FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1103

Date Filmed May 13, 1982 Camera No. --- 2

Cameraman SFC

FEDERAL ELECTION COMMISSION

MUR 1103

Routing slips

Conciliation Documents

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	___	(6) Personal privacy
___	(2) Internal rules and practices	___	(7) Investigatory files
X	(3) Exempted by statute FECA	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
X	(5) Internal Documents		

Signed Gary D. Jansen

date 4-26-82

FEC 9-21-77

8040321000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

Paul A. Brown
Treasurer/Director
Life Amendment Political
Action Committee, Inc.
6 Library Court, S.E.
Washington, D.C. 20003

Re: MUR 1103

Dear Mr. Brown:

On April 19, 1982, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)) and 2 U.S.C. § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 436g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

cc: Marion Edwyn Harrison

8204032001

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1982

Gail M. Harmon
Sheldon, Harmon and Weiss
1725 I Street, N.W., Suite 506
Washington, D.C. 20006

Re: MUR 1103

Dear Ms. Harmon:

This is in refrence to the complaint you filed with the Commission on November 30, 1979 concerning certain violations of the Federal Election Campaign Act of 1971, as amended.

After conducting an investigation in this matter, the Commission determined there was probable cause to believe that Life Amendment Political Action Committee violated 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)) and 2 U.S.C. § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. On April 19, 1982, 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 1103. If you have any questions, please contact Dolores Pesce, the staff member assigned to this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

8204032100 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Gail M. Harmon
Sheldon, Harmon and Weiss
1725 I Street, N.W., Suite 506
Washington, D.C. 20006

Re: MUR 1103

Dear Ms. Harmon:

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After conducting an investigation in this matter, the Commission determined there was probable cause to believe that Life Amendment Political Action Committee violated 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)) and 2 U.S.C. § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. On April , 1982, 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 1103. If you have any questions, please contact Dolores Pesce, the staff member assigned to this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

4-20-82

8204032 1003

8204032 1004

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul A. Brown
Treasurer/Director
Life Amendment Political
Action Committee, Inc.
6 Library Court, S.E.
Washington, D.C. 20003

Re: MUR 1103

Dear Mr. Brown:

On April , 1982, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)) and 2 U.S.C. § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 436g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

cc: Marion Edwyn Harrison

4-20-82

GCC# 7461

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
Life Amendment Political)
Action Committee, Inc.)

RECEIVED
FEDERAL ELECTION
GENERAL COUNSEL
92 MAR 31 P3:31

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Gail Harmon on behalf of the National Abortion Rights Action League. An investigation was conducted, and probable cause to believe was found that Life Amendment Political Action Committee, Inc. ("Respondent") violated: 1) 2 U.S.C. § 441d by its omission of a non-authorization statement on the Downey/Jefferson letter; and 2) 2 U.S.C. § 434 by filing incomplete reports with the Federal Election Commission.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) 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:

1. Respondent is a multi-candidate political action committee.

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2. In 1979 respondent made expenditures of $90.00 for the printing and mailing of the letter signed by Sean Morton Downey and Mildred F. Jefferson.

3. The Downey/Jefferson letter advocated the election of Don Lyon for the 16th Congressional District of Illinois.

4. The letter was not authorized by the candidate.

5. Respondent did not include a statement on the letter that it was not authorized by the candidate and that respondent had paid for the letter, as required by 2 U.S.C. § 441d.

6. Respondent received the following loans: $6,500 from David and Nancy Osborne; $5,000 from Karl Karcher; $5,000 from Judy and Paul Brown; $5,000 from Security National Bank; and $2,500 from Robert Lepak. All of these loans have been repaid except for the $5,000 loan from Karl Karcher.

7. Respondent did not report receipt of these loans, as required by 2 U.S.C. § 434(b)(5)(presently §434(b)(3)(E)).

WHEREFORE, Respondent agrees:

V. Respondent omitted a statement on the Downey/Jefferson letter, expressly advocating the election of Don Lyon, that it was not authorized by the candidate and that respondent had paid for the letter, in violation of 2 U.S.C. § 441d.

