

2. Of a \$20,000 loan to the Candidate, reported as a Committee receipt, \$17,700 was deposited in the designated campaign depository. The Candidate claims that the remaining \$2,300, reported as a receipt by the Committee, was used to purchase a cashier's check to pay the Postmaster for a campaign expense. The auditors have not been provided with a copy of this cashier's check. It is a violation of 2 U.S.C. § 437b(a)(1) as interpreted by 11 C.F.R. § 103.3(a) to fail to make campaign expenditures from the Committee's designated campaign checking account.

3. The Candidate made a \$1,500 expenditure on behalf of his campaign with a check drawn on his law firm (not incorporated) account which is also a violation of 2 U.S.C. § 437b(a)(1).

4. The Candidate's personal checking account served as the Committee's only designated campaign depository. A substantial sum of money deposited in this account was, according to the Candidate, not campaign-related however no records were made available to verify this claim. Commingling of personal and campaign funds is a violation of 2 U.S.C. § 432(b).

5. 29 expenditures totaling \$42,613.82 (61.7% of the total number of itemizable expenditures and 38.99% of the total dollar value of itemizable expenditures,) were not adequately documented as required by 2 U.S.C. § 432(d).

The auditors have requested documentation and additional information as needed for the above instances of non-compliance. The Respondent has furnished, as requested, some loan agreements, cancelled checks and copies of letters requesting receipted bills from 8 vendors but, as yet, no substantial effort has been made to comply with the auditor's suggestions found in the report of audit findings.

RECOMMENDATIONS

1. Find reason to believe the Respondent Committee violated 2 U.S.C. § 437b(a)(1) by failing to deposit certain campaign receipts in designated accounts and failing to make certain campaign expenditures from the designated campaign checking account; that Respondent Committee commingled campaign funds with the personal funds of the Candidate in violation of 2 U.S.C. § 432(b) and; that Respondent Committee failed to keep adequate documentation for expenditures aggregating in excess of \$100 per year to individual payees in violation of 2 U.S.C. § 432(d).

2. Send attached letter.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Dorothy L. Krasnoff, Treasurer
Krasnoff for Congress
4964 Chrysler St.
New Orleans, LA 70127

Re: MUR 596

Dear Mrs. Krasnoff:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that Krasnoff for Congress (the "Committee") has violated the Federal Election Campaign Act, as amended (the "Act"), in that the Committee:

1. Failed to deposit certain campaign receipts in designated accounts and failed to make certain campaign expenditures therefrom in violation of 2 U.S.C. § 437b(a)(1) as interpreted by 11 C.F.R. § 103.3(a).
2. Commingled campaign funds with the personal funds of the candidate in violation of 2 U.S.C. § 432(b).
3. Failed to keep adequate documentation for 29 expenditures totaling \$42,613.82 (61.70% of total number of itemizable expenditures and 38.99% of total dollar value of itemizable expenditures) as required by 2 U.S.C. § 432(d).

These instances of non-compliance are outlined in more detailed fashion in a letter to you dated March 8, 1978 from the Commission's audit division.

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Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action should be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202/523-4040 or toll free 800/424-9530, ext 50).

Sincerely yours,

William C. Oldaker
General Counsel

30040131512





FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: BILL OLDAKER

THROUGH: *AC* ORLANDO B. POTTER *OBP*

FROM: BOB COSTA/RUSSELL BRUNER *CR*

SUBJECT: NONCOMPLIANCE OF SANFORD KRASNOFF
CONCERNING AUDIT STAFF RECOMMENDATIONS

Attached is the audit report on Sanford Krasnoff, Candidate, and the Krasnoff for Congress committee. The Candidate was advised of our audit findings at the close of our field work on January 5, 1978, and again in a letter dated March 8, 1978. We have made repeated attempts to get the Candidate to comply with our recommendations. We received some information on March 28 and March 30, 1978. As of the date of this report, the Candidate has not substantially complied with our requests.

The Audit staff recommends that the Office of General Counsel consider pursuing one of the two following alternatives: 1) consider this report as a compliance matter, or 2) recommend that the Commission release the report to the public as is.

Attachment as stated





FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20461

REPORT OF THE AUDIT DIVISION ON KRASNOFF FOR CONGRESS

I. Background

A. Overview

This report is based on an audit of the Krasnoff for Congress ("the Committee") and the Candidate's reports undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2, United States Code, which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the Federal Election Commission on August 11, 1977, in support of Sanford Krasnoff, a candidate in the special election for the office of United States Representative from the 1st Congressional District of Louisiana. The Committee maintained its headquarters in New Orleans, Louisiana.

