



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 960

Date Filmed 5/30/80 Camera No. --- 2

Cameraman GPC

7047191612

AL

PS Form 3811, Aug. 1978

SHINGON, DC - PM

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

2. 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)

3. **ARTICLE ADDRESSED TO:**

Genl M. Harmon

4. **ARTICLE DESCRIPTION**

REGISTERED NO. CERTIFIED NO. INSURED NO.

269733

(Always obtain signature of addressee or agent)

I have examined the article described above

and it is correct incorrect

Robert L. Chales

MAY 19 1980 POSTMARK

5. **ADDRESS** Complete only if requested

6. **UNABLE TO DELIVER BECAUSE**

CLERK'S INITIALS

U.S. POST OFFICE

W. E. ...



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion Edwyn Harrison, Esquire
BARNETT, ALAGIA AND CAREY
1627 K Street, N.W.
Washington, D.C. 20006

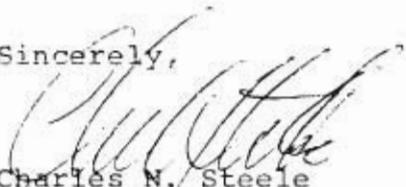
Re: MUR 960; Life Amendment
Political Action Committee,
Inc.

Dear Mr. Harrison:

This letter is to acknowledge the receipt of your client's check for \$100 to the United States Treasury as a civil penalty in the settlement of MUR 960. Accordingly, the Commission has closed its file regarding this matter.

As the Commission informed you in its letter of April 30, 1980, this matter will become a part of the public record in 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 written consent of the respondent and the Commission. As no such consent exists to date, these materials will remain confidential.

Sincerely,


Charles N. Steele
General Counsel

0040191614

FEDERAL ELECTION COMMISSION

MUR 960 - LAPAC, Inc.

Memo to Commission of July 10, 1979

with Express Advocacy Chart of

"No-Life" MURS

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):

- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute
5 U.S.C. § 437g (a)(2)(A)
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Banking Information
- (9) Well Information (geographic or geophysical)

Signed

Cynthia Payne-Boole

date

May 16, 1980

FEDERAL ELECTION COMMISSION

MUR 960- LAPAC, Inc.

Draft Conciliation Agreements and
relevant letters and memos thereof.

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 other statute
<i>2 U.S.C. § 4379(a)(4)(B)</i> | <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 Carolyn Kay Weeder

date May 16, 1980

ITEM IS IN PAYMENT OF FOLLOWING

DATE	AMOUNT

CORRECT ENDORSEMENT IS RECEIPT

LAPAC, INC. 1077
 P. O. BOX 14263
 WASHINGTON, D. C. 20044
 BEN FRANKLIN STATION

975

5-8 1980 17-80 05
 340

PAY TO THE ORDER OF Dept. of Treasury \$ 100.00
One hundred & 00/100 DOLLARS

 SECURITY NATIONAL BANK
 WASHINGTON, D. C.

[Signature]

MUR 960

⑈0000975⑈ • ⑆054000807⑆ ⑈05414024⑈01⑈

219101000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1980

RECEIVED



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Attorney at Law
Barnett, Alagia and Carey
1627 K Street, N.W.
Washington, D.C. 20006

807989

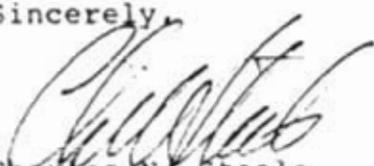
Re: MUR 960; Life Amendment
Political Action Committee, Inc.

Dear Mr. Harrison:

On April 28, 1980, the Commission accepted the conciliation agreement signed by you on behalf of your client in the settlement of a violation of 2 U.S.C. § 441d. Accordingly, the file will be closed in this matter upon the Commission's receipt of the civil penalty. This matter will become a part of the public record thirty days after the file is closed. However, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without 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 agreement for your files.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

MAY 14 9:30 AM '80

00101619

6 1 9
6 0 0 0 0 0 0
BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006



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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Attorney at Law
Barnett, Alagia and Carey
1627 K Street, N.W.
Washington, D.C. 20006

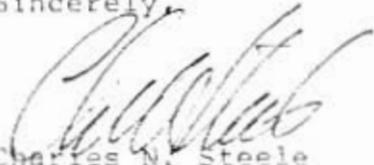
Re: MUR 960; Life Amendment
Political Action Committee, Inc.

Dear Mr. Harrison:

On April 29, 1980, the Commission accepted the conciliation agreement signed by you on behalf of your client in the settlement of a violation of 2 U.S.C. § 441d. Accordingly, the file will be closed in this matter upon the Commission's receipt of the civil penalty. This matter will become a part of the public record thirty days after the file is closed. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without 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 agreement for your files.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

0040191620

666#1056

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political)
Action Committee, Inc.)

MUR 960

907462

CONCILIATION AGREEMENT

This matter having been initiated by a signed, sworn, and notarized complaint by the National Abortion Rights Action League, an investigation having been conducted, and reasonable cause to believe having been found that Life Amendment Political Action Committee, Inc., ("Respondent") violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endorsed.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- 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:

0047191621

- A. LAPAC, Inc., paid for the publication and distribution of three general public communications which expressly advocate the election of clearly identified federal candidates.
- B. The communications at issue did not contain a notice of candidate authorization/non-authorization as required by law.
- C. The distribution of said communications exceeds 15,000 copies.

WHEREFORE, Respondent agrees:

- V. LAPAC, Inc., did not consult counsel prior to taking the steps described in ¶IV above; LAPAC, Inc., intended no violation of the law; but LAPAC, Inc., admits that LAPAC, Inc., is in violation of 2 U.S.C. §441d by having made expenditures for communications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by those candidates endorsed.
- VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of \$100 pursuant 2 U.S.C. §437g(a)(6)(B).
- VII. Respondent will 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.

0047191629

GENERAL CONDITIONS

- VIII. 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.
- IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.
- X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in XVI of this agreement and to so notify the Commission.

60040191623

30 April 1980
Date

April 12, 1980
Date



 Charles N. Steele
 General Counsel
 Federal Election Commission



 Marion Edwyn Harrison
 Attorney for Life Amendment
 Political Action Committee,
 Inc.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Attorney at Law
Barnett, Alagin and Carey
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 960; Life Amendment
Political Action Committee, Inc.

Dear Mr. Harrison:

On April , 1980, the Commission accepted the conciliation agreement signed by you on behalf of your client in the settlement of a violation of 2 U.S.C. § 441d. Accordingly, the file will be closed in this matter upon the Commission's receipt of the civil penalty. This matter will become a part of the public record thirty days after the file is closed. However, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without 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 agreement for your files.

Sincerely,

Charles H. Steele
General Counsel

Enclosure

Conciliation Agreement

MS

0040191624



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1980

Memo

To: MUR FILE 960
From: Carolyn Weeder *cw*
Re: Resending letter to Complainant notifying of closing of MUR 960

The letter addressed to Gail M. Harmon, Esquire notifying of the closing of MUR 960 was returned to the Commission with the explanation of "Moved, not forwardable." A recent address was obtained, therefore the letter is to be resent.

5
2
6
1
9

0
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use \$300

POSTAGE AND FEES PAID



- Moved, left no address
- No such number
- Moved, not forwardable
- Addressee unknown

558

Ms. Gail M. Harmon
Attorney at Law
Sheldon, Harmon, Roisman and Weiss
1025 15th Street, N.W., Suite 500
Washington, D.C. 20005

CERTIFIED
944682



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gail M. Harmon
Attorney at Law
Sheldon, Harmon, Roisman and Weiss
1025 15th Street, N.W., Suite 500
Washington, D.C. 20005

Re: MUR 960

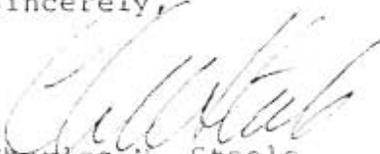
Dear Ms. Harmon:

This is in reference to the complaint you filed with the Commission on April 30, 1979 concerning the Life Amendment Political Action Committee, Incorporated ("LAPAC, Inc.").

After conducting an investigation in this matter, the Commission determined there was reasonable cause to believe that LAPAC, Inc. violated a provision of the Federal Election Campaign Act of 1971, as amended. On April 28, 1980 a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 960. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

0040191625

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gail M. Harmon
Attorney at Law
Sheldon, Harmon, Roisman and Weiss
1025 15th Street, N.W., Suite 500
Washington, D.C. 20005

Re: MUR 960

Dear Ms. Harmon:

This is in reference to the complaint you filed with the Commission on April 30, 1979 concerning the Life Amendment Political Action Committee, Incorporated ("LAPAC, Inc.").

After conducting an investigation in this matter, the Commission determined there was reasonable cause to believe that LAPAC, Inc. violated a provision of the Federal Election Campaign Act of 1971, as amended. On April , 1980 a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 960. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

CNW

80040191627

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political) MUR 960
Action Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 28, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 960:

1. Accept the conciliation agreement as attached to the Memorandum to Commission dated April 24, 1980.
2. Close the File.
3. Approve and send the letter to Marion Harrison, counsel for respondent LAPAC, Inc., (Attachment to the above-named memorandum).
4. Approve and send the letter to Gail Harmon, counsel for complainant National Abortion Rights Action League, (Attachment to the above-named memorandum.)

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

Attest:

4/29/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 4-24-80, 10:04
Circulated on 48 hour vote basis: 4-24-80, 4:00

0017:91628

Wander has copy

611

GCC#92

80 JAN 16 4:29

MLR 960

CHECK IS IN PAYMENT OF FOLLOWING ITEMS	
DATE	AMOUNT

2 LAPAC, INC.
 P. O. BOX 14263
 BEN FRANKLIN STATION
 WASHINGTON, D. C. 20044

371

2-22 1978 15-80 540 05

PAY TO THE ORDER OF *Princess Shop at Kensington* \$ *112.53*
One hundred twelve & 53/100 DOLLARS

CORRECT ENDORSEMENT IS RECEIPT



SECURITY NATIONAL BANK
 WASHINGTON, D. C.

⑆0540⑉0080⑆

[Signature]

⑈0000011253⑈

91629

CHECK IS IN PAYMENT OF FOLLOWING ITEMS	
DATE	AMOUNT

LAPAC, INC.
 P. O. BOX 14263
 BEN FRANKLIN STATION
 WASHINGTON, D. C. 20044

284

10-27 1978 15-80 540 05

PAY TO THE ORDER OF *South Dakota PTL* \$ *80.00*
Fifty & 99/100 DOLLARS

CORRECT ENDORSEMENT IS RECEIPT



SECURITY NATIONAL BANK
 WASHINGTON, D. C.

⑆0540⑉0080⑆

[Signature]

⑈0000008000⑈

For Deposit Only
Acct. No. 1259 28 1
Printing Shoppes of Kennington

1616 97978

PAY ANY BANK P.E.G.
THE NAT'L BANK
OF WASH DC
WASHINGTON DC
15-7 15-7

FEB 27 79

For Deposit Only
First National Bank of Pierre
PIERRE, SOUTH DAKOTA
S.B. Right to Life Corp.
84-256-8 816
2000 39685

NOV 21 78

NOV 27 78
THE FIRST NATIONAL
BANK OF CHICAGO
PAY ANY BANK P.E.G.

AND HAYL BANK
MILL MD. 0520 0016E

0 9 1 0 1 0 0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Jeanette Smith
606 E. Tallent
Rapid City, S.D. 57701

RE: MUR 960

Dear Ms. Smith:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation showed that while you paid for the publication of advertisements in the Rapid City Guide and The Rapid City Journal, these advertisements stated that they were "paid for" by the Life Amendment Political Action Committee of South Dakota. In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "paid for" the publication of the advertisement, as well as stating whether or not the publication was authorized by a candidate.

004091631

Jeannette Smith
Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,



Charles C. Steele
Acting General Counsel

0000019163?

RETURN RECEIPT REGISTERED REGISTERED INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3
Add your address in the RETURN TO space on
Form No.

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
Jeannette Smith

3 ARTICLE DESCRIPTION
REGISTERED NO. 1915295 INSURED (100%)

(Always obtain signature of addressee or agent)
I have received the article described above
SIGNATURE (1) Addressed (1) Authorized agent
Jeannette Smith

4 DATE OF DELIVERY
NOV 14 1979

5 ADDRESS: Complete only if requested

6 UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

246-505

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Jeanette Smith
606 E. Tallent
Rapid City, S.D. 57701

RE: MUR 960

Dear Ms. Smith:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

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CRW

80040191633

Jeannette Smith
Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,

Charles N. Steele
Acting General Counsel

80040191634



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker
Counselor at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

RE: MUR 960
LAPAC, S.D.

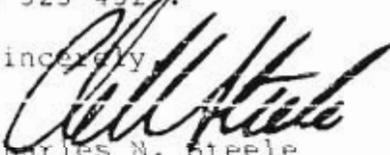
Dear Mr. Becker:

On November 1, 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorization/non-authorization by candidates endorsed.

After reviewing the available information, the Commission determined that it appeared that local pro-life groups in South Dakota used LAPAC, S.D.'s disclaimer without authorization in publications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by these candidates endorsed. The Commission has determined that LAPAC, S.D. shall not be held liable for the unauthorized use of a disclaimer notice attributed to it.

Accordingly, LAPAC, S.D.'s involvement in this matter has been terminated. Should further information come to your attention which you believe is relevant to the Commission's analysis of this matter, please contact Carolyn Weeder at (202) 523-4529.

Sincerely,


Charles N. Steele
Acting General Counsel

00191635

Miss 960 - Weeden

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:
James L. Becker

3. ARTICLE DESCRIPTION
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *963246* |
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *Nov. 13, 1979* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker
Counselor at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

RE: MUR 960
LAPAC, S.D.

Dear Mr. Becker:

On November 1, 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorization/non-authorization by candidates endorsed.

After reviewing the available information, the Commission determined that it appeared that local pro-life groups in South Dakota used LAPAC, S.D.'s disclaimer without authorization in publications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by these candidates endorsed. The Commission has determined that LAPAC, S.D. shall not be held liable for the unauthorized use of a disclaimer notice attributed to it.

Accordingly, LAPAC, S.D.'s involvement in this matter has been terminated. Should further information come to your attention which you believe is relevant to the Commission's analysis of this matter, please contact Carolyn Weeder at (202) 523-4529.

Sincerely,

Charles N. Steele
Acting General Counsel



30040191637



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Barnett, Alagia and Carey
1627 K Street, N.W.
Washington, D.C. 20006

RE: MUR 960

Dear Mr. Harrison:

On November 1, 1979, the Commission determined there was reasonable cause to believe that your client, Life Amendment Political Action Committee, Inc. committed a violation of 2 U.S.C. section 441d of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that LAPAC, INC. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endorsed.

In addition, the Commission determined to take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt, and to take no further action in this matter regarding LAPAC, INC.'s failure to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations

The Commission has a duty to attempt to correct the above described violation of 2 U.S.C. §441d for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. section 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute a civil suit in United States District Court and seek payment of a civil penalty.

0047191637

Mr. Marion Edwyn Harrison
Page 2

Enclosed is a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4529.

Sincerely,



Charles N. Steele
Acting General Counsel

Enclosure
Conciliation Agreement

004091639

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL
PS Form 3811, Apr 1971

Miss Glad - Weeder

1 The following service is requested (check one)
a Show to whom and date delivered
b Show to whom, date and address of delivery
c RESTRICTED DELIVERY
d Show to whom and date delivered
e RESTRICTED DELIVERY
f Show to whom, date and address of delivery \$
g CONSULT POSTMASTER FOR FEES!

2 ARTICLE ADDRESSED TO
M Marion E. Harrison

3 ARTICLE DESCRIPTION REGISTERED NO CERTIFIED NO INSURED NO
993247

(Always obtain signature of addressee or agent)

4 I have received the article described above:
SIGNATURE Addressee Authorized agent
X James Stein

5 DATE OF DELIVERY *11/9/79* POSTMARK

6 ADDRESS *(Complete only if requested)*

7 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS *lll*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Barnett, Alagia and Carey
1627 K Street, N.W.
Washington, D.C. 20006

RE: MUR 960

Dear Mr. Harrison:

On November 1, 1979, the Commission determined there was reasonable cause to believe that your client, Life Amendment Political Action Committee, Inc. committed a violation of 2 U.S.C. section 441d of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that LAPAC, INC. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endorsed.

In addition, the Commission determined to take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt, and to take no further action in this matter regarding LAPAC, INC.'s failure to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations

The Commission has a duty to attempt to correct the above described violation of 2 U.S.C. §441d for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. section 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute a civil suit in United States District Court and seek payment of a civil penalty.

clw

00040191640

Mr. Marion Edwyn Harrison
Page 2

Enclosed is a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4529.

Sincerely,

Charles N. Steele
Acting General Counsel

Enclosure
Conciliation Agreement

0040191641



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Conner
2719 Elm Avenue
Rapid City, South Dakota 57701

RE: MUR 960

Dear Mr. Conner:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

- (2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation indicated that while you paid for the publication of a handbill distributed in your local area, you had printed upon this publication that it was "sponsored by" the Life Amendment Political Action Committee (LAPAC). In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "sponsored" the publication of the handbill.

0040191642

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Conner
2719 Elm Avenue
Rapid City, South Dakota 57701

RE: MUR 960

Dear Mr. Conner:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

- (2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation indicated that while you paid for the publication of a handbill distributed in your local area, you had printed upon this publication that it was "sponsored by" the Life Amendment Political Action Committee (LAPAC). In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "sponsored" the publication of the handbill.

ckw

80040191644

Kevin Conner
Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,

Charles N. Steele
Acting General Counsel

00040191645

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political)
Action Committee, Inc.)
and)
Life Amendment Political)
Action Committee, South)
Dakota)

MUR 960

CERTIFICATION

I, Marjorie W. Ermons, Recording Secretary for the Federal Election Commission's Executive Session on November 1, 1979, do hereby certify that the Commission determined by a vote of 5-0 to take the following actions in MUR 960:

1. Take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt.
2. Find reasonable cause to believe that LAPAC, Inc. violated 2 U.S.C. §44d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by these candidates endorsed, and enter into conciliation.
3. Find no reasonable cause to believe that LAPAC, S. D. violated 2 U.S.C. §44d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by those candidates endorsed.
4. Take no further action in this MUR regarding LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC, S. D. and/or other local pro-life committees as affiliated organizations.

0017191645

5. Approve the letters attached to the General Counsel's October 15, 1979 report, as amended during the Executive Session of November 1, 1979.

Attest:

11-5-79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

0047191647



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwa*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: OCTOBER 25, 1979
SUBJECT: COMMENTS REGARDING MUR 960 General Counsel's
Report dated 10-15-79

Attached is a copy of Commissioner Aikens'
vote sheet with comments regarding MUR 960.

00493643

ATTACHMENT:
Copy of Vote Sheet

48 HOUR TALLY SHEET

ed



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: 10-22-79, 4:00

79 OCT 21

COMM

Commissioner FRIEDERSDORF, [REDACTED], TIERNAN, McGARRY, REICKE, HARRIS

PS
04

RETURN TO OFFICE OF COMMISSION SECRETARY BY: OCTOBER 24, 1979 - 4:00

MUR No. 960 - General Counsel's Report dated 10-15-79

- I approve the recommendation
- I object to the recommendation

COMMENTS: Typo in letter to Becker -
Conciliation agreement should not include
LAPAC-SD in heading since no ECTB was found.

Date: 10-24-79 Signature: *J. Tucker*

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

0047191649





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: OCTOBER 24, 1979
SUBJECT: MUR 960 - General Counsel's Report dated
10-15-79; Received in OCS 10-22-79,
9:42

The above-named document was circulated on a 48 hour
vote basis at 4:00, October 22, 1979.

Commissioner Friedersdorf submitted an objection at
1:45, October 24, 1979, thereby placing MUR 960 on the
Executive Session Agenda for November 1, 1979.

0 0 9 0 1 0 1 6 5 0

October 22, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 960

Please have the attached General Counsel's Report
on MUR 960 distributed to the Commission on a 48 hour
daily basis.

Thank you

80040191651

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

79 OCT 22 A 9: 42

In the Matter of)	
)	
Life Amendment Political)	MUR 960
Action Committee, Inc.)	
and)	
Life Amendment Political)	
Action Committee, South Dakota)	

GENERAL COUNSEL'S REPORT

I. Background/Previous Commission Action

The National Abortion Rights Action League filed a complaint alleging that the Life Amendment Political Action Committee, South Dakota (LAPAC, S.D.) and/or the Life Amendment Political Action Committee, Inc. (LAPAC, INC.) violated certain FECA provisions. On June 27, 1979, the Commission made the following determinations:

- A. Reason to believe that Life Amendment Political Action Committee, Inc. may have violated 2 U.S.C. §434 by failing to report the liquidation of a debt;
- B. Reason to believe that LAPAC, Inc. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates;
- C. Reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization.

The evidence from the investigation of these possible violations and the conclusions derived therefrom are provided below.

0040191652

II. Legal Analysis

A. LAPAC, Inc's Failure To Report The Liquidation OF A Debt

LAPAC, Inc. reported a debt to Harold's Printing Company on its 1978 30-day General Report which was not continuously reported in its 1978 Year-End Report pursuant to 2 U.S.C. §434 and 11 C.F.R. §104.8(a).^{1/} The Reports Analysis Division sent an RFAI in April 1979 regarding the committee's failure to carry forward the debt in its Year-End Report. The reporting error was rectified soon thereafter. In light of the fact that LAPAC, Inc. timely complied with the RFAI, as well as having originally reported the debt, and in consideration that the reporting error was corrected prior to the filing of the complaint, the Office of the General Counsel recommends that no further action be taken concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 for failure to report the liquidation of a debt.

B. LAPAC, Inc. and LAPAC, S.D.'s Failure to Include Required Disclaimers on Express Advocacy Communications

As discussed in the First General Counsel's Report (June 27, 1979), four communications submitted by Complainant as Exhibits C and C-b published by LAPAC, Inc. and Exhibit B and D apparently published by LAPAC, S.D. appear to be examples of express advocacy which do not display the disclaimer required by 2 U.S.C. §441d. Interrogatory responses from both respondents regarding this issue are discussed herein.

^{1/} 2 U.S.C. §434(c) exempts debts previously reported from the need to be carried forward (11 C.F.R. §104.8(a)) only in the circumstance where there has been no change in the total debts and obligations from one report to the other.

00047191653

1) LAPAC, Inc.

LAPAC, Inc. acknowledges that it paid for the publication and distribution of Exhibits C, C-b and an additional publication, Exhibit E.^{2/} As discussed in the First General Counsel's Report, Exhibits C and C-b specifically identify federal candidates who support pro-life issues along with the following language:

LAPAC - Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

and

THIS LITTLE GUY WANTS YOU TO VOTE

VOTE FOR HIS LIFE

NOVEMBER 7

and

VOTE FOR THE UNBORN

THERE IS A DIFFERENCE!

and

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

Furthermore, the additional communication paid for by LAPAC, Inc. submitted in response to interrogatories is also a clear example of express advocacy.

Exhibit E states "Vote for the unborn - VOTE THORSNESS - November 7, 1978."

^{2/} See Attached Exhibits

0047191654

2 U.S.C. §441d requires that such communications include statements of authorization/non-authorization by those candidates endorsed. LAPAC, Inc.'s aforementioned communications fail to include the said required disclaimer.

In response to possible violation of §441d, LAPAC, Inc., neither denies nor refutes that LAPAC, Inc.'s publications in question are examples of express advocacy. Instead, LAPAC Inc.'s contentions are based on two grounds which it claims exempt the communications from the requirements specified in §441d.^{3/}

First, LAPAC, Inc. argues that the publications are in fact "handbills" which are excluded from §441d requirements, evident by the omission of "handbills" within the statutory language.

Express advocacy communications are defined in 11 C.F.R. §110.11(a)(1) which states:

§110.11 Communications; advertising.

(a)(1) Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, but not on a bumper strip, pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed, the communication -- ...

^{3/} See Attachment 1.

0010165

The exemption to the very broad coverage afforded the regulatory definition of "communication" in 11 C.F.R. §110.11(a)(1) is limited to "small items upon which the disclaimer cannot be conveniently printed ..." The handbills, because of their size, do not fall into the "small item" category and therefore clearly fall within the category, "any other type of general public advertising."

LAPAC, Inc.'s second contention is that the said handbills are personal communications rather than general public political advertisements and are thus exempt from the §441d disclaimer requirements. This argument seems weak in light of the fact that the distribution of the handbills exceeds 15,000. Such a distribution shows that the communications are general public advertisements as opposed to personal correspondence, and thus, the communications are not exempt from Section 441d provisions.

The Office of General Counsel therefore recommends a finding of reasonable cause to believe that LAPAC, Inc. violated 2 U.S.C. §441d and 11 C.F.R. §110.11(a)(1), and enter into conciliation.

2) LAPAC, S.D.

Investigation of LAPAC, S.D.'s possible violation of 2 U.S.C. §441d reveals that LAPAC, S.D. apparently neither paid for nor authorized the use of its name on Exhibits B and D of the original complaint.

0047191655

Exhibits B and D expressly advocate the election of clearly identified federal candidates and indicate that LAPAC, S.D. "paid for" and "sponsored" their publication. The following language appears on Exhibit B:

This ad written, or ordered and paid for by LAPAC-S.D. (Life Amendment Political Action Committee, White, S.D. 57276, Ellen Dempsey, Treas.)

The statement "Sponsored by LAPAC (Life Amendment Political Action Committee), Hq. White, S.D." appears on Exhibit D.

Initially, LAPAC, S.D. responses to interrogatories appeared to contradict the language contained in Exhibits B and D.^{4/} For example, its responses state that "no federal candidates were endorsed in flyers or brochures paid for by (LAPAC, S.D.) Life Amendment Political Action Committee, South Dakota, ...," and that "no expenses were incurred in the preparation and distribution of any communications relating to a federal election" by LAPAC, S.D., and that "no brochures were printed or distributed by (LAPAC, S.D.) which mentioned in any manner the names of any candidates for federal office ..."

A letter was sent to LAPAC, S.D. requesting an explanation for the contradictions between these responses and the language which appears on Exhibits B and D.

4/ See Attachment 2.

000191657

LAPAC, S.D. responded that the disclaimer was used in both advertisements by local pro-life groups of Rapid City, South Dakota without the authorization or knowledge by Ellen Dempsey, the sole officer of LAPAC, S.D. and that the exhibits had been overlooked when responding to interrogatories.

The Commission received affidavits from Ellen Dempsey of LAPAC, S.D. and from Jeanette Smith and Kevin Conner, representing two Rapid City area groups. The three affidavits confirm that Jeanette Smith paid for the publication of Exhibit B, that Kevin Conner paid for Exhibit D, and that both persons used LAPAC, S.D.'s disclaimer without Ellen Dempsey's authorization or knowledge.^{5/}

The Office of General Counsel therefore recommends a finding of no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d.

From the information submitted in the affidavits, it now appears that Jeanette Smith and Kevin Conner, representing Rapid City pro-life persons, may have violated 2 U.S.C. §441d. The expenditures incurred for the publications are reported as being \$140.00 by Jeanette Smith's group and \$40.00 by Kevin Conner's group. Exhibit B appeared in The Rapid City Guide and The Rapid City Journal a total of four times. Exhibit D was hand distributed by Kevin Conner and other local pro-life youth.

^{5/} See Attachment 3.

In light of the fact that the expenditures for these publications are minimal and that the circulation is limited, the Office of General Counsel recommends that the Commission take no action with respect to a violation of 2 U.S.C. §441d by the Rapid City, S.D. pro-life groups.

C. LAPAC, Inc.'s Failure To Include LAPAC, S.D. As An Affiliated Organization.

At issue is whether LAPAC, Inc. violated 2 U.S.C. §434 by failing to report LAPAC, S.D. as an affiliated organization on its statement of organization.

LAPAC, Inc. claims to have no relationship with LAPAC, S.D. LAPAC, Inc. states that it has neither provided nor received any administrative or financial assistance from LAPAC, S.D. or other pro-life groups, except for the Pro-Life Action Council of Iowa, which is the focus of MUR 885.^{6/} LAPAC, S.D. also claims to have no administrative or financial relationship with LAPAC, Inc.

There is not sufficient evidence to establish affiliation between LAPAC, S.D. and LAPAC, Inc.; and yet there is evidence of some coordination and, possibly, control. For example, the name of the sole officer of LAPAC, S.D., Ellen Dempsey, repeatedly appears on LAPAC, Inc.'s publications endorsing South Dakota's federal pro-life candidates. In addition, references have been made in the affidavits from Ellen Dempsey and Jeanette Smith

^{6/} See Attachment 1, Response to Interrogatory 4.

0047191659

Although the above described evidence is not in itself sufficient to determine affiliation, it appears to warrant further consideration. For this reason, the Office of General Counsel recommends to take no further action in this MUR with regard to LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations, but to incorporate this information regarding affiliation into MUR 996, which specifically deals with the affiliation issue. For reasons of confidentiality, we recommend that this file be kept open pending resolution of the affiliation issue and that the letters to LAPAC, S.D.; Jeanette Smith; and Kevin Conner be sent upon the closing of this matter.

Recommendations

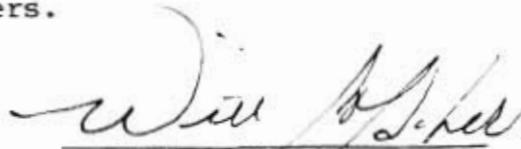
- 1) Take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt.
- 2) Find reasonable cause to believe that LAPAC, Inc. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by these candidates endorsed, and enter into conciliation.
- 3) Find no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including required statements of authorization/non-authorization by those candidates endorsed.

0040191661

4) Take no further action in this MUR regarding LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations, but authorize that the affiliation issue be incorporated with MUR 996.

5) Approve the attached letters.

10/15/79
Date


William C. Oldaker
General Counsel

Attachments

- Exhibits B of complaint
- Exhibit C of complaint
- Exhibit C-b of complaint
- Exhibit D of complaint
- Exhibit E - additionally submitted by LAPAC, Inc. in Attachment 1
- 1 - LAPAC, Inc.'s Responses to Interrogatories
- 2 - LAPAC, S.D.'s Response to Interrogatories
- 3 - Affidavits submitted by LAPAC, S.D.

Letters

- RCTB letter to LAPAC, Inc. and Conciliation Agreement
- No RCTB letter to LAPAC, S.D.
- Letter of admonition to Jeanette Smith
- Letter to admonition to Kevin Conner

004791662

"8"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

- U.S. Senator: LARRY PRESSLER
- U.S. House of Representatives: JAMES ABDNOR
BOB SAMUELESON
- South Dakota Governor: WILLIAM JANKLOW
- South Dakota Lt. Governor: LOWELL HANSON
- South Dakota Attorney General: MARK MEIERHENRY
MAX GORE
- State Treas.: DAVID VOLK
- South Dakota Senate (Dist. 27): LYNDELL PETERSON
- South Dakota House (Dist. 27): GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, printed and paid for by the S.D. Life Amendment Political Action Committee, White, S.D. 57204, Ellen Dempsey, Treas.)

0047191663

EV 218

LAPAC

(Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

HARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORNSNESS will sponsor and promote a Human Life Amendment.

AMES ADDON has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7
Sean Morton Downey, Jr., Chairman
LAPAC, Inc.
Ellen Downey, State Coordinator, LAPAC, Inc.

THIS LITTLE GUY WANTS YOU TO VOTE



FOR HIS LIFE NOVEMBER 7

EX-111 C

#C-10
Printed

VOTE FOR THE UNBORN

There Is a Difference!

LEO THORSNESS

TOM DASCHLE

"When elected to Congress I would be honored to co-sponsor and promote a Human Life Amendment."

"... I can't support a Human Life Amendment."

Leo Thorsness is strongly *opposed* to our tax dollars being used for abortions.

Daschel would use your tax dollars to abort babies.

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, P.C.
Benjamin Franklin Station • P.O. Box 11263 • Washington, D.C. 20010 • U P U U

A copy of our report will be sent to the Federal Election Commission upon request.

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

*I found this group
saved the mind that
was in my car.
G. Meyer*

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

A Vote For These Candidates is A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

For Governor:

WILLIAM JANKLOW *

For Atty. General

MARK MEIERHEFFRY *
MAX GORS

For Lt. Governor:

LOWELL HANSEN II *

For St. Treasurer:

DAVID VOLK *

For U.S. Senate:

LARRY PRESSLER *

For U.S. House of Rep.

JAMES ABONGR *

BOB SAMUELSON *defeated*

For South Dakota Senate - Dist. 27
LYNDELL PETERSON

For South Dakota House - Dist. 27
GORDON PEDERSON
JOHN HANI
OWEN CADDY
GEORGE SAUNDON
KATHLEEN PEARSON

6650191000

**VOTE FOR THOSE WHO VALUE LIFE —
THEY WILL VALUE YOURS!**

Sponsored by LAFAC (Life Amendment Political Action Committee), Hq., White, SD

STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

We are disappointed this list for LAFAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion.

We believe every human being has the right to his or her journey through life.

We believe those who are weak must be helped by the strong at all stages of life.

We believe our elected officials must have the intelligence, integrity and determination to solve social problems without resorting to the inhumane solution of killing the helpless.

We are glad to give our time and efforts to work for these candidates who have pledged their support of a Human Life Amendment.

Rapid City Youth For Life

If you share our concern and wish to join or help in any way, call 242-6100

WE LOVE LIFE!

Rapid City, S. Dak 57701

F. H. L. L.

If you'd like to ●

ATTACHMENT 2

Vote for the unborn —

VOTE

Thorsness

NOVEMBER 7, 1978

0047191567

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."

Lee C. Thorsness



LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

11/15/78

10760 Weeder
BARNETT, ALAGIA & CAREY

1827 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572

CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA*

KENTUCKY HOME LIFE BUILDING

BOX 1178

LOUISVILLE, KENTUCKY 40201

TELEPHONE (502) 385-4151

BARNETT, ALAGIA & PROSPERII**

248 ROYAL PALM WAY

PALM BEACH, FLORIDA 33480

TELEPHONE (305) 832-5886

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER*
MICHAEL E. LANNON*
RICHARD A. GLADSTONE
PATRICIA C. ANDERSON
ANTHONY O. BROWN*
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL

RUFUS E. WILSON

August 1, 1979

BY HAND

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

Re: Life Amendment Political Action Committee, Inc.
MUR #960

Dear Mr. Oldaker:

In response to your letter of July 2, 1979 addressed to our client Life Amendment Political Action Committee, Inc. ("LAPAC"), MUR #960, we attach executed Answers to Interrogatories and comment as follows.