VI. Respondent did not report the receipt of loans from David and Nancy Osborne, Karl Karcher, Judy and Paul Brown, Security National Bank, and Robert Lepak, in violation of 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)).

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VII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars ($250), pursuant to 2 U.S.C. § 437g(a)(5)(A), and file appropriate amended reports disclosing the receipt of loans from David and Nancy Osborne, Karl Karcher, Judy and Paul Brown, Security National Bank and Robert Lepak.

VIII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. 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.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

April 20, 1982
Date

BY: [signature]
Kenneth A. Gross
Associate General Counsel

Date

Life Amendment PAC
Respondent's Name

BY: [signature]

ITS: Treasurer

8204032100 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MUR 1103
Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that the on April 19, 1982, the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

1. accept the conciliation agreement as offered by Life Amendment Political Action Committee in settlement of this matter;

2. approve and send the letters attached to the General Counsel's April 14, 1982 report;

3. CLOSE THE FILE.

Commissioners Aikens, Elliott, Harris, McGarry, and Reiche voted affirmatively for the decision. Commissioner McDonald did not vote.

Attest:

4-19-82
Date

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

9204032/0009

ATTACHMENT TO REPORTS FILED FOR CALENDAR 78

SCC# 7477

SCHEDULE A — **ITEMIZED RECEIPTS** (7)

Page ____ of ____ for LINE NUMBER ____ (Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Karl Karcher 1200 N. Harbor Anaheim, CA 92801 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self-employed Occupation: Restaurateur Aggregate Year-to-Date—$	-78	$5,000.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. David Osborne 2996 Avery Dr Palm Springs, CA 92262 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self Employed Occupation: Aerospace Aggregate Year-to-Date—$	-78	$3,000.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mrs. Nancy Osborne 2996 Avery Dr. Palm Springs, CA 92262 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	NA Occupation: Housewife Aggregate Year-to-Date—$	-78	$3,500.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Paul and Judie Brown 2018 Midshipman Drive Stafford, VA 22554 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	LAPAC Inc. Occupation: Management Aggregate Year-to-Date—$	-78	$5,000.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Security National Bank National Press Building Washington, D.C. 20045 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	NA Occupation: Aggregate Year-to-Date—$	-78	$5,000.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. Robert Lepak 51 Candice Circle Springfield, MA 01107 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Aggregate Year-to-Date—$	-78	$5,000.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
NOTE: All loans have been repaid by LAPAC except Karcher's. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			26,500.00
TOTAL This Period (last page this line number only)			

820321010

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 1103
)
Life Amendment Political)
Action Committee, Inc.)

CERTIFICATION

I, Joyce E. Thomann, Recording Secretary of the Federal Election Commission, do hereby certify that during the Executive Session of February 23, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1103:

1. Find probable cause to believe that Life Amendment Political Action Committee, Inc., violated former 2 U.S.C. §435(b) and take no further action;

2. Find probable cause to believe that Life Amendment Political Action Committee violated 2 U.S.C. §441d:

3. Take no further action with regard to a 2 U.S.C. §434(b)(2) (presently §434(b)(3)(A) and §431(13)(A)) violation by Life Amendment Political Action Committee, Inc.;

4. Find probable cause to believe that Life Amendment Political Action Committee, Inc. violated 2 U.S.C. §434(b)(12) (presently §434(b)(8));

5. Find probable cause to believe that Life Amendment Political Action Committee violated 2 U.S.C. §434(b)(5) (presently §434(b)(3)(E));

6. Approve and send the letter and proposed conciliation agreement to counsel for the respondent attached to the General Counsel's Report dated February 11, 1982 and considered by the Commission at the Executive Session of Tuesday, February 23, 1982.

(continued)

8204032101

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in the matter; Commissioner Harris was absent.

Attest:

February 23, 1982
Date

FOR: Marjorie W. Emmons,
Secretary of the Commission

8204032012

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1981

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

Re: MUR 1103

Dear Mr. Harrison:

On November 18, 1980, the Commission found reason to believe that your client, Let's All Protect A Child Fund, had violated 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action at this time and close its file with regard to Let's All Protect A Child Fund. This matter will be made part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission will notify you when the entire file has been closed. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed.