The audit covered the period June 1, 1976, the inception date of the Candidate's campaign through September 30, 1977, the final coverage date of the latest report filed by the Candidate at the time of the audit. The Candidate reported a beginning cash balance at June 1, 1976 of \$-0-, total receipts for the period of \$120,807.98, total expenditures for the period of \$110,675.57 and a closing cash balance at September 30, 1977 of \$10,132.41. During this period, the Committee reported receipts and expenditures of \$-0-.

This audit report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report and were available to Commissioners and appropriate staff for review.



B. Key Personnel

The principal officers of the Committee were Mr. Sanford Krasnoff, Chairman, and Mrs. Dorothy Luckow Krasnoff, Treasurer, during the period of audit.

C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and, such other audit procedures as deemed necessary under the circumstances.

II. Auditor's Statement and Description of Findings

It is the opinion of the Audit staff, based upon examination of the reports and statements filed and records presented, that the Candidate, Sanford Krasnoff, has not conducted his activities in compliance with the Federal Election Campaign Act and that the reports and statements filed by the Candidate do not fairly present the financial activities of the Candidate for the period covered by the audit.

A. Deposits and Expenditures

Section 437b(a)(1) of Title 2, United States Code, in part, states that each candidate shall designate one or more national or State banks as his campaign depositories. The principal campaign committee of such candidate, and any other political committee authorized by him to receive contributions or to make expenditures on his behalf, shall maintain a single checking account and such other accounts as the committee determines to maintain at its discretion at a depository designated by the candidate and shall deposit any contributions received by such committee into such account. No expenditure may be made by any such committee on behalf of a candidate or to influence his election except by check drawn on such account, other than petty cash expenditures.

Our review of the Candidate's bank records disclosed that there was a total of \$4,300.00 in reported receipts that were not deposited in the Candidate's personal checking account which he designated as his only campaign depository. The Candidate used \$3,800.00 of these receipts for the campaign expenditures described in (1) and (3) below.

According to the Candidate, the following items relate to the \$4,300.00 mentioned above:

(1) On July 14, 1976, \$1,500.00 was paid to a vendor from another checking account. The \$1,500.00 payment represented a contribution from the Candidate to his campaign.

(2) A contribution from an individual for \$500.00 was deposited in another unidentified account.

(3) On August 25, 1977, the Candidate borrowed \$20,000.00 from the Bank of New Orleans, which the Candidate contributed to his campaign. Only \$17,700.00 was deposited into the campaign's checking account. The remaining \$2,300.00 was used for a campaign expenditure to the Postmaster by a certified check issued by the Bank of New Orleans.

We recommended that the Candidate and/or Committee:
1) provide to the Audit staff a copy of the cancelled check to support the \$1,500.00 disbursement to a vendor, and identify the bank account on which the check was written; 2) provide us a copy of the deposit slip, and identify the bank account in which the \$500.00 received on September 1, 1976, was deposited; and 3) provide us a copy of the certified check to the Postmaster for \$2,300.00.

On March 28, 1978, we received a letter from the Candidate with a copy of the \$1,500.00 check to the vendor written on his law office account.

B. Additional Information

Section 104.12(b)(1) and (3) of Title 11, Code of Federal Regulations, in part, requires each candidate, political committee, or other person required to file any report or statement, to maintain records which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, and to keep those records and reports available for audit, inspection, or examination by the Commission or its authorized representatives for a period of not less than 3 years from the end of the year in which the report or statement was filed.

Section 432(b) of Title 2, United States Code, in part, requires all funds of a political committee to be segregated from, and not commingled with, any personal funds of officers, members, or associates of such committee.

(1) During our audit, the Candidate did not make available copies of any deposit slips for the period June 1, 1976 to September 30, 1977. The Candidate also did not make available his copies of loan agreements with the Bank of New Orleans.

(2) Since the Candidate used his personal checking account as his campaign depository, there was a total of \$33,911.09 in receipts deposited in the account that, according to the Candidate, were not related to the campaign. The Candidate's records did not disclose the source of these receipts to verify that they were not campaign related. It appears that the Candidate has commingled campaign funds with his personal funds.