1. LAPAC is not in violation of the provisions of 2 USC §434 inasmuch as LAPAC reported the liquidation of the debt to which the Interrogatories make reference. See Interrogatory #3 and Answer.

2. LAPAC is not in violation of the provisions of 2 USC §433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

Attachment 1

0047191668

If you'd like to

ATTACHMENT 2

Vote for the unborn —

VOTE

Thorsness

NOVEMBER 7, 1978

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."

Lee C. Thorsness



LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14250 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

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Wieder

BARNETT, ALAGIA & CAREY

1827 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572

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OF COUNSEL
RUFUS E. WILSON

August 1, 1979

BY HAND

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

Re: Life Amendment Political Action Committee, Inc.
MUR #960

Dear Mr. Oldaker:

In response to your letter of July 2, 1979 addressed to our client Life Amendment Political Action Committee, Inc. ("LAPAC"), MUR #960, we attach executed Answers to Interrogatories and comment as follows.

1. LAPAC is not in violation of the provisions of 2 USC §434 inasmuch as LAPAC reported the liquidation of the debt to which the Interrogatories make reference. See Interrogatory #3 and Answer.

2. LAPAC is not in violation of the provisions of 2 USC §433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

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Handwritten initials or signature

BARNETT, ALAGIA & CAREY

William C. Oldaker, Esquire
August 1, 1979
Page two

3. LAPAC is not in violation of the provisions of 2 USC §44ld with respect to Attachments 1, 2 and 3 to the Interrogatories, q.v. §44ld refers to communications ". . . through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising . . ." The regulation repeats the statutory language adding, by way of example as to limitation, exclusions as to "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed . . ." 11 CFR §110.11(a)(1). Thus, neither the statute nor the regulation includes a handbill, which obviously is not "general public political advertising" but rather a form of personal communication.

As a lawyer I find the purpose of the Federal Election Commission ("FEC") in drafting §110.11(a)(1) as it did to be obvious - namely, to *exclude* "bumper strips, a pin, button, pen and similar *small items upon which the disclaimer cannot be conveniently printed . . .*" [Italics supplied.] Hence, if asked, I would have advised a client to include the applicable portion of the message set forth in 11 CFR §110.11(a)(1)(ii), not because §44ld(2) necessarily requires it but because FEC intends it. However, because the handbills are not "general public political advertising" our client should not be held to a violation, however minimal and technical the violation otherwise might be.

The charges in MUR #960, all trivial whether or not accurate, emanate from a letter of April 30, 1979 to FEC from Ms. Gail M. Harmon, filing on behalf of her client the National Abortion Rights Action League ("NARAL"). NARAL is conducting a nationwide campaign of harassment and vilification of prolife groups. We have reason to believe NARAL has filed complaints with the FEC against seven or so other prolife organizations. In evaluating the charges at issue, the FEC should bear in mind this motivation. For example, on April 18, 1979 NARAL issued a press release, Attachment A, in which NARAL announced "allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups . . ." The press release further announced a press conference on Capitol Hill for

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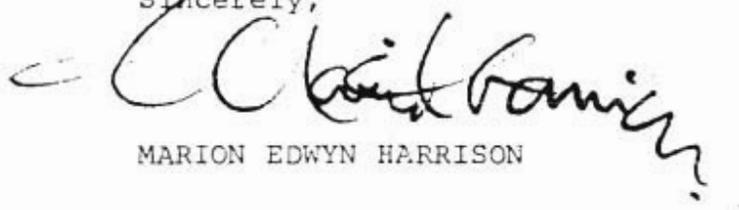
BARNETT, ALAGIA & CAREY

William C. Oldaker, Esquire
August 1, 1979
Page three

10:00 AM on April 30. In addition, on April 12 NARAL issued another press release, to be held for release until April 30 at 10:30 AM, charging LAPAC and other prolife groups with "major" and "flagrant . . ." unlawful acts. Attachment B. It ill behooves FEC to waste its resources and those of lawful political action committees in facilitating NARAL's campaign of harassment.

Our client waives confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record. 2 USC §437g(a)(3)(B).

Sincerely,

A handwritten signature in black ink, appearing to read "Marion Edwyn Harrison". The signature is written in a cursive style with a large initial "M".

MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Carolyn Weeder

004019167?

FOR IMMEDIATE RELEASE

For more information, contact:

Janet Beals, Director of Public Information

(202) 347-7774 OR

Joan Eisenstedt, Conference Coordinator

347-7774 through April 27

April 27-30: 234-0700, NARAL/Shoreham Americana

ABORTION RIGHTS CONVENTION FOCUSES ON ELECTORAL POLITICS

Washington, D.C., April 18, 1979 ----- Abortion rights supporters from all 50 states will converge on Washington this month to attend the National Abortion Rights Action League's annual convention. The League, the nation's largest single-issue group working to defend abortion rights, will celebrate its 10th year of existence at the April 28-30 annual meeting, to be held at the Shoreham-Americana Hotel.

The convention's focus on the combination of electoral politics with grassroots organizing parallels a recent change in strategy for the pro-choice group. "This year," said Karen Mulhauser, NARAL Executive Director, "marks the beginning of an aggressive campaign -- we call it "Impact '80" -- to let legislators know that compulsory pregnancy is not the will of the people. We are arming our activists now to support those who vote for choice. We know that the majority of Americans believe that abortion should remain a women's personal decision and our goal is to organize that majority."

In workshops and other information sessions, participants will hear the history of the issue and learn to mobilize to insure its future.

A list of speakers follows:

Midge Costanza and Michael McCloud will lead the plenary on electoral politics (9-10:15 a.m., Sunday). Costanza, former Special Assistant to the President, will speak on the importance of grassroots involvement in electoral politics. McCloud,

right-hand man to John Anderson, will speak from his involvement in Anderson's successful campaign against a single-issue anti-abortion candidate in 1978.

Anderson will be meeting the abortion issue head-on again in his bid for the Republican presidential nomination.

Immediately following will be "how-to" workshops on electoral politics, led by six political consultants, including Matt Reese, specialist on campaigns for single-issue coalitions.

Highlights of Saturday's program include comments by well-known constitutional lawyer and abortion rights specialist Harriet Pilpel, the General Counsel to Planned Parenthood Federation of America. She will speak of the recent history of the abortion rights struggle -- how the fight was won through litigation and legislation. (Saturday plenary, 10-11 a.m.) Also speaking will be Rebecca Cook, who has been consulting at cabinet and parliamentary levels on national family planning law and policy for the past six years with the International Planned Parenthood Federation. She will discuss the increasing liberalization of abortion laws in other countries in the past dozen years, and its connection with other civil rights for women abroad. (Also Saturday plenary session)

Saturday brunch will include an address from Jeannie I. Rosoff, President of the Alan Guttmacher Institute. Rosoff will share her perspective as a long-time member of the Capitol Hill scene, recalling the days when even contraception was a practically forbidden topic.

Session I workshops (2:45-3:45 p.m., Saturday) include Minors' Rights by Bill Baird, who has been challenging restrictive birth control and abortion laws for 15 years, and is the plaintiff in Beilotti v. Baird, now before the Supreme Court, a case which will dramatically affect the rights of teenagers to abortions.

Session I will also mark the beginnings of the first national group for doctors organizing to defend a woman's right to abortion. The Physicians for Choice workshop will be directed by Dr. Christopher Tietze, one of the world's most eminent authorities on human fertility and its control. Dr. Tietze is now a Senior Consultant to

the Center for Policy Studies of the Population Council where he is primarily concerned with research in the demographic and public health aspects of induced abortion. Dr. Tietze, with Dr. Jack Lippes, inventor of the "Lippes Loop" IUD, will discuss how to organize physicians to become actively involved in abortion rights.

Naomi Baden, Executive Director of the Coalition of Labor Union Women and a staff member of the Amalgamated Clothing and Textile Workers Union, will lead Working with Union People, also in Session I. She will speak to the possibilities and problems of cooperation between abortion rights groups and labor unions.

Pat Gavett, Executive Director of the Religious Coalition for Abortion Rights, will preside over a workshop on Working with the Religious Community in Session II (4:15-6 p.m., Saturday). The Religious Coalition was responsible earlier this year for the recommitment of 18 of its member denominations and religious organizations to make abortion rights one of the major social action issues on which they work.

Well-known organizing expert and Director of the Midwest Academy, Heather Booth, will lead a community organizing workshop. Uta Landy, Executive Director of the National Abortion Federation, the professional association of abortion providers, and who established the first national toll-free consumer hotline on abortion, will lead the Clinic Organizing workshop.

Dr. Helen Rodriguez-Trias, Chief of Pediatrics at Roosevelt Hospital in New York, will join other minority leaders in chairing the Working with Minorities workshop. She is a founder of the Committee to End Sterilization Abuse, and works to protect Puerto Rican women against coerced sterilization.

Monday, April 30 (8:30 a.m.) expected so far are George Millican (D-CA), Michael Barnes (D-MD), Ted Weiss (D-NY), Tony Beilenson (D-CA), Vic Fazio (D-CA), and others.

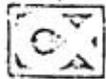
Immediately following, a press conference will announce NARAL's allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups. The conference will be held on Capitol Hill (exact location to be announced), at 10:00 a.m. Karen Mulhauser, NARAL Executive Director, will speak, and NARAL's attorney and others will be available as resource people. NARAL will be filing complaints against all six groups that morning with the Federal Election Commission. Another complaint against an Iowa anti-abortion group, the Pro-Life Action Council, was filed with the FEC by NARAL last year. It is still under investigation.

Convention-goers and many others will spend the rest of the day lobbying their Congresspeople on the issue of abortion rights.

See attached schedule for more details.



004019167

**NARAL****News Release**

NATIONAL ABORTION RIGHTS ACTION LEAGUE
 325 15th Street, N.W., Washington D. C. 20005

HOLD FOR RELEASE UNTIL

RECEIVED
 JUL 11 1979 APRIL 30, 1979, 10:30 AM

For more information, contact:
 Janet Beals, Director of Public Information
 (202) 347-7774

SIX ANTI-ABORTION GROUPS CHARGED
 WITH ELECTION LAW VIOLATIONS

Washington, D.C. 5/30/79 -- Complaints alleging violations of federal election laws by two national and four state anti-abortion groups were filed today with the Federal Election Commission.

The complaints were filed by the National Abortion Rights Action League against two national anti-abortion organizations, the Life Amendment Political Action Committee (LAPAC), and the National Right to Life Committee (NRLC). Complaints were also filed against state anti-abortion groups in South Dakota, Massachusetts, Indiana and New Mexico.

"We are appalled at the major violations of federal election laws that we have found in our limited search. We are asking the Federal Election Commission to investigate the extent of this lawbreaking, and take appropriate action," said Executive Director Karen Mullasser.

"Both national groups flagrantly violated election laws in 1978, and continue to do so. We have been saying since last November that their claims to political strength lack credibility. Their illegal actions make them even less credible."

NARAL is charging that the Life Amendment Political Action Committee is illegally soliciting funds from the general public through advertising, direct mail requests and ticket sales. NARAL alleges that the Life Amendment Political Action Committee is connected with the National Right to Life Committee, and federal election law clearly states that an affiliated organization may only solicit contributions from its parent organization's membership . . . not from the general public.

NARAL has requested the Federal Election Commission to order that such illegal activity be discontinued and to instruct LAPAC to return these illegally solicited funds to the donors.

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NARAL's second complaint, against the National Right to Life Committee, alleges that NRLC's Voter Identification Project (which seeks to identify anti-abortion voters and mobilize them in support of anti-abortion candidates) constitutes unlawful corporate contributions to anti-abortion candidates. NARAL is requesting that the FEC prohibit NRLC's Voter Identification Project.

NARAL is also drawing to the FEC's attention unreported and illegal election activity in South Dakota, Massachusetts, Indiana and New Mexico.

Penalties for these violations of federal election law by two national and four state anti-abortion groups could total in excess of a hundred thousand dollars. If the violations are found to be knowing and willful, penalties could be double that amount.

NARAL's complaint to the Federal Election Commission alleging illegal activities by the Iowa Pro Life Action Council in the 1978 election is still under investigation.

0040191679

o A Massachusetts anti-abortion group, Massachusetts Citizens for Life, acted illegally by distributing a brochure to the general public endorsing federal candidates. This constitutes an unlawful corporate contribution to a campaign.

Because the Massachusetts group is an affiliate of the National Right to Life Committee, and because NRLC's past president, Dr. Mildred Jefferson, is connected with the local group, NARAL suspects that the violation was knowing and willful.

o A great deal of anti-abortion political activity, including printing and distribution of brochures and placement of full-page ads in newspapers, took place in Indiana's 8th Congressional District, and was not reported to the Federal Election Commission. The activity was done in the name of the Right to Life Chapter of the 8th Congressional District, but was not reported by that group. Neither was it reported by the registered political action committee of Indiana Right to Life, with which the district group is affiliated. This is in violation of federal election law requiring reporting of any campaign contributions of corporations and political action committees.

In addition, a large number of purportedly personal letters (signed by a local priest and other anti-abortion leaders) endorsing a candidate were mailed in the district without naming the political group that authorized them, in clear violation of federal election law. Postage for some of these letters was paid by a political campaign, one indication that the letters were not simply personal.

o An anti-abortion group incorporated in New Mexico, The Right to Life Committee of New Mexico, violated election laws by printing and distributing large numbers of newsletters endorsing state and federal candidates. This constitutes an unlawful corporate contribution to a political campaign.

NARAL found this illegal activity in the four states it investigated. NARAL is asking that the FEC investigate for similar activity in these and other states. Because the pattern is similar, the possibility is great that unlawful activity is more extensive than we discovered in the initial research.

The Federal Election Commission, if it finds violations, may enforce penalties up to the amount of the violation, which would total in excess of a hundred thousand dollars in these instances. If the violations are considered knowing and willful, penalties can reach double the amount of the violation.

request, or suggest the use of their names? If so, please explain.

A. No. Life Amendment Political Action Committee, Inc. ("LAPAC") issued only three flyers pertaining to South Dakota elections. Attachments 1, 2 and 3.

3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.

A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.

A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed. Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure, Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2.

5. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.

A. See Interrogatory #3, supra.

6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members.

A. Articles of Incorporation and Bylaws attached as Attachments 7 and 8.

Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

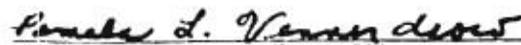
BY


PAUL A. BROWN, Treasurer

District of Columbia

City of Washington, ss: My Commission Expires April 14, 1984

Subscribed and sworn to before me a Notary Public this
1st day of August, 1979.


PAMELA L. VENNERDROW
Notary Public, D.C.

My Commission expires April 14, 1984.

LAPAC

(Life Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNOR has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7

*Sean Morton Downey, Jr., Chairman
LAPAC, Inc.*

Ellen Gempsey, State Coordinator, LAPAC, Inc.

THIS LITTLE GUY
WANTS YOU TO
VOTE



FOR HIS LIFE
NOVEMBER 7

0047191681

If you'd like to

Vote for the unborn —

VOTE

Thorsness

NOVEMBER 7, 1978

50040191685

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."

Lee C. Thorsness



LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14255 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

VOTE FOR THE UNBORN
There Is a Difference!

LEO
THORSNESS

TOM
DASCHLE

"When elected to Congress
I would be honored to co-
sponsor and promote a
Human Life Amendment."

"... I can't support a
Human Life Amend-
ment."

Leo Thorsness is strong-
ly *opposed* to our tax
dollars being used for
abortions.

Daschel would use your
tax dollars to abort
babies.

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.
Benjamin Franklin Station • P.O. Box 14253 • Washington, D.C. 20044

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Vote for the unborn

Your vote is

→ CRUCIAL! ←

LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC. ENDORSES AND URGES YOUR SUPPORT OF THE FOLLOWING PRO-LIFE CANDIDATES TO THE HOUSE AND SENATE OF THE UNITED STATES ON NOVEMBER 7, 1978.

SOUTH DAKOTA SENATE: LARRY PRESSLER IS BY FAR THE BEST PERSON TO SEND TO THE SENATE.

SOUTH DAKOTA 1ST CONGRESSIONAL DISTRICT: LEO THORSNESS SUPPORTS THE HUMAN LIFE AMENDMENT AND WILL BE A LEADER IN OUR FIGHT TO RESTORE RESPECT FOR THE UNBORN.

SOUTH DAKOTA 2ND CONGRESSIONAL DISTRICT: REPRESENTATIVE JAMES ABDNOR HAS ONE OF THE BEST PRO-LIFE VOTING RECORDS IN THE HOUSE AND DESERVES YOUR FULL SUPPORT FOR RE-ELECTION.

PLEASE BACK ALL THREE OF THESE MEN THIS NOVEMBER 7TH. VOLUNTEER YOUR TIME NOW AND GIVE MILLIONS OF UNBORN CHILDREN THE CHANCE TO SEE WHAT WE TAKE FOR GRANTED.....THE LIGHT OF GOD'S BEAUTIFUL DAY.

SEAN MORTON DOWNEY JR.
CHAIRMAN: LAPAC INC.

ELLEN DEMPSEY
STATE COORDINATOR: LAPAC INC.

NOVEMBER 7, 1978 — VOTE PRO-LIFE

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

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JAN 11 '79 00202

MA 2692 JH 09 79 18-041

0000-0000-0
FIRST PRODUCTION

00040191680

At Appt. on Sun Sept 2, 1978
Des Moines Sunday Register

PERSONALS
ABORTION
Up to (24 wks) termination, mod-
ern clinic or hospital, appts made
7 dys Toll free 1-800-451-6722
WANTED: A...ONE...Balance

**SEE WHY THIS
LITTLE GUY
WANTS YOU TO**

**VOTE
TUESDAY
NOV-7TH!**

18 WEEKS

Pro-Life Action Council
P.O. Box 2035
Des Moines, Iowa 50310

BIJK RATE
U.S. POSTAGE
PAID
Permit No. 1343
Des Moines, Iowa

ATTACHMENT 6

004019169

Vote for the Unborn on Nov. 7th!

In America today, the most helpless member of the human family — the unborn child — has been denied the protection of the law! Sad but true, even some endangered species of animals enjoy more legal protection than the unborn child.

You have an unalienable right to life. And that right was legally protected for you from the day you were conceived. Today, because of a single Supreme Court decision, the same right to life you have always possessed has been taken away from the unborn child. If the unborn can be "terminated" today just because they are unplanned, unwanted or inconvenient, who might be eliminated for similar reasons tomorrow — the aged, the sickly, the mentally retarded, the physically handicapped? In the end,

just how safe will YOUR right to life be?

The unborn cannot speak for themselves but you can speak for them — with your vote on Tuesday, November 7th! We must elect men and women who will work for passage of a Human Life Amendment (H.L.A.) to the Constitution. This amendment will guarantee legal protection for ALL human life, regardless of age, health, capability or state of dependency.

If you feel, like our forefathers did, that the right to life is the foundation of all human rights, then read below how the various candidates stand on key pro-life issues — and VOTE on November 7th!



Roger
JEPSEN

UNITED STATES SENATE

HUMAN LIFE AMENDMENT (H.L.A.)

YES

Jepsen will sponsor and support a Human Life Amendment to restore legal protection for the unborn child.

NO

Clark is opposed to any meaningful Human Life Amendment to restore the right to life for the unborn child.



Dick
CLARK

USE OF TAX DOLLARS TO PAY FOR GOVERNMENT-SUBSIDIZED ABORTIONS

NO

Jepsen is opposed to using your tax dollars in any way to pay for abortion services.

Clark has consistently supported using your tax dollars to pay for abortions.

YES

FORCING EMPLOYERS TO PROVIDE ABORTION BENEFITS.

NO

Jepsen supports a "conscience clause" permitting private employers to exclude abortions from pregnancy disability benefits.

Clark has voted to force private employers to include abortions in their pregnancy disability benefits.

YES

ENDORSED BY . . .

Pro-Life Action Council of Iowa
Life Amendment Political Action Committee
National Pro-Life Political Action Committee

SUPPORTED BY . . .

National Abortion Rights Action League — the most radical and militant pro-abortion group in America.

U.S. HOUSE (INDIANA)

James
LEACH

Opposes Human Life Amendment; opposes public funding of abortions.

Richard
MEYERS

Opposes Human Life Amendment; supports public funding of abortions.

Neal
SMITH

Unclear on H.L.A. — wants to hear from constituents. Has voted for some public funding restrictions on abortions.

Charles
MINOR

Opposes Human Life Amendment; supports public funding of abortions.

GOVERNOR

Jerry
FITZGERALD

Opposes any meaningful Human Life Amendment; opposes public funding for abortions.

Robert
RAY

Opposes Human Life Amendment; supports public funding for abortions.

Terry
BRANSTAD

Supports Human Life Amendment; opposes public funding for abortions.

William
PALMER

Opposes Human Life Amendment; opposes public funding for abortions.

ATTN: GOVERNOR

Since The Supreme Court Legalized Abortions in 1973 . . .

- ... over 6,000,000 abortions have been performed in the United States in the past five years.
- ... over \$256,000,000 in tax dollars have been spent to directly pay for 1,400,000 government-subsidized abortions.
- ... parents have been stripped of their rights to be consulted or even notified before their minor daughters undergo abortions.

- ... fathers have been stripped of their rights to protect the lives of their unborn children.
- ... some calloused members of Congress argue that it is cheaper to pay for abortions than to provide post-natal care.
- ... some members of the medical profession describe human pregnancy as "the second leading form of venereal disease."

Now Ask Yourself If This Issue Is Important Enough To Base Your Vote On?

Your vote on Tuesday, November 7th is **CRUCIAL!** Several important races can be decided by a margin as narrow as 1 or 2 votes per precinct. If you vote and urge your pro-life friends and relatives to vote, the election of qualified pro-life candidates will be assured! Be sure to **VOTE** . . . and **PLEASE** help us in our fight to stop the legalized killing of human life —

MAIL THIS COUPON TODAY! —

TO Pro-Life Action Council
P. O. Box 2035
Des Moines, Iowa 50310

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

___\$100 ___\$75 ___\$50 ___\$25 ___\$10 \$___

YOUR NAME _____

ADDRESS _____

CITY STATE _____ ZIP _____

PHONE _____

00401691

ARTICLES OF AMENDMENT
TO THE
ARTICLES OF INCORPORATION
OF

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

To: The Recorder of Deeds of the District of Columbia,
Washington, D. C.

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act the Board of Directors of Life Amendment Political Action Committee, Inc., adopts the following Articles of Amendment to the Articles of Incorporation of Life Amendment Political Action Committee, Inc.

FIRST: The name of the corporation is:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

SECOND: The period of duration is perpetual.

THIRD: The specific and primary purposes for which this Corporation is formed and for which it shall be exclusively administered and operated are to receive, administer and expend funds for political, charitable and educational purposes in connection with the following:

1. To engage in nonpartisan research, study and analysis, for the benefit of the general public, regarding the political structure of the United States;

2. To engage in ~~nonpartisan research~~, study and analysis for the benefit of the general public on those questions affecting the public interest with respect to both the public and private sectors, and to publish the results of such study;

3. To prepare educational materials and conduct educational activities in support of the general purposes of the Corporation;

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4. To conduct and sponsor forums, lectures, debates and similar programs;

5. To qualify as a political committee and as a multicandidate political committee pursuant to the provisions of §§301(d) and 320(a)(4) of the Federal Election Campaign Act Amendments of 1976 (or corresponding provisions of subsequent federal election laws);

6. To assist other political, charitable or educational organizations in the conduct of lawful activities;

7. To engage in any and all lawful activities incidental to the foregoing purposes except as restricted herein;

To accomplish the foregoing purposes, the Corporation shall also have the power to:

- a. sue and be sued;
- b. contract;
- c. receive property by devise or bequest, subject to the laws regulating the transfer of property by will, and otherwise acquire and hold all property, real or personal, including shares of stock, bonds and securities of other corporations;
- d. act as trustee under any trust the objects of which are related to the principal objects of the Corporation, and to receive, hold, administer and expend funds and property subject to such trust;
- e. convey, exchange, hypothecate, lease, mortgage, encumber, transfer upon trust or otherwise dispose of all property, real or personal;
- f. borrow money, contract debts and issue bonds, notes and debentures, and secure the payment of and performance of its obligations; and
- g. do all other acts necessary or expedient for the administration of the affairs and attainment of the purposes of the Corporation;

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FOURTH: The Corporation is not to have members.

FIFTH: No part of the net income of the Corporation shall inure to the benefit of or be distributable to its directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered and to make payments and distributions in furtherance of the purposes and objects set forth in Article THIRD hereof.

SIXTH: The business of the Corporation shall be carried on through its Board of Directors; the manner of their election or appointment, other than the initial Board of Directors provided for in the Articles of Incorporation, shall be as provided in the Bylaws.

SEVENTH: The private property of the incorporators, directors and officers shall not be subject to the payment of corporate debts to any extent whatever. In furtherance and not in limitation of the powers conferred by statute, the Corporation expressly is authorized to carry on its business and to hold annual or special meetings of its Board of Directors in any of the states, territories or possessions of the United States or the District of Columbia.

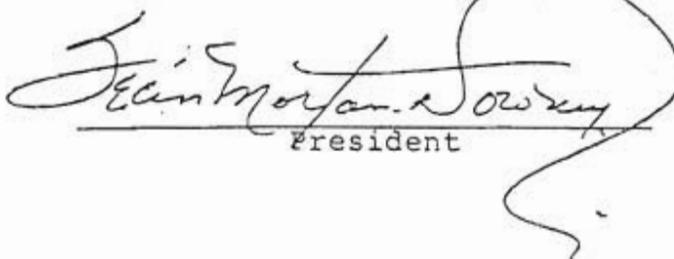
EIGHTH: Upon the dissolution of the Corporation or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively for charitable, religious, scientific, testing for public safety, literary or educational purposes to organizations which are then exempt from federal tax under §501(c)(3) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws and to which contributions are then deductible under §170(c)(2) of such Code or corresponding provisions of any subsequent federal tax laws.

ADOPTION: These Articles of Amendment were adopted at a meeting of the Board of Directors held on August 1, 1978 and received a vote of a majority of the Directors in office,

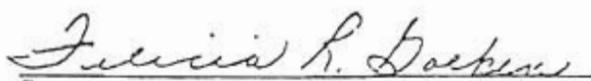
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there being no members having voting rights with respect
thereof.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.


Edwin Morgan Rowley
President

Attest:


Patricia R. Doebner
Secretary

0040191698

BYLAWS
OF
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

ARTICLE I - Name and Offices

§1. Name. The name of this Corporation is Life Amendment Political Action Committee, Inc. ("LAPAC").

§2. Offices. The principal office of the Corporation is in the District of Columbia. The Corporation also may have offices at such other places as the Board of Directors may appoint.

ARTICLE II - Purposes

§1. General. The specific and primary purposes of the Corporation are set forth in the Articles of Incorporation.

§2. Restrictions. The Corporation uses its funds only to accomplish objectives and purposes consistent with these Bylaws. No part of such funds shall inure, or be distributed, to members of the Corporation. If the Corporation be dissolved, assets remaining, if any, shall be distributed as provided in the Articles of Amendment to the Articles of Incorporation.

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ARTICLE III - Board of Directors

§1. Duties. The Board of Directors manages the business and property and determines the policy of the Corporation pursuant to, and within the scope of, the Articles of Incorporation and the Bylaws.

§2. Composition and Tenure. The Board of Directors consists of seven members. A Director holds office until a successor qualifies. At each annual meeting of the Board of Directors, held in December of each year on a date specified at least 30 days in advance by the Board of Directors, the Board of Directors elects those individuals who shall serve thereon for the terms prescribed herein. Whenever a vacancy occurs for a reason other than expiration of a term of a Director, the remaining members of the Board may fill said vacancy. Effective at the December 1978 annual meeting two Directors shall be elected for one-year terms, two for two-year terms and three for three-year terms. Thereafter, each term will be for three years.

§3. Meetings. The Board of Directors meets in December. If the Board shall fail to designate at least 30 days in advance of said meeting the time and place thereof, said meeting shall be held commencing at 1:00 P.M. on the first

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Monday in December at the principal office of the Corporation. The Board may hold additional meetings at any time and place it may designate upon 10 days written notice to each Director or upon written waiver. The Chairman or the Treasurer may call any such meeting.

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§4. Chairman of the Board. The Board elects the Chairman, who also serves as President of the Corporation, at its December meeting, to serve until the adjournment of the following December meeting. In the event the office of the Chairman becomes vacant, the Board elects an individual to serve the unexpired term.

§5. Quorum. A majority of the Board of Directors constitutes a quorum provided that if less than a quorum of the Board is present at a meeting duly called a majority of those present may adjourn the meeting from time to time without further notice.

§6. Resignation. A Director at any time may resign effective upon the date of his actual resignation or upon any successive date by delivering to each Director written notice.

§7. Compensation. A Director receives no stated salary for his services but by resolution of the Board may

receive a fixed stipend and/or his expenses of attendance, if any, or both, for actual attendance upon a meeting of the Board. A member of the Board serving the Corporation as an officer or employee of the Corporation or in a contractual capacity may be compensated for such service.

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§8. Voting Rights. Each Director has one vote. By a written memorandum filed with the Board of Directors the Board may confirm nunc pro tunc an informal action taken by the Board and in that event the Directors need not have been present in the same place at the time of the taking of the action or upon the filing of said written memorandum.

§9. Majority. All votes of the Board of Directors are by a three-fifths majority of a quorum unless otherwise specified in the Bylaws.

§10. Carryover of Term. A member of the Board of Directors serves until a successor is elected and qualifies.

§11. Attendance at Meetings. If a member of the Board shall fail to attend three consecutive meetings of the Board without approval or ratification of his actions by the Board, his membership on the Board automatically terminates.

§12. Parliamentary Rule. ROBERT'S RULES OF ORDER, REVISED, in the most recent edition available, applies to the conduct of business.

ARTICLE IV - Officers

§1. Designation. At its December meeting the Board of Directors also elects the Secretary and the Treasurer, either of whom need be a Director. Each serves for a term of one year or to fill an unexpired term, whichever is the shorter period. No person, including a Director, simultaneously may hold two or more of said offices.

§2. Agents and Assistants. The Board of Directors may elect such agents and assistants as it may deem necessary for performance of duties delegated to them by the Board.

§3. Compensation. The Board fixes the compensation, including expenditure authorizations and reimbursement of expenditures, for all officers, agents, assistants and other personnel.

§4. Removal. The Board of Directors may remove an officer of the Corporation at any time, and without advance notice to him, for any reason which in its judgment best

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serves the Corporation but may not abrogate a contractual right of any person so removed.

§5. Vacancies. Should an office of the Corporation become vacant, by whatever cause, the majority of the Directors then in office, although less than a quorum, may fill any such vacancy.

§6. Carryover of Term. An officer serves until his successor is elected and qualifies.

§7. President and Chairman. The President and Chairman is the chief executive officer of the Corporation, performs those duties normally inherent in said office and presides over meetings of the Board of Directors.

§8. Secretary. The Secretary prepares and maintains minutes of meetings of the Board of Directors, maintains the records of the Corporation and performs those duties normally inherent in said office.

§9. Treasurer. The Treasurer is custodian of corporate funds and securities and keeps full and accurate accounts of receipts and disbursements; deposits all monies and other valuable effects in the name, and to the credit, of the Corporation in such depositories as the Board of Directors

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may designate; disburses funds as authorized by the Board; reports at the December meeting and otherwise when directed to the Board; submits to an annual independent audit directed by the Board; complies with applicable reporting and other provisions of the Federal Election Campaign Amendment Act of 1976, PL 94-283, 2 USC §§431 et seq, as amended, and any other applicable law.

ARTICLE V - Fiscal Year

The fiscal year is the calendar year. The fiscal year 1977 commences on the date of incorporation of the Corporation.

ARTICLE VI - Indemnification

The Board of Directors shall indemnify the President and Chairman, the Secretary, the Treasurer, and members of the Board of Directors, the employees and agents of the Corporation and former Presidents and Chairmen, Secretaries, Treasurers and members of the Board of Directors, employees or agents, expenses actually and necessarily incurred by them in connection with the defense of any action, suit or proceeding (actual or threatened; brought by or in the light of the Corporation or otherwise; civil, criminal, administrative

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or investigative, including appeal) in which they, or any of them, are made parties, by reason of being, or having been, President, Chairman, Secretary, Treasurer or a member of the Board of Directors, an employee or an agent of the Corporation, except in relation to matters in which any such person shall be judged finally in such action, suit or proceeding to be liable for negligence or for misconduct in the performance of duties. The term "expenses" herein means all amounts paid in settlement by any such person in connection with any such matter as to which the Corporation is advised by counsel selected by the Corporation that such persons to be indemnified did not commit such a breach of duty. The Board of Directors may advance any such expenses prior to the final disposition of the action, suit or proceeding.

ARTICLE VII - Amendments to Bylaws

These Bylaws may be amended by the Board of Directors upon ten days written notice of intent to amend to each member of the Board of Directors.

ARTICLE VIII - Notice

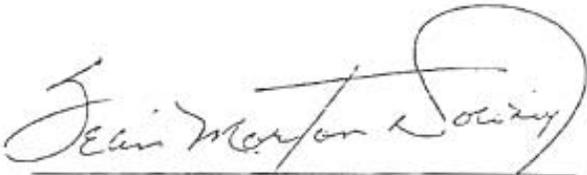
Notice of any kind whatsoever to any person holding office in, contracting with or doing business with the

Corporation shall be good and sufficient if mailed certified, postage prepaid to the last known address of record of the addressee, and shall be mailed in good time if postmarked on or before the date which equals or exceeds the number of days requisite for advance notice.

ARTICLE IX - Use of Words

As appropriate herein, a word may be used in the singular or plural, masculine or feminine. Verbs may be used in the appropriate tense and in the imperative.

RATIFIED AND APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 1, 1978 IN WASHINGTON, D.C.


President

Attest:


Secretary

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Weeder *ccc* *10852*
MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1463

SIOUX FALLS, SOUTH DAKOTA 57104

903533

TELEPHONE
(605) 336-2363

R. G. MAY
GEORGE O. JOHNSON
NAROLD C. DOYLE
JAMES R. BECKER
GALE E. FISHER
DERALD W. WIEHL
RICHARD MOE
EDWARD J. LEAHY
GARY D. JENSEN

August 6, 1979

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

Re: Life Amendment Political Action Committee, Inc. -
South Dakota
MUR 960

Dear Mr. Oldaker:

I represent Life Amendment Political Action Committee - South Dakota ("LAPAC-SD") in connection with the above matter. As requested in your letter of July 2, 1979, addressed to our client, we enclose executed Answers to Interrogatories.