If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8204032013

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
LAPAC Fund)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on December 8, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1103:

1. Take no further action at this time with regard to LAPAC Fund and close the file with regard to it.

2. Approve and send the closing letter to counsel for LAPAC Fund as submitted with the General Counsel's November 23, 1981 report in this matter.

Attest:

12/9/81
Date

Marjorie W. Emmons
Secretary of the Commission

8204032014

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: The File

FROM: Dolores Pesce DP

RE: MUR 1103

I have made two changes on page one of the General Counsel's Report signed November 23, 1981. Both changes involve dates. May 6, 1980 is changed to May 6, 1981. June 19, 1980 is changed to June 19, 1981.

8204032015

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
LAPAC Fund)

GENERAL COUNSEL'S REPORT

I. Background

On November 18, 1980, the Commission found reason to believe that Let's All Protect A Child Fund ("LAPAC FUND") is a political committee, in violation of 2 U.S.C. § 433 for failure to register and § 434 for failure to report with the Commission. The Commission also authorized sending interrogatories to Sean Downey, Chairman of LAPAC Fund. Mr. Downey submitted answers to the interrogatories on January 20, 1981, after considerable delay which included a request for extension of response time. Since some of the answers were inconclusive, founded on Mr. Downey's stance, "I have no knowledge," the Commission authorized additional interrogatories on May 6, 1981. When no response was received, the Commission resent them under subpoena on June 19, 1981. To date, no response has been forthcoming.

II. Legal Analysis

After review and consideration of this matter, the Office of General Counsel concludes that subpoena enforcement is not warranted. Further, the Office of General Counsel recommends that, with regard to LAPAC Fund's

8204032106

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: DECEMBER 2, 1981

SUBJECT: OBJECTION - MUR 1103 General Counsel's Report dated 11-23-81; Received in OCS, 12-1-81, 9:38

The above-named document was circulated to the Commission on December 1, 1981 at 4:00.

Commissioner Harris submitted an objection at 10:07, December 2, 1981.

This matter will be placed on the agenda for the Executive Session of Tuesday, December 8, 1981.

8204032107

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
LAPAC Fund)

DEC 1
81 ~~NOV 31~~ A 9: 38
MUR 1103

8204032109

GENERAL COUNSEL'S REPORT

I. Background

On November 18, 1980, the Commission found reason to believe that Let's All Protect A Child Fund ("LAPAC FUND") is a political committee, in violation of 2 U.S.C. § 433 for failure to register and § 434 for failure to report with the Commission. The Commission also authorized sending interrogatories to Sean Downey, Chairman of LAPAC Fund. Mr. Downey submitted answers to the interrogatories on January 20, 1981, after considerable delay which included a request for extension of response time. Since some of the answers were inconclusive, founded on Mr. Downey's stance, "I have no knowledge," the Commission authorized additional interrogatories on May 6, 1980. When no response was received, the Commission resent them under subpoena on June 19, 1980. To date, no response has been forthcoming.

II. Legal Analysis

After review and consideration of this matter, the Office of General Counsel concludes that subpoena enforcement is not warranted. Further, the Office of General Counsel recommends that, with regard to LAPAC Fund's

possible status as a political committee, the Commission take no further action at this time.

The Commission's RTB finding was based on a letter dated February 6, 1979 signed by LAPAC Fund Chairman Sean Downey. In that letter, there was a statement that LAPAC Fund scheduled campaign training schools to prepare its people "to go out and help win elections for more pro-life candidates." If the follow-up activities suggested by this statement were carried out, LAPAC Fund could possibly have made political expenditures and qualified as a political committee under 2 U.S.C. § 431(4).

In his answers to interrogatories, Mr. Downey stated that LAPAC Fund has sponsored one "educational conference." With regard to the questions asking if LAPAC Fund made expenditures or received contributions, Mr. Downey answered with the equivocal expression, "I have no knowledge." However, to the question, "Has LAPAC Fund made any contribution to candidates for office?", he did reply directly "Upon information and belief, no."