We requested the Candidate to provide us the records noted in (1) above, and to identify the source of receipts noted in (2) above. On March 28, 1978, we received copies of the loan agreements. We received another letter on March 30, 1978, which explained why the Candidate would not comply with our request for copies of the deposit slips. He stated the bank would provide the deposit slips to him, if he guaranteed to pay the cost of gathering the material, but it would not give the Candidate an estimate of the costs involved. Accordingly, Mr. Krasnoff was not willing to incur the cost to comply with our request.

C. Supporting Documentation of Expenditures

Section 102.9(c) of Title 11, Code of Federal Regulations, requires, in part, that the candidate and treasurer obtain and keep a receipted bill from the person to whom the expenditure is made, stating the particulars, for every expenditure made by or on behalf of the candidate in excess of \$100, and for any such expenditures in a lesser amount if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100. When a receipted bill is not available, the treasurer may keep a cancelled check with a bill, invoice, or contemporaneous memorandum.

Our examination revealed that the Candidate did not maintain sufficient documentation to support 29 (61.70%) of the 47 expenditures aggregating in excess of \$100 to payees during the calendar year. The 29 expenditures totaled \$42,613.82 (38.99% of the \$109,292.33 in total itemizable expenditures).

We recommended that the Candidate obtain and furnish to the Audit staff copies of adequate supporting documentation for these expenditures, or evidence of their best efforts to obtain it. On March 30, 1978, the Candidate provided copies of letters sent to vendors requesting additional documentation for eight (8) of the expenditures totaling \$9,962.06 mentioned above.

D. Other Matters

The following matters were noted during the audit for which no further action is recommended.

(1) The Candidate did not have examples of his campaign literature available for our review during our field work. Following our request, the Candidate provided two (2) examples of this information on March 30, 1978. Our review of the literature revealed that the Candidate had not included the authorization required by Section 441d(1) of Title 2, United States Code, on one of the examples. According to the Candidate, he was not aware of the requirement.

(2) The Candidate received eight (8) contributions totaling \$1,400.00 which were not deposited within 10 days of receipt as required by Section 103.3(a). These contributions were received between July 11, 1977 and August 20, 1977 and were not deposited until September 1, 1977.

During the audit the Candidate stated that there was a delay in depositing the contributions because the contributor checks were delivered to his office, which he seldom went to during the campaign. We informed the Candidate of the requirements of Section 103.3(a).



FEDERAL ELECTION COMMISSION

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

April 12, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

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

FROM: *RC* BOB COSTA/RUSSELL BRUNER *RB*

SUBJECT: POSSIBLE VIOLATION OF CONTRIBUTION
LIMITATION UNDER 2 U.S.C. 441a(a)(1)(A)

Our review of the campaign of Sanford Krasnoff, a candidate seeking the office of Representative from the First Congressional District of Louisiana disclosed the following problems which we are referring to your office for review.

A. Contribution Limitation

Section 110.10(a) and (b)(1) of Title 11, Code of Federal Regulations, in part, provides that candidates for Federal office may make unlimited expenditures from personal funds. Personal funds are defined as any assets to which, at the time he or she became a candidate, the candidate had legal and rightful title, or with respect to which the candidate had the right of beneficial enjoyment, under applicable State law, and which the candidate had legal right of access to or control over, including funds from immediate family members.

Mr. Krasnoff was involved in two (2) elections, one in 1976 and the other in 1977. He contributed \$3,500 to his 1976 campaign and \$114,511.99 to his 1977 campaign. Of the \$114,511.99 contributed in 1977, \$80,000 was borrowed from a bank, and properties which Mr. Krasnoff owned were used as collateral for the loans.



According to the candidate, since Louisiana is a community property state, the candidate's wife has a 50% ownership in the properties which were used for collateral in the campaign and also has a 50% ownership of the other \$38,011.99 in funds contributed to the campaign. The only way money or property can be segregated between spouses is by a written legal document, which does not exist in this candidate's situation.

We request your assistance in interpreting Section 110.10(a) and (b)(1). Does the money mentioned above meet the definition of the candidate's personal funds, or was 50% of the \$118,011.99 contributed to the campaign his wife's funds and a violation under 2 U.S.C. 441a(a)(1)(A)?

Should you have any questions, please contact Russ Bruner on extension 3-4155.

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 594

Date Filmed _____ Camera No. --- 2

Cameraman _____

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