The activities of LAPAC-SD were limited solely to those in connection with elections for statewide offices in South Dakota. LAPAC-SD has not, at any time, participated, either directly or indirectly, in any elections or campaigns for federal office. Specifically, LAPAC-SD has not expended any funds, either directly or indirectly, in connection with the campaigns for Congress referred to in the letter of Ms. Gail M. Harmon to the FEC dated April 30, 1979.

We believe that this information, together with the Answers to Interrogatories enclosed will provide your office with sufficient information to determine that the charges of Ms. Harmon are totally unfounded and to close the file on this matter insofar as LAPAC-SD is concerned.

However, if further information is required, please advise the undersigned.

Our client, LAPAC-SD, hereby waives confidentiality and requests that the full proceedings in MUR 960, insofar as it relates to LAPAC-SD, be spread upon the public record. 2 U.S.C. § 457(g) (a) (3) (B).

Very truly yours,

MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

By _____

James R. Becker

JRB:sw

cc: Ms. Carolyn Weeder

01:28 01:10 67

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Harmon

BEFORE THE FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE,
SOUTH DAKOTA

MUR 960

ANSWERS TO INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?

ANSWER: There is no relationship between Life Amendment Political Action Committee, South Dakota and LAPAC, Inc.

2. Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.

ANSWER: To my best knowledge, no bills were paid for, debts liquidated, or any funds transferred to LAPAC, Inc.

3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.

ANSWER: No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, to my best knowledge.

4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.

ANSWER: No expenses were incurred in the preparation and distribution of any communications relating to a federal election by Life Amendment Political Action Committee, South Dakota.

5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?

ANSWER: Life Amendment Political Action Committee, South Dakota did not engage in any activities seeking to obtain information about federal candidates' views on pro-life issues and accordingly no costs were incurred by it in collecting any such information.

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6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail.

ANSWER: None.

7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.

ANSWER: Yes. Copies of Life Amendment Political Action Committee, South Dakota's filings with the South Dakota State Ethics Commission were attached to the letter dated April 30, 1979 from Gail M. Harmon to the Federal Election Commission which apparently was the basis for the above Complaint. No reports after that date have been filed with the South Dakota State Ethics Commission.

8. Is LAPAC, S. D. incorporated? If so, please submit copies of Articles of Incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S. D.

ANSWER: Life Amendment Political Action Committee, South Dakota is not incorporated. Its sole officer is Ellen Dempsey, Treasurer, White, South Dakota.

9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.

ANSWER: All contributions received are listed on the reports filed with the South Dakota State Ethics Commission.

10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.

ANSWER: All expenditures by Life Amendment Political Action Committee, South Dakota, are set forth on the reports filed with the South Dakota State Ethics Commission.

11. Please submit a copy of every brochure printed and/or distributed by LAPAC, S. D. which mentions in any manner the name(s) of a candidate for federal office.

ANSWER: No brochures were printed or distributed by Life Amendment Political Action Committee, South Dakota which mentioned in any manner the names of any candidates for federal office to the best of my knowledge.

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MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE
(605) 336-1345

R. G. MAY
GEORGE O. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
DERALD W. WIEHL
RICHARD MOE
EDWARD J. LEAHY
GARY D. JENSEN
ROBERT A. MARTIN

September 19, 1979

CERTIFIED MAIL

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

Attention: William C. Oldaker
General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,
South Dakota

Dear Mr. Oldaker:

In accordance with our letter to you of August 22, 1979 and our subsequent telephone conversation with Carolyn Weeder of your staff on September 10, 1979, we are enclosing original Affidavits of Ellen Dempsey, Kevin Conner and Jeanette Smith. We believe these Affidavits should clarify the answers to Interrogatories numbers 3, 4, 6 and 11 previously submitted by Life Amendment Political Action Committee - South Dakota to the Federal Election Commission and to substantiate that Committee's contention that the advertisement and the flyer referred to as Exhibits "B" and "D", respectively, in the above Complaint were not sponsored, distributed or paid for, either directly or indirectly, by the Life Amendment Political Action Committee - South Dakota. In the event that there are any questions or if further information is desired, please advise.

As I indicated in our telephone conversations with Ms. Weeder and in previous correspondence with the Commission, the delay in furnishing this information to the Commission is regretted but was frankly unavoidable. I was required to be out of my office between August 23-September 4. Upon my return, I had received additional information in answer to the Commission's inquiries from various people throughout the State of South Dakota. After reviewing the information, I had several questions which required extensive telephone conversations with the involved persons and some of them were out of town so a further delay resulted. After determining the facts, I then had to prepare the enclosed Affidavits and transmit them by mail to the three named persons who, in turn, returned the executed Affidavits to me. Because the parties live in different areas of the State, all the communication had to be either

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Att. Target 3
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by mail or telephone which resulted in additional time being required to prepare the enclosed Affidavits. I trust this information will be of some assistance to the Commission in explaining the delay in furnishing the requested information.

Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB:sko

Enclosures

cc: Carolyn Weeder

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Page 2

of disseminating views of candidates for state or local public office within South Dakota concerning abortion. That your Affiant advised pro-life people in various parts of South Dakota of the organization and existence of LAPAC-SD and of the fact that its activities were limited to candidates for public office on a state or local level only through mailings, handouts and by personal conversation; and that any political activity on behalf of candidates for public office on a national level were to be handled by and through an independent organization known as Life Amendment Political Action Committee with headquarters in Washington, D. C.

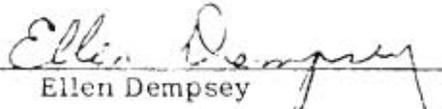
That your Affiant was not aware of the printing or dissemination of either Exhibits 1 or 2 at any time prior to their publication and distribution. That your Affiant believes that she first learned of the advertisement (Exhibit 1) which had been run in The Rapid City Guide on October 26, 1978, sometime thereafter but prior to October 30, 1978. She believes she became aware of the advertisement and its contents either by telephone conversation with someone in Rapid City who was familiar with the ad or upon receipt by her of the ad proofs from the printer. At the time that your Affiant became aware of the advertisement, she advised the responsible persons in Rapid City that such advertisement was improper in that LAPAC-SD could not disseminate the views of candidates for national public office and that any ads thereafter run in Rapid City over the name of LAPAC-SD involve only candidates for state or local public office. That your Affiant does not recall when she first became aware of the flyer (Exhibit 2) which had been distributed in Rapid City but believes it was sometime after the November 7, 1978 general election and was accordingly after its preparation and distribution.

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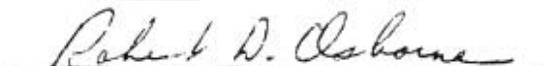
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That attached hereto, marked Exhibits 3, 4, and 5, are copies of the Registration Form and Statement of Organization (Exhibit 3) filed by your Affiant on behalf of LAPAC-SD with the State Ethics Commission of South Dakota on August 17, 1978, and Report of Receipts and Expenditures (Exhibits 4 and 5), filed on November 1, 1978 and January 30, 1979 respectively with the State Ethics Commission of South Dakota. That such Registration Form and reports are true and correct to the best knowledge, information and belief of your Affiant. That all receipts and disbursements of LAPAC-SD were made by your Affiant, as its Treasurer and sole officer, and are accurately shown and set forth on said reports; that the disbursements shown on Exhibits 4 and 5 do not contain any disbursements to or for the benefit of any person connected with the preparation, publication or distribution of either the advertisement or flyer (Exhibits 1 and 2).



Ellen Dempsey

Subscribed and sworn to before
me this 18th day of September, 1979.



Notary Public, South Dakota

(SEAL)

committee had been established in South Dakota for the purpose of disseminating the views concerning abortion of candidates for state and local public office in the November, 1978 general election. Your Affiant and other pro-life people in the Rapid City, South Dakota area desired to disseminate information in the Rapid City, South Dakota area concerning the views on abortion of certain candidates for public office in that election. Because the election was drawing close, we were operating under severe time pressures and did not take the time to contact Ellen Dempsey, Treasurer of LAPAC-SD concerning the advertisement before it was run. We believed that any such advertisement had to be run over the name of LAPAC-SD, but we were not aware that LAPAC-SD was involved only in the dissemination of views of candidates for public office on the state and local level and was not involved in the dissemination of views of candidates for public office on a national level. Not until after the advertisement marked Exhibit 1 had been run did we become aware of the fact that any dissemination of candidates' views concerning abortion for national public office was required to be done by Life Amendment Political Action Committee and not LAPAC-SD.

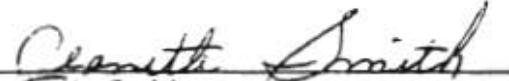
Donations were solicited from private individuals in the Rapid City area in late October, 1978 and on October 26, 1978, the advertisement marked Exhibit 1 was run in The Rapid City Guide. To the best of my knowledge, recollection and belief, the proofs of such ad were sent by The Rapid City Guide to Ellen Dempsey, Treasurer of LAPAC-SD, who received them after the ad was run. After she saw the proofs, Mrs. Dempsey informed us that any ads run over the name of LAPAC-SD could not contain any information concerning the views of candidates for national public office. To the best of my knowledge, information and belief, this was the

first that Ellen Dempsey knew of the ad which was run in The Rapid City Guide on October 26, 1978. Subsequent advertisements which we ran in The Rapid City Guide on November 2, 1978, and in The Rapid City Journal on October 29, 1978 and sometime in November, prior to the election, which were over the LAPAC-SD name disseminated only the views of candidates for state or local political office.

To the best of my knowledge, information and belief, the advertisements in The Rapid City Guide, including the October 26 advertisement, (Exhibit 1), cost \$120.00 which was paid for personally by your Affiant by check dated November 16, 1978 for which I was reimbursed from funds resulting from contributions from private individuals.

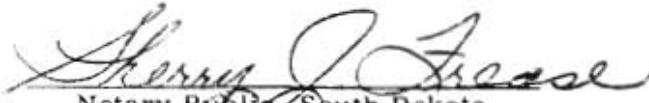
That after we realized the October 26, 1978 advertisement (Exhibit 1) was not proper, all subsequent advertisements run over the LAPAC-SD name concerned the views only of state and local candidates. To my best knowledge, information and belief, the October 26, 1978 advertisement (Exhibit 1) was not, in any way, sponsored, prepared, or run with the prior knowledge or consent of LAPAC-SD, Ellen Dempsey, its Treasurer, or anyone else on its behalf, but was sponsored, prepared and run in The Rapid City Guide on October 26, 1978 by myself and other interested and concerned persons in the Rapid City, South Dakota, area under the mistaken belief that such ads had to be run over the LAPAC-SD name and could include both candidates for national as well as state and local office. Ellen Dempsey, on behalf of LAPAC-SD, did not condone this advertisement and, in fact, called our attention to this error immediately after the ad was run when she first received knowledge of the contents of the ad. That the October 26, 1978 advertisement was

not paid for with any funds received from or through LAPAC-SD nor was I reimbursed with monies for such advertisement from LAPAC-SD. Finally, no federal candidates endorsed in that advertisement consented to, cooperated with, requested or suggested the use of their names in that advertisement.



Jeanette Smith

Subscribed and sworn to before me
this 17th day of September, 1979.



Notary Public, South Dakota

(SEAL)
Aug. 17, 1984

0040191720

"B"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABDNOR
BOB SAMUELSON

South Dakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK MEIERHENRY
MAX GORS

State Treas.: DAVID VOLK

South Dakota Senate: (Dist. 27)
LYNDELL PETERSON

South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LAPAC-SD (Life Amendment Political Action Committee, White, S.D. 57276), Ellen Dempsey, Treas.)

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that any dissemination of such views was required to be made over the name of LAPAC.

Your Affiant caused to be prepared and printed a one-page flyer, (Exhibit 1). At the time such flyer was prepared and distributed, your Affiant was not aware that the activities of LAPAC-SD were limited to the dissemination of views of candidates for public office on a state or local level and that LAPAC-SD could not in any way involve itself with the views of candidates for public office on a national level. Your Affiant also did not contact Ellen Dempsey, Treasurer of LAPAC-SD, prior to the distribution of the flyer concerning its contents.

Your Affiant prepared Exhibit 1 and caused it to be published in Rapid City by Simpson's Creative Printers on or about October 23, 1978, which flyers were subsequently distributed before the November 7, 1978 election by himself and other pro-life youth throughout the Rapid City, South Dakota area. The printing costs for such flyers amounted to approximately \$40.00, which was paid by monies raised from private contributions on or about October 23, 1978.

That to the best knowledge, information and belief of your Affiant, Ellen Dempsey, Treasurer of LAPAC-SD, was not aware of the nature or contents of the flyer marked Exhibit 1 at any time prior to its publication and distribution nor was that flyer sponsored, prepared, distributed, or paid for by LAPAC-SD or anyone on its behalf; rather the flyer was sponsored, prepared, distributed and paid for solely through the efforts of your Affiant and others acting on his behalf having no connection with LAPAC-SD. Your Affiant did not receive any monies from LAPAC-SD at any time for payment of the printing costs of the flyers or as reimbursement

for such such costs. Finally, no federal candidates endorsed in that flyer con-
sented to, cooperated with, requested or suggested the use of their names in that
flyer.

Kevin G. Conner
Kevin Conner

Subscribed and sworn to before me
this 15 day of September, 1979.

Robert A. Conner
Notary Public, South Dakota

(SEAL)

0040191724



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker
Counselor at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

RE: MUR 960
LAPAC, S.D.

Dear Mr. Becker:

On October , 1979, the Commission found no reasonable cause to believe that LAPAC, S.D. violated 2 U.S.C. §441d by making expenditures expressly advocating the election of clearly identified federal candidates without statements of authorization/non-authorization by candidates endorsed.

After reviewing the available information, the Commission determined that it appeared that local pro-life groups in South Dakota used LAPAC, S.D.'s disclaimer without authorization in publications expressly advocating the election of clearly identified federal candidates without including statements of authorization/non-authorization by these candidates endorsed. Such unauthorized use of the disclaimer shall not hold LAPAC, S.D. liable for the violation.

Accordingly, LAPAC, S.D.'s involvement in this matter has been terminated. Should further information come to your attention which you believe is relevant to the Commission's analysis of this matter, please contact Carolyn Weeder at (202) 523-4039.

Sincerely,

William C. Oldaker
General Counsel

004091723



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Marion Edwyn Harrison
Barnett, Alagia and Carey
1627 K Street, N.W.
Washington, D.C. 20006

RE: MUR 960

Dear Mr. Harrison:

On October , 1979, the Commission determined there was reasonable cause to believe that your client, Life Amendment Political Action Committee, Inc. committed a violation of 2 U.S.C. section 441d of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that LAPAC, INC. violated 2 U.S.C. §441d by making expenditures for communications expressly advocating the election of clearly identified federal candidates without properly displaying statements of authorization/non-authorization by candidates endorsed.

In addition, the Commission determined to take no further action concerning LAPAC, Inc.'s possible violation of 2 U.S.C. §434 by failing to report the liquidation of a debt, and to take no further action in this matter regarding LAPAC, INC.'s failure to report LAPAC, S.D. and/or other local pro-life committees as affiliated organizations

The Commission has a duty to attempt to correct the above described violation of 2 U.S.C. §441d for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. section 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute a civil suit in United States District Court and seek payment of a civil penalty.

09191725

Mr. Marion Edwyn Harrison
Page 2

Enclosed is a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

0040191727



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Jeanette Smith
606 E. Tallent
Rapid City, D.S. 57701

RE: MUR 960

Dear Ms. Smith:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation showed that while you paid for the publication of advertisements in the Rapid City Guide and The Rapid City Journal, these advertisements stated that they were "paid for" by the Life Amendment Political Action Committee of South Dakota. In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "paid for" the publication of the advertisement, as well as stating whether or not the publication was authorized by a candidate.

004091729

Jeannette Smith
Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,

William C. Oldaker
General Counsel

0040193729



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Conner

RE: MUR 960

Dear Mr. Conner:

An investigation undertaken by the Federal Election Commission indicates that you took actions in connection with the November, 1978 federal election which were in violation of 2 U.S.C. §441d(2) of the Federal Election Campaign Act. This provision states:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication --

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2).

The investigation indicated that while you paid for the publication of a handbill distributed in your local area, you had printed upon this publication that it was "sponsored by" the Life Amendment Political Action Committee (LAPAC). In order to comply with 2 U.S.C. §441d you would have had to indicate that you or your local group "sponsored" the publication of the handbill.

00040191737

Kevin Conner
Page 2

However, in view of the small amount of money involved and the apparently limited circulation of the publication, the Commission has decided to terminate its investigation without taking official action against you. This letter is to put you on notice that you have apparently acted in violation of the Federal Election Campaign Act and that you should be careful to abide by the provisions of that Act in order to avoid future Commission proceedings against you.

Sincerely,

William C. Oldaker
General Counsel

0040191731

11198

MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57101

RECEIVED
FEDERAL ELECTION
COMMISSION

79 SEP 24 AM 10:29

TELEPHONE
16051 336-2565

R G MAY
GEORGE O JOHNSON
HAROLD C DOYLE
JAMES R BECKER
DERALD W WIEHL
RICHARD MUE
EDWARD J LEAHY
GARY D JENSEN
ROBERT A MARTIN

September 19, 1979

CERTIFIED MAIL

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

Attention: William C. Oldaker
General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,
South Dakota

Dear Mr. Oldaker:

In accordance with our letter to you of August 22, 1979 and our subsequent telephone conversation with Carolyn Weeder of your staff on September 10, 1979, we are enclosing original Affidavits of Ellen Dempsey, Kevin Conner and Jeanette Smith. We believe these Affidavits should clarify the answers to Interrogatories numbers 3, 4, 6 and 11 previously submitted by Life Amendment Political Action Committee - South Dakota to the Federal Election Commission and to substantiate that Committee's contention that the advertisement and the flyer referred to as Exhibits "B" and "D", respectively, in the above Complaint were not sponsored, distributed or paid for, either directly or indirectly, by the Life Amendment Political Action Committee - South Dakota. In the event that there are any questions or if further information is desired, please advise.

As I indicated in our telephone conversations with Ms. Weeder and in previous correspondence with the Commission, the delay in furnishing this information to the Commission is regretted but was frankly unavoidable. I was required to be out of my office between August 23-September 4. Upon my return, I had received additional information in answer to the Commission's inquiries from various people throughout the State of South Dakota. After reviewing the information, I had several questions which required extensive telephone conversations with the involved persons and some of them were out of town so a further delay resulted. After determining the facts, I then had to prepare the enclosed Affidavits and transmit them by mail to the three named persons who, in turn, returned the executed Affidavits to me. Because the parties live in different areas of the State, all the communication had to be either

0010191739

by mail or telephone which resulted in additional time being required to prepare the enclosed Affidavits. I trust this information will be of some assistance to the Commission in explaining the delay in furnishing the requested information.

Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB:sko

Enclosures

cc: Carolyn Weeder ✓

0040101733

May, Johnson, Doyle & Becker, P. C.

Counsellors At Law

412 West Ninth Street

P. O. Box 1443-

Sioux Falls, SD 57101

00179
19 DEC 1977



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

1-10-77

11174

904200

MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE
605/336-7365

R. G. MAY
GEORGE C. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
HERALD W. WOOD
RICHARD M. B.
EDWARD J. LEAHY
GARY D. JENSEN
W. R. MARTIN

September 19, 1979

19 SEP 21 4:49
OFFICE OF THE
GENERAL COUNSEL

CERTIFIED MAIL

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

Attention: William C. Oldaker
General Counsel

RE: MUR 960 - Life Amendment Political Action Committee,
South Dakota

Dear Mr. Oldaker:

In accordance with our letter to you of August 22, 1979 and our subsequent telephone conversation with Carolyn Weeder of your staff on September 10, 1979, we are enclosing original Affidavits of Ellen Dempsey, Kevin Conner and Jeanette Smith. We believe these Affidavits should clarify the answers to Interrogatories numbers 3, 4, 6 and 11 previously submitted by Life Amendment Political Action Committee - South Dakota to the Federal Election Commission and to substantiate that Committee's contention that the advertisement and the flyer referred to as Exhibits "B" and "D", respectively, in the above Complaint were not sponsored, distributed or paid for, either directly or indirectly, by the Life Amendment Political Action Committee - South Dakota. In the event that there are any questions or if further information is desired, please advise.

As I indicated in our telephone conversations with Ms. Weeder and in previous correspondence with the Commission, the delay in furnishing this information to the Commission is regretted but was frankly unavoidable. I was required to be out of my office between August 23-September 4. Upon my return, I had received additional information in answer to the Commission's inquiries from various people throughout the State of South Dakota. After reviewing the information, I had several questions which required extensive telephone conversations with the involved persons and some of them were out of town so a further delay resulted. After determining the facts, I then had to prepare the enclosed Affidavits and transmit them by mail to the three named persons who, in turn, returned the executed Affidavits to me. Because the parties live in different areas of the State, all the communication had to be either

0 1 1 0 1 7 3 1

by mail or telephone which resulted in additional time being required to prepare the enclosed Affidavits. I trust this information will be of some assistance to the Commission in explaining the delay in furnishing the requested information.

Very truly yours,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB:sko

Enclosures

cc: Carolyn Weeder

004910173

of disseminating views of candidates for state or local public office within South Dakota concerning abortion. That your Affiant advised pro-life people in various parts of South Dakota of the organization and existence of LAPAC-SD and of the fact that its activities were limited to candidates for public office on a state or local level only through mailings, handouts and by personal conversation; and that any political activity on behalf of candidates for public office on a national level were to be handled by and through an independent organization known as Life Amendment Political Action Committee with headquarters in Washington, D. C.

That your Affiant was not aware of the printing or dissemination of either Exhibits 1 or 2 at any time prior to their publication and distribution. That your Affiant believes that she first learned of the advertisement (Exhibit 1) which had been run in The Rapid City Guide on October 26, 1978, sometime thereafter but prior to October 30, 1978. She believes she became aware of the advertisement and its contents either by telephone conversation with someone in Rapid City who was familiar with the ad or upon receipt by her of the ad proofs from the printer. At the time that your Affiant became aware of the advertisement, she advised the responsible persons in Rapid City that such advertisement was improper in that LAPAC-SD could not disseminate the views of candidates for national public office and that any ads thereafter run in Rapid City over the name of LAPAC SD involve only candidates for state or local public office. That your Affiant does not recall when she first became aware of the flyer (Exhibit 2) which had been distributed in Rapid City but believes it was sometime after the November 7, 1978 general election and was accordingly after its preparation and distribution.

00047191738

That attached hereto, marked Exhibits 3, 4, and 5, are copies of the Registration Form and Statement of Organization (Exhibit 3) filed by your Affiant on behalf of LAPAC-SD with the State Ethics Commission of South Dakota on August 17, 1978, and Report of Receipts and Expenditures (Exhibits 4 and 5), filed on November 1, 1978 and January 30, 1979 respectively with the State Ethics Commission of South Dakota. That such Registration Form and reports are true and correct to the best knowledge, information and belief of your Affiant. That all receipts and disbursements of LAPAC-SD were made by your Affiant, as its Treasurer and sole officer, and are accurately shown and set forth on said reports; that the disbursements shown on Exhibits 4 and 5 do not contain any disbursements to or for the benefit of any person connected with the preparation, publication or distribution of either the advertisement or flyer (Exhibits 1 and 2).

Ellen Dempsey
Ellen Dempsey

Subscribed and sworn to before me this 18th day of September, 1979.

Robert D. Osborne
Notary Public, South Dakota

(SEAL)

0040:91730

"B"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

- U.S. Senate:** LARRY PRESSLER
- U.S. House of Representatives:** JAMES ABDNOR
BOB SAMUELSON
- South Dakota Governor:** WILLIAM JANKLOW
- South Dakota Lt. Governor:** LOWELL HANSON
- South Dakota Attorney General:** MARK MEIERHENRY
MAX GORS
- State Treas.:** DAVID VOLK

South Dakota Senate: (Dist. 27)
LYNDELL PETERSON

South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LSPMSD Life Amendment Political Action Committee, White, S.D. 57260, Ellen Dempsey, Treas.)

0040191740

RECEIVED
NOV 1 1978
Secretary of State

STATE ETHICS COMMISSION
Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

% Ellen Dempsey - Treasurer
R.R. 1 (Street)

White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on November 7, 1978
- January 30th Report _____ (Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.
First National Bank, Brookings, S.D. 57006

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

Ellen Dempsey - Treas.
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 31st day of October, 1978.

(SEAL)

Robert D. Carls
Notary Public
Officer Administering Oath
My Commission Expires
August 31, 1986

Filed this 1
day of Nov. 19 78 Reg.
STATE ETHICS COMMISSION
Office of Secretary
of State

0040191744

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>00</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>100.00</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>—</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>326.09</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>709.00</u>	
6.	Total Cash Receipts		\$ <u>1135.09</u>
7.	Total Cash Available		\$ <u>1135.09</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>864.07</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>—</u>	
10.	Total Cash Disbursements		\$ <u>864.07</u>
11.	Ending Cash Balance		\$ <u>271.02</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>540.43</u>
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STATEMENT OF CAMPAIGN FUND STATUS

Assets

13.	Cash Balance	\$ <u>271.02</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>—</u>
		\$ <u>—</u>
		\$ <u>—</u>
15.	Add 13 and 14 together	\$ <u>271.02</u>
	Liabilities and Balance	
16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>—</u>
17.	Balance	\$ <u>271.02</u>

INSTRUCTIONS

Line No.

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds-List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10. This amount must equal Line 13.
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

0 0 4 0 1 9 1 7 4 5

SCHEDULE A
ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
10/11/78	Mrs. & Mrs. Harvey Buhl 320 W. Dakota Pierre, S.D. 57501	Own Laundry Chain	\$100.00	\$100.00

Page _____ of _____

TOTAL THIS PERIOD \$ 100.00
(Last page only)

Transfer total to Summary Page - Line 2

0040191746

Schedule D

Expenses

Date	Check No.	Payee	Purpose	Amount
9-78	101	Index	Bookkeeping Supplies	11.89
27-78	103	→ Harold's Printing	Printing	18.72
25-78	102	White Postmaster	Bulk Mailing Permit + Postage	143.50
2-78	104	" "	Postage	15.00
26-78	—	First Natl Bank	Check Printing	9.90
11-78	105	White Postmaster	Postage	250.00
10-78	106	Index	Office Supplies	14.19
11-78	107	Reynold's Printing	Printing	5.42
11-78	108	Hipple Printing	Printing	38.63
11-78	109	may, Johnson, Doyle, Becker, Fisher, P.C.	Lawyer Services	10.64
11-78	110	South Dub. Right to Life	Printing	78.00
11-78	111	White Postmaster	Stamps	15.00
11-78	112	Karen Prochnick	S.A.P.L. Advertising	30.00
11-78	113	→ Harold's Printing	Printing	74.93
11-78	114	Imesty Prints	Printing	48. ²⁵
11-78	115	White Postmaster	Postage	100.00

\$864.00

SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page - Line 9

TOTAL \$ _____
(Last Page Only)

SCHEDULE F
IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
Scott Reardon, 320 E. 27th, Sioux Falls, S.D. 57105	Paid Advertising	540.43

Page _____ of _____

Transfer Total to Summary Page - Line 12

Total This Period \$ 540.43
(Last Page Only)

6771010400

SCHEDULE G

ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

0 5 7 1 6 1 0 4 0 0

STATE ETHICS COMMISSION

Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

c/o Ellen Dempsey - Treasurer
(Street)

R. Rt. 1
White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on _____
- January 30th Report 1979
(Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.

First National Bank, Brookings, S. D. 57006

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

Ellen Dempsey - Treas.
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 29 day of January, 1979.

(SEAL)

Walter Willmott
Officer Administering Oath

Filed this 30
day of Jan, 1979
STATE ETHICS COMMISSION
Office of Secretary
of State

0040191751

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>271.02</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>437.97</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>—</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>100.00</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>396.57</u>	
6.	Total Cash Receipts		\$ <u>934.54</u>
7.	Total Cash Available		\$ <u>1205.56</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>961.11</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>—</u>	
10.	Total Cash Disbursements		\$ <u>961.11</u>
11.	Ending Cash Balance		\$ <u>244.45</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>703.50</u>
-----	---	------------------

STATEMENT OF CAMPAIGN FUND STATUS

Assets

13.	Cash Balance	\$ <u>244.45</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>—</u>
		\$ <u>—</u>
		\$ <u>—</u>
15.	Add 13 and 14 together	\$ <u>244.45</u>

Liabilities and Balance

16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>—</u>
17.	Balance	\$ <u>244.45</u>

INSTRUCTIONS

Line No.

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10. This amount must equal Line 13.
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

0040191752

SCHEDULE A

ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
11-7-78	Lois Baus Elkton, S.D.	Farm wife	100.00	100.00
29-78	Jeanette Smith 606 E. Tolland, Rapid City 57701	Rapid Fundraising	100.00	110.00
12-18-78	Mr + Mrs. Tom Martin 527-17th St. S. Brookings	Attorney	100.00	100.00
1-9-79	Pat Cassell R.R. 1 Volga, S.D. 57071	Farm wife	137.97	137.97
1-15-79	LTRAAC Huron Fundraising Ch. Supper			

Page _____ of _____

TOTAL THIS PERIOD \$ 437.97
(Last page only)

Transfer total to Summary Page - Line 2

3 5 7 9 1 0 4 0 0 0 0 0 3

LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

SCHEDULE C
TRANSFERS/EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
1-15-79	LAPAC-Huron Fundraising - Chili Supper	100.00

Transfer Total to Summary Page - Line 4

SCHEDULE D
EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet Attached		

Transfer Total to Summary Page - Line 8

60040191754

Schedule Expenses

<u>Date</u>	<u>Check No.</u>	<u>Payee</u>	<u>Purpose</u>	<u>Amount</u>
10-31-78	116	White Postmaster	Postage	3165.96
11-3-78	117	Huron Publishing Co.	Advertising	105.57
11-29-78	118	Interstate Office Products	Supplies	69.46
11-29-78	119	Reynolds Printing	Printing	21.25
11-28-78	120	Carol Covvie	Tele. & Services	32.35
11-29-78	121	S.D. Right to Life	Printing & Pulling List	20.24
12-18-78	122	Karen Prochick	Tele. & Postage	56.44
1-24-79	123	James Becker	Tele. Reimbursed	26.47
1-24-79	124	William Dempsey	Tele. Reimbursed	41.67
				961.11

00040191755

82100

SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page - Line 9

TOTAL \$ _____
(Last Page Only)

SCHEDULE F
IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 Aberdeen Fundraising	Advertising	710.85
10-31-78 Rapid City Fundraising	Advertising	242.32
11-1-78 Minnehaha Area Fundraising Project	Pamphlets	159.18
11-8-78 Butte Area Representative	Advertising	155.57
11-1-78 Scott Rowden 320 E 27 th Sioux Falls 57105	Advertising	151.20

Page _____ of _____

Transfer Total to Summary Page - Line 12

Total This Period \$ 703.50
(Last Page Only)

9 5 2 1 6 1 0 0 0 0

SCHEDULE G

ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

0040191757

000191750

committee had been established in South Dakota for the purpose of disseminating the views concerning abortion of candidates for state and local public office in the November, 1978 general election. Your Affiant and other pro-life people in the Rapid City, South Dakota area desired to disseminate information in the Rapid City, South Dakota area concerning the views on abortion of certain candidates for public office in that election. Because the election was drawing close, we were operating under severe time pressures and did not take the time to contact Ellen Dempsey, Treasurer of LAPAC-SD concerning the advertisement before it was run. We believed that any such advertisement had to be run over the name of LAPAC-SD, but we were not aware that LAPAC-SD was involved only in the dissemination of views of candidates for public office on the state and local level and was not involved in the dissemination of views of candidates for public office on a national level. Not until after the advertisement marked Exhibit 1 had been run did we become aware of the fact that any dissemination of candidates' views concerning abortion for national public office was required to be done by Life Amendment Political Action Committee and not LAPAC-SD.

Donations were solicited from private individuals in the Rapid City area in late October, 1978 and on October 26, 1978, the advertisement marked Exhibit 1 was run in The Rapid City Guide. To the best of my knowledge, recollection and belief, the proofs of such ad were sent by The Rapid City Guide to Ellen Dempsey, Treasurer of LAPAC-SD, who received them after the ad was run. After she saw the proofs, Mrs. Dempsey informed us that any ads run over the name of LAPAC-SD could not contain any information concerning the views of candidates for national public office. To the best of my knowledge, information and belief, this was the

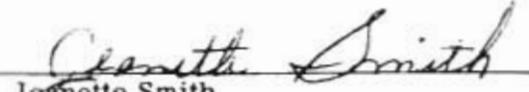
first that Ellen Dempsey knew of the ad which was run in The Rapid City Guide on October 26, 1978. Subsequent advertisements which we ran in The Rapid City Guide on November 2, 1978, and in The Rapid City Journal on October 29, 1978 and sometime in November, prior to the election, which were over the LAPAC-SD name disseminated only the views of candidates for state or local political office.

To the best of my knowledge, information and belief, the advertisements in The Rapid City Guide, including the October 26 advertisement, (Exhibit 1), cost \$120.00 which was paid for personally by your Affiant by check dated November 16, 1978 for which I was reimbursed from funds resulting from contributions from private individuals.

That after we realized the October 26, 1978 advertisement (Exhibit 1) was not proper, all subsequent advertisements run over the LAPAC-SD name concerned the views only of state and local candidates. To my best knowledge, information and belief, the October 26, 1978 advertisement (Exhibit 1) was not, in any way, sponsored, prepared, or run with the prior knowledge or consent of LAPAC-SD, Ellen Dempsey, its Treasurer, or anyone else on its behalf, but was sponsored, prepared and run in The Rapid City Guide on October 26, 1978 by myself and other interested and concerned persons in the Rapid City, South Dakota, area under the mistaken belief that such ads had to be run over the LAPAC-SD name and could include both candidates for national as well as state and local office. Ellen Dempsey, on behalf of LAPAC-SD, did not condone this advertisement and, in fact, called our attention to this error immediately after the ad was run when she first received knowledge of the contents of the ad. That the October 26, 1978 advertisement was

0047191760

not paid for with any funds received from or through LAPAC-SD nor was I reimbursed with monies for such advertisement from LAPAC-SD. Finally, no federal candidates endorsed in that advertisement consented to, cooperated with, requested or suggested the use of their names in that advertisement.