Therefore, although the investigation has not yielded complete information on LAPAC Fund's activities, the issue of its making political contributions has been answered in the negative. The only evidence indicating any possible political activity is the February 6, 1979 letter.

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In light of Sean Downey's statements and the lack of any significant evidence that LAPAC Fund is acting as a political committee as defined by 2 U.S.C. § 431(4), the Office of General Counsel recommends that the Commission take no further action at this time with regard to LAPAC Fund and close the file with regard to it.

III. Recommendations

1. Take no further action at this time with regard to LAPAC Fund and close the file with regard to it.

2. Approve and send the closing letter to counsel for LAPAC Fund.

Charles N. Steele
General Counsel

Nov. 23, 1981
Date

by Kenneth A. Gross
Kenneth A. Gross
Associates General Counel

Attachments
1. Closing letter to counsel for LAPAC Fund

8204032102I

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Re: MUR 1103

Dear Mr. Harrison:

On November 18, 1980, the Commission found reason to believe that your client, Let's All Protect A Child Fund, had violated 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action at this time and close its file with regard to Let's All Protect A Child Fund. This matter will be made part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission will notify you when the entire file has been closed. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed.

If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

ATTACHMENT 1

8204032102

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Re: MUR 1103

Dear Mr. Harrison:

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The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed.

If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

8204032102 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Re: MUR 1103

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The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed.

If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

8204032 1024

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1981

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

Re: MUR 1103

Dear Mr. Harrison:

Based on a complaint filed with the Commission on November 29, 1979, the Commission determined on November 18, 1980, that there was reason to believe that your client, Life Amendment Political Action Committee, Inc., had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred with regard to the provisions of 2 U.S.C. § 434, § 441d and former § 435(b).

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

8204032025

Should you have any questions, please contact Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8204032i026

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 NOV 20 P2: 59

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1103

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent's counsel of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on November 20, 1981. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Counsel for Respondent

8204032 1028

BEFORE THE FEDERAL ELECTION COMMISSION

September 28, 1981

In the Matter of)
) MUR 1103
Life Amendment Political)
Action Committee, Inc.)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On November 29, 1979, Gail Harmon filed a complaint with the Federal Election Commission (hereinafter "the Commission" or "the FEC") on behalf of the National Abortion Rights Action League. The complaint repeated an allegation regarding Life Amendment Political Action Committee, Inc. (hereinafter "LAPAC") as the separate segregated fund of National Right to Life Committee, Inc. (hereinafter "NRLC"), which was the subject of an earlier complaint filed by Ms. Harmon on April 30, 1979 (MUR 961). In the November 29, 1979 complaint, Ms. Harmon made two additional allegations: 1) that LAPAC paid for the printing and mailing of a solicitation letter signed by Mrs. Penny Dines, but failed to include a notice pursuant to former 2 U.S.C. § 435(b); and 2) that LAPAC filed incomplete reports with the FEC, in violation of 2 U.S.C. § 434.

On November 18, 1980, the Commission determined to incorporate into MUR 961 the portion of the November 29, 1979 complaint regarding the issue of LAPAC as the separate segregated fund of NRLC. At the same time, the Commission found reason to believe that LAPAC violated: 1) 2 U.S.C. § 435(b) by its

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omission of a notice on the solicitation letter signed by Mrs. Penny Dines; 2) 2 U.S.C. § 434 by filing incomplete reports with the FEC; and 3) 2 U.S.C. § 441d by its omission of an authorization or non-authorization statement on the Downey-Jefferson letter.

On November 19, 1980, the Commission notified the respondent of its reason to believe findings and enclosed interrogatories to be answered by LAPAC's treasurer, Paul A. Brown. On December 17, 1980, the Commission approved a twenty-day extension of time for response to interrogatories at the request of Mr. brown. Mr. brown submitted Answers to Interrogatories through Marion Edwyn Harrison, counsel for LAPAC, on February 4, 1981. On March 16, 1981, the Commission determined to send additional interrogatories to Mr. Brown. As no response was forthcoming, the Commission issued a subpoena/order to respondent on June 16, 1981. Respondent has submitted answers to the interrogatories via letter from counsel dated July 9, 1981.