Jeanette Smith

Subscribed and sworn to before me
this 17th day of September, 1979.



Notary Public, South Dakota

(SEAL)

Aug. 17, 1984

0040191761

"B"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

- U.S. Senate: LARRY PRESSLER
- U.S. House of Representatives: JAMES ABDNOR
BOB SAMUELSON
- South Dakota Governor: WILLIAM JANKLOW
- South Dakota Lt. Governor: LOWELL HANSON
- South Dakota Attorney General: MARK MEIERHENRY
MAX GORS
- State Treas.: DAVID VOLK

South Dakota Senate: (Dist. 27)
LYNDELL PETERSON

South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HARRIS
OWEN CADDY

These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LSPAC-SD Life Amendment Political Action Committee, White, S.D. 57263, Ellen Dempsey, Treas.)

0040191762

that any dissemination of such views was required to be made over the name of LAPAC.

Your Affiant caused to be prepared and printed a one-page flyer, (Exhibit 1). At the time such flyer was prepared and distributed, your Affiant was not aware that the activities of LAPAC-SD were limited to the dissemination of views of candidates for public office on a state or local level and that LAPAC-SD could not in any way involve itself with the views of candidates for public office on a national level. Your Affiant also did not contact Ellen Dempsey, Treasurer of LAPAC-SD, prior to the distribution of the flyer concerning its contents.

Your Affiant prepared Exhibit 1 and caused it to be published in Rapid City by Simpson's Creative Printers on or about October 23, 1978, which flyers were subsequently distributed before the November 7, 1978 election by himself and other pro-life youth throughout the Rapid City, South Dakota area. The printing costs for such flyers amounted to approximately \$40.00, which was paid by monies raised from private contributions on or about October 23, 1978.

That to the best knowledge, information and belief of your Affiant, Ellen Dempsey, Treasurer of LAPAC-SD, was not aware of the nature or contents of the flyer marked Exhibit 1 at any time prior to its publication and distribution nor was that flyer sponsored, prepared, distributed, or paid for by LAPAC-SD or anyone on its behalf; rather the flyer was sponsored, prepared, distributed and paid for solely through the efforts of your Affiant and others acting on his behalf having no connection with LAPAC-SD. Your Affiant did not receive any monies from LAPAC-SD at any time for payment of the printing costs of the flyers or as reimbursement

0004791751

for such such costs. Finally, no federal candidates endorsed in that flyer con-
sented to, cooperated with, requested or suggested the use of their names in that
flyer.

Kevin G. Conner

Kevin Conner

Subscribed and sworn to before me
this 15 day of September, 1979.

Robert A. Condit

Notary Public, South Dakota

(SEAL)

0040191755

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

*I found this gem
under the windshield
wiper on my car.
J. Meyer*

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

A Vote For These Candidates Is A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

- For Governor: **WILLIAM JANKLOW** ✓
- For Atty. General: **MARK MEIERHENRY** ✓
MAX GORS
- For Lt. Governor: **LOWELL HANSEN II** ✓
- For St. Treasurer: **DAVID VOLK** ✓
- For U.S. Senate: **LARRY PRESSLER** ✓
- For U.S. House of Rep. **JAMES ADDONOR** ✓
BOB SAMUELSON *defeated*
- For South Dakota Senate - Dist. 27
LYNDELL PETERSON
- For South Dakota House - Dist. 27
✓ **GORDON PEDERSON**
✓ **DON HAM**
OWEN CADY **KATHLEEN PERRIGO**
✓ **GEORGE CROUCH**

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He all elected

VOTE FOR THOSE WHO VALUE LIFE — THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hq., White, SD

STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

- We are distributing this list for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion.
- We believe every human being has the right to his or her journey through life.
- We believe those who are weak must be helped by the strong at all stages of life.
- We believe our elected officials must have the intelligence, integrity and determination to solve social problems without resorting to the inhumane solution of killing the helpless.
- We are glad to give our time and efforts to work for these candidates who have pledged their support of a Human Life Amendment.

Rapid City Youth For Life
If you share our concern and wish to join or help in any way, call 342 6136
Rapid City, S. Dak. 57701

WE LOVE LIFE!

MAY, JOHNSON, DOYLE & BECKER P.C.

ATTORNEYS AT LAW
1100 K STREET, N.W.
WASHINGTON, D.C. 20004
TEL: 555-1234

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

Attention William C. Oldaker
FIRST CLASS MAIL

Return Receipt Requested

NO. 12345

MAIL

Dec 11129

MAY, JOHNSON, DOYLE & BECKER, P.C.

904132

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1445

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE
605/336-2165

R. G. MAY
GEORGE O. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
DERALD W. WIEHL
RICHARD MUE
EDWARD J. LEAHY
GARY D. JENSEN
ROBERT A. MARTIN

September 13, 1979

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

Attention: Carolyn Weeder

Re: MUR 960

Dear Ms. Weeder:

I wish to advise you that I have sent in the mail today to persons in Rapid City, South Dakota and White, South Dakota, Affidavits for execution by them detailing their knowledge concerning Exhibits "B" and "D" referred to in the above Complaint. I hope to have them back in my office the first of next week so that I can immediately forward them to you so that you will have them sometime next week as we discussed in our telephone conversation on Monday, September 10.

I was not able to prepare the Affidavits prior to today since one of the persons with knowledge was gone and I was not able to visit with them until later yesterday.

Immediately upon return of the executed Affidavits to me, I will immediately forward them to you so that you should have them sometime next week.

Thank you for your continued cooperation.

Yours very truly,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB: sw

0 0 1 0 9 : 7 6 9

1 0 0 4 0 1 9 1 7 6)

May, Johnson, Doyie & Becker, P. C.

Counsellors At Law
412 West Ninth Street
P. O. Box 1443
Sioux Falls, SD 57101



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

Attention: Carolyn Weeder



MAY, JOHNSON, DOYLE & BECKER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

P.O. BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57101

RECEIVED
FEDERAL ELECTION
COMMISSION

846
600#
10981

'79 AUG 27 AM 9:43

TELEPHONE
(605) 336-2565

R. G. MAY
GEORGE O. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
DERALD W. WIEHL
RICHARD MOE
EDWARD J. LEAHY
GARY D. JENSEN
ROBERT A. MARTIN

August 22, 1979

Federal Election Commission
1325 K Street NW
Washington DC 20463

ATTENTION: William C. Oldaker
General Counsel

RE: MUR 960-Life Amendment
Political Action Committee, South Dakota

Dear Mr. Oldaker:

This letter is to confirm my telephone conversation with Carolyn Weeder of your staff on August 20, 1979 in response to the questions raised in your letter of August 16, 1979.

We do not believe that the answers to any of the interrogatories are inconsistent with the two exhibits "B" and "D" for the reason that neither of those exhibits were sponsored, paid for, authorized or prepared with the prior knowledge or consent of LAPAC, S.D. Rather, we believe that the two exhibits were prepared, paid for and distributed by others who used the LAPAC name without permission. Accordingly, the answers to interrogatories 3, 4, 6 and 11 are correct.

In my telephone conversation with Ms. Weeder on August 20, I advised her that I would be away from my office between August 22 and September 4. However, I do want to submit additional documentation and evidence in support of the position of LAPAC, S.D. to the Federal Election Commission. Because of time pressures, I am unable to set forth in this letter, in any detail, the facts which support the general position stated above. However, I have telephoned the representative of LAPAC, S.D. and advised her to obtain for me from persons involved in, or having knowledge of, the distribution of Exhibits "B" and "D" the facts surrounding their publication and dissemination and payment therefor. Upon my return to

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the office, I will follow up on this matter and submit a more detailed statement, together with whatever evidence is available, to the Commission for the purpose of clarifying and supplementing this general response.

Very truly,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB:mlr

0040191771



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: SEPTEMBER 6, 1979

SUBJECT: MUR 960 - Interim Investigative
Report dated 9-4-79; Received
In OCS 9-5-79, 9:56

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, September 5, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

3004919177

September 5, 1979

MEMORANDUM TO: Marge Ermons
FROM: Elissa T. Garr
SUBJECT: MUR 960

Please have the attached Interim Invest Report on
MUR 960 distributed to the Commission.

Thank you.

00040191774

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 SEP 5 A 9: 56

BEFORE THE FEDERAL ELECTION COMMISSION
September 4, 1979

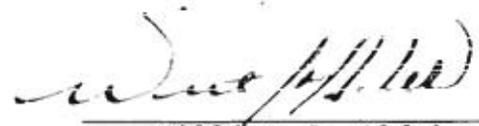
In the Matter of)	
)	
Life Amendment Political)	
Action Committee, South)	MUR 960
Dakota)	
)	
Life Amendment Political)	
Action Committee, Inc.)	

INTERIM INVESTIGATIVE REPORT

A draft General Counsel's Report has been prepared concerning this matter, and approval by the Team Supervisor is pending. The final General Counsel's Report will be ready for Commission consideration during the week of September 3, 1979.

9/4/79

Date



William C. Oldaker
General Counsel

004791775

DOYLE, BECKER & FISHER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57104

TELEPHONE
(605) 336-2565

R. G. MAY
GEORGE O. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
GAIL S. FISHER
DONALD W. P.
RICHARD
EDWARD
GARY D.

August 6, 1979

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

Re: Life Amendment Political Action Committee, Inc. -
South Dakota
MUR 960

Dear Mr. Oldaker:

I represent Life Amendment Political Action Committee - South Dakota ("LAPAC SD") in connection with the above matter. As requested in your letter of July 2, 1979, addressed to our client, we enclose executed Answers to Interrogatories.

The activities of LAPAC-SD were limited solely to those in connection with elections for statewide offices in South Dakota. LAPAC-SD has not, at any time, participated, either directly or indirectly, in any elections or campaigns for federal office. Specifically, LAPAC-SD has not expended any funds, either directly or indirectly, in connection with the campaigns for Congress referred to in the letter of Ms. Gail M. Harmon to the FEC dated April 30, 1979.

We believe that this information, together with the Answers to Interrogatories enclosed will provide your office with sufficient information to determine that the charges of Ms. Harmon are totally unfounded and to close the file on this matter insofar as LAPAC-SD is concerned.

However, if further information is required, please advise the undersigned.

Our client, LAPAC-SD, hereby waives confidentiality and requests that the full proceedings in MUR 960, insofar as it relates to LAPAC-SD, be spread upon the public record. 2 U.S.C. § 457(g)(a)(3)(B).

Very truly yours,

MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

By James R. Becker
James R. Becker

JRB:sw

cc: Ms. Carolyn Weeder

MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

SIOUX FALLS, SOUTH DAKOTA 57104

TELEPHONE
(605) 336-2565

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GEORGE H. JOHNSON
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JAMES R. BECKER
GALE E. FISHER
DERALD W. WIEHL
RICHARD M. YE
EDWARD J. LEAHY
GARY D. JENSEN

August 6, 1979

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

Re: Life Amendment Political Action Committee, Inc. -
South Dakota
MUR 960

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Very truly yours,

MAY, JOHNSON, DOYLE, BECKER & FISHER, P.C.

By James R. Becker
James R. Becker

JRB:sw

cc: Ms. Carolyn Weeder

08 AUG 1979 9:01 777

BEFORE THE FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE,
SOUTH DAKOTA

MUR 960

ANSWERS TO INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?

ANSWER: There is no relationship between Life Amendment Political Action Committee, South Dakota and LAPAC, Inc.

2. Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.

ANSWER: To my best knowledge, no bills were paid for, debts liquidated, or any funds transferred to LAPAC, Inc.

3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.

ANSWER: No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, to my best knowledge.

4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.

ANSWER: No expenses were incurred in the preparation and distribution of any communications relating to a federal election by Life Amendment Political Action Committee, South Dakota.

5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?

ANSWER: Life Amendment Political Action Committee, South Dakota did not engage in any activities seeking to obtain information about federal candidates' views on pro-life issues and accordingly no costs were incurred by it in collecting any such information.

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6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail.

ANSWER: None.

7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.

ANSWER: Yes. Copies of Life Amendment Political Action Committee, South Dakota's filings with the South Dakota State Ethics Commission were attached to the letter dated April 30, 1979 from Gail M. Harmon to the Federal Election Commission which apparently was the basis for the above Complaint. No reports after that date have been filed with the South Dakota State Ethics Commission.

8. Is LAPAC, S. D. incorporated? If so, please submit copies of Articles of Incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S. D.

ANSWER: Life Amendment Political Action Committee, South Dakota is not incorporated. Its sole officer is Ellen Dempsey, Treasurer, White, South Dakota.

9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.

ANSWER: All contributions received are listed on the reports filed with the South Dakota State Ethics Commission.

10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.

ANSWER: All expenditures by Life Amendment Political Action Committee, South Dakota, are set forth on the reports filed with the South Dakota State Ethics Commission.

11. Please submit a copy of every brochure printed and/or distributed by LAPAC, S. D. which mentions in any manner the name(s) of a candidate for federal office.

ANSWER: No brochures were printed or distributed by Life Amendment Political Action Committee, South Dakota which mentioned in any manner the names of any candidates for federal office to the best of my knowledge.

60040191779



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 16, 1979

FEDERAL EXPRESS

Mr. James R. Becker
Counselor at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

RE: MUR 960-Life Amendment
Political Action
Committee, South Dakota

Dear Mr. Becker:

The Commission has received Life Amendment Political Action Committee, South Dakota's response to MUR 960 Interrogatories.

The Commission fails to understand answers to Interrogatories 3, 4, 6 and 11 in light of the facts presented in the complaint, specifically Exhibits "B" and "D".

For example, Answer 3 states that "No federal candidates were endorsed in flyers or brochures paid for by Life Amendment Political Action Committee, South Dakota, ..." Furthermore, Answer 4 reads that "No expenses were incurred in the preparation and distribution of any communications relating to a federal election..." by LAPAC, S.D.

Answer 6 indicates that LAPAC, S.D. made no expenditures and/or contributions in connection with federal activities. Answer 11 further states that "No brochures were printed or distributed by (LAPAC, S.D.) which mentioned in any manner the names of any candidates for federal office..."

With these aforementioned responses in mind, how does LAPAC, S.D. account for publications Exhibits "B" and "D" which clearly endorse federal candidates and which state that they were "paid for" and "sponsored by" LAPAC, S.D.?

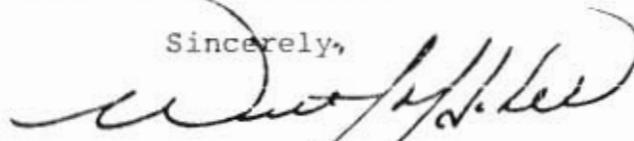
00010191783

James R. Becker
Page 2

The Commission gives you an opportunity to explain this discrepancy. In order to expedite this matter, please telephone your clarification to Carolyn Weeder, the staff member assigned to this matter at (202) 523-4039. The conversation can subsequently be confirmed by a written response.

We anticipate your immediate reply.

Sincerely,



William C. Oldaker
General Counsel

00010191784

MUR960 - ~~1100~~

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)

<input type="checkbox"/> Show to whom and date delivered	c
<input type="checkbox"/> Show to whom, date, and address of delivery	c
<input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered	c
<input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery	c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
James R. Becker

3. ARTICLE DESCRIPTION
REGISTERED NO. 943528
CERTIFIED NO. 3
INSURED NO. 2

(Always obtain signature of addressee or agent)

I have received the article described above:

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
Lynn Stark

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE

ST. LOUIS, MO
AUG 20 1979
CLERK'S OFFICE

2090 (57) - 3 749 985

400W
10837

903513

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006

RECEIVED
FEDERAL ELECTION
COMMISSION

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572
CABLE ALL OFFICES

9 PM 1:10

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPER**
ST. JOHN BARRETT
CHARLES DAWSON BARNETT*
FRANKLIN DRAKE*
JOHN E. EVANS*
RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN S. KECK*
KARL F. LOUCKS II**
DONALD F. MINTMIRE
JACK E. RUCK*
JOHN F. SHERLOCK II.
LEE C. SUMMERS*
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1179
LOUISVILLE, KENTUCKY 40201
TELEPHONE (502) 585-4131

BARNETT, ALAGIA & PROSPER**
249 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 827-5898

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER*
MICHAEL E. LANNON*
RICHARD A. GLADSTONE
PATRICIA C. ANDERSON
ANTHONY O. BROWN*
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

August 6, 1979

000191785

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

Re: Life Amendment Political Action Committee, Inc.
MUR #960

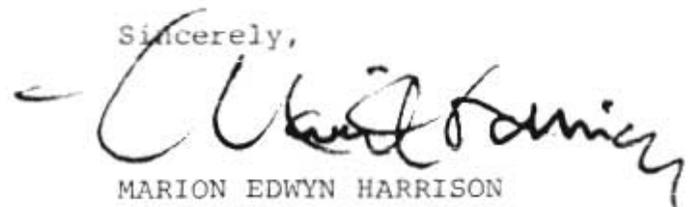
Dear Mr. Oldaker:

Part of the Answer to Interrogatory #6, photocopy enclosed, inadvertently is in error.

The Directors of LAPAC are Mr. Paul A. Brown, Dr. Mildred F. Jefferson and Robert L. Sassone, Esquire.

Both the Interrogatory and that portion of the answer are irrelevant to the issues in the case in any event.

Sincerely,



MARION EDWYN HARRISON

MEI:kg
Enc
cc Ms. Carolyn Weeder

- 2 -

request, or suggest the use of their names? If so, please explain.

A. No. Life Amendment Political Action Committee, Inc. ("LAPAC") issued only three flyers pertaining to South Dakota elections. Attachments 1, 2 and 3.

3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.

A. LAPAC liquidated said debt by a payment of \$350.00 under date of January 4, 1979 and \$319.19 under date of March 22, 1979, photocopies of checks attached as Attachments 4 and 5.

LAPAC reported both payments. See LAPAC's First Quarter 1979 Report, filed April 10, 1979, pages 1 and 12.

4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc., endorsing any federal candidate and the number of copies of each printed and distributed.

A. As to South Dakota (the subject matter of MUR #960), see Interrogatory #2, supra. Of Attachment 1, 15,000 were printed. Of Attachment 2, approximately 100 were printed. Of Attachment 3, approximately 100 were printed.

As to states other than South Dakota (each beyond the scope of MUR #960), LAPAC paid to Lessing Flynn Ad Agency, Des Moines, Iowa, the sum of \$2,000.00 to defray in part the

- 3 -

distribution by Pro-Life Action Council, Box 2035, Des Moines, Iowa 50310, of a brochure, Attachment 6. See LAPAC's November 7, 1978 10-day report, page 2.

5. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.

A. See Interrogatory #3, supra.

6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/Bylaws and a list of its Board members.

A. Articles of Incorporation and Bylaws attached as Attachments 7 and 8.

Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

By


PAUL A. BROWN, Treasurer

District of Columbia

City of Washington, ss: My Commission Expires April 14, 1984

Subscribed and sworn to before me a Notary Public this
1st day of August, 1979.


PAMELA L. VENERDROW
Notary Public, D.C.

My Commission expires April 14, 1984.

LAW OFFICES

BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D. C. 20006

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

CCC
10833

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006

RECEIVED
FEDERAL ELECTION
COMMISSION

903501

TELEPHONE (202) 785-5572
CABLE ALL OFFICES

79 AUG 9 AM 8:58

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPERII**
ST. JOHN BARRETT
CHARLES DAWSON BARNETT*
FRANKLIN DRAKE*
JOHN E. EVANS*
RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN S. KECK*
KARL F. LOUCKS II**
DONALD F. MINTMIRE
JACK E. RUCK*
JOHN F. SHERLOCK II.
LEE C. SUMMERS*
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1179
LOUISVILLE, KENTUCKY 40201
TELEPHONE (502) 585-4131

BARNETT, ALAGIA & PROSPERII**
248 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 832-5888

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
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W. DAVID KISER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

August 6, 1979

0040191797

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

Re: Life Amendment Political Action Committee, Inc.
MUR #960

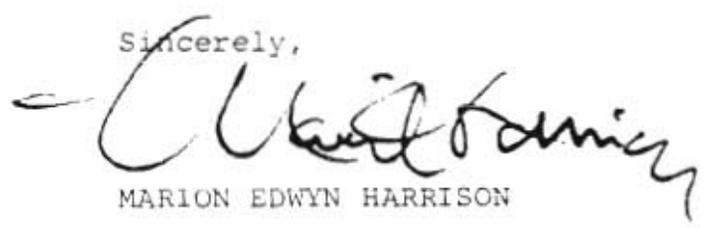
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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

By *Paul A. Brown*
PAUL A. BROWN, Treasurer

District of Columbia

City of Washington, ss: My Commission expires April 14, 1984

Subscribed and sworn to before me a Notary Public this 1st day of August, 1979.

Pamela L. Vennerdrow
PAMELA L. VENNERDROW
Notary Public, D.C.

My Commission expires April 14, 1984.

LAW OFFICES

~~BARNETT, ALAGIA & GAREY~~

1627 K STREET, N.W.

WASHINGTON, D.C. 20006



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

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RECEIVED
MAY, JOHNSON, DOYLE & BECKER
COUNSELLORS AT LAW
COMMISSION

412 WEST NINTH STREET

PO BOX 179 AUG 6 AM 10:34

SIOUX FALLS, SOUTH DAKOTA 57101

TELEPHONE
605/336-2365

R. G. MAY
GEORGE O. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
DERALD W. WIEHL
RICHARD MOE
EDWARD J. LEAHY
GARY D. JENSEN
MURIEL A. MARTIN

August 2, 1979

0010191793

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

RE: MUR 960

Dear Mr. Oldaker:

On August 1, 1979 we received your letter of July 25, 1979 granting our request for an extension of time in which to file Answers to Interrogatories in the above matter. On July 31, the undersigned called Carolyn Weeder of your office advising that the written Answers would not be filed with your office by the end of July and requesting a short additional extension of time.

We are aware of the obligation imposed upon the FEC to expeditiously conduct its investigation. However, we would ask that you bear in mind that your initial letter was received by Mrs. Ellen Dempsey on behalf of LAPAC, S.D. who then had to mail the Interrogatories to me since she does not regularly have the opportunity to come to Sioux Falls. After I received the Interrogatories I then had to review them and get back in touch with her to ascertain the necessary facts to formulate proper Answers. Since everything had to be done by the mail or telephone, a substantially greater amount of time elapsed than you might normally consider reasonable. Furthermore, I was away from my office a good deal during the month of July because of an injury.

However, as I advised Ms. Weeder in my telephone conversation with her, the Answers to the Interrogatories had already been formulated and sent to my client for review and signature. Upon her receipt of the Answers, she will be required to take them to a Notary Public in a community approximately twenty miles from her home to have her signature acknowledged and then return them to me through the mail. As I also advised Ms. Weeder,

Mr. Oldaker

-2-

August 2, 1979

I will be out of my office between August 2-8 but I have instructed my secretary to immediately forward to you the executed Answers to the Interrogatories as soon as they have been returned to us.

Accordingly, we would respectfully request that the Commission hold its file open on this matter pending receipt by it of the Answers which should be forthcoming within the next week at the latest.

Your cooperation in this matter will be greatly appreciated.

Very truly,

MAY, JOHNSON, DOYLE & BECKER, P.C.

By James R. Becker
James R. Becker

JRB:sko

0040191795

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10760

BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 785-5572

CABLE ALL OFFICES ALBAR

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DONALD F. MINTMIRE
JACK E. RUCK*
JOHN F. SHERLOCK II.
LEE C. SUMMERS*
MARY JO WINKLER*

August 1, 1979

BY HAND

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

Re: Life Amendment Political Action Committee, Inc.
MUR #960

Dear Mr. Oldaker:

In response to your letter of July 2, 1979 addressed to our client Life Amendment Political Action Committee, Inc. ("LAPAC"), MUR #960, we attach executed Answers to Interrogatories and comment as follows.

1. LAPAC is not in violation of the provisions of 2 USC §434 inasmuch as LAPAC reported the liquidation of the debt to which the Interrogatories make reference. See Interrogatory #3 and Answer.

2. LAPAC is not in violation of the provisions of 2 USC §433 for failing to include LAPAC, S.D. and/or other prolife committees as affiliated organizations inasmuch as no such organization is affiliated. See Interrogatory #1 and Answer. Further, there is some question as to whether LAPAC, S.D. exists.

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BARNETT, ALAGIA & CAREY

William C. Oldaker, Esquire
August 1, 1979
Page two

3. LAPAC is not in violation of the provisions of 2 USC §441d with respect to Attachments 1, 2 and 3 to the Interrogatories, q.v. §441d refers to communications ". . . through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising . . ." The regulation repeats the statutory language adding, by way of example as to limitation, exclusions as to "bumper strips, a pin, button, pen and similar small items upon which the disclaimer cannot be conveniently printed . . ." 11 CFR §110.11(a)(1). Thus, neither the statute nor the regulation includes a handbill, which obviously is not "general public political advertising" but rather a form of personal communication.

As a lawyer I find the purpose of the Federal Election Commission ("FEC") in drafting §110.11(a)(1) as it did to be obvious - namely, to exclude "bumper strips, a pin, button, pen and similar *small items upon which the disclaimer cannot be conveniently printed . . .*" [Italics supplied.] Hence, if asked, I would have advised a client to include the applicable portion of the message set forth in 11 CFR §110.11(a)(1)(ii), not because §441d(2) necessarily requires it but because FEC intends it. However, because the handbills are not "general public political advertising" our client should not be held to a violation, however minimal and technical the violation otherwise might be.

The charges in MUR #960, all trivial whether or not accurate, emanate from a letter of April 30, 1979 to FEC from Ms. Gail M. Harmon, filing on behalf of her client the National Abortion Rights Action League ("NARAL"). NARAL is conducting a nationwide campaign of harassment and vilification of prolife groups. We have reason to believe NARAL has filed complaints with the FEC against seven or so other prolife organizations. In evaluating the charges at issue, the FEC should bear in mind this motivation. For example, on April 18, 1979 NARAL issued a press release, Attachment A, in which NARAL announced "allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups . . ." The press release further announced a press conference on Capitol Hill for

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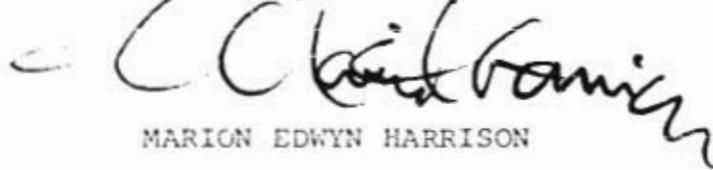
BARNETT, ALAGIA & CAREY

William C. Oldaker, Esquire
August 1, 1979
Page three

10:00 AM on April 30. In addition, on April 12 NARAL issued another press release, to be held for release until April 30 at 10:30 AM, charging LAPAC and other prolife groups with "major" and "flagrant . . ." unlawful acts. Attachment B. It ill behooves FEC to waste its resources and those of lawful political action committees in facilitating NARAL's campaign of harassment.

Our client waives confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record. 2 USC §437g(a)(3)(B).

Sincerely,


MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Carolyn Weeder

001009809

NATIONAL ABORTION RIGHTS ACTION LEAGUE
 825 15th Street, NW, Washington D. C. 20005

ATTACHMENT A

FOR IMMEDIATE RELEASE

For more information, contact:

Janet Beals, Director of Public Information

(202) 347-7774 OR

Joan Eisenstodt, Conference Coordinator

347-7774 through April 27

April 27-30: 234-0700, NARAL/Shoreham Americana

ABORTION RIGHTS CONVENTION FOCUSES ON ELECTORAL POLITICS

Washington, D.C., April 18, 1979 ----- Abortion rights supporters from all 50 states will converge on Washington this month to attend the National Abortion Rights Action League's annual convention. The League, the nation's largest single-issue group working to defend abortion rights, will celebrate its 10th year of existence at the April 28-30 annual meeting, to be held at the Shoreham-Americana Hotel.

The convention's focus on the combination of electoral politics with grassroots organizing parallels a recent change in strategy for the pro-choice group. "This year," said Karen Mulhauser, NARAL Executive Director, "marks the beginning of an aggressive campaign -- we call it "Impact '80" -- to let legislators know that compulsory pregnancy is not the will of the people. We are arming our activists now to support those who vote for choice. We know that the majority of Americans believe that abortion should remain a woman's personal decision and our goal is to organize that majority."

In workshops and other information sessions, participants will hear the history of the issue and learn to mobilize to insure its future.

A list of speakers follows:

Nidge Costanza and Michael McCloud will lead the plenary on electoral politics (9-10:15 a.m., Sunday). Costanza, former Special Assistant to the President, will speak on the importance of grassroots involvement in electoral politics. McCloud,

right-hand man to John Anderson, will speak from his involvement in Anderson's successful campaign against a single-issue anti-abortion candidate in 1978.

Anderson will be meeting the abortion issue head-on again in his bid for the Republican presidential nomination.

Immediately following will be "how-to" workshops on electoral politics, led by six political consultants, including Matt Reese, specialist on campaigns for single-issue coalitions.

Highlights of Saturday's program include comments by well-known constitutional lawyer and abortion rights specialist Harrict Pilpel, the General Counsel to Planned Parenthood Federation of America. She will speak of the recent history of the abortion rights struggle -- how the fight was won through litigation and legislation. (Saturday plenary, 10-11 a.m.) Also speaking will be Rebecca Cook, who has been consulting at cabinet and parliamentary levels on national family planning law and policy for the past six years with the International Planned Parenthood Federation. She will discuss the increasing liberalization of abortion laws in other countries in the past dozen years, and its connection with other civil rights for women abroad. (Also Saturday plenary session)

Saturday brunch will include an address from Jeannie I. Rosoff, President of the Alan Guttmacher Institute. Rosoff will share her perspective as a long-time member of the Capitol Hill scene, recalling the days when even contraception was a practically forbidden topic.

Session I workshops (2:45-3:45 p.m., Saturday) include Minors' Rights by Bill Baird, who has been challenging restrictive birth control and abortion laws for 15 years, and is the plaintiff in Bellotti v. Baird, now before the Supreme Court, a case which will dramatically affect the rights of teenagers to abortions.

Session I will also mark the beginnings of the first national group for doctors organizing to defend a woman's right to abortion. The Physicians for Choice workshop will be directed by Dr. Christopher Tietze, one of the world's most eminent authorities on human fertility and its control. Dr. Tietze is now a Senior Consultant to

the Center for Policy Studies of the Population Council where he is primarily concerned with research in the demographic and public health aspects of induced abortion. Dr. Tietze, with Dr. Jack Lippes, inventor of the "Lippes Loop" IUD, will discuss how to organize physicians to become actively involved in abortion rights.

Naomi Baden, Executive Director of the Coalition of Labor Union Women and a staff member of the Amalgamated Clothing and Textile Workers Union, will lead Working with Union People, also in Session I. She will speak to the possibilities and problems of cooperation between abortion rights groups and labor unions.

Pat Gavett, Executive Director of the Religious Coalition for Abortion Rights, will preside over a workshop on Working with the Religious Community in Session II (4:15-6 p.m., Saturday). The Religious Coalition was responsible earlier this year for the recommitment of 18 of its member denominations and religious organizations to make abortion rights one of the major social action issues on which they work.

Well-known organizing expert and Director of the Midwest Academy, Heather Booth, will lead a community organizing workshop. Uta Landy, Executive Director of the National Abortion Federation, the professional association of abortion providers, and who established the first national toll-free consumer hotline on abortion, will lead the Clinic Organizing workshop.

Dr. Helen Rodrigues-Trias, Chief of Pediatrics at Roosevelt Hospital in New York, will join other minority leaders in chairing the Working with Minorities workshop. She is a founder of the Committee to End Sterilization Abuse, and works to protect Puerto Rican women against coerced sterilization.

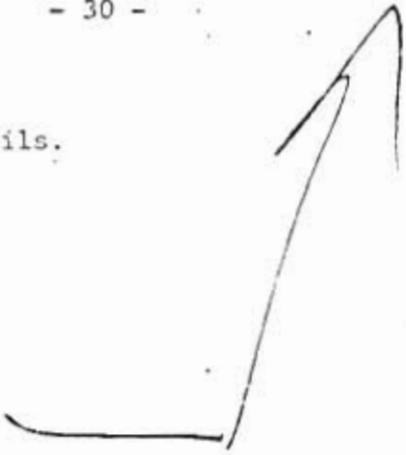
Breakfast with Congressional pro-choice leaders will begin the day on Monday, April 30 (8:30 a.m.) expected so far are George Miller (D-CA), Michael Barnes (D-MD), Ted Weiss (D-NY), Tony Beilenson (D-CA), Vic Fazio (D-CA), and others.

Immediately following, a press conference will announce NARAL's allegations of major illegal actions by two national anti-abortion groups and four state anti-abortion groups. The conference will be held on Capitol Hill (exact location to be announced), at 10:00 a.m. Karen Mulhauser, NARAL Executive Director, will speak, and NARAL's attorney and others will be available as resource people. NARAL will be filing complaints against all six groups that morning with the Federal Election Commission. Another complaint against an Iowa anti-abortion group, the Pro-Life Action Council, was filed with the FEC by NARAL last year. It is still under investigation.

Convention-goers and many others will spend the rest of the day lobbying their Congresspeople on the issue of abortion rights.

- 30 -

See attached schedule for more details.



**NARAL****News Release**NATIONAL ABORTION RIGHTS ACTION LEAGUE
325 15th Street, N.W., Washington D. C. 20005

HOLD FOR RELEASE UNTIL

For more information, contact:
Janet Beals, Director of Public Information
(202) 347-7774RECEIVED
JUL 11 1979
APRIL 30, 1979, 10:30 AM**SIX ANTI-ABORTION GROUPS CHARGED
WITH ELECTION LAW VIOLATIONS**

Washington, D.C. 5/30/79 -- Complaints alleging violations of federal election laws by two national and four state anti-abortion groups were filed today with the Federal Election Commission.

The complaints were filed by the National Abortion Rights Action League against two national anti-abortion organizations, the Life Amendment Political Action Committee (LAPAC), and the National Right to Life Committee (NRLC). Complaints were also filed against state anti-abortion groups in South Dakota, Massachusetts, Indiana and New Mexico.

"We are appalled at the major violations of federal election laws that we have found in our limited search. We are asking the Federal Election Commission to investigate the extent of this lawbreaking, and take appropriate action," said Executive Director Karen Mulhauser.