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II. Legal Analysis

Failure to Include Solicitation Notice

The complaint alleged that LAPAC paid the costs for a solicitation letter signed by an individual, Penny Dines, and failed to place a notice on the letter as required by former 2 U.S.C. § 435(b).

In her letter, Mrs. Dines states that Sean Morton Downey, chairman of LAPAC, asked her to write the letter

explaining why people should support LAPAC. In Answers to Interrogatories of January 31, 1981, Mr. Brown confirmed that this request occurred and stated that Mrs. Dines wrote the letter on behalf of LAPAC "to solicit funds for LAPAC." Further, he stated that LAPAC paid the printing and mailing costs for the letter. In his Answers to Interrogatories of July 9, 1981, Mr. Brown stated that LAPAC made expenditures totaling $5,120.65 in connection with the Dines letter.

Former 2 U.S.C. § 435(b) required that any solicitation communication include a notice stating that copies of the Committee's reports have been filed with the Commission and are available for purchase. Since the Dines letter was distributed during 1979 when this provision was in effect, LAPAC, having made expenditures for the letter, violated this provision of the Act through its failure to include a notice. Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that LAPAC violated former 2 U.S.C. § 435(b).

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Failure to Include Authorization/Non-Authorization Notice

Upon review of the attachments submitted with complaint, the Office of General Counsel noted that a letter signed by Sean Morton Downey and Mildred F. Jefferson, chairman and advisory chairman, respectively, of LAPAC, advocated the election of Don Lyon for the 16th Congressional District of Illinois. The letter did not contain a notice stating whether or not it was authorized by the candidate, and who paid for it, as required by 2 U.S.C. § 441d.

In Answers to Interrogatories of January 31, 1981, Mr. Brown stated that the Downey/Jefferson letter was not authorized by Don Lyon and that LAPAC had paid the costs for the letter. In Answers to Interrogatories of July 9, 1981, Mr. Brown stated that LAPAC made expenditures totaling $90 for the printing and mailing of 500 copies of the letter.

2 U.S.C. § 441d requires, in part, that when any person makes an expenditure for a communication expressly advocating the election of a clearly identified candidate, the communication shall state whether or not it was authorized by the candidate and who paid for it. Accordingly, since LAPAC made expenditures for the Downey/Jefferson letter which expressly advocates the election of Don Lyon, LAPAC violated this provision by not including a statement that the communication was unauthorized and that LAPAC had paid for the communication.

The Office of General Counsel recommends that the Commission find probable cause to believe that LAPAC violated 2 U.S.C. § 441d.

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Incomplete Reports

In response to the complaint's allegation that LAPAC was filing incomplete reports with the FEC, a review was conducted of LAPAC's July 10, 1979 Quarterly through June 1980 Monthly reports. In addition, on September 24, 1980, the Reports Analysis Division sent a referral update to the Office of General Counsel. The review and update uncovered violations by LAPAC of three reporting provisions: 1) § 434(b)(2)

(presently § 434(b)(3)(A) and § 431(13)(A)) by failing to report occupation and principal place of business for 102 contributors; 2) § 434(b)(12)(presently § 434(b)(8)) by failing to report an outstanding debt until it is extinguished, or if it has been extinguished, by failing to report the circumstances and conditions under which it is extinguished; and 3) 434(b)(5) (presently § 434(b)(3)(E)) by failing to report loans from four individuals. In the last instance, the Commission made an alternative reason to believe finding for two of the individuals since it appeared that they may have made expenditures on behalf of LAPAC, rather than made loans to LAPAC. The alternative finding cited § 434(b)(9)(presently § 434(b)(5)(A)).

In Answers to Interrogatories of July 9, 1981, Mr. Brown addressed the issue of LAPAC's failure to provide occupation and principal place for business for 102 contributors. He stated that all fund-raising letters have a space on the response card for the donor to include this information. Further, "Most donors do not fill in this information. Accordingly, at intervals LAPAC mails a form letter to such donors specifically asking only for that information. When the information is received it is filed." Mr. Brown included a copy of the form letter used.

2 U.S.C. § 432(i) states that when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by this Act, any report or any records of such committee shall be

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considered in compliance with this Act. Based on Mr. Brown's description of LAPAC's regular and follow-up procedures to obtain contributor information, it appears that LAPAC has made best effort attempts to comply with the provision of § 434(b)(2). Accordingly, the Office of General Counsel recommends that the Commission take no further action with regard to a 2 U.S.C. § 434(b)(2)(presently § 434(b)(3)(A) and § 431(13)(A)) violation by LAPAC.

The Commission's finding on a § 434(b)(12) violation concerned LAPAC's failure to properly report a debt owed to LAPAC by David and Nancy Osborne in the total amount of $6,500. In response to the Reports Analysis Division's Request for Additional Information, LAPAC stated that the Osbornes repaid the debt; however, LAPAC did not show repayment on its reports as required by § 434(b)(12).

In Answers to Interrogatories of July 9, 1981, Mr. Brown has clarified that the debt was for a loan made by, and not to, the Osbornes. However, Mr. Brown has not provided the Commission with information on the debt's extinguishment nor has he amended LAPAC's reports to reflect this information in accordance with § 434(b)(12).

Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that LAPAC violated 2 U.S.C. § 434(b)(12)(presently § 434(b)(8)).

With regard to the final reporting issue, LAPAC's reports showed debts owed to Karl Karcher ($5,000) and to Judy and Paul

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brown (combined $5,000). The reports left it unclear as to whether Mr. Karcher and the Browns made loans to LAPAC or made expenditures on its behalf. Since LAPAC did not report receiving loans or the making of expenditures on its behalf, the Commission made a reason to believe finding in the alternative: § 434(b)(5) or § 434(b)(9).

LAPAC also reported two loan repayments for which there had been no previous reporting of receipt of loan. The loan repayments were $5,138.08 to Security National Bank and $2,534.30 to Robert Lepak. In these two instances, the Commission found reason to believe for a violation of § 434(b)(5).

In Answers to Interrogatories of July 9, 1981, Mr. Brown clarified that the transactions involving all the named individuals and entities, i.e., the Browns, Mr. Karcher, Security National Bank, and Mr. Lepak, were loans made to LAPAC. Accordingly, § 434(b)(5), which requires reporting of receipt of loans, is the applicable provision in this violation. To date, LAPAC has not furnished the Commission with dates of receipt of these loans nor has it filed amendments reporting receipt of these loans.

Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that LAPAC violated 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)).

III. General Counsel's Recommendations

1. Find probable cause to believe that LAPAC violated former 2 U.S.C. § 435(b).

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2. Find probable cause to believe that LAPAC violated 2 U.S.C. § 441d.

3. Take no further action with regard to a 2 U.S.C. § 434(b)(2)(presently 434(b)(3)(A) and § 431(13)(A), violation by LAPAC.

4. Find probable cause to believe that LAPAC violated 2 U.S.C. § 434(b)(12)(presently § 434(b)(8)).

5. Find probable cause to bleieve that LAPAC violated 2 U.S.C. § 434(b)(5)(presently § 434(b)(3)(E)).

19 November 1981
Date

Charles N. Steele
General Counsel

8204032103 36

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1981

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

Re: MUR 1103

Dear Mr. Harrison:

Based on a complaint filed with the Commission on November 29, 1979, the Commission determined on November 18, 1980, that there was reason to believe that your client, Life Amendment Political Action Committee, Inc., had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred with regard to the provisions of 2 U.S.C. § 434, § 441d and former § 435(b).

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

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Should you have any questions, please contact Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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

TELEPHONE & TELECOPIER
(202) 785-0500

CABLE ALBAR

TELEX 89-2445

July 9, 1981

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D. C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
81 JUL 10 P1:10

Re: MUR 1103

Dear Mr. Steele:

We attach the original of executed Answers to Interrogatories signed by Mr. Paul A. Brown.