"Both national groups flagrantly violated election laws in 1978, and continue to do so. We have been saying since last November that their claims to political strength lack credibility. Their illegal actions make them even less credible."

NARAL is charging that the Life Amendment Political Action Committee is illegally soliciting funds from the general public through advertising, direct mail requests and ticket sales. NARAL alleges that the Life Amendment Political Action Committee is connected with the National Right to Life Committee, and federal election law clearly states that an affiliated organization may only solicit contributions from its parent organization's membership . . . not from the general public.

NARAL has requested the Federal Election Commission to order that such illegal activity be discontinued and to instruct LAPAC to return these illegally solicited funds to the donors.

NARAL's second complaint, against the National Right to Life Committee, alleges that NRLC's Voter Identification Project (which seeks to identify anti-abortion voters and mobilize them in support of anti-abortion candidates) constitutes unlawful corporate contributions to anti-abortion candidates. NARAL is requesting that the FEC prohibit NRLC's Voter Identification Project.

NARAL is also drawing to the FEC's attention unreported and illegal election activity in South Dakota, Massachusetts, Indiana and New Mexico.

Penalties for these violations of federal election law by two national and four state anti-abortion groups could total in excess of a hundred thousand dollars. If the violations are found to be knowing and willful, penalties could be double that amount.

NARAL's complaint to the Federal Election Commission alleging illegal activities by the Iowa Pro Life Action Council in the 1978 election is still under investigation.

o A Massachusetts anti-abortion group, Massachusetts Citizens for Life, acted illegally by distributing a brochure to the general public endorsing federal candidates. This constitutes an unlawful corporate contribution to a campaign.

Because the Massachusetts group is an affiliate of the National Right to Life Committee, and because NRLC's past president, Dr. Mildred Jefferson, is connected with the local group, NARAL suspects that the violation was knowing and willful.

o A great deal of anti-abortion political activity, including printing and distribution of brochures and placement of full-page ads in newspapers, took place in Indiana's 8th Congressional District, and was not reported to the Federal Election Commission. The activity was done in the name of the Right to Life Chapter of the 8th Congressional District, but was not reported by that group. Neither was it reported by the registered political action committee of Indiana Right to Life, with which the district group is affiliated. This is in violation of federal election law requiring reporting of any campaign contributions of corporations and political action committees.

In addition, a large number of purportedly personal letters (signed by a local priest and other anti-abortion leaders) endorsing a candidate were mailed in the district without naming the political group that authorized them, in clear violation of federal election law. Postage for some of these letters was paid by a political campaign, one indication that the letters were not simply personal.

o An anti-abortion group incorporated in New Mexico, The Right to Life Committee of New Mexico, violated election laws by printing and distributing large numbers of newsletters endorsing state and federal candidates. This constitutes an unlawful corporate contribution to a political campaign.

NARAL found this illegal activity in the four states it investigated. NARAL is asking that the FEC investigate for similar activity in these and other states. Because the pattern is similar, the possibility is great that unlawful activity is more extensive than we discovered in the initial research.

The Federal Election Commission, if it finds violations, may enforce penalties up to the amount of the violation, which would total in excess of a hundred thousand dollars in these instances. If the violations are considered knowing and willful, penalties can reach double the amount of the violation.

request, or suggest the use of their names? If so, please explain.

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Directors are Mr. Paul A. Brown, Mrs. Judith A. Brown, Mrs. Mary Hunt.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

By



PAUL A. BROWN, Treasurer

District of Columbia

City of Washington, ss: My Commission Expires April 14, 1984

Subscribed and sworn to before me a Notary Public this 1st day of August, 1979.


PAMELA L. VENNERDROW
Notary Public, D.C.

My Commission expires April 14, 1984.

LAPAC

(Life Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNOR has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7

Sean Morton Downey, Jr., Chairman
LAPAC, Inc.

Ellen Dempsey, State Coordinator LAPAC, Inc.

THIS LITTLE GUY WANTS YOU TO VOTE



FOR HIS LIFE NOVEMBER 7

VOTE FOR THE UNBORN
There Is a Difference!



LEO

THORSNESS



TOM

DASCHLE

"When elected to Congress I would be honored to co-sponsor and promote a Human Life Amendment."

"... I can't support a Human Life Amendment."

Leo Thorsness is strongly *opposed* to our tax dollars being used for abortions.

Daschel would use your tax dollars to abort babies.

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.
Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our pamphlet filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

00191913

If you'd like to

ATTACHMENT 2

Vote for the unborn —

VOTE

Thorsness

NOVEMBER 7, 1978

"If I am elected to Congress this November I would gladly sponsor a constitutional amendment allowing abortion only to prevent the death of the mother."

Leo C. Thorsness



LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

P.S. There's a difference in the two candidates for First District Congressman.

00401814

Vote for the unborn

Your vote is

→ CRUCIAL! ←

LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC. ENDORSES AND URGES YOUR SUPPORT OF THE FOLLOWING PRO-LIFE CANDIDATES TO THE HOUSE AND SENATE OF THE UNITED STATES ON NOVEMBER 7, 1978.

SOUTH DAKOTA SENATE: LARRY PRESSLER IS BY FAR THE BEST PERSON TO SEND TO THE SENATE.

SOUTH DAKOTA 1ST CONGRESSIONAL DISTRICT: LEO THORSNESS SUPPORTS THE HUMAN LIFE AMENDMENT AND WILL BE A LEADER IN OUR FIGHT TO RESTORE RESPECT FOR THE UNBORN.

SOUTH DAKOTA 2ND CONGRESSIONAL DISTRICT: REPRESENTATIVE JAMES ABDNOR HAS ONE OF THE BEST PRO-LIFE VOTING RECORDS IN THE HOUSE AND DESERVES YOUR FULL SUPPORT FOR RE-ELECTION.

PLEASE BACK ALL THREE OF THESE MEN THIS NOVEMBER 7TH. VOLUNTEER YOUR TIME NOW AND GIVE MILLIONS OF UNBORN CHILDREN THE CHANCE TO SEE WHAT WE TAKE FOR GRANTED.....THE LIGHT OF GOD'S BEAUTIFUL DAY.

SEAN MORTON DOWNEY JR.
CHAIRMAN:LAPAC INC.

ELLEN DEMPSEY
STATE COORDINATOR: LAPAC INC.

NOVEMBER 7, 1978 — VOTE PRO-LIFE

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission Washington D C

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THE AIR MAIL SERVICE
UNITED STATES DEPARTMENT OF POSTS AND TELEGRAPHS

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As Appeared on Sept. 3, 1978 —
Des Moines Sunday Register

PERSONALS

ABORTION

Up to (24 wks) termination, modern clinic or hospital, appts made 7 dys. Toll free, 1-800-
WANTED AT ONCE - Available



SEE WHY THIS
LITTLE GUY
WANTS YOU TO

VOTE

TUESDAY
NOV. 7TH!

Photo by Lennart Nilsson,
"Life Before Birth", LIFE, 1965

Pro-Life Action Council
P.O. Box 2035
Des Moines, Iowa 50310

BULK RATE
U.S. POSTAGE
PAID
Permit No. 1343
Des Moines, Iowa

ATTACHMENT 6

Vote for the Unborn on Nov. 7th!

In America today, the most helpless member of the human family — the unborn child — has been denied the protection of the law! Sad but true, even some endangered species of animals enjoy more legal protection than the unborn child.

You have an unalienable right to life. And that right was legally protected for you from the day you were conceived. Today, because of a single Supreme Court decision, the same right to life you have always possessed has been taken away from the unborn child. If the unborn can be "terminated" today just because they are unplanned, unwanted or inconvenient, who might be eliminated for similar reasons tomorrow — the aged, the sickly, the mentally retarded, the physically handicapped? In the end,

just how safe will YOUR right to life be?

The unborn cannot speak for themselves but you can speak for them — with your vote on Tuesday, November 7th! We must elect men and women who will work for passage of a Human Life Amendment (H.L.A.) to the Constitution. This amendment will guarantee legal protection for ALL human life, regardless of age, health, capability or state of dependency.

If you feel, like our forefathers did, that the right to life is the foundation of all human rights, then read below how the various candidates stand on key pro-life issues — and VOTE on November 7th!



Roger
JEPSEN

UNITED STATES SENATE

HUMAN LIFE AMENDMENT (H.L.A.)

YES

Jepsen will sponsor and support a Human Life Amendment to restore legal protection for the unborn child.

NO

Clark is opposed to any meaningful Human Life Amendment to restore the right to life for the unborn child.



Dick
CLARK

USE OF TAX DOLLARS TO PAY FOR GOVERNMENT-SUBSIDIZED ABORTIONS

NO

Jepsen is opposed to using your tax dollars in any way to pay for abortion services.

Clark has consistently supported using your tax dollars to pay for abortions.

YES

NO

Jepsen supports a "conscience clause" permitting private employers to exclude abortions from pregnancy disability benefits.

Clark has voted to force private employers to include abortions in their pregnancy disability benefits.

YES

FORCING EMPLOYERS TO PROVIDE ABORTION BENEFITS.

ENDORSED BY . . .

Pro-Life Action Council of Iowa
Life Amendment Political Action Committee
National Pro-Life Political Action Committee

SUPPORTED BY . . .

National Abortion Rights Action League — the most radical and militant pro-abortion group in America.

U.S. HOUSE (1st District)

James
LEACH

Opposes Human Life Amendment; opposes public funding of abortions.

Richard
MEYERS

Opposes Human Life Amendment; supports public funding of abortions.

U.S. HOUSE (4th District)

Neal
SMITH

Opposes H.L.A. — wants to hear from constituents; has voted for some but not all funding restrictions on abortions.

Charles
MINOR

Opposes Human Life Amendment; supports public funding of abortions.

GOVERNOR

Jerry
FITZGERALD

Opposes any meaningful Human Life Amendment; opposes public funding for abortions.

Robert
RAY

Opposes Human Life Amendment; supports public funding for abortions.

LT. GOVERNOR

Terry
BRANSTAD

Supports Human Life Amendment; opposes public funding for abortions.

William
PALMER

Supports Human Life Amendment; opposes public funding for abortions.

Since The Supreme Court Legalized Abortions in 1973 . . .

- ... over 6,000,000 abortions have been performed in the United States in the past five years.
- ... over \$256,000,000 in tax dollars have been spent to directly pay for 1,400,000 government-subsidized abortions.
- ... parents have been stripped of their rights to be consulted or even notified before their minor daughters undergo abortions.

- ... fathers have been stripped of their rights to protect the lives of their unborn children.
- ... some calloused members of Congress argue that it is cheaper to pay for abortions than to provide post-natal care.
- ... some members of the medical profession describe human pregnancy as "the second leading form of venereal disease."

Now Ask Yourself If This Issue Is Important Enough To Base Your Vote On?

Your vote on Tuesday, November 7th is **CRUCIAL!** Several important races can be decided by a margin as narrow as 1 or 2 votes per precinct. If you vote and urge your pro-life friends and relatives to vote, the election of qualified pro-life candidates will be assured! Be sure to **VOTE . . .** and **PLEASE** help us in our fight to stop the legalized killing of human life —

MAIL THIS COUPON TODAY!

TO: Pro-Life Action Council
P. O. Box 2035
Des Moines, Iowa 50310

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

___\$100 ___\$75 ___\$50 ___\$25 ___\$10 \$___

YOUR NAME _____

ADDRESS _____

CITY/STATE _____ ZIP _____

PHONE _____

00471822

ARTICLES OF AMENDMENT
TO THE
ARTICLES OF INCORPORATION
OF

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

To: The Recorder of Deeds of the District of Columbia,
Washington, D. C.

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act the Board of Directors of Life Amendment Political Action Committee, Inc., adopts the following Articles of Amendment to the Articles of Incorporation of Life Amendment Political Action Committee, Inc.

FIRST: The name of the corporation is:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

SECOND: The period of duration is perpetual.

THIRD: The specific and primary purposes for which this Corporation is formed and for which it shall be exclusively administered and operated are to receive, administer and expend funds for political, charitable and educational purposes in connection with the following:

1. To engage in nonpartisan research, study and analysis, for the benefit of the general public, regarding the political structure of the United States;

2. To engage in nonpartisan research, study and analysis for the benefit of the general public on those questions affecting the public interest with respect to both the public and private sectors, and to publish the results of such study;

3. To prepare educational materials and conduct educational activities in support of the general purposes of the Corporation;

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4. To conduct and sponsor forums, lectures, debates and similar programs;

5. To qualify as a political committee and as a multicandidate political committee pursuant to the provisions of §§301(d) and 320(a)(4) of the Federal Election Campaign Act Amendments of 1976 (or corresponding provisions of subsequent federal election laws);

6. To assist other political, charitable or educational organizations in the conduct of lawful activities;

7. To engage in any and all lawful activities incidental to the foregoing purposes except as restricted herein;

To accomplish the foregoing purposes, the Corporation shall also have the power to:

- a. sue and be sued;
- b. contract;
- c. receive property by devise or bequest, subject to the laws regulating the transfer of property by will, and otherwise acquire and hold all property, real or personal, including shares of stock, bonds and securities of other corporations;
- d. act as trustee under any trust the objects of which are related to the principal objects of the Corporation, and to receive, hold, administer and expend funds and property subject to such trust;
- e. convey, exchange, hypothecate, lease, mortgage, encumber, transfer upon trust or otherwise dispose of all property, real or personal;
- f. borrow money, contract debts and issue bonds, notes and debentures, and secure the payment of and performance of its obligations; and
- g. do all other acts necessary or expedient for the administration of the affairs and attainment of the purposes of the Corporation;

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FOURTH: The Corporation is not to have members.

FIFTH: No part of the net income of the Corporation shall inure to the benefit of or be distributable to its directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered and to make payments and distributions in furtherance of the purposes and objects set forth in Article THIRD hereof.

SIXTH: The business of the Corporation shall be carried on through its Board of Directors; the manner of their election or appointment, other than the initial Board of Directors provided for in the Articles of Incorporation, shall be as provided in the Bylaws.

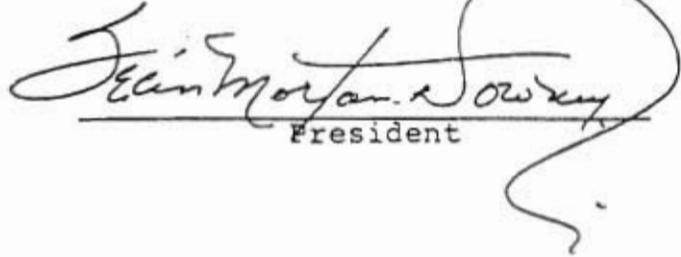
SEVENTH: The private property of the incorporators, directors and officers shall not be subject to the payment of corporate debts to any extent whatever. In furtherance and not in limitation of the powers conferred by statute, the Corporation expressly is authorized to carry on its business and to hold annual or special meetings of its Board of Directors in any of the states, territories or possessions of the United States or the District of Columbia.

EIGHTH: Upon the dissolution of the Corporation or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively for charitable, religious, scientific, testing for public safety, literary or educational purposes to organizations which are then exempt from federal tax under §501(c)(3) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws and to which contributions are then deductible under §170(c)(2) of such Code or corresponding provisions of any subsequent federal tax laws.

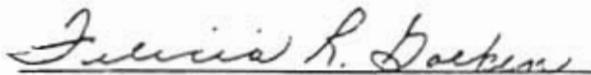
ADOPTION: These Articles of Amendment were adopted at a meeting of the Board of Directors held on August 1, 1978 and received a vote of a majority of the Directors in office,

there being no members having voting rights with respect thereof.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.


John Morgan Rowley
President

Attest:


Patricia R. Lockman
Secretary

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BYLAWS
OF
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

ARTICLE I - Name and Offices

§1. Name. The name of this Corporation is Life Amendment Political Action Committee, Inc. ("LAPAC").

§2. Offices. The principal office of the Corporation is in the District of Columbia. The Corporation also may have offices at such other places as the Board of Directors may appoint.

ARTICLE II - Purposes

§1. General. The specific and primary purposes of the Corporation are set forth in the Articles of Incorporation.

§2. Restrictions. The Corporation uses its funds only to accomplish objectives and purposes consistent with these Bylaws. No part of such funds shall inure, or be distributed, to members of the Corporation. If the Corporation be dissolved, assets remaining, if any, shall be distributed as provided in the Articles of Amendment to the Articles of Incorporation.

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ARTICLE III - Board of Directors

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§1. Duties. The Board of Directors manages the business and property and determines the policy of the Corporation pursuant to, and within the scope of, the Articles of Incorporation and the Bylaws.

§2. Composition and Tenure. The Board of Directors consists of seven members. A Director holds office until a successor qualifies. At each annual meeting of the Board of Directors, held in December of each year on a date specified at least 30 days in advance by the Board of Directors, the Board of Directors elects those individuals who shall serve thereon for the terms prescribed herein. Whenever a vacancy occurs for a reason other than expiration of a term of a Director, the remaining members of the Board may fill said vacancy. Effective at the December 1978 annual meeting two Directors shall be elected for one-year terms, two for two-year terms and three for three-year terms. Thereafter, each term will be for three years.

§3. Meetings. The Board of Directors meets in December. If the Board shall fail to designate at least 30 days in advance of said meeting the time and place thereof, said meeting shall be held commencing at 1:00 PM on the first

Monday in December at the principal office of the Corporation. The Board may hold additional meetings at any time and place it may designate upon 10 days written notice to each Director or upon written waiver. The Chairman or the Treasurer may call any such meeting.

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§4. Chairman of the Board. The Board elects the Chairman, who also serves as President of the Corporation, at its December meeting, to serve until the adjournment of the following December meeting. In the event the office of the Chairman becomes vacant, the Board elects an individual to serve the unexpired term.

§5. Quorum. A majority of the Board of Directors constitutes a quorum provided that if less than a quorum of the Board is present at a meeting duly called a majority of those present may adjourn the meeting from time to time without further notice.

§6. Resignation. A Director at any time may resign effective upon the date of his actual resignation or upon any successive date by delivering to each Director written notice.

§7. Compensation. A Director receives no stated salary for his services but by resolution of the Board may

receive a fixed stipend and/or his expenses of attendance, if any, or both, for actual attendance upon a meeting of the Board. A member of the Board serving the Corporation as an officer or employee of the Corporation or in a contractual capacity may be compensated for such service.

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§8. Voting Rights. Each Director has one vote. By a written memorandum filed with the Board of Directors the Board may confirm nunc pro tunc an informal action taken by the Board and in that event the Directors need not have been present in the same place at the time of the taking of the action or upon the filing of said written memorandum.

§9. Majority. All votes of the Board of Directors are by a three-fifths majority of a quorum unless otherwise specified in the Bylaws.

§10. Carryover of Term. A member of the Board of Directors serves until a successor is elected and qualifies.

§11. Attendance at Meetings. If a member of the Board shall fail to attend three consecutive meetings of the Board without approval or ratification of his actions by the Board, his membership on the Board automatically terminates.

§12. Parliamentary Rule. ROBERT'S RULES OF ORDER, REVISED, in the most recent edition available, applies to the conduct of business.

ARTICLE IV - Officers

§1. Designation. At its December meeting the Board of Directors also elects the Secretary and the Treasurer, either of whom need be a Director. Each serves for a term of one year or to fill an unexpired term, whichever is the shorter period. No person, including a Director, simultaneously may hold two or more of said offices.

§2. Agents and Assistants. The Board of Directors may elect such agents and assistants as it may deem necessary for performance of duties delegated to them by the Board.

§3. Compensation. The Board fixes the compensation, including expenditure authorizations and reimbursement of expenditures, for all officers, agents, assistants and other personnel.

§4. Removal. The Board of Directors may remove an officer of the Corporation at any time, and without advance notice to him, for any reason which in its judgment best

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serves the Corporation but may not abrogate a contractual right of any person so removed.

§5. Vacancies. Should an office of the Corporation become vacant, by whatever cause, the majority of the Directors then in office, although less than a quorum, may fill any such vacancy.

§6. Carryover of Term. An officer serves until his successor is elected and qualifies.

§7. President and Chairman. The President and Chairman is the chief executive officer of the Corporation, performs those duties normally inherent in said office and presides over meetings of the Board of Directors.

§8. Secretary. The Secretary prepares and maintains minutes of meetings of the Board of Directors, maintains the records of the Corporation and performs those duties normally inherent in said office.

§9. Treasurer. The Treasurer is custodian of corporate funds and securities and keeps full and accurate accounts of receipts and disbursements; deposits all monies and othe valuable affects in the name, and to the credit, of the Corporation in such depositories as the Board of Directors

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may designate; disburses funds as authorized by the Board; reports at the December meeting and otherwise when directed to the Board; submits to an annual independent audit directed by the Board; complies with applicable reporting and other provisions of the Federal Election Campaign Amendment Act of 1976, PL 94-283, 2 USC §§431 et seq, as amended, and any other applicable law.

ARTICLE V - Fiscal Year

The fiscal year is the calendar year. The fiscal year 1977 commences on the date of incorporation of the Corporation.

ARTICLE VI - Indemnification

The Board of Directors shall indemnify the President and Chairman, the Secretary, the Treasurer, and members of the Board of Directors, the employees and agents of the Corporation and former Presidents and Chairmen, Secretaries, Treasurers and members of the Board of Directors, employees or agents, expenses actually and necessarily incurred by them in connection with the defense of any action, suit or proceeding (actual or threatened; brought by or in the light of the Corporation or otherwise; civil, criminal, administrative

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or investigative, including appeal) in which they, or any of them, are made parties, by reason of being, or having been, President, Chairman, Secretary, Treasurer or a member of the Board of Directors, an employee or an agent of the Corporation, except in relation to matters in which any such person shall be judged finally in such action, suit or proceeding to be liable for negligence or for misconduct in the performance of duties. The term "expenses" herein means all amounts paid in settlement by any such person in connection with any such matter as to which the Corporation is advised by counsel selected by the Corporation that such persons to be indemnified did not commit such a breach of duty. The Board of Directors may advance any such expenses prior to the final disposition of the action, suit or proceeding.

ARTICLE VII - Amendments to Bylaws

These Bylaws may be amended by the Board of Directors upon ten days written notice of intent to amend to each member of the Board of Directors.

ARTICLE VIII - Notice

Notice of any kind whatsoever to any person holding office in, contracting with or doing business with the

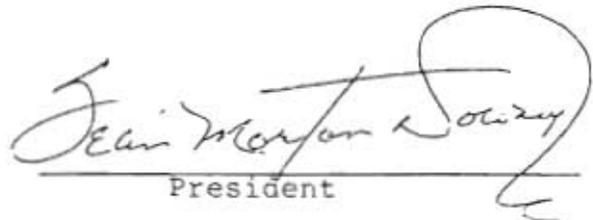
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Corporation shall be good and sufficient if mailed certified, postage prepaid to the last known address of record of the addressee, and shall be mailed in good time if postmarked on or before the date which equals or exceeds the number of days requisite for advance notice.

ARTICLE IX - Use of Words

As appropriate herein, a word may be used in the singular or plural, masculine or feminine. Verbs may be used in the appropriate tense and in the imperative.

RATIFIED AND APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 1, 1978 IN WASHINGTON, D.C.


President

Attest:


Secretary

00040191835



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MS*
DATE: JULY 26, 1979
SUBJECT: MUR 960 - Interim Investigative Report
signed by GC 7-24-79, Received by OCS
7-25-79, 11:00

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, July 25, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

0040191836

July 25, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elisa T. Carr
SUBJECT: MUR 960

Please have the attached Interim Invest Report on
MUR 960 distributed to the Commission.

Thank you.

80040191837

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
SECRETARY

79 JUL 25 All: 00

In the Matter of)
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)
Life Amendment Political)
Action Committee, Inc.)
)
)
&)
Life Amendment Political)
Action Committee, South)
Dakota)

MUR 960

Interim Investigative Report

Both respondents, LAPAC, Inc. and LAPAC, S.D., have acknowledged receipt of the Commission's letter and interrogatories. Counsel for LAPAC, Inc. called on July 13, 1979 to say that he was collecting the requested data which will be arriving shortly.

Counsel for LAPAC, S.D., stated in a letter of July 10 that it would be impossible to compile the necessary information until some time prior to the end of July. The Commission has sent counsel for LAPAC, S.D. a letter expressing the Commission's statutory obligation to investigate this matter expeditiously.

7/24/79
Date

William C. Oldaker
William C. Oldaker
General Counsel

0017191838



FEDERAL ELECTION COMMISSION

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

July 25, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James R. Becker
May, Johnson, Doyle, Becker
& Fisher, P.C.
Counselors at Law
412 West Ninth Street
P.O. Box 1443
Sioux Falls, South Dakota 57104

Re: MUR 960

Dear Mr. Becker:

This letter is in response to your correspondence of July 10 requesting an extension of time to respond to the interrogatories. The Federal Election Commission has a statutory obligation to conduct its investigations expeditiously pursuant to 2 U.S.C. §437g(a)(3)(A) and therefore requests that LAPAC, S.D. respond at the earliest possible date, but no later than the end of July.

Your cooperation and expediency in this matter will be appreciated.

Sincerely,

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

William C. Oldaker
General Counsel

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Merch 560 - Weeden

PS Form 3811, April 1967

● **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):
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 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
James R. Becker

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

(Always obtain signature of addressee or agent)

POSTMASTER: REGISTERED MAIL SERVICE IS AVAILABLE
 SIGNATURE: Addressee Authorized agent
Sum & Wife

DATE OF DELIVERY POSTMARK
 AUG 1 1979

UNABLE TO DELIVER BECAUSE OF _____ CLERK'S INITIALS

GC#
10564

MAY, JOHNSON, DOYLE, BECKER & FISHER
FEDERAL ELECTION COMMISSION

COUNSELLORS AT LAW

412 WEST NINTH STREET

PO BOX 1443

'79 JUL 16 AM 11:50

SIOUX FALLS, SOUTH DAKOTA 57104

TELEPHONE
(605) 336-2565

R. G. MAY
GEORGE D. JOHNSON
HAROLD C. DOYLE
JAMES R. BECKER
GALE F. FISHER
DERALD W. WIEHL
RICHARD MOE
EDWARD J. LEAHY
GLARY E. JENSEN

July 10, 1979

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

Attention: Carolyn Weeder

963056

Re: MUR 960

Dear Miss Weeder:

I represent LAPAC-S.D. and have been requested to respond to the letter from the Federal Election Commission dated July 2, 1979, addressed to that organization. Enclosed with that letter were numerous interrogatories which were requested to be answered within ten days from the date of that letter.

This is to advise that it will be impossible to completely and accurately answer the interrogatories and to present any facts deemed necessary by LAPAC-S.D. within that time period.

I wanted to advise you of this fact and to assure you that the letter and requested information is not being ignored by LAPAC-S.D. but rather will be furnished to you as soon as it is completed. At the present time, we would anticipate that your requested information will be provided prior to the end of July. If this time frame presents any problem, please advise.

Very truly yours,

By James R. Becker
James R. Becker

JRB:lms

cc LAPAC-S.D.

10:48 91707 67

730
203

0010191841

94010901940

May, Johnson, Doyle, Becker & Fisher, P. C.
Counsellors at Law
412 West Ninth Street
P. O. Box 1443
Sioux Falls, SD 57101



79 NOV 11 11 50

RECEIVED
FEDERAL ELECTION COMMISSION
NOV 11 1962

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





FEDERAL ELECTION COMMISSION

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

July 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
Rural Route 1
White, South Dakota 57276

RE: MUR 960

Dear Ms. Dempsey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee - South Dakota (LAPAC, S.D.) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 960.

The Commission has reason to believe that the matters alleged in the complaint therein state a possible violation of 2 U.S.C. § 441d. Specifically, it appears that:

LAPAC S.D. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.

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

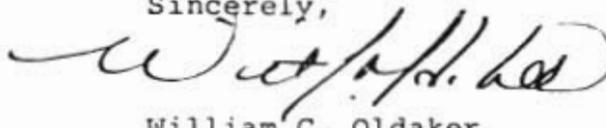


If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

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.

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

Sincerely,



William C. Oldaker
General Counsel

Enclosure

10191841

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
Rural Route 1
White, South Dakota 57276

RE: MUR 960

Dear Ms. Dempsey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee - South Dakota (LAPAC, S.D.) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 960.

The Commission has reason to believe that the matters alleged in the complaint therein state a possible violation of 2 U.S.C. § 441d. Specifically, it appears that:

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

80040191845

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure

CKW

60040191845

Ellen Dempsey

Life Amendment Political Action Committee, South Dakota

INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?
2. Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.
3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.
4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.
5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?
6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail.
7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.
8. Is LAPAC, S.D. incorporated? If so, please submit copies of Articles of Incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S.D.
9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
11. Please submit a copy of every brochure printed and/or distributed by LAPAC, S.D. which mentions in any manner the name(s) of a candidate for federal office.

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12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution.

10191849



FEDERAL ELECTION COMMISSION

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

July 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey, Chairman
Life Amendment Political Action
Committee, Inc.
P.O. Box 14263, Ben Franklin Station
Washington, D.C. 20044

RE: MUR 960

Dear Mr. Downey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee, Inc. (LAPAC, Inc.) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 960.

The Commission has reason to believe that the matters alleged in the complaint state a possible violation of 2 U.S.C. § 433, § 434, §441d. Specifically, it appears:

- (1) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

Enclosure

Mrs. Carolyn Weeder

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
Sean Martin Downey

3 ARTICLE DESCRIPTION
 REGISTERED NO. *348457* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE *[Signature]* Addressed agent
 DATE OF DELIVERY *JUL - 9 1979*
 ADDRESS *[Address]*

4 POST OFFICE
 JUL 9 1979
 5 ADDRESS - (Indicate city, county, and state)

6 UNABLE TO DELIVER BECAUSE
 CLERK'S INITIALS

PS Form 3811, Apr. 1977. RETURN RECEIPT REGISTERED, INSURED, AND CERTIFIED MAIL. 5-570 19 7 0 249 595

0 1 9 1 8 5 0

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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Life Amendment Political Action
Committee, Inc.
P.O. Box 14263, Ben Franklin Station
Washington, D.C. 20044

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- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.

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

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure



80040191852

Sean Morton Downey, Chairman

Life Amendment Political Action Committee, Inc.

INTERROGATORIES

1. What is your relationship with LAPAC, S.D.? Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local pro-life committees? Is LAPAC, S.D. a member of LAPAC, Inc. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
2. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names? If so, please explain.
3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc. endorsing any federal candidate and the number of copies of each printed and distributed.
5. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.
6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/ By-Laws and a list of its Board members.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political)
Action Committee, Inc.)
Life Amendment Political)
Action Committee - South)
Dakota)

MUR 960

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 27, 1979, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 4-1 to adopt the recommendation of the General Counsel to take the following actions in MUR 960:

1. Find reason to believe that Life Amendment Political Action Committee, Inc. may have violated 2 U.S.C. §434 by failing to report the liquidation of a debt.
2. Find reason to believe that LAPAC, Inc. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates.
3. Find reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S. D. and/or other pro-life committees as affiliated organizations in its statement of organization.
4. Approve and send the letter and interrogatories attached to the General Counsel's June 20, 1979 report in this matter.

Commissioners Harris, McGarry, Thomson, and Tiernan voted affirmatively for the above actions; Commissioner Friedersdorf dissented; Commissioner Aikens abstained from voting.

Attest:

6/28/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

00491851



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: JUNE 22, 1979
SUBJECT: OBJECTION - MUR 960 - First General Counsel's
Report dated 6-20-79; Received in OCS
6-20-79, 11:36

The above-named document was circulated on a 48 hour
vote baiss at 4:00, June 20, 1979.

Commissioner Friedersdorf has submitted an objection
at 11:18, June 22, 1979, thereby placing MUR 960 on the
Executive Session Agenda for Tuesday, June 26, 1979.

00000191855

June 20, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 960

Please have the attached First General Counsel's
Report on MUR 960 distributed to the Commission on a
48 hour tally basis.

Thank you.

80040191856

FIRST GENERAL COUNSEL'S REPORT

'9 JUN 20 AM: 36

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JUN 20 1979

MUR NO. 960
DATE COMPLAINT RECEIVED
BY OGC May 1, 1979
STAFF
MEMBER Weeder

COMPLAINANT'S NAME: National Abortion Rights Action League

RESPONDENT'S NAME: Life Amendment Political Action Committee, Inc.
Life Amendment Political Action Committee - South
Dakota

RELEVANT STATUTE: 2 U.S.C. § 433 § 434, § 441d; 11 CFR § 110.11,
11 CFR § 104.8(a)

INTERNAL REPORTS CHECKED: LAPAC, Inc. registration and reports
Searched for LAPAC, S.D.'s PAC registration
FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The National Abortion Rights Action League filed a complaint alleging that the Life Amendment Political Action Committee, South Dakota (LAPAC, S.D.) and/or the Life Amendment Political Action Committee, Inc. (LAPAC, INC.) violated certain FECA provisions. The complaint alleges the following:

- (1) That LAPAC and/or LAPAC, S.D. may have violated 2 U.S.C. § 434 by failing to report expenditures for the preparation and distribution of brochures and flyers endorsing federal candidates.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (3) That LAPAC, S.D. is a "political committee" which should have registered with the Commission and reported pursuant to 2 U.S.C. § 433, 434.
- (4) That LAPAC and/or LAPAC, S.D. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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- (5) That LAPAC may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.

LEGAL ANALYSIS

Failure to Report Expenditures for Preparation and Distribution of Communications

NARAL alleges that LAPAC, Inc., and/or LAPAC, S.D. failed to report expenditures for the preparation and distribution of brochures and flyers endorsing federal candidates.

Of the exhibits submitted by the complainant, two flyers are sponsored and paid for by LAPAC, Inc., and the remaining two flyers by LAPAC, S.D. LAPAC, Inc. has identified only one of these publications in its report, indicated and described in Exhibit "E" as a debt to Harold's Printing Company for the "Printing of 50,000 brochures endorsing candidacy of Larry Pressler - South Dakota-Senate; Leo Thorsness - South Dakota, 1st C.D. House; and James Abdnor - South Dakota, 2nd C.D. House" which is speculated to be Exhibit "C". LAPAC, Inc., reported at least five other expenditures for "Printing" but the specific printed materials were not identified in the report, so we cannot determine from the reports whether or not LAPAC, Inc., reported the expenses incurred in the preparation and distribution of the remaining flyer (Exhibit "C (b)").