We have forwarded to Mr. Sean Morton Downey, Jr., in Nevada the Interrogatories addressed to him. Our client has no control over whether he answers those Interrogatories. However, we invite your attention to SIVB, page 4, of Answers to Interrogatories of Sean Morton Downey, Jr., Esquire, MUR 1103, subscribed and sworn to January 20, 1981, in which Mr. Downey correctly states in pertinent part that "There is no connection between LAPAC Fund and Life Amendment Political Action Committee, Inc., and no connection between Life Amendment Political Action Committee, Inc., and Christian Family Renewal, Inc." Furthermore, inasmuch as LAPAC Fund and Christian Family Renewal, Inc., do not appear to be political action committees, to contribute to candidates for federal office or otherwise to be within the jurisdiction of the Federal Election Commission, there would seem to be no reason for Mr. Downey or anybody on

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behalf of those organizations to respond unless they chose to do so.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Dolores Pesce

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RECEIVED
81 JUL 10 P12:01

FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.] MUR 1103]

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
81 JUL 10 P1:18

ANSWER TO INTERROGATORIES
OF MR. PAUL A. BROWN

1. Please answer the following questions regarding the letter signed by Mrs. Penny Dines.

a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

Upon information and belief, $3,257.20.

b. How many copies of the letter were printed?

Upon information and belief, 130,000.

c. How many copies of the letter were mailed?

Upon information and belief, 124,230.

d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

Photocopies of invoices from Creative Mailing Consultants of America, Inc., attached.

e. Were any copies of the letter distributed by means other than mail?

Upon information and belief, none.

f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

N/A.

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

N/A.

2. Please answer the following questions regarding the letter signed by Sean Morton Downey, Jr., and Mildred F. Jefferson.

a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

Approximately three cents each.

b. How many copies of the letter were printed?

Approximately 500.

c. How many copies of the letter were mailed?

Approximately 500.

d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

$75.00.

e. Were any copies of the letter distributed by means other than mail?

Upon information and belief, no.

f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

N/A.

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

N/A.

With reference to LAPAC's reports filed with the Federal Election Commission, please answer the following questions.

3. LAPAC's 1979 Year-End Report shows debts totaling $5,000.00 owed to Judy and Paul Brown.

a. Was this $5,000.00 amount a loan by the Browns to LAPAC?

Yes.

b. If so, when did LAPAC receive the loan?

1979.

c. Was this $5,000.00 amount an expenditure by the Browns on behalf of LAPAC?

No.

d. If so, when did the Browns make the expenditure on behalf of LAPAC?

N/A.

4. LAPAC's 1979 July Report shows a debt of $5,000.00 owed to Karl Karcher.

a. Was this $5,000.00 amount a loan by Mr. Karcher to LAPAC?

Yes.

b. If so, when did LAPAC receive the loan?

Date to be furnished.

c. Was this $5,000.00 amount an expenditure by Mr. Karcher on behalf of LAPAC?

No.

d. If so, when did Mr. Karcher make the expenditure on behalf of LAPAC?

N/A.

5. LAPAC's Year-End Report shows a "Repayment of Loan" expenditure to Security National Bank in the amount of $5,138.08.

a. Was the $5,138.08 amount a loan by the bank to LAPAC?

Principal - $5,000.00; Interest - $138.08; total $5,138.08.

b. If so, when did LAPAC receive the loan?

Date to be furnished.

6. LAPAC's 1980 February Report shows a "Repayment of Loan" expenditure to Robert Lepak in the amount of $2,534.30.

a. Was the $2,534.30 amount a loan by Mr. Lepak to LAPAC?

Principal - $2,500.00; Interest - $34.30.

b. If so, when did LAPAC receive the loan and when did it repay the loan to Mr. Lepak?

Date to be furnished.

c. Was the $2,534.30 amount a loan by LAPAC to Mr. Lepak?

No.

d. If so, when did LAPAC make the loan and when did LAPAC receive repayment from Mr. Lepak?

N/A.

7. With regard to LAPAC's April 10, 1979 Quarterly, July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980, February 1980, March 1980, April 1980, May 1980 and June 1980 Reports, please state occupation and principal place of business of contributors where this information was not included in the reports.