LAPAC, S.D. is indicated to be the sponsoring committee for the two remaining flyers (Exhibits "B" and "D"). LAPAC, S.D. has registered with the State Ethics Commission of South Dakota. Its committee report (Exhibit "G") reveals that numerous expenses were incurred for "Advertising" and "Printing." The specific communications have not been identified, which makes it difficult to determine which expenses for what publication have been reported and which have not. In any event, LAPAC, S.D. has not registered as a political committee with the Commission, and therefore none of these expenses have been reported to the Commission.

Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories in an effort to obtain further information.

Failure to Report Liquidation of Debt

The debt of \$669.10 to Harold's Printing Company reported in LAPAC, Inc.'s 30 day Post-General Election report (Exhibit "E") does not appear as either a debt or an expenditure in the first quarter 1979 report resulting in a possible violation of 2 U.S.C. § 434 and 11 CFR 104.8(a). 11 CFR 104.8(a) specifically states that "these debts [outstanding debts] and obligations shall be reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished."

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Therefore, the Office of General Counsel recommends that the Commission find reason to believe that LAPAC, Inc., may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.

LAPAC, S.D. as a Political Committee

FECA defines "political committee" as "any committee, club, association or other group of persons which receives contributions or make expenditures during a calendar year in an aggregate amount exceeding \$1,000," 2 U.S.C. § 431(d).

Furthermore, FECA states that "Each political committee which anticipates receiving contributions or making expenditures during the calendar year in a aggregate amount exceeding \$1,000 shall file with the Commission a statement of organization." 2 U.S.C. §433(a).

2 U.S.C. § 431(f) defines "expenditure" as a "purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value made for the purpose of influencing the nomination for election, or the election of, any person to federal office, ..." A contribution is "a gift, subscription, loan, advance, or deposit of money or anything of value made for the purpose of influencing the nomination for election, or election, of any person to federal office..." 2 U.S.C. § 431(c).

LAPAC, S.D. sponsored at least two publications marked "Exhibit B" and Exhibit "E". Both publications are concerned with "influencing a federal election"(as shown in the following subsection) and thus constitute expenditures according to 2 U.S.C. § 431(f). Determination of the exact expenditures incurred for the preparation and distribution of these and other such publications should be investigated. It would seem the expenses for widespread publication and distribution of these ads and flyers in combination with the federally-related monies of the reported contributions in Exhibit "G" could easily exceed the \$1,000 limitation, thus, triggering registration and reporting responsibilities as a political committee.

Further information from LAPAC, S.D. is necessary in order to segregate the exact amount of the monies reported in Exhibit "G" which relates to federal activities and the exact amount which relates to state activities.

Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories to LAPAC, S.D. in an effort to obtain further information on this matter.

LAPAC, INC. AND LAPAC, S.D.'s Communications as "Express Advocacy" requiring statements of authorization/non-authorization by candidate

11 C.F.R. 109.1(b)(2) defines "Express Advocacy" as "any communication containing a message advocating election or defeat, including but not limited to the name of the candidate, ..." and the FECA requires that authorization/non-authorization statements appear on any communication expressly advocating the election of a clearly identified candidate. 2 U.S.C. §441d, 11 C.F.R. 110.11.

The communications offered by Complainants (Exhibits "B," "C," "C(b)," and "D") are examples of express advocacy of Larry Pressler, Senate; James Abdnor, House; Leo Thorsness, House; and Robert Samuelson, House. The communications specifically identify these candidates who support "pro-life" issues and contain words and phrases such as "Vote Pro-Life," "Vote for the Unborn," "This Little Guy wants you to vote," and "A Vote for these candidates is a vote for Life." These phrases leave no reasonable doubt in the reader's mind that the sponsoring committee is expressly advocating the election of clearly identified federal candidates who support pro-life legislation.

In addition, LAPAC, INC.'s listing of the debt to Harold's Printing Company for the publication of Exhibit "C" specifically states that the brochures endorsed (emphasis added) Larry Pressler, Leo Thorsness, and James Abdnor, thus this communication requires statements of authorization/non-authorization delineated in 2 U.S.C. §441d:

§441d. Publication or distribution of political statements

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication

(1) if authorized by a candidate, his authorized political committees or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication has been authorized; or

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization required to be disclosed under section 433(b)(2). See also 11 C.F.R. 110.11.

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The attached communications submitted by complainant fail to contain any such statements.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that LAPAC, INC. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. 110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

LAPAC, Inc. and LAPAC, S.D. as affiliated committees

The FECA requires that political committees include in their statement of organization the names, addresses, and relationships of affiliated or connected organizations. 2 U.S.C. §433(b)(2).

Committees are affiliated if "established, financed, maintained, or controlled by the same corporation, labor organization, person, or group of persons, including any parent, subsidiary, branch, division, department, or local unit thereof ...". 11 C.F.R. 100.14(c)(2).

The evidence of coinciding materials and circumstances raise reason to believe that LAPAC, Inc., LAPAC, S.D. and other Pro-Life Organizations in Iowa, Arizona, Minnesota, and Ohio may be affiliated committees.

First, the name of Ellen Dempsey appears on both LAPAC, S.D. and LAPAC, Inc. publications as an officer of each committee. On Exhibit "B" Ellen Dempsey is indicated as "Treasurer" of LAPAC, S.D. Ellen Dempsey is also indicated as "State Coordinator, LAPAC, Inc." on Exhibit "C". This coincidence raises questions concerning Ellen Dempsey's role in both committees and concerning the relationship of LAPAC, S.D. to LAPAC, Inc.

Secondly, Exhibit "H" indicates that the chairman of LAPAC, Inc., Sean Morton Downey, traveled in October 1978 to make personal appearances endorsing Leo Thorsness (1st CD-So. Dak.) and Roger Jepsen (Sen.-Iowa). The complainant suggests that Downey discussed campaign strategy with local anti-abortion activists. Downey's name appears on Exhibit "C" as "Chairman" along with Dempsey's name as "State Coordinator, LAPAC, Inc." The question of Downey's role and participation in establishing, financing, maintaining, or controlling LAPAC, S.D. and other local pro-life groups calls attention to the need for further investigation in this matter.

Third, LAPAC, Inc. flyers and brochures are not unique. For example, the same language and same pictures of "This Little Guy wants you to vote" (Exhibit "E") appear on several other pro-life publications endorsing candidates in Iowa, Minnesota, Arizona, and Ohio (See Attachments 1-4). The origin and adoption of this slogan by these and other pro-life committees in relation to LAPAC, Inc.'s influence in this matter requires further investigation.

Another point of interest is the mutual patronage of Harold's Printing Company by LAPAC, S.D. and LAPAC, Inc. as evidenced in the financial statements of Exhibit "G", page 13 and Exhibit "E". Harold's Printing Company is located in Brookings, South Dakota while LAPAC, Inc. is located in Washington, D.C.

These aforementioned examples of coinciding materials and circumstances indicate a close-relationship between LAPAC, Inc., LAPAC, S.D. and other local pro-life committees. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the FEC.

RECOMMENDATIONS

1) Find reason to believe that Life Amendment Political Action Committee, Inc. may have violated 2 U.S.C. §434 by failing to report the liquidation of a debt.

2) Find reason to believe that LAPAC, Inc. and LAPAC, S.D. may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 by making expenditures for communications expressly advocating the election of clearly identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

3) Find reason to believe that LAPAC, Inc. may have violated 2 U.S.C. §433 by failing to report LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization.

4) Approve and send the attached letter and interrogatories.

Attachments

1. Complaint
2. Letter to Respondents
3. Interrogatories

MUR 960

SHELDON, HARMON, ROISMAN & WEISS

1025 15TH STREET, N.W.

SUITE 500

WASHINGTON, D. C. 20005

TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ANTHONY Z. ROISMAN
ELLYN R. WEISS
WILLIAM S. JORDAN, III *
ADMITTED IN MICHIGAN ONLY *

April 30, 1979

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

Dear Ladies & Gentlemen:

On behalf of the National Abortion Rights Action League, ("NARAL") I am filing this complaint of violations of the Federal election law by Life Amendment Political Action Committee, South Dakota ("LAPAC, S.D.") and/or Life Amendment Political Action Committee ("LAPAC"). One or both of these groups made significant political contributions or expenditures during 1978 elections, but failed to report these expenses to the Federal Election Commission.

During the 1978 general elections at least the following political expenditures were made by LAPAC, its South Dakota chapter, or a sympathetic South Dakota group which used LAPAC's name:

1. Advertisements costing a total of \$955.00 were run under LAPAC's name endorsing Leo Thorsness, James Abnor, and Larry Pressler. (Exhibit "A")
2. At least one additional advertisement was run using LAPAC's name endorsing Pressler, Abnor, and Bob Samuelson. (Exhibit "B")
3. "This little guy wants you to vote" brochure bearing LAPAC's name and endorsing Thorsness, Abnor and Pressler was printed for \$669.10 and widely distributed. (Exhibit "C")
4. A one page flyer, again supposedly sponsored by LAPAC, also endorsed federal candidates Pressler, Abnor, and Samuelson. (Exhibit "D")

As shown in the attached letter filed with the Commission, LAPAC denies having run the ads listed under #1 above. (Exhibit "A") Since LAPAC does not report contributions to or in-kind printing expenditures for the benefit of Thorsness, Pressler

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et. al we had assumed that the brochure and flyer were also paid for by the South Dakota Committee. One disturbing piece of information confuses the picture, however. On its 30 day post-general election report LAPAC lists a debt to Harold's Printing Company for \$669.10 for printing 50,000 brochures endorsing Thorsness, Abnor, Pressler. (Exhibit "E") Its first quarter 1979 report, however, shows no such debt and no expenditures. (Exhibit "F") We ask you to investigate whether, LAPAC, South Dakota paid off this debt, or whether LAPAC itself did while failing to report either the expenditure or the in-kind contribution to wipe out the debt.

The cost of printing the brochure was reported to be \$669.10. Estimates for the flyer are \$48.50 for 5,000 and \$91.00 for \$10,000. We ask you to investigate how many flyers were printed, whether additional costs were incurred in preparation and distribution of the brochure and flyer, i.e., design, layout, postage, and salaries and which organization made these political expenditures. We also ask you to investigate how the local political committee obtained information about the candidates' views on pro-life issues. What costs were incurred in collecting this information?

If these expenses were incurred by LAPAC, South Dakota, it clearly should have registered with the Federal Election Commission since the total cost of the ads and printing either the flyers or the brochure exceeds \$1,000.00. §431(d) Obviously the local group should have also filed reports of contributions to it and the expenditures it made.

For your information, we are attaching LAPAC, South Dakota's filings with the State Ethics Commission. (Exhibit "G") These reports indicate direct expenditures and expenditures made on its behalf which total over \$3,000. We ask you to investigate whether these amounts include expenses related to federal elections.

In addition to investigating exactly who made the expenditures, we ask you to investigate how national LAPAC relates to local, allegedly independent, unaffiliated committees. We know that Sean Morton Downey, LAPAC's chairman, traveled to South Dakota in October 1978. See p. 3 of Itemized Expenditures (Exhibit "H") It seems reasonable to think that on his visit he discussed campaign strategy with local anti-abortion activists. We ask you to investigate how much he knew of LAPAC,

30040191864

SHELDON, HARMON, ROISMAN & WEISS

The Federal Election Commission
April 30, 1979
Page 3

South Dakota's activities, and whether or not he encouraged or acquiesced in their failing to register with the FEC. For example, the "this little guy wants you to vote" brochure is not unique to South Dakota. The same language and same or similar pictures have been used on Right-to-Life brochures endorsing candidates in Iowa, Arizona, Ohio and Minnesota and perhaps other states. Does LAPAC provide technical assistance and/or advice to local committees? Does it help organize local committees?

I have prepared this complaint and believe that it is true and correct to the best of my knowledge. This complaint was not filed on behalf of or at the request or suggestion of any candidate.

Sincerely,

Gail M. Harmon
Gail M. Harmon

GMH/dmw

Subscribed and sworn to before
me this 30th day of April, 1979.

Katherine Katsaros
Notary Public

00010191865

1981

"A"

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

BENJAMIN FRANKLIN STATION 8 P.O. BOX 14783 WASHINGTON D.C. 20044 (202) 638-3241

12-15-78

Federal Election Commission
Washington, D.C.

Please note that a total of \$555.52 was spent for newspaper ads in behalf of Leo Thompson, 1st C.D.; James Abdnor, 2nd C.D. and Larry Pressler Senate III from South Dakota. The ads were placed by individuals and paid for by them. They are favorable to our PAC and used our name for the disclaimer. These figures are not reflected in our report.

Paul A. Brown
Treasurer

70910101865

"B"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

- U.S. Senator: LARRY PRESSLER
- U.S. House of Representatives: JAMES ABONOR
BOB SAMUELSON
- South Dakota Governor: WILLIAM JANKLOW
- South Dakota Lt. Governor: LOWELL HANSON
- South Dakota Attorney General: MARK MEIERHENRY
MAX GORS
- State Treas.: DAVID VOLK

- South Dakota Senate: (Dist. 27) LYNDLELL PETERSON
- South Dakota House: (Dist. 27) GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADDY

These candidates respect the rights of the defenseless.
They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LSPMSD (Life Amendment Political Action Committee, White, S.D. 57226), Ellen Demme, Treas.)

000001867





Don Barnett
Age 35
Hometown - Rapid City
Married, two children
A two-term mayor of Rapid City, Don Barnett is the Democrat Party's candidate for the U.S. Senate.

Born in Hot Springs, Barnett grew up in Rapid City, graduated from Rapid City High School and South Dakota State University. He also attended graduate school at the University of Nebraska. He gained national recognition while mayor following the June 1977 flood and the following early spring when militant American militants conducted demonstrations in Rapid City and other Black Hills communities.

He served a tour in Vietnam as a company grade Army officer. After serving as mayor, Barnett entered private business as manager of a shop and a position he still holds.



Jim Abdnor
Age 55
Hometown - Kennebec
Single
A two-term Republican Congressman from this District, Jim Abdnor is running for re-election.

Raised in Kennebec, Abdnor graduated from the University of Nebraska and then returned to teach and coach and later started a farm and ranch which he still operates. He has been involved in Republican Party politics for a long while serving as a State Senator and Lieutenant Governor, before being elected to Congress.

He is an Army veteran of WWII.



Bob Samuelson
Age 53
Hometown - Faith
Married
Rancher Bob Samuelson is the Democrat Party's candidate for U.S. Congress from the Second District.

He is a lifelong resident of Meade County where he operates a ranch in partnership with his brother. They also have ranching interests in eastern Montana. He is a graduate of Spearfish High School and saw service during WWII with the Army.

He has been active in various farm-ranch commodity promotion groups and has run unsuccessfully for a seat on the state legislature.

*Comments, questions
on inside pages*

Old people have reservations

and more low-income
for the program when
passed," he said. "We'll
working poor."

1977 "is, with modest modifications, the proposal
that the President and the Department submitted to
Congress last year."

Other changes in the new regulations include
more flexible certification procedures for elderly



0 1 1 0 . 0 1 9 6 9

LAPAC

(Human Life Amendment Political Action Committee, Inc.)

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNOR has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7

Sean Morton Downey, Jr., Chairman
LAPAC, Inc.

Ellen Compney, State Coordinator, LAPAC, Inc.

THIS LITTLE GUY
WANTS YOU TO
VOTE



FOR HIS LIFE
NOVEMBER 7 00

C-14

VOTE FOR THE UNBORN

There Is a Difference!

LEO THORSNESS

TOM DASCHLE

"When elected to Congress I would be honored to co-sponsor and promote a Human Life Amendment."

"... I can't support a Human Life Amendment."

Leo Thorsness is strongly *opposed* to our tax dollars being used for abortions.

Daschel would use your tax dollars to abort babies.

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

*I found this gem
under the missed check
major on my car.
J. Meyer*

SUPPORT LIFE-PAC



VOTE AGAINST ABORTION
THIS NOVEMBER 7th

A Vote For These Candidates Is A VOTE FOR LIFE

The following candidates support a Human Life Amendment to end the killing of unborn children and guarantee the constitutional right of all human beings to life irrespective of age, health, function or condition of dependency.

- For Governor: WILLIAM JANKLOW ***
- For Atty. General: MARK MEIERHENRY ***
MAX GORS
- For Lt. Governor: LOWELL HANSEN II ***
- For St. Treasurer: DAVID VOLK ***
- For U.S. Senate: LARRY PRESSLER ***
- For U.S. House of Rep. JAMES ADDICER ***
BOB SAMUELSON *defeat!*
- For South Dakota Senate - Dist. 27: LYNDELL PETERSON
- For South Dakota House - Dist. 27: GORDON PEDERSON ***
DOY NATH ***
OWEN CODY ***
KATHLEEN PERRIGO ***
GEORGE CROUCH ***

0000091871

VOTE FOR THOSE WHO VALUE LIFE — THEY WILL VALUE YOURS!

Sponsored by LAPAC (Life Amendment Political Action Committee), Hq., White, SD

STATEMENT BY THE RAPID CITY YOUTH FOR LIFE:

- We are distributing this list for LAPAC because THE SUPREME COURT DOES NOT SPEAK FOR US on abortion.
- We believe every human being has the right to begin her journey through life.
- We believe those who are weak must be helped by the strong at all stages of life.
- We believe our elected officials must have the intelligence, integrity and discrimination to solve social problems without resorting to the inhumane solution of killing the helpless.
- We are glad to give our time and efforts to work for those candidates who have pledged their support of a Human Life Amendment.

Rapid City Youth For Life

If you share our concern and wish to join or help in any way call 342-4125

WE LOVE LIFE!

Rapid City, S.D. 57701

STATEMENT 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)

HAND DELIVERED

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. LIES AMENDMENT P.A.C.
Name of Candidate or Committee (in full)
P.O. Box 14263 BEN FRANKLIN STN.
Address (number and street)
WASHINGTON DC 20045
City, State and ZIP Code

2. I.D. No. C00092297
Candidate/Committee

3. _____
Office Sought, State/District (if applicable)
Year of Election 1978

4. Type of Report (check appropriate boxes)

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

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

5. Reporting Period <u>11/25/78</u> Through <u>12/21/78</u>	Column A This Period	Column B Calendar Year-To-Date
6. Cash on hand January 1, 1978		\$ 1055.81
7. Cash on hand at beginning of reporting period	\$ 692.45	
8. Total receipts (from line 10)	\$ 6952.71	\$ 95,306.05
9a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 7515.16	\$ 96,262.84
9. Total expenditures (from line 25)	\$ 6320.95	\$ 95,068.60
10. Cash on hand at close of reporting period (Subtract line 9 from line 9a)	\$ 1194.21	\$ 1194.21
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ _____	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ _____	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 1199.00	

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

11-27
(Date)

[Signature]
(Typed Name of Treasurer or Candidate)

[Signature]
(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 437a, or Section 441 (see reverse side of form).

For further information, contact:



Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20483

or call DCO424-9530

Approved by GAO
187610 (1/75) (e)
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.

301019187

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

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
		FROM:	TO:
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
16. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 800.00		
(b) Unitemized	\$ 6032.71		
(c) Sales and collections included above: List by event on memo Schedule D (S _____)			
(d) Subtotal of contributions from individuals	\$ 6832.71	\$ 96262.80	
17. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$		
(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)	\$		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	\$	
18. Other Income:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of other income	\$	\$	
19. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$	\$	
20. Refunds, Penalties, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of refunds, penalties, returns of deposits	\$	\$	
21. Total Receipts	\$ 6832.71	\$ 96262.80	
EXPENDITURES			
22. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 6007.36		
(b) Unitemized	\$ 213.59		
(c) Subtotal of operating expenditures	\$ 6320.95	\$ 95068.63	
23. 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	\$	\$	
24. 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	\$	\$	
25. Independent Expenditures (use Schedule E)	\$	\$	
26. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$	\$	
27. Total Expenditures	\$ 6320.95	\$ 95068.63	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28. Total Receipts (from line 19)	\$		
29. Transfers (In) (from line 15(a))	\$		
30. Net Receipts (Subtract line 29 from line 28)	\$		
31. Total Expenditures (from line 27)	\$		
32. Transfers Out (from line 22(a))	\$		
33. Net Expenditures (Subtract line 32 from line 31)	\$		

107-87-0

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

Life Amendment Political Action Committee Inc.

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>Mr. T. J. Connors 3633 R.R. 22 Naperville, Ill. 67753</i>	<i>retired</i> Occupation	<i>11-28</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>J. A. E. Driscoll Box 1750 Fargo, N.D.</i>	<i>Fargo</i> Occupation <i>minister</i>	<i>12-11</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>J. D. Chapman 3214 Fulkerson Ct. Richmond, VA 23227</i>	<i>Richmond</i> Occupation <i>ret.</i>	<i>12-11</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>Quasiano R. F. Box 1042 Bloomington, KY</i>	<i>ret.</i> Occupation	<i>12-21</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>M. T. Naylor 14133 French Road Rd. 20 Woodburn, OR 97071</i>	<i>Woodburn</i> Occupation <i>Farmer</i>	<i>12-18</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>V. Beason 24 Old Gods So. Florisant, MO</i>	<i>Florisant</i> Occupation <i>Farmer</i>	<i>12-17</i>	<i>200.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		
<i>P. R. North 6141 Locke Fort Worth, TX</i>	<i>retired</i> Occupation	<i>11-28</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date <i>5</i>		

SUBTOTAL of receipts this page (optional) \$ *800.00*

TOTAL this period (two page and one number only) \$ *800.00*

000119187

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
Life Amendment Political Action Committee Inc				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
CMAA Inc 8800 Edgworth Ave. Capitol Heights, MD. 20747	12-1-79	\$ -	\$ -	\$ 5890
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):
acc. payable fundraising

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
PAI Inc 2117 Washington Blvd Stafford, VA 22557	1/1/78	\$ 1500	\$ -	\$ 1500
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):
loan due 6-1-79 @ 5% per annum

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Donna Stone 2180 Woodlawn Dr Bryans, VA 22901	5/1/78	\$ 4300	\$ -	\$ 4300
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):
loan due 6-1-79 @ 5% per annum

SUBTOTALS this period this page (optional)	\$	\$	\$ 11890
TOTAL this period (last page this line number only)	\$	\$	\$ 11890

70000000875

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

7
 9
 1
 9
 7
 0
 0
 4
 7

Name of Candidate or Committee in Full			
LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC.			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NATIONAL RIGHT TO LIFE COMMITTEE INC. 524-14 ST. NW #341 WASHINGTON, DC 20045	RENT-DEC. Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	12/19/78	150.00
BARBARA BAROODY 40 P.O. BOX 14263 WASHINGTON, DC 20044	EXPENSE REIMBURSEMENT Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	12/19/78	519.20
C&P TELEPHONE P.O. BOX 2123 WASHINGTON, DC 20003	TELEPHONE-DEC Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	12/21/78	305.98
P. A. BROWN P.O. BOX 14262 WASHINGTON, DC 20045	TELEPHONE EXPENSE NOV/DEC Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	12/21/78	274.88
SUBTOTAL of expenditures this page (optional)			\$ 1250.06
TOTAL this period (last page this line number only)			\$ 6007.56

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

RECEIVED
AUG 17 1978
Secretary of State

Return Completed Forms to:

Executive Director
State Ethics Commission
Office of Secretary of State
Capitol Building
Pierre, South Dakota 57501
(605) 224-3537

New Registration

Registration Amendment

I.D. No. [

(For office use only)

Within fifteen days after receiving contributions or making expenditures in the amount of \$100.00 or more, all political committees and any person who is not a candidate or a member of a political committee that are required to file state campaign financing statements pursuant to SDCL 12-25-13 and SDCL 12-25-19, must file this statement with the State Ethics Commission.

0040191878

1. Full name of committee Life Amendment Political Action Committee -
South Dakota (LAPAC - S.D.)

Mailing address RR1 White S.D. 57276

2. Full name of chairperson no one named at this time.

Mailing address _____

Telephone number _____

3. Full name of treasurer Ellen Demsey

Mailing address RR1 White, S.D. 57276

Telephone number 624-6281

4. If this committee is supporting an entire ticket of a party, give name of party _____

5. If this committee is the principal campaign committee of a candidate, give name of candidate and office sought _____

6. If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation _____

none at this time

Filed this 17
day of August 1978
STATE ETHICS COMMISSION
Office of Secretary
of State

STATE ETHICS COMMISSION

Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

o/c Ellen Dempsey - Treasurer
R. Rt. 1 (Street)

White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on _____
- January 30th Report 1979
(Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.

First National Bank, Brookings, S.D. 57006

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

Ellen Dempsey - Treasurer
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 29 day of January, 1979.

(SEAL)

Walter Willmott
Officer Administering Oath

Filed this 30
day of Jan, 1979
STATE ETHICS COMMISSION
Office of Secretary
of State

60040191880

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>271.02</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>437.97</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>-</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>100.00</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>396.57</u>	
6.	Total Cash Receipts		\$ <u>934.54</u>
7.	Total Cash Available		\$ <u>1205.56</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>961.11</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>-</u>	
10.	Total Cash Disbursements		\$ <u>961.11</u>
11.	Ending Cash Balance		\$ <u>244.45</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>703.50</u>
-----	---	------------------

STATEMENT OF CAMPAIGN FUND STATUS
Assets

13.	Cash Balance	\$ <u>244.45</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>-</u>
		\$ <u>-</u>
		\$ <u>-</u>
15.	Add 13 and 14 together	\$ <u>244.45</u>
	Liabilities and Balance	
16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>-</u>
17.	Balance	\$ <u>244.45</u>

INSTRUCTIONS

Line No.

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10. This amount must equal Line 13.
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

00010191881

SCHEDULE A
ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
7-78	Lois Beus Elkton, S.D.	Home wife	100.00	100.00
1-29-78	Jeanette Smith 606 E. Tallent, Rapid City S.D.	57701 - Rapid Fundraising	100.00	110.00
12-28-78	Mr + Mrs. Tom Martin 527-17 th St. S. Brookings	Attorney	100.00	100.00
1-9-79	Pat Cassell R.R. 1 Volga, S.D. 57071	Home wife	137.97	137.97
1-15-79	LTPAC Home Fundraising Ch. 10			

TOTAL THIS PERIOD \$ 427.97
(Last page only)

Transfer total to Summary Page - Line 2

881010000

LOAN PROCEEDS

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

Page 4

Page 5

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

SCHEDULE C
TRANSFERS/ EVENT PROCEEDS

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
1-15-79	LAPAC-Huron Fundraising Chili Supper	100.00

Transfer Total to Summary Page - Line 4

SCHEDULE D
EXPENSES

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet Attached		

Transfer Total to Summary Page - Line 8

Page _____ of _____

00040191883

Schedule Expenses

<u>Date</u>	<u>Check No.</u>	<u>Payee</u>	<u>Purpose</u>	<u>Amount</u>
10-31-78	116	White Postmaster	Postage	\$165.06
11-3-78	117	Huron Publishing Co.	Advertising	105.57
11-20-78	118	Interstate Office Products	Supplies	60.46
11-20-78	119	Reynolds Printing	Printing	21.25
11-28-78	120	Carol Covatta	Tele. & Services	32.15
11-20-78	121	A.D. Right to Life	Printing & Pulling List	20.20
12-18-78	122	Karen Prochotick	Tele. & Postage	45.44
1-24-79	123	James Becker	Tele. Reimbursed	26.47
1-24-79	124	William Dempsey	Tele. Reimbursed	41.67
				961.11

0040191884

Page 8

SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page - Line 9

TOTAL \$ _____
(Last Page Only)

SCHEDULE F
IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 Aberdeen Fundraising	Advertising	210.80
10-31-78 Rapid City Fundraising	Advertising	240.32
11-1-78 Minnehaha Area Fundraising Project	Pamphlets	159.18
11-3-78 Butte Area Representative	Advertising	151.20
11-1-78 Scott Rendon 320 E 27 th South Falls 57105	Advertising	151.20

Page _____ of _____

Transfer Total to Summary Page - Line 12

Total This Period \$ 703.50
(Last Page Only)

5 8 8 1 6 1 0 4 0 0 0

SCHEDULE G

ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

5 8 8 1 6 1 0 4 0 0 0

RECEIVED
NOV 1 1978
Secretary of State

STATE ETHICS COMMISSION

Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

% Ellen Dempsey - Treasurer
R.R. 1 (Street)

White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on November 7, 1978
- January 30th Report _____
(Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.

First National Bank, Brookings, S.D. 57006

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

Ellen Dempsey - Treas.
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 31st day of October, 1978.

(SEAL)

Robert L. Rusk
Notary Public
by Commission Expires
August 27, 1986
Officer Administering Oath

Filed this 1
day of Nov, 1978
STATE ETHICS COMMISSION
Office of Secretary
of State

Reg.

60040191887

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>00</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>100.00</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>—</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>326.09</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>709.00</u>	
6.	Total Cash Receipts		\$ <u>1135.09</u>
7.	Total Cash Available		\$ <u>1135.09</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>864.07</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>—</u>	
10.	Total Cash Disbursements		\$ <u>864.07</u>
11.	Ending Cash Balance		\$ <u>271.02</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>540.43</u>
-----	---	------------------

STATEMENT OF CAMPAIGN FUND STATUS

Assets

13.	Cash Balance	\$ <u>271.02</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>—</u>
		\$ <u>—</u>
15.	Add 13 and 14 together	\$ <u>271.02</u>
	Liabilities and Balance	
16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>—</u>
17.	Balance	\$ <u>271.02</u>

INSTRUCTIONS

Line No

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10. This amount must equal Line 13.
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

SCHEDULE A
ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
10/11/78	Mr. + Mrs. Harvey Buhl 320 W. Dakota Pierre, S.D. 57501	Own Laundry Chain	\$100.00	\$100.00

Page _____ of _____

TOTAL THIS PERIOD \$ \$100.00
(Last page only)

Transfer total to Summary Page - Line 2

00049191880

Schedule D

Expenses

Date	Check No.	Payee	Purpose	Amount
19-78	101	Index	Bookkeeping Supplies	11.89
27-78	103	→ Harold's Printing	Printing	18.72
25-78	102	White Postmaster	Bulk Mailing Permit + Postage	143.50
2-78	104	" "	Postage	15.00
26-78	—	First Nat'l Bank	Check Printing	9.90
5-11-78	105	White Postmaster	Postage	250.00
10-78	106	Index	Office Supplies	14.19
9-78	107	Reynold's Printing	Printing	5.42
8-78	108	Hipple Printing	Printing	38.63
11-78	109	may, Johnson, Doyle, Becker, Fisher, D.C.	Lawyer Services	10.64
8-78	110	South Dub. Right to Life	Printing	78.00
23-78	111	White Postmaster	Stamps	15.00
35-78	112	Karen Prouhnick	S.A.R.L. Advertizing	30.00
23-78	113	→ Harold's Printing	Printing	74.93
77-78	114	Imaty Prints	Printing	48. ²⁵
30-78	115	White Postmaster	Postage	<u>100.00</u>

#864.07

**SCHEDULE B
LOAN PROCEEDS**

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

**SCHEDULE C
TRANSFERS EVENT PROCEEDS**

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
8-10-78/4-19-78	Sale of Raffle tickets	326.09

Transfer Total to Summary Page - Line 4

**SCHEDULE D
EXPENSES**

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet attached		

SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page - Line 9

TOTAL \$ _____
(Last Page Only)

SCHEDULE F
IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
Scott Reardon, 320 E. 27th, Sioux Falls, S.D. 57105	Paid Advertising	540.43

Page _____ of _____

Transfer Total to Summary Page - Line 12

Total This Period \$ 540.43
(Last Page Only)

2 6 8 1 6 1 0 0 0 0

SCHEDULE G

ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

0 0 4 0 1 9 1 8 9 2

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

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

Life Amendment Political Action Committee Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>CMCA Inc. 8800 Edgeworth Ave. Capital Heights, MD</i>	<i>postage advance fundraising</i>	<i>10-19-78</i>	<i>3,000⁰⁰</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<i>CMCA Inc. 8800 Edgeworth Ave Capital Heights MD.</i>	<i>postage advance</i>	<i>10-23-78</i>	<i>400⁰⁰</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<i>Lee Hurick 205 20505, NE Washington, D.C.</i>	<i>deposit - Van for Rent Volley Walk</i>	<i>10-23-78</i>	<i>200⁰⁰</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<i>NRLC Inc. 529-14th St. N.W. #341 Washington, D.C.</i>	<i>office rent Newspaper ad</i>	<i>10-23-78</i>	<i>1,746⁰⁰</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<i>M. H. ...</i>	<i>...</i>	<i>10-27-78</i>	<i>...</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<i>John M. Downey 305 Howard St. Sparks, NE 69431</i>	<i>...</i>	<i>10-14-78</i>	<i>256⁰⁰</i>
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			

SUBTOTAL of expenditures this page (optional) \$ *5346.*

TOTAL this period (last page this line number only) \$ *19082.*

0047191894

** ...*

Your vote in the Primary is **CRUCIAL!**

Your vote in the Primary Election on Tuesday, June 6th, will have the impact of 10 VOTES or more since it is expected that less than 10% of the eligible voters will go to the polls. Don't pass up this unique chance you have to speak out loud and clear for PRO-LIFE—VOTE JUNE6TH!

00191895

THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
JUNE 6TH
PRIMARY

Pro-Life Action Council
P.O. Box 7149, Grand Station
Des Moines, Iowa 50309

BULK RATE
U.S. POSTAGE
PAID
Permit No. 1343
Des Moines, Iowa



Vote for the unborn in the June 6th Primary!

The unborn cannot speak for themselves but you can speak for them—with your ballot in the June 6th Primary. Your vote will help to elect candidates who will stand up and defend the most basic of all human rights—the Right To Life! If you will vote on June 6th and also urge two or three of your pro-life friends or relatives to vote, the election of pro-life candidates will be assured!

THE CANDIDATES

IOWA LIEUTENANT GOVERNOR DEMOCRATIC PRIMARY

BILL PALMER

Democrats... make sure you vote for Bill Palmer! As Chairman of the Senate Budget Committee, Palmer successfully fought to restrict abortions paid with your tax dollars.



~~WILLIAM ROBERTS... opposing pro-abortionist legislation...~~

REPUBLICAN PRIMARY

TERRY BRANDSTAD

Republicans... make sure you pull the lever for Terry Brandstad! Brandstad is one of the strongest Right-To-Life advocates in the Iowa Legislature and supports a Pro-Life constitutional amendment.



~~WILLIAM ROBERTS... opposing pro-life legislation...~~

~~BRUCE BRADLEY... has not...~~

Independent Voter!

If you are a registered Democrat or Republican, you can still vote in the Primary. In the primary you will sign a declaration card at the Poll which you will need to sign or re-declare as an Independent if you choose.

U. S. SENATE* REPUBLICAN PRIMARY

ROGER JEPSEN

Supports a Pro-Life Constitutional Amendment... opposes the use of tax money to pay for abortions.

MAURICE VAN NOSTRAND

Opposes a Pro-Life Constitutional Amendment... supports the use of tax money to pay for abortions.

JOSEPH BERTROONE

Opposes a Pro-Life Constitutional Amendment... opposes the use of tax money to pay for abortions.

*The Pro-Life Action Council is a state political action committee and cannot legally participate in the endorsement of candidates for Federal office. We have, however, attempted to provide you with those candidates' positions on certain pro-life issues.

CLIP AND MAIL IN

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

\$25 or more _____ \$10 _____ \$5 _____ Other _____

I would like to become active in the Pro-Life Movement.

Name _____

Address _____

City/State _____ ZIP _____

Phone _____

Pro-Life Action Council
P.O. Box 7173 Grand Station
Des Moines, Iowa 50309

PHOTO COURTESY OF THE IOWA LEGISLATURE

Your vote in the General Election is

crucial

YOUR VOTE IN THE GENERAL ELECTION ON TUESDAY, NOVEMBER 7 WILL HAVE THE IMPACT OF SEVERAL VOTES SINCE IT IS EXPECTED THAT LESS THAN HALF OF THE ELIGIBLE VOTERS WILL GO TO THE POLLS. DON'T PASS UP THIS UNIQUE CHANCE YOU HAVE TO SPEAK OUT FOR THOSE WHO CANNOT SPEAK FOR THEMSELVES. VOTE NOVEMBER 7.

Paid for by Arizonans for Life
Karen M. Kims, Chairman
1017 N. 3rd Street -
Phoenix, Arizona 85004

0040191897



ARIZONANS FOR LIFE
1017 N. 3rd Street
Phoenix, Arizona 85004

THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
NOV. 7
ELECTION

BULK RATE
U. S. Postage
PAID
PHOENIX, ARIZONA
Permit No. 269

VOTE FOR THE UNBORN IN THE NOV. 7 ELECTION

Unborn children cannot speak for themselves but you can speak for them with your ballot in the Tuesday, November 7, General Election. Your vote can guarantee that the candidates elected to office will be the people who will stand up and defend the most basic of all human rights — **THE RIGHT TO LIFE.**

If the candidates listed below win the election, then the unborn and defenseless will win.

HUMAN LIFE IS ENDANGERED!!! Did you know that:

- On January 22, 1973 the U. S. Supreme Court legalized defacto abortion-on-demand to the day of the baby's birth?
- On July 1, 1976 the Court ruled that a girl of 12 may obtain an abortion without her parent's advice or consent, and that a woman can obtain an abortion without the knowledge or consent of her husband — striking at the very heart of the family unit?

THE ELECTION OF THESE PRO-LIFE CANDIDATES WILL HELP ASSURE THE SUCCESS OF OUR GOAL TO RESTORE LEGAL PROTECTION TO THE UNBORN AND DEFENSELESS BY PERMITTING ABORTION ONLY TO PREVENT THE DEATH OF THE MOTHER. YOU ARE URGED TO TAKE 5 PRO-LIFE FRIENDS WITH YOU TO THE POLLS.

Take this brochure with you to the polls

and vote **ONLY** for the candidates recommended below.

Governor — Evan Mecham
 Secretary of State — Rosa Mofford or Henry Haws
 Attorney General — Bob Corbin
 State Superintendent of Public Instruction — Steve Jenkins
 Congressional District 1 — John Rhodes
 Congressional District 2 — Tom Richey
 Congressional District 3 — — — — —
 Congressional District 4 — Eldon Rudd

Legislative Districts

District 15
 District 16
 District 17
 District 18
 District 19
 District 20
 District 21
 District 22
 District 23
 District 24
 District 25
 District 26
 District 27
 District 28
 District 29
 District 30

Senate

S. H. "Hal" Runyan ✓
 Dr. Wayne Stump
 Anne Lindeman ✓
 — — — — —
 — — — — —
 George Hussey
 — — — — —
 Manuel Pena, Jr. ✓
 — — — — —
 — — — — —
 Trudy Camping
 — — — — —
 — — — — —
 Jack Taylor
 Stan Turley ✓

House

James B. Ratliff ✓
 Bob Hungerford
 Wilbert Davis
 Burton Barr, Pete Dunn
 Tony West
 Debbie McCune, Lillian Jordan
 Robert Griffin, Don Kenney
 — — — — —
 Tony R. Abril, Sr. ✓
 Pete Corpstein, David Gorman
 D. Lee Jones
 Mary C. Hegarty, Frank Kelley
 — — — — —
 Tony Raineri, Jim Skelly
 Donna Carlson, Jan Cooper ✓
 Carl J. Kunasek, James J. Sossamon

DEMOCRATS, REPUBLICANS AND INDEPENDENTS . . . *Unita and help defend those who cannot defend themselves* — VOTE PRO-LIFE ON NOVEMBER 7.

0040191899

Your Vote Is CRUCIAL!

Paid for by the Ohio Right To Life
Political Action Committee
Mary Gignadel, Treasurer
610 South 3rd Street
Columbus, Ohio 43206



6681899
004400

There's a sign in your car - this - just in case



THESE LITTLE
GUYS WANT
YOU
TO VOTE
IN THE
NOV. 7
ELECTION

1/11/77

THE ELECTION OF A PRO-LIFE GOVERNOR WILL BE ASSURED IF YOU WILL VOTE IN THE ELECTION, TUESDAY, NOVEMBER 7 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

FOR GOVERNOR



JAMES RHODES



RICHARD CELESTE

- ☆ James Rhodes will actively support and work for the Human Life Amendment to end abortion and protect human life.
- ☆ James Rhodes will oppose the use of your tax dollars to pay for abortions.
- ☆ James Rhodes will "strongly support other pro-life legislation."

- Celeste will not support the Human Life Amendment. He insists that it be encumbered with other non-related issues, thus effectively destroying any chance of its passage.
- Celeste will not oppose the use of your tax money for abortion.
- Celeste—although "personally opposed" to abortion, his public position is one of paying for abortions and allowing them to continue.

Other Pro Life State Candidates include:

George Voinovich (R) and Michael Dorrian (D) for Lieutenant Governor
Ted Brown (R) and Tony Celebrezze (D) for Secretary of State
Thomas Ferguson (D) and Donald Lukens (R) for Auditor of State
William Brown (D) and George Smith (R) for Attorney General

DEMOCRATS AND INDEPENDENTS . . . YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR ELECTION CONTEST BY VOTING IN THE ELECTION NOVEMBER 7. AFTER VOTING FOR GOVERNOR, WE HOPE YOU WILL THEN VOTE FOR OTHER PRO-LIFE CANDIDATES REGARDLESS OF PARTY.

VOTE JAMES RHODES

00040191901

THE ELECTION OF A PRO-LIFE SENATOR WILL BE ASSURED IF YOU WILL VOTE IN THE DFL PRIMARY, TUESDAY, SEPT. 12 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

THE CANDIDATES



BOB SHORT

- ★ Bob Short will actively support and work for a Human Life Amendment to end abortion and protect human life.
- ★ Bob Short will oppose the use of tax dollars to pay for abortions.
- ★ Bob Short will oppose the use of tax dollars to fund "research" where living babies that survive abortion are used as experimental subjects.



DONALD FRASER

- Fraser supports the current abortion on demand policy. As a Minneapolis Congressman he worked and testified against the Human Life Amendment.
- Fraser has always voted to use tax dollars to pay for abortions.
- Fraser voted against forbidding the use of tax dollars for "research" where living babies that survive abortion are used as experimental subjects.

WHO FUNDS FRASER? The largest for-profit abortion clinic in Minnesota used its newsletter to raise funds for the Fraser campaign. The incorporator of the clinic and his wife each gave the Fraser campaign \$1,000. A major Washington based pro-abortion lobby group, the National Abortion Rights Action League, gave the Fraser campaign \$2,500.

REPUBLICANS AND INDEPENDENTS... YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR PRIMARY ELECTION CONTEST BY VOTING IN THE DFL PRIMARY SEPTEMBER 12. YOU DO NOT HAVE TO DECLARE ANY PARTY AFFILIATION BEFORE ENTERING THE VOTING BOOTH. REMEMBER TO VOTE ONLY ON THE DFL SIDE OF THE BALLOT (OR IT WILL NOT BE COUNTED AT ALL). THIS DOES NOT OBLIGATE YOU IN THE NOVEMBER GENERAL ELECTION. YOU MAY THEN VOTE FOR ANY CANDIDATE OR PARTY YOU WISH.

VOTE BOB SHORT

CRUCIAL!

0040191902



Paid for by the Democrats, Republicans and
Independents United for a Pro-life Senate,
Kristine Kremet, Chairman, P.O. Box 18029
Diamond Lake Station
Mpls., Minn. 55419



THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
SEPT. 12
PRIMARY

Democrats, Republicans
and Independents United
for a Pro-life Senate
P.O. Box 18029
Diamond Lake Station
Mpls., Minn. 55419

APAC INCORPORATED

LIFE AMENDMENT POLITICAL ACTION COMMITTEE

BOARD OF DIRECTORS

February 21, 1979

Mrs. Jeanne Fertel
1560 Kanunu St
Honolulu, Hawaii 96814

Sean Morton Downey, Jr.
Chairman
Fellota Goeken
Secretary
Paul A. Brown
Treasurer
Jean Doyle
Carolyn Garsten, M.D.
Robert L. Sassons, Esq.
J. C. Wilks, M.D.

ELECTION DAY 1978 INCREASED OUR NUMBER
OF PRO-LIFE SENATORS FROM 36 TO 43. IN
THE HOUSE OUR PRO-LIFE GAIN AMOUNTED
TO ABOUT 30. TRULY OUTSTANDING!

Dear Mrs. Fertel:

We all know that regardless of legalistic word-play and whimsical fact-juggling, abortion is murder -- killing a human being.

To kill a human being is wrong!

To kill a child is wrong!

To kill a baby is wrong!

To kill a baby in its mother's womb is wrong!

We are writing to you today for two reasons: 1) to report our remarkable pro-life election successes in 1978, and 2) to ask you to join us in producing even greater election successes in 1979 and 1980 -- especially in special elections this year.

Election Day 1978 increased our number of pro-life Senators from 36 to 43. In the House, our pro-life gain amounted to about 30. A significant accomplishment!

National media made great news out of the pro-life victories in Minnesota, North Carolina, Ohio, South Dakota, Iowa, New Hampshire, and several other targeted states.

Let's face it -- one reason a lot of people don't like to talk about or even think about abortion is that often the details are almost too ghastly to repeat. Remember the sensational trial in California last year? (See enclosed clipping.)

A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C.

P O BOX 14263 • BEN FRANKLIN STATION • WASHINGTON, D. C. 20044

0040191903

According to the prosecution and a medical doctor who witnessed the incident, a prominent obstetrician manually choked to death a baby girl approximately an hour after she had been born alive, some 12 hours following the injection of saline to kill the baby in her mother's uterus.

Despite horrors such as this, on January 9, 1979, the Supreme Court struck down a Pennsylvania law which would have made abortionists subject to criminal prosecution under certain circumstances.

It is clear that only an amendment to the Constitution will guarantee the legal protection of life to babies living in their mothers' wombs.

That Human Life Amendment to our Constitution is the single goal of the Life Amendment Political Action Committee. We must elect U.S. Senators and Congressmen who will support a Human Life Amendment.

All of the financial support given to the various campaigns by the Life Amendment Political Action Committee, as well as grants to candidates, came from the generous donations received from loyal supporters like you.

Based on our great pro-life successes of 1978, now is the time to make our big move. In 1979 and 1980 we can achieve the two-thirds majority needed in the Senate and House to release our Human Life Amendment from the stalling tactics of subcommittees.

Here is how we plan to do it.

LAPAC has already targeted for defeat the following anti-Life Amendment Senators: Birch Bayh, Indiana; Bob Packwood, Oregon; Patrick Leahy, Vermont; George McGovern, South Dakota; John Culver, Iowa; and Frank Church, Idaho.

With your help, LAPAC can defeat these first six "senseless assassins of unborn children" and expand the anti-Life Amendment target list. You can help directly to gain the necessary two-thirds majority of pro-life votes on Capitol Hill.

First, take a few moments to complete the questionnaire enclosed, indicating your personal preference about the Human Life Amendments in Congressional subcommittees now.

Then return your completed questionnaire and the most generous check you can afford -- \$200, \$100, \$50, \$25 or even \$15 -- to LAPAC.

Your contribution will be used specifically to elect pro-life Senators and Congressmen in 1979 and 1980, to prepare for special elections in Wisconsin and California, to send out more

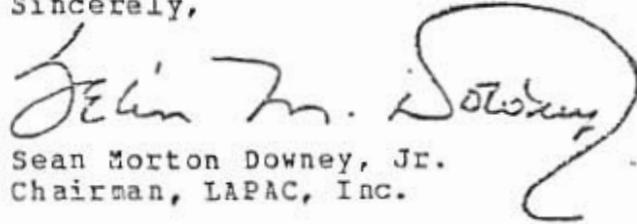
0040191904

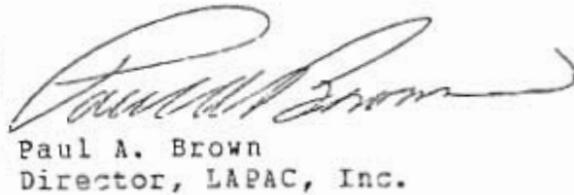
questionnaires, and to let candidates know they'll have our financial support.

Frankly, we are too close to winning the necessary two-thirds majority now to give up the battle to the anti-life abortionists.

Please send your generous pro-life check with your completed questionnaire in the special reply envelope enclosed for your convenience. We hope you can afford to send at least \$100, but even \$15 will be a great boost to the campaign and candidate support by LAPAC.

Sincerely,


Sean Morton Downey, Jr.
Chairman, LAPAC, Inc.


Paul A. Brown
Director, LAPAC, Inc.

P.S. As a result of LAPAC's exposure to millions of Americans on the NBC "Weekend" program of January 21, 1979, many positive things have already happened for LAPAC. We can keep the momentum going and take full advantage of the national publicity we received if we can count on your financial support. Please mail your check today.

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ellen Dempsey
Life Amendment Political Action
Committee - South Dakota
RRI White, South Dakota 57276

RE: MUR 960

Dear Ms. Dempsey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee - South Dakota (LAPAC, S.D.) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 960.

The Commission has reason to believe that the matters alleged in the complaint therein state a possible violation of 2 U.S.C. § 44ld. Specifically, it appears that:

LAPAC S.D. may have violated 2 U.S.C. § 44ld by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.

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



If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at 202/523-4039.

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.

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure

40191907

Ellen Dempsey

Life Amendment Political Action Committee, South Dakota

INTERROGATORIES

1. What is your committee's relationship to LAPAC, Inc.?
2. Did you pay any bills for, liquidate any debts for, or transfer any funds to LAPAC, Inc.? If so, please explain.
3. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names or positions in these materials? If so, please explain.
4. Please itemize all expenses incurred in the preparation and distribution of every communication (ads, brochures, flyers, etc.) relating to a federal election. Please include and describe expenses incurred for design, layout, printing, postage, salaries, etc. of these communications.
5. How did your committee obtain information about the candidates' views on pro-life issues and what costs were incurred in collecting this information?
6. Please state exact amounts of expenditures and contributions, and any other monies relating to any federal activities. Please itemize and describe each of these expenditures and contributions in detail.
7. Is LAPAC, S.D. registered as a political committee in South Dakota? If so, please submit copies of any statements or reports filed with the state.
8. Is LAPAC, S.D. incorporated? If so, please submit copies of Articles of Incorporation, By-Laws, etc. If not, please submit a list of Board members or officers of LAPAC, S.D.
9. Has your group ever received money from other pro-life groups? If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
10. Has your group ever transferred money to other pro-life groups. If so, please state the name and address of the group, the amount of money and the date of the transfer of money.
11. Please submit a copy of every brochure printed and/or distributed by LAPAC, S.D. which mentions in any manner the name(s) of a candidate for federal office.

12. Has your group ever made a contribution to a candidate for federal office. If so, state the name of the candidate and the amount of the contribution.

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey, Chairman
Life Amendment Political Action
Committee, Inc.
P.O. Box 14263, Ben Franklin Station
Washington, D.C. 20044

RE: MUR 960

Dear Mr. Downey:

The Federal Election Commission has received a complaint which alleges that Life Amendment Political Action Committee, Inc. (LAPAC, Inc.) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 960.

The Commission has reason to believe that the matters alleged in the complaint state a possible violation of 2 U.S.C. § 433, § 434, §441d. Specifically, it appears:

- (1) That LAPAC, Inc. may have violated 2 U.S.C. § 434 by failing to report the liquidation of a debt.
- (2) That LAPAC, Inc. may have violated 2 U.S.C. § 433 by failing to include LAPAC, S.D. and/or other pro-life committees as affiliated organizations in its statement of organization filed with the Federal Election Commission.
- (3) That LAPAC, Inc. may have violated 2 U.S.C. § 441d by making expenditures for communications expressly advocating the election of clearly-identified federal candidates without including the required statements of authorization/non-authorization by those candidates.

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. Additionally, please submit answers to the enclosed questions. Where appropriate, statements should be submitted under oath.



Sean Morton Downey, Chairman

Life Amendment Political Action Committee, Inc.

INTERROGATORIES

1. What is your relationship with LAPAC, S.D.? Have you ever in any way provided administrative or financial assistance to LAPAC, S.D. or to any other local pro-life committees? Is LAPAC, S.D. a member of LAPAC, Inc. If so, what does this mean in terms of benefits to LAPAC, S.D. or duties?
2. Did the federal candidates endorsed in your flyers and brochures in any way consent to, cooperate with, request, or suggest the use of their names? If so, please explain.
3. Explain how your committee liquidated the debt of \$669.10 to Harold's Printing Company in your 30-day post general election report and explain why this was not reported.
4. Provide a copy of every communication sponsored and paid for by LAPAC, Inc. endorsing any federal candidate and the number of copies of each printed and distributed.
5. Itemize and describe in detail all expenses incurred in the preparation and distribution of every communication relating to any federal election, including costs for design, layout, printing, postage, salaries, etc.
6. Provide a copy of LAPAC, Inc.'s Articles of Incorporation/ By-Laws and a list of its Board members.



FEDERAL ELECTION COMMISSION

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

May 1, 1979

Ms. Gail M. Harmon
Sheldon, Harmon, Roisman and Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Dear Ms. Harmon:

This is to acknowledge receipt of your complaints of April 30, 1979, alleging violations of the Federal Election Campaign Laws. Staff members have been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how these matters should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely,

A handwritten signature in cursive script, appearing to read "Hal Ponder".

Hal Ponder
Assistant General Counsel

Enclosure

MUR 960

SHELDON, HARMON, ROISMAN & WEISS

1025 15TH STREET, N.W.
SUITE 500

WASHINGTON, D. C. 20005

TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ANTHONY Z. ROISMAN
ELLYN R. WEISS
WILLIAM S. JORDAN, III *
ADMITTED IN MICHIGAN ONLY *

April 30, 1979

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

Dear Ladies & Gentlemen:

On behalf of the National Abortion Rights Action League, ("NARAL") I am filing this complaint of violations of the Federal election law by Life Amendment Political Action Committee, South Dakota ("LAPAC, S.D.") and/or Life Amendment Political Action Committee ("LAPAC"). One or both of these groups made significant political contributions or expenditures during 1978 elections, but failed to report these expenses to the Federal Election Commission.

During the 1978 general elections at least the following political expenditures were made by LAPAC, its South Dakota chapter, or a sympathetic South Dakota group which used LAPAC's name:

1. Advertisements costing a total of \$955.00 were run under LAPAC's name endorsing Leo Thorsness, James Abnor, and Larry Pressler. (Exhibit "A")
2. At least one additional advertisement was run using LAPAC's name endorsing Pressler, Abnor, and Bob Samuelson. (Exhibit "B")
3. "This little guy wants you to vote" brochure bearing LAPAC's name and endorsing Thorsness, Abnor and Pressler was printed for \$669.10 and widely distributed. (Exhibit "C")
4. A one page flyer, again supposedly sponsored by LAPAC, also endorsed federal candidates Pressler, Abnor, and Samuelson. (Exhibit "D")

As shown in the attached letter filed with the Commission, LAPAC denies having run the ads listed under #1 above. (Exhibit "A") Since LAPAC does not report contributions to or in-kind printing expenditures for the benefit of Thorsness, Pressler

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et. al we had assumed that the brochure and flyer were also paid for by the South Dakota Committee. One disturbing piece of information confuses the picture, however. On its 30 day post-general election report LAPAC lists a debt to Harold's Printing Company for \$669.10 for printing 50,000 brochures endorsing Thorsness, Abnor, Pressler. (Exhibit "E") Its first quarter 1979 report, however, shows no such debt and no expenditures. (Exhibit "F") We ask you to investigate whether, LAPAC, South Dakota paid off this debt, or whether LAPAC itself did while failing to report either the expenditure or the in-kind contribution to wipe out the debt.

The cost of printing the brochure was reported to be \$669.10. Estimates for the flyer are \$48.50 for 5,000 and \$91.00 for \$10,000. We ask you to investigate how many flyers were printed, whether additional costs were incurred in preparation and distribution of the brochure and flyer, i.e., design, layout, postage, and salaries and which organization made these political expenditures. We also ask you to investigate how the local political committee obtained information about the candidates' views on pro-life issues. What costs were incurred in collecting this information?

If these expenses were incurred by LAPAC, South Dakota, it clearly should have registered with the Federal Election Commission since the total cost of the ads and printing either the flyers or the brochure exceeds \$1,000.00. §431(d) Obviously the local group should have also filed reports of contributions to it and the expenditures it made.

For your information, we are attaching LAPAC, South Dakota's filings with the State Ethics Commission. (Exhibit "G") These reports indicate direct expenditures and expenditures made on its behalf which total over \$3,000. We ask you to investigate whether these amounts include expenses related to federal elections.

In addition to investigating exactly who made the expenditures, we ask you to investigate how national LAPAC relates to local, allegedly independent, unaffiliated committees. We know that Sean Morton Downey, LAPAC's chairman, traveled to South Dakota in October 1978. See p. 3 of Itemized Expenditures (Exhibit "H") It seems reasonable to think that on his visit he discussed campaign strategy with local anti-abortion activists. We ask you to investigate how much he knew of LAPAC,

00401915

SHELDON, HARMON, ROISMAN & WEISS

The Federal Election Commission
April 30, 1979
Page 3

South Dakota's activities, and whether or not he encouraged or acquiesced in their failing to register with the FEC. For example, the "this little guy wants you to vote" brochure is not unique to South Dakota. The same language and same or similar pictures have been used on Right-to-Life brochures endorsing candidates in Iowa, Arizona, Ohio and Minnesota and perhaps other states. Does LAPAC provide technical assistance and/or advice to local committees? Does it help organize local committees?

I have prepared this complaint and believe that it is true and correct to the best of my knowledge. This complaint was not filed on behalf of or at the request or suggestion of any candidate.

Sincerely,

Gail M. Harmon
Gail M. Harmon

GMH/dmw

Subscribed and sworn to before
me this 30th day of April, 1979.

Katherine Katsura

Notary Public

1981

000401916

"A"

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

BENJAMIN FRANKLIN STATION • P O BOX 14263 • WASHINGTON D C 20044 • (202) 638-3961

12-15-78

Federal Election Commission
Washington, D.C.

Please note that a total of \$655.52 was spent for newspaper ads in behalf of Leo Thorsness, 1st C.D.; James Abdnor, 2nd C.D. and Larry Pressler Senate all from South Dakota. The ads were placed by individuals and paid for by them. They are favorable to our PAC and used our name for the disclaimer. These figures are not reflected in our report.

Paul A. Brown
Treasurer

000001917
000001917

"B"



ATTENTION ALL VOTERS IN SELECTING YOUR CANDIDATES

YOU are voting on a life or death issue!
Who has the right to live?

- All human beings.
- Just the planned, the privileged and the perfect.

ONLY a Human Life Amendment will restore the original spirit of the Constitution guaranteeing the right to life to all human beings, born and unborn, young and old, advantaged and handicapped, weak and strong.

The following candidates support a Human Life Amendment:

U.S. Senate: LARRY PRESSLER

U.S. House of Representatives: JAMES ABDNOR
BOB SAMUELSON

South Dakota Governor: WILLIAM JANKLOW

South Dakota Lt. Governor: LOWELL HANSON

South Dakota Attorney General: MARK MFIFRHENRY
MAX GORS

State Treas.: DAVID VOLK

South Dakota Senate: (Dist. 27)
LYNDELL PETERSON

South Dakota House: (Dist. 27)
GORDON PEDERSON
GEORGE CROUCH
DON HAM
OWEN CADY

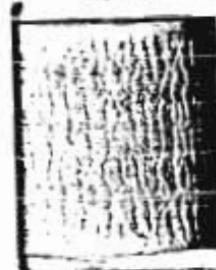
These candidates respect the rights of the defenseless.

They will respect yours!

VOTE PRO LIFE!

(This ad written, or ordered and paid for by LAPAC-SD (Life Amendment Political Action Committee, White, S.D. 57216), Ellen Dempsey, Treas.)

00401918





Don Barnett
Age 36
Hometown - Rapid City
Married, two children

A two-term mayor of Rapid City, Don Barnett is the Democrat Party's candidate for the U.S. Senate.

Born in Hot Springs, Barnett grew up in Rapid City, graduated from Rapid City High School and South Dakota State University. He also attended graduate school at the University of Nebraska. He gained national recognition while mayor following the June 1972 flood and the following early spring when militant American Indians conducted demonstrations in Rapid City and other Black Hills communities.

He served a tour in Vietnam as a company grade Army officer. After serving as mayor, Barnett entered private business as manager of a shopping mall, a position he still holds.



Jim Abdnor
Age 55
Hometown - Kennebec
Single

A two-term Republican Congressman from this District, Jim Abdnor is running for re-election.

Raised in Kennebec, Abdnor graduated from the University of Nebraska and then returned to teach and coach and later started a farm and ranch which he still operates. He has been involved in Republican Party politics for a long while serving as a State Senator and Lieutenant Governor before being elected to Congress.

He is an Army veteran of WWII.



Bob Samuelson
Age 53
Hometown - Faith
Married

Rancher Bob Samuelson is the Democrat Party's candidate for U.S. Congress from the Second District.

He is a lifelong resident of Meade County where he operates a ranch in partnership with his brother. They also have ranching interests in eastern Montana. He is a graduate of Spearfish High School and saw service during WWII with the Army.

He has been active in various farm-ranch commodity promotion groups and has run unsuccessfully for a seat on the state legislature.

*Comments, questions
on inside pages*

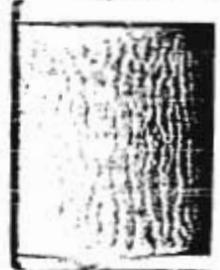
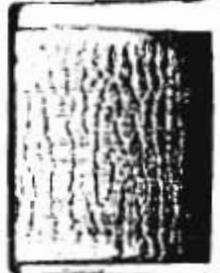
cal people have reservations

and more low income

fter the program when
ended," he said, "will
working poor"

1977 "is, with modest modifications, the proposal that the President and the Department submitted to Congress last year."

Other changes in the new regulations include more flexible certification procedures for elderly



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LAPAC

Amendment Political Action Committee, Inc.

Endorses and urges your support of the following Pro-Life candidates to the House and Senate of the United States on November 7, 1978:

LARRY PRESSLER has an excellent voting record in the U.S. House on all pro-life tax issues and has co-sponsored a Human Life Amendment.

LEO THORSNESS will sponsor and promote a Human Life Amendment.

JAMES ABDNOR has one of the best voting records for life in the U.S. House.

Vote FOR Life November 7

*Sean Morton Downey, Jr., Chairman
LAPAC, Inc.*

Ellen Dempsey, State Coordinator, LAPAC, Inc.

THIS LITTLE GUY
WANTS YOU TO
VOTE



FOR HIS LIFE
NOVEMBER 7

VOTE FOR THE UNBORN

There Is a Difference!

LEO
THORSNESS

TOM
DASCHLE

*"When elected to Congress
I would be honored to co-
sponsor and promote a
Human Life Amendment."*

*"... I can't support a
Human Life Amend-
ment."*

Leo Thorsness is strong-
ly *opposed* to our tax
dollars being used for
abortions.

Daschel would use your
tax dollars to abort
babies.

VOTE PRO-LIFE TUESDAY, NOV. 7, 1978

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

Benjamin Franklin Station • P.O. Box 14263 • Washington, D.C. 20044

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

LAPAC

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Harold's Printing Company 216 Ritts Ave. Brookings, S.D. 57006	11-16-78	669.10	—	669.10
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Printing of 50,000 brochures endorsing candidacy of Larry Prosser - S. Dakota Senate Lee Phares - S. Dakota 1 st C.D. House James Ribner - S. Dakota 2 nd C.D. House				
The Coalition of PA 201 Box 121 Brookings, S.D. 57006	11-1-78	1,000.00	—	1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Newspaper Ads - Sunny Corp - 8 th C.D. PA				
Bar Card Directory P.O. Box 263 Washington, D.C. 20040	11/1/78	514.73	0	514.73
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Expenses for New Hampshire Senate on card of of Gordon Humphrey.				
SUBTOTALS this period this page (optional)		\$	\$	\$ 2,538.83
TOTAL this period (last page this line number only)		\$	\$	\$ 3,543.83
Carry outstanding balance only to appropriate line of summary				

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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)

PAID DELIVERED

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.

LIFE AMENDMENT P.A.C.
Name of Candidate or Committee (in full)
P.O. Box 14263 BEN FRANKLIN STN.
Address (number and street)
WASHINGTON, DC 20045
City, State and ZIP Code

2 I.D. No. C00082297
Candidate/Committee

3 Office Sought, State/District (if applicable)

Year of Election 1978

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report
 July 10 Quarterly Report
 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)
- 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>11/28/78</u> Through <u>12/31/78</u>		
6 Cash on hand January 1, 1979		\$ 1056.81
7 Cash on hand at beginning of reporting period	\$ 682.45	
8 Total receipts (from line 19)	\$ 6852.71	\$ 95206.03
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 7535.16	\$ 96262.84
9 Total expenditures (from line 25)	\$ 6320.95	\$ 95068.63
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 1194.21	\$ 1194.21
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 11890	

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)

Paul H. Brown
(Typed Name of Treasurer or Candidate)

Paul H. Brown
(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 441 (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
187620 (R0508)
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.

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

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
	FROM:	TO:
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$ 800.00	
(b) Unitemized	\$ 6032.71	
(c) Sales and collections included above:		
List by event on memo Schedule D (S _____)		
(d) Subtotal of contributions from individuals	\$ 6832.71	\$ 96262.84
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$	
(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)	\$	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	\$
16. Other Income:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of other income	\$	\$
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns of deposits	\$	\$
19. Total Receipts	\$ 6832.71	\$ 96262.84
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ 6007.36	
(b) Unitemized	\$ 313.59	
(c) Subtotal of operating expenditures	\$ 6320.95	\$ 95068.63
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	\$ 6320.95	\$ 95068.63
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$	
27. Transfers In (from line 15(a))	\$	
28. Net Receipts (subtract line 27 from line 26)	\$	
29. Total Expenditures (from line 25)	\$	
30. Transfers Out (from line 22(a))	\$	
31. Net Expenditures (subtract line 30 from line 29)	\$	

601011

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			
<i>Life Amendment Political Action Committee Inc.</i>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>M. T. J. Connors 3633 Rt. 33 Neptune, N.J. 07753</i>	<i>retired</i>	<i>11-28</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>J. A. E. Driscoll Box 1750 Fargo, N.D.</i>	<i>Fargo</i>	<i>12-11</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>J. D. Gorman 8319 Fulham Ct. Richmond, VA 23227</i>	<i>Richmond</i>	<i>12-11</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>Owensboro RFL Box 1043 Owensboro, KY</i>		<i>12-21</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>N. J. Niblow 14165 French town Rd. NE Woodburn, OR 97071</i>	<i>Woodburn</i>	<i>12-18</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>V. Bessem 22 CIB Cnds So. Florissant, Mo</i>	<i>Florissant</i>	<i>12-19</i>	<i>200⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<i>P. R. North 6141 Locke Fort Worth, TX</i>	<i>retired</i>	<i>11-28</i>	<i>100⁰⁰</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation <input type="checkbox"/> Check if Contributor is self-employed		
SUBTOTAL of receipts this page (optional)			\$ <i>800⁰⁰</i>
TOTAL (this period last page this line number only)			\$ <i>800⁰⁰</i>

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

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

Page 2 of 2 for
 Line Number 20A
 (Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
<i>LIFE AMENDMENT POLITICAL ACTION COMMITTEE INC.</i>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>NATIONAL RIGHT TO LIFE COMMITTEE INC. 524-14 ST. NW #341 WASHINGTON, DC 20005</i>	<i>RENT- DEC.</i>	<i>12/19/78</i>	<i>150.00</i>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>BARBARA BAROODY 40 P.O. BOX 14263 WASHINGTON, DC 20044</i>	<i>EXPENSE REIMBURSEMENT</i>	<i>12/19/78</i>	<i>519.20</i>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>C+P TELEPHONE P.O. BOX 2123 WASHINGTON, DC 20003</i>	<i>TELEPHONE-DEC</i>	<i>12/21/78</i>	<i>305.98</i>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>P.A. BROWN P.O. BOX 14263 WASHINGTON, DC 20005</i>	<i>TELEPHONE EXPENSE NOV/DEC</i>	<i>12/24/78</i>	<i>274.88</i>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" 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		
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)			<i>\$ 1250.06</i>
TOTAL this period (last page this line number only)			<i>\$ 6007.56</i>

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

"G"
RECEIVED
AUG 17 1978
Secretary of State

Return Completed Forms to:

Executive Director
State Ethics Commission
Office of Secretary of State
Capitol Building
Pierre, South Dakota 57501
(605) 224-3537

New Registration

Registration Amendment

I.D. No. |

(For office use only)

Within fifteen days after receiving contributions or making expenditures in the amount of \$100.00 or more, all political committees and any person who is not a candidate or a member of a political committee that are required to file state campaign financing statements pursuant to SDCL 12-25-13 and SDCL 12-25-19, must file this statement with the State Ethics Commission.

0040191920

1. Full name of committee Life Amendment Political Action Committee -
South Dakota (LAPAC - So. Dak.)

Mailing address RR1 White S.D. 57276

2. Full name of chairperson no one named at this time.

Mailing address _____

Telephone number _____

3. Full name of treasurer Ellen Dempsey

Mailing address RR1 White, So. Dak. 57276

Telephone number 627-6281

4. If this committee is supporting an entire ticket of a party, give name of party _____

5. If this committee is the principal campaign committee of a candidate, give name of candidate and office sought

6. If this committee supports a selected candidate or candidates, list them by name, office sought and party affiliation.

none at this time

Filed this 17
day of August, 1978
STATE ETHICS COMMISSION
Office of Secretary
of State

STATE ETHICS COMMISSION

Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

% Ellen Dempsey - Treasurer
R. Rt. 1 (Street)

White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on _____
- January 30th Report 1979
(Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.

First National Bank, Brookings, S.D. 57006

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

Ellen Dempsey - Treas.
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 29 day of January, 1979.

(SEAL)

White Willmetts
Officer Administering Oath

Filed this 30
day of Jan, 1979
STATE ETHICS COMMISSION
Office of Secretary
of State

0047191931

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>271.02</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>437.97</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>-</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>100.00</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>396.57</u>	
6.	Total Cash Receipts		\$ <u>934.54</u>
7.	Total Cash Available		\$ <u>1205.56</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>961.11</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>-</u>	
10.	Total Cash Disbursements		\$ <u>961.11</u>
11.	Ending Cash Balance		\$ <u>244.45</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>703.50</u>
-----	---	------------------

STATEMENT OF CAMPAIGN FUND STATUS

Assets

13.	Cash Balance	\$ <u>244.45</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>-</u>
		\$ <u>-</u>
		\$ <u>-</u>
15.	Add 13 and 14 together	\$ <u>244.45</u>

Liabilities and Balance

16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>-</u>
17.	Balance	\$ <u>244.45</u>

INSTRUCTIONS

Line No.

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed.
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10 This amount must equal Line 13.
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

004019193

SCHEDULE A
ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month. Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
11-7-78	Lois Bews Elkton, S.D.	Homewife	100.00	100.00
1-29-78	Jeanette Smith 606 E. Tallent, Rapid City 57701	Rapid Fundraising	100.00	110.00
12-28-78	Mr. Mrs. Tom Marten 527-17 th St. S. Brookings	Attorney	100.00	100.00
1-9-79	Pat Cassell R.R. 1 Volga, S.D. 57071	Homewife	137.97	137.97
1-15-79	L.P.A.C. Home Fundraising Ch. 10 Super			

Page _____ of _____

TOTAL THIS PERIOD \$ 437.97
(Last page only)

Transfer total to Summary Page - Line 2

Σ Σ 6 1 6 1 0 0 0 0

**SCHEDULE D
LOAN PROCEEDS**

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

Page 4

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

**SCHEDULE C
TRANSFERS/ EVENT PROCEEDS**

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
1-15-79	LAPAC-Huron Fundraising Chili Supper	100.00

Transfer Total to Summary Page - Line 4

**SCHEDULE D
EXPENSES**

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet Attached		

Transfer Total to Summary Page - Line 8

1261010000

Schedule Expenses

<u>Date</u>	<u>Check No.</u>	<u>Payee</u>	<u>Purpose</u>	<u>Amount</u>
10-31-78	116	White Postmaster	Postage	\$165.96
11-3-78	117	Huron Publishing Co.	Advertisizing	105.57
11-29-78	118	Interstate Office Products	supplies	69.46
11-27-78	119	Reyold's Printing	Printing	21.25
11-28-78	120	Carol Covitz	Tele. & Services	32.15
11-29-78	121	A.D. Right to Life	Printing & Pulling list	20.24
12-18-78	122	Karen Prochack	Tele. & Postage	50.44
1-24-79	123	James Becker	Tele. Reimbursed	26.47
1-24-79	124	William Dempsey	Tele. Reimbursed	44.67
				961.11

00010191935

SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page - Line 9

TOTAL \$ _____
(Last Page Only)

SCHEDULE F
IN-KIND CONTRIBUTIONS

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
10-27-78 Aberdeen Fundraising	Advertising	710.80
10-31-78 Rapid City Fundraising	Advertising	28.33
11-1-78 Minnehaha Area Fundraising Project	Pamphlets	159.18
11-3-78 Beta Beta Beta Representing	Advertising	115.57
11-1-78 Scott Rouden 320 E 27 th S. Sioux Falls 57105	Advertising	151.20

Page ____ of ____

Transfer Total to Summary Page - Line 12

Total This Period \$ 703.50
(Last Page Only)

9 2 6 1 0 1 0 1 0 0 0

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

NOV 1 1978

Secretary of State

STATE ETHICS COMMISSION

Report of Receipts and Expenditures

Life Amendment Political Action Committee - South Dakota
(Full Name of Candidate or Committee)

% Ellen Dempsey - Treasurer
R.R. 1 (Street)

White, South Dakota 57276
(City, State, ZIP Code)

TYPE OF REPORT

- 7th Day Report Preceding Primary Election on _____
- 7th Day Report Preceding General Election on November 7, 1978
- January 30th Report _____
(Year)
- Termination Report
- Amendment of _____ Report

List all banks or other depositories and mailing address in which you hold campaign accounts and deposit campaign funds.

First National Bank, Brookings, S.D. 57006

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

Ellen Dempsey - Treas.
Signature of Candidate or Committee Treasurer

Subscribed and sworn to before me this 31st day of October, 1978.

(SEAL)

Robert D. Carbone
Notary Public
By Commission Expires
August 27, 1986
Officer Administering Oath

Filed this 1
day of Nov, 1978 Reg.
STATE ETHICS COMMISSION
Office of Secretary
of State

000401938

STATEMENT OF CASH TRANSACTIONS

1.	Beginning Cash Balance		\$ <u>00</u>
2.	Itemized Contributions (Schedule A, Page 3)	\$ <u>100.00</u>	
3.	Loan Proceeds (Schedule B, Page 4)	\$ <u>—</u>	
4.	Transfer/Event Proceeds (Schedule C, Page 4)	\$ <u>326.09</u>	
5.	Unitemized Contribution (Total Only)	\$ <u>709.00</u>	
6.	Total Cash Receipts		\$ <u>1135.09</u>
7.	Total Cash Available		\$ <u>1135.09</u>
8.	Expenses (Schedule D, Page 4)	\$ <u>864.07</u>	
9.	Payment on Loans This Period (Schedule E, Page 5)	\$ <u>—</u>	
10.	Total Cash Disbursements		\$ <u>864.07</u>
11.	Ending Cash Balance		\$ <u>271.02</u>

STATEMENT OF IN-KIND CONTRIBUTIONS

12.	Total Value of In-Kind Contributions (Schedule F, Page 5)	\$ <u>540.43</u>
-----	---	------------------

STATEMENT OF CAMPAIGN FUND STATUS

Assets

13.	Cash Balance	\$ <u>271.02</u>
14.	Other Assets (Savings Accounts, CD's, Stocks, Etc.)	\$ <u>—</u>
		\$ <u>—</u>
		\$ <u>—</u>
15.	Add 13 and 14 together	\$ <u>271.02</u>
	Liabilities and Balance	
16.	Accounts and Loans Payable (Schedule G, Page 6)	\$ <u>—</u>
17.	Balance	\$ <u>271.02</u>

INSTRUCTIONS

Line No.

1. Beginning Cash Balance-This amount must agree with the Ending Cash Balance (Line 11) from the last finance report filed
2. Itemized Contribution-List all contributions of \$100 or more (Schedule A, Page 3)
4. Transfer/Event Proceeds- List all transfers from other committees and proceeds from fund raising events (Schedule C, Page 4)
5. Unitemized Contributions-Total of Contribution under \$100.
6. Total Cash Receipts-Line 2 + 3 + 4 + 5.
7. Total Cash Available-Line 1 + 6.
10. Total Cash Disbursements-Line 8 + 9.
11. Ending Cash Balance-Line 7 - 10. This amount must equal Line 13
12. Total Value of In-Kind Contributions-Total of Schedule F, Page 5.
14. Other Assets-Do not list office furniture and equipment.
16. Accounts and Loans Payable-Total Schedule G, Page 6.
17. Balance-Subtract Line 16 from Line 15.

001093

SCHEDULE A
ITEMIZED CONTRIBUTIONS

List the name, residence address and principal place of employment of any person who contributed \$100. or more and the amount contributed by that person during the reporting period and aggregate year to date.

DATE Month, Day, Year	NAME AND ADDRESS	PRINCIPAL PLACE OF EMPLOYMENT	AMOUNT OF CONTRIBUTION	
			This Period	Aggregate year to date
10/11/78	Mrs. & Mrs. Harvey Buhl 320 W. Dakota Pierre, S.D. 57501	Own Laundry Chain	\$100.00	\$100.00

Page _____ of _____

TOTAL THIS PERIOD \$ \$100.00
(Last page only)

Transfer total to Summary Page - Line 2

0 4 6 1 6 1 0 1 0 0

Schedule D

Expenses

Date	Check No.	Payer	Purpose	Amount
8-19-78	101	Index	Bookkeeping Supplies	11.89
8-27-78	103	Harold's Printing	Printing	18.72
8-25-78	102	White Postmaster	Bulk Mailing Permit + Postage	143.50
9-2-78	104	" "	Postage	15.00
9-26-78	—	First Natl Bank	Check Printing	9.90
10-11-78	105	White Postmaster	Postage	250.00
10-10-78	106	Index	Office Supplies	14.19
10-11-78	107	Reynold's Printing	Printing	5.42
10-11-78	108	Hipple Printing	Printing	38.63
10-11-78	109	may, Johnson, Doyle, Becker, Fisher, D.C.	Lawyer Services	10.64
10-21-78	110	South Dub. Right to Life	Printing	78.00
10-23-78	111	White Postmaster	Stamps	15.00
10-25-78	112	Karen Prochnick	SARL Advertising	30.00
10-23-78	113	Harold's Printing	Printing	74.93
10-27-78	114	Smoky Prints	Printing	48 ²⁵
10-30-78	115	White Postmaster	Postage	<u>100.00</u>

864.07

**SCHEDULE B
LOAN PROCEEDS**

List name and address of the Bank, name and address of the cosigner and/or guarantors of the note and the amount of the loan.

Page 4

DATE	NAME AND ADDRESS OF BANK AND COSIGNERS/GUARANTORS	AMOUNT

Transfer Total to Summary Page - Line 3

**SCHEDULE C
TRANSFERS EVENT PROCEEDS**

List the source and amount of transfers from other committees and/or accounts, and the total proceeds from fund raising events including the date, location and type of event.

DATE	SOURCE OR LOCATION AND TYPE OF EVENT	AMOUNT
8-10-78/8-19-78	Sale of Raffle tickets	326.09

Transfer Total to Summary Page - Line 4

**SCHEDULE D
EXPENSES**

List the amount, purpose, date and check number of all expenditures and the name of each payee.

DATE	CHECK NO.	PAYEE	PURPOSE	AMOUNT
		Sheet Attached		

Transfer Total to Summary Page - Line 8

**SCHEDULE E
PAYMENT ON LOANS DURING THIS PERIOD**

List the date, check number and names of the payees and the amounts of the loan repayments during this reporting period.

DATE	CHECK NO.	PAYEE AND ADDRESS	AMOUNT

Transfer Total to Summary Page -- Line 9

TOTAL \$ _____
(Last Page Only)

**SCHEDULE F
IN-KIND CONTRIBUTIONS**

List the information as to the nature of the good or services provided, the name and address of the persons who provided them, and the fair market values if \$100 or more.

NAME AND ADDRESS	NATURE OF GOODS/SERVICES	VALUE
Scott Reardon, 320 E. 27th, Sioux Falls, S.D. 57105	Paid Advertising	540.43

Page ____ of ____

Transfer Total to Summary Page - Line 12

Total This Period \$ 540.43
(Last Page Only)

001019143

SCHEDULE G

ACCOUNTS AND LOANS PAYABLE

List information as to the names and addresses of the creditors, date in which loan and/or debt incurred, the amount of the original loan and/or debt, cumulative payment to date and outstanding and/or principal balances owed.

DATE INCURRED	NAME AND ADDRESS	AMOUNT OF ORIGINAL LOAN	CUMULATIVE PRINCIPAL PAYMENT TO DATE	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

Page _____ of _____

Transfer Total to Summary Page - Line 16

Total This Period \$ _____
(Last Page Only)

0 0 0 0 0 0 0 0 0 0

Your vote in the Primary is **CRUCIAL!**

Your vote in the Primary Election on Tuesday, June 6th, will have the impact of **10 VOTES** or more since it is expected that less than 10% of the eligible voters will go to the polls. Don't pass up this unique chance you have to speak out loud and clear for **PRO-LIFE—VOTE JUNE6TH!**

0040191945

**THIS LITTLE
GUY WANTS**

**YOU
TO VOTE
IN THE
JUNE 6TH
PRIMARY**

Pro-Life Action Council
P.O. Box 7149, Grand Station
Des Moines, Iowa 50309

BULK RATE
U.S. POSTAGE
PAID
Permit No. 1343
Des Moines, Iowa

Vote for the unborn in the June 6th Primary!

The unborn cannot speak for themselves but you can speak for them—with your ballot in the June 6th Primary. Your vote will help to elect candidates who will stand up and defend the most basic of all human rights—the Right To Life! If you will vote on June 6th and also urge two or three of your pro-life friends or relatives to vote, the election of pro-life candidates will be assured!

THE CANDIDATES

IOWA LIEUTENANT GOVERNOR DEMOCRATIC PRIMARY

BILL PALMER

Democrats... make sure you vote for Bill Palmer! As Chairman of the Senate Budget Committee, Palmer successfully fought to restrict abortions paid with your tax dollars.



~~MINNETTE BODERER... leading pro-abortionist in the Iowa legislature. She has actively opposed all Pro-Life legislation.~~

REPUBLICAN PRIMARY

TERRY BRANDSTAD

Republicans... make sure you pull the lever for Terry Brandstad! Brandstad is one of the strongest Right-To-Life advocates in the Iowa Legislature and supports a Pro-Life constitutional amendment.



~~WILLIAM HANSEN... has opposed Pro-Life legislation.~~

~~BRUCE PARKLEY... has actively supported Pro-Life legislation.~~

Independent Voter!

If you are a registered Independent voter, you can still vote in the Primary, but only if you declare on a declaration card at the Polls that you wish you are a voter re-declare as an Independent if you choose.

U. S. SENATE* REPUBLICAN PRIMARY

ROGER JEPSEN

Supports a Pro-Life Constitutional Amendment... opposes the use of tax money to pay for abortions.

MAURICE VAN NOSTRAND

Opposes a Pro-Life Constitutional Amendment... supports the use of tax money to pay for abortions.

JOSEPH BERTROCHE

Opposes a Pro-Life Constitutional Amendment... opposes the use of tax money to pay for abortions.

*The Pro-Life Action Council is a state political action committee and cannot legally participate in the endorsement of candidates for Federal office. We have, however, attempted to provide you with those candidates' positions on certain pro-life issues.

CLIP AND MAIL IN

Enclosed is my contribution to help defray the costs of printing and mailing (donations are tax deductible).

\$25 or more _____ \$10 _____ \$5 _____ Other _____

I would like to become active in the Pro-Life Movement.

Name _____

Address _____

City/State _____ ZIP _____

Phone _____

Pro-Life Action Council
P.O. Box 7147 Grand Station
Des Moines, Iowa 50309

Your vote in the General Election is

crucial

YOUR VOTE IN THE GENERAL ELECTION ON TUESDAY, NOVEMBER 7 WILL HAVE THE IMPACT OF SEVERAL VOTES SINCE IT IS EXPECTED THAT LESS THAN HALF OF THE ELIGIBLE VOTERS WILL GO TO THE POLLS. DON'T PASS UP THIS UNIQUE CHANCE YOU HAVE TO SPEAK OUT FOR THOSE WHO CANNOT SPEAK FOR THEMSELVES. VOTE NOVEMBER 7.

Paid for by Arizonans for Life
Karen H. Mills, Chairman
1017 N. 3rd Street
Phoenix, Arizona 85004

0047191948



ARIZONANS FOR LIFE
1017 N. 3rd Street
Phoenix, Arizona 85004

THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
NOV. 7
ELECTION

BULK RATE
U. S. Postage
PAID
PHOENIX, ARIZONA
Permit No. 269

VOTE FOR THE UNBORN IN THE NOV. 7 ELECTION

Unborn children cannot speak for themselves but you can speak for them with your ballot in the Tuesday, November 7, General Election. Your vote can guarantee that the candidates elected to office will be the people who will stand up and defend the most basic of all human rights — **THE RIGHT TO LIFE**.

If the candidates listed below win the election, then the unborn and defenseless will win.

HUMAN LIFE IS ENDANGERED!!! Did you know that:

- On January 22, 1973 the U. S. Supreme Court legalized defacto abortion-on-demand to the day of the baby's birth?
- On July 1, 1976 the Court ruled that a girl of 12 may obtain an abortion without her parent's advice or consent, and that a woman can obtain an abortion without the knowledge or consent of her husband — striking at the very heart of the family unit?

THE ELECTION OF THESE PRO-LIFE CANDIDATES WILL HELP ASSURE THE SUCCESS OF OUR GOAL TO RESTORE LEGAL PROTECTION TO THE UNBORN AND DEFENSELESS BY PERMITTING ABORTION ONLY TO PREVENT THE DEATH OF THE MOTHER. YOU ARE URGED TO TAKE 5 PRO-LIFE FRIENDS WITH YOU TO THE POLLS.

Take this brochure with you to the polls

and vote **ONLY** for the candidates recommended below.

Governor — Evan Mecham
 Secretary of State — Rose Mofford or Henry Haws
 Attorney General — Bob Corbin
 State Superintendent of Public Instruction — Steve Jenkins
 Congressional District 1 — John Rhodes
 Congressional District 2 — Tom Richey
 Congressional District 3 — ————
 Congressional District 4 — Elton Rudd

Legislative Districts

District 15
 District 16
 District 17
 District 18
 District 19
 District 20
 District 21
 District 22
 District 23
 District 24
 District 25
 District 26
 District 27
 District 28
 District 29
 District 30

Senate

S. H. "Hal" Runyan ✓
 Dr. Wayne Stump
 Anne Lindeman ✓
 ————
 ————
 George Hussey
 ————
 Manuel Pena, Jr. ✓
 ————
 ————
 Trudy Camping
 ————
 ————
 Jack Taylor
 Stan Turley ✓

House

James B. Ratliff ✓
 Bob Hungerford
 Wilbert Davis
 Burton Barr, Pete Dunn
 Tony West
 Debbie McCune, Lillian Jordan
 Robert Griffin, Don Kenney
 ————
 Tony R. Abril, Sr. ✓
 Pete Corpstein, David Gorman
 D. Lee Jones
 Mary C. Hegarty, Frank Kelley
 ————
 Tony Raineri, Jim Skelly
 Donna Carlsen, Jim Cooper ✓
 Carl J. Kunasek, James J. Sossaman

DEMOCRATS, REPUBLICANS AND INDEPENDENTS . . . Unite and help defend those who cannot defend themselves — VOTE PRO-LIFE ON NOVEMBER 7.

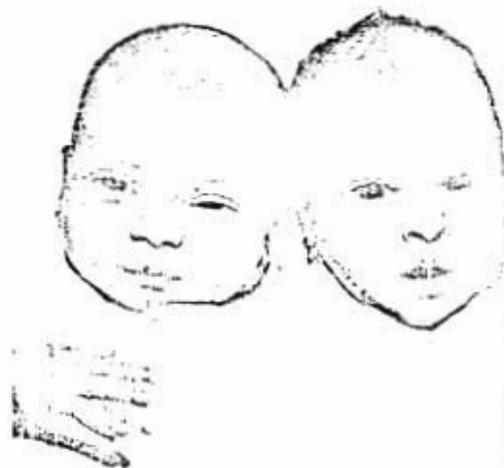
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from you in love
the - just in case.



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THE ELECTION OF A PRO-LIFE GOVERNOR WILL BE ASSURED IF YOU WILL VOTE IN THE ELECTION, TUESDAY, NOVEMBER 7 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

FOR GOVERNOR



JAMES RHODES

- ☆ James Rhodes will actively support and work for the Human Life Amendment to end abortion and protect human life.
- ☆ James Rhodes will oppose the use of your tax dollars to pay for abortions.
- ☆ James Rhodes will "strongly support other pro-life legislation."



RICHARD CELESTE

- Celeste will not support the Human Life Amendment. He insists that it be encumbered with other non-related issues, thus effectively destroying any chance of its passage.
- Celeste will not oppose the use of your tax money for abortion.
- Celeste—although "personally opposed" to abortion, his public position is one of paying for abortions and allowing them to continue.

Other Pro Life State Candidates include:

George Voinovich (R) and Michael Dorrian (D) for Lieutenant Governor
Ted Brown (R) and Tony Celebrezze (D) for Secretary of State
Thomas Ferguson (D) and Donald Lukens (R) for Auditor of State
William Brown (D) and George Smith (R) for Attorney General

DEMOCRATS AND INDEPENDENTS . . . YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR ELECTION CONTEST BY VOTING IN THE ELECTION NOVEMBER 7. AFTER VOTING FOR GOVERNOR, WE HOPE YOU WILL THEN VOTE FOR OTHER PRO-LIFE CANDIDATES REGARDLESS OF PARTY.

VOTE JAMES RHODES

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THE ELECTION OF A PRO-LIFE SENATOR WILL BE ASSURED IF YOU WILL VOTE IN THE DFL PRIMARY, TUESDAY, SEPT. 12 AND ALSO URGE TWO OR THREE OF YOUR PRO-LIFE FRIENDS AND RELATIVES TO VOTE.

THE CANDIDATES



BOB SHORT

- ☆ Bob Short will actively support and work for a Human Life Amendment to end abortion and protect human life.
- ☆ Bob Short will oppose the use of tax dollars to pay for abortions.
- ☆ Bob Short will oppose the use of tax dollars to fund "research" where living babies that survive abortion are used as experimental subjects.



DONALD FRASER

- Fraser supports the current abortion on demand policy. As a Minneapolis Congressman he worked and testified against the Human Life Amendment.
- Fraser has always voted to use tax dollars to pay for abortions.
- Fraser voted against forbidding the use of tax dollars for "research" where living babies that survive abortion are used as experimental subjects.

WHO FUNDS FRASER? The largest for-profit abortion clinic in Minnesota used its newsletter to raise funds for the Fraser campaign. The incorporator of the clinic, and his wife, each gave the Fraser campaign \$1,000. A major Washington based pro-abortion lobby group, the National Abortion Rights Action League, gave the Fraser campaign \$3,500.

REPUBLICANS AND INDEPENDENTS... YOU TOO SHOULD PARTICIPATE IN THIS YEAR'S MAJOR PRIMARY ELECTION CONTEST BY VOTING IN THE DFL PRIMARY SEPTEMBER 12. YOU DO NOT HAVE TO DECLARE ANY PARTY AFFILIATION BEFORE ENTERING THE VOTING BOOTH. REMEMBER TO VOTE ONLY ON THE DFL SIDE OF THE BALLOT (OR IT WILL NOT BE COUNTED AT ALL). THIS DOES NOT OBLIGATE YOU IN THE NOVEMBER GENERAL ELECTION. YOU MAY THEN VOTE FOR ANY CANDIDATE OR PARTY YOU WISH.

VOTE BOB SHORT

CRUCIAL!



Paid for by the Democrats, Republicans and
Independents United for a Pro-life Senate,
Kristine Kremer, Chairman, P.O. Box 19029
Diamond Lake Station
Mpls., Minn. 55419

56161000



**THIS LITTLE
GUY WANTS
YOU
TO VOTE
IN THE
SEPT. 12
PRIMARY**

Democrats, Republicans
and Independents United
for a Pro-life Senate
P.O. Box 19029
Diamond Lake Station
Mpls., Minn. 55419

APAC INCORPORATED

LIFE AMENDMENT POLITICAL ACTION COMMITTEE

BOARD OF DIRECTORS

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Felicia Goeken
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Paul A. Brown
Treasurer
Jean Doyle
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Robert L. Sassone, Esq.
J. C. Willke, M.V.

February 21, 1979

Mrs. Jeanne Fertel
1560 Kanunu St
Honolulu, Hawaii 96814

ELECTION DAY 1978 INCREASED OUR NUMBER
OF PRO-LIFE SENATORS FROM 36 TO 43. IN
THE HOUSE OUR PRO-LIFE GAIN AMOUNTED
TO ABOUT 30. TRULY OUTSTANDING!

Dear Mrs. Fertel:

We all know that regardless of legalistic word-play and whimsical fact-juggling, abortion is murder -- killing a human being.

To kill a human being is wrong!

To kill a child is wrong!

To kill a baby is wrong!

To kill a baby in its mother's womb is wrong!

We are writing to you today for two reasons: 1) to report our remarkable pro-life election successes in 1978, and 2) to ask you to join us in producing even greater election successes in 1979 and 1980 -- especially in special elections this year.

Election Day 1978 increased our number of pro-life Senators from 36 to 43. In the House, our pro-life gain amounted to about 30. A significant accomplishment!

National media made great news out of the pro-life victories in Minnesota, North Carolina, Ohio, South Dakota, Iowa, New Hampshire, and several other targeted states.

Let's face it -- one reason a lot of people don't like to talk about or even think about abortion is that often the details are almost too ghastly to repeat. Remember the sensational trial in California last year? (See enclosed clipping.)

A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington D.C.

P. O. BOX 14263 • BEN FRANKLIN STATION • WASHINGTON, D. C. 20044

0040191954

"E"

According to the prosecution and a medical doctor who witnessed the incident, a prominent obstetrician manually choked to death a baby girl approximately an hour after she had been born alive, some 12 hours following the injection of saline to kill the baby in her mother's uterus.

Despite horrors such as this, on January 9, 1979, the Supreme Court struck down a Pennsylvania law which would have made abortionists subject to criminal prosecution under certain circumstances.

It is clear that only an amendment to the Constitution will guarantee the legal protection of life to babies living in their mothers' wombs.

That Human Life Amendment to our Constitution is the single goal of the Life Amendment Political Action Committee. We must elect U.S. Senators and Congressmen who will support a Human Life Amendment.

All of the financial support given to the various campaigns by the Life Amendment Political Action Committee, as well as grants to candidates, came from the generous donations received from loyal supporters like you.

Based on our great pro-life successes of 1978, now is the time to make our big move. In 1979 and 1980 we can achieve the two-thirds majority needed in the Senate and House to release our Human Life Amendment from the stalling tactics of subcommittees.

Here is how we plan to do it.

LAPAC has already targeted for defeat the following anti-Life Amendment Senators: Birch Bayh, Indiana; Bob Packwood, Oregon; Patrick Leahy, Vermont; George McGovern, South Dakota; John Culver, Iowa; and Frank Church, Idaho.

With your help, LAPAC can defeat these first six "senseless assassins of unborn children" and expand the anti-Life Amendment target list. You can help directly to gain the necessary two-thirds majority of pro-life votes on Capitol Hill.

First, take a few moments to complete the questionnaire enclosed, indicating your personal preference about the Human Life Amendments in Congressional subcommittees now.

Then return your completed questionnaire and the most generous check you can afford -- \$200, \$100, \$50, \$25 or even \$15 -- to LAPAC.

Your contribution will be used specifically to elect pro-life Senators and Congressmen in 1979 and 1980, to prepare for special elections in Wisconsin and California, to send out more

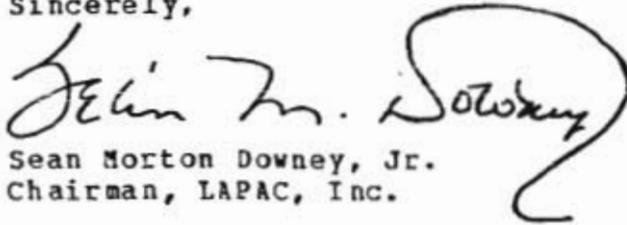
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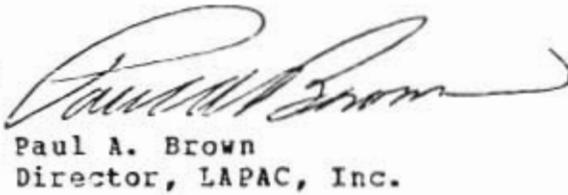
questionnaires, and to let candidates know they'll have our financial support.

Frankly, we are too close to winning the necessary two-thirds majority now to give up the battle to the anti-life abortionists.

Please send your generous pro-life check with your completed questionnaire in the special reply envelope enclosed for your convenience. We hope you can afford to send at least \$100, but even \$15 will be a great boost to the campaign and candidate support by LAPAC.

Sincerely,


Sean Morton Downey, Jr.
Chairman, LAPAC, Inc.


Paul A. Brown
Director, LAPAC, Inc.

P.S. As a result of LAPAC's exposure to millions of Americans on the NBC "Weekend" program of January 21, 1979, many positive things have already happened for LAPAC. We can keep the momentum going and take full advantage of the national publicity we received if we can count on your financial support. Please mail your check today.

0040191955



FEDERAL ELECTION COMMISSION

105 K STREET NW
WASHINGTON, DC 20461

THIS IS THE BEGINNING OF MUR # 960

Date Filmed 5/30/80 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MR. 960.

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RECEIVED
GCC#1628
JUN 11 AM 11:35

RE
OF
GEN
BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006-19

(202) 785-5572

CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA
KENTUCKY HOME LIFE BUILDING
BOX 1179
LOUISVILLE, KENTUCKY 40201
(502) 585-4131

BARNETT, ALAGIA & PROSPERIT
249 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
(305) 832-5696

BARNETT, ALAGIA & YESSIN
P.O. DRAWER B
FRANKFORT, KENTUCKY 40601
(502) 221-1326

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOSEPH M. DAY
A. PAUL PROSPERIT
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W. DAVID KISER
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DONALD F. MINTMIRE
JEFFREY S. RITTER

OF COUNSEL
RUFUS E. WILSON

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON
RUDY YESSIN
MICHAEL E. LANNON
ST. JOHN BARRETT
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GARY D. GARRISON
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JOHN S. KECK
JOHN B. LYNN
HUGH MacMILLAN, JR.
IVAN H. RICH, JR.
JACK E. RUCK
JOHN F. SHERLOCK III
MARY JO WINKLER

June 10, 1980

008383

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: Life Amendment Political Action Committee, Inc.
MUR #960

Dear Mr. Steele:

Thank you for your letter of May 23, received
May 27.

With respect to the second paragraph thereof and
the matter of confidentiality, we invite your attention to
our letter of August 1, 1979 and more particularly to the
last paragraph thereof, which reads in full:

"Our client waives confidentiality
and requests that the full proceedings in
MUR #960 be spread upon the public record.
2 USC §437g(a)(3)(B)."

Our client waives confidentiality, because, as
explained in that letter and elsewhere, our client is the
victim of continuing, if unsuccessful, harassment attempts

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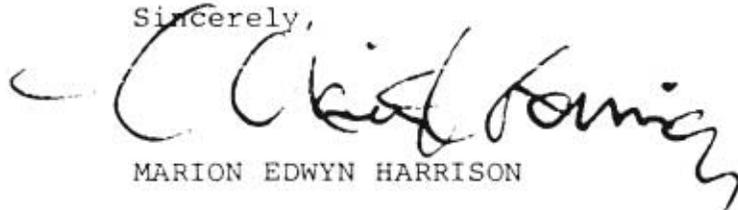
BARNETT, ALAGIA & CAREY

Charles N. Steele, Esquire
June 10, 1980
Page two

by National Abortion Rights Action League. As a protection, and in the interests of full disclosure, our client wants all files pertaining to these harassing complaints available to the public.

Accordingly, our client in writing has waived, and waives, confidentiality and requests that the full proceedings in MUR #960 be spread upon the public record.

Sincerely,



MARION EDWYN HARRISON

MEH:kg
cc Ms. Carolyn Weeder

20040123579

9 BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006



THE WACCP-S...
IT WASN'T EASY THEN
IT ISN'T EASY NOW

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

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1627 K STREET, N.W.

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P.O. DRAWER 6
FRANKFORT, KENTUCKY 40601
(502) 221-7326

BERNARD H. BARNETT
MARION EDWYN HARRISON
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A. PAUL PROSPERI**
JAMES L. COORSSEN*
PATRICIA C. ANDERSON
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RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN W. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
DONALD J. MINTNIRE
JEFFREY B. RITTER*
OF COUNSEL
RUFUS E. WILSON

6/18/80
A10:57

June 10, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

000521

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BARNETT, ALAGIA & CAREY

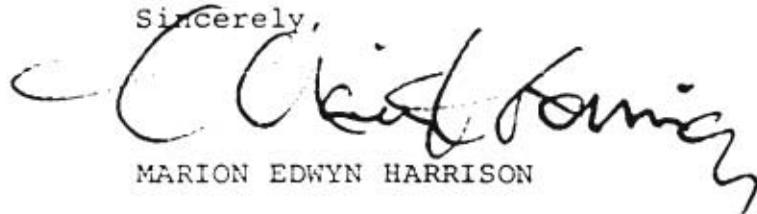
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Charles N. Steele, Esquire
June 10, 1980
Page two

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Sincerely,



MARION EDWYN HARRISON

MEH:kg
cc Ms. Carolyn Weeder

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BARNETT, ALAGIA & CAREY

1627 K STREET, N.W.

WASHINGTON, D.C. 20006



THE NAACP-SINCE 1909
IT WASN'T EASY THEN
IT ISN'T EASY NOW

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

6:06 AM '80

Handwritten signature or initials

3074173573

PS Form 3811, Aug. 1978

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).
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2. ARTICLE ADDRESSED TO: *Marion Edwards Harrison*
1627 K S N W
Wash DC. 20006

3. ARTICLE DESCRIPTION:
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 | *944916* | |

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

4. DATE OF DELIVERY *5/27/80* | POSTMARK

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6. UNABLE TO DELIVER BECAUSE _____ | CLEARANCE *[Signature]*

Mur 960 C. Weeder

U.S. G.P.O. 1978-272-382



FEDERAL ELECTION COMMISSION

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WASHINGTON, D.C. 20463

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END OF ADDITIONAL MATERIAL FOR CLOSED MR 960.