All fund-raising letters have a space on the response card for the donor to indicate "occupation and occupational address". Most donors do not fill in this

information. Accordingly, at intervals LAPAC mails a form letter to such donors specifically asking only for that information. When the information is received it is filed, photocopy of form letter used throughout 1980 attached.

8. LAPAC's 1979 April Report shows a loan made to David Osborne in the amount of $3,500.00 and to Nancy Osborne in the amount of $3,000.00.

a. Have the Osbornes repaid the loans to LAPAC?

There is no LAPAC loan to the Osbornes. Rather, the Osbornes made loans to LAPAC, as reported by LAPAC to FEC.

b. If yes, when did the Osbornes repay the loan?

N/A.

c. Did the Osbornes repay the full amount of each loan?

N/A.

d. If no, how much did they repay?

N/A.

e. Also, if not repaid in full, please explain the circumstances and conditions under which the loan obligations were extinguished and the consideration therefor.

N/A.

PAUL A. BROWN

DISTRICT OF COLUMBIA
CITY OF WASHINGTON, ss:

Subscribed and sworn to before me, a Notary Public, this 9th day of July, 1981.

Pamela L. Vennerdrow
PAMELA L. VENNERDROW
Notary Public

My commission expires: April 14, 1984

My Commission Expires April 14, 1984

EAGLE
ROJAN BOND
25% COTTON FIBER U.S.A.

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

BENJAMIN FRANKLIN STATION • P.O. BOX 14263 • WASHINGTON, D.C. 20044 • (202) 638-3981

BOARD OF DIRECTORS:
MILDRED F. JEFFERSON, MD
REV. PAUL MARX, OSB
ROBERT L. SASSONE, ESQ.

PAUL A. BROWN
TREASURER/DIRECTOR

1-31-80

Dear Friend of Life and LAPAC:

This is not a request for more money. We would like to thank you for all your generous support of our work here for God's unborn children.

The Federal Election Commission requires that we report the name, address, occupation and place (city and state) of employment of each donor that gives LAPAC $100.01 or more per year. It is, of course, perfectly legal to donate these amounts, but we are then simply required to report them.

So that we may comply with the law please fill in the information requested and return it to our office at your earliest convinience.

_____
Name

_____
Type of employment

_____
Place of employment (city and state)

A return mail envelope is enclosed for your use. Please again accept my sincere thanks for your loyal support and also please do keep us in your prayers.

God is Life, Love LIFE!

Paul

Paul A. Brown

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a copy of our report is on file and available for purchase from the federal election commission, washington, d.c.

INVOICE

mattera LITHO, INC.
9124 Prelish Lane
Olney, Maryland 20761
301-[illegible]

TO
LAPAC, INC.
c/o C.M.C.A., Inc.
8800 Edgeworth Drive
Capitol Heights, Maryland 20027
Attention: Judy Bridgett

Customer's Order No. 2690-860 Invoice No. 12978 & 12992 Date 5/26 19 79

Quantity	Description	Price	Amount
34,000	Reno Mailing Letters and Leaflets	23.15/M	$3,102.10
	Maryland tax		155.10
			$3,257.20

8 2 0 4 0 3 2 1 0 4

Please make all checks payable to Mattera Litho, Inc.

CREATIVE MAILING CONSULTANTS OF AMERICA, INC.
8800 Edgeworth Drive • Capitol Heights • Maryland 20027

(301) 350-5600

Mr. Paul Brown
LARAC, INC.
P.O. Box 14263
Ben Franklin Station
Washington, D.C. 20044

DATE: May 24, 1979

INVOICE NO 0091

JOB #360 - 130M Reno Package

Consulting fee on 124,230 pieces mailed @ $15.00/M =	$1,863.45

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

Charles N. Steele, Esquire

General Counsel

Federal Election Commission

Washington, D. C. 20463

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

Ms. Dolores Pesce

Attorney

Federal Election Commission

Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

On March 18, 1981, the Commission sent interrogatories to you to be answered by your client, Paul A. Brown on behalf of LAPAC, Inc., in connection with the above-captioned matter. In addition, on May 7, 1981, the Commission sent interrogatories to you to be answered by Sean Morton Downey on behalf of LAPAC Fund.

As no responses to these interrogatories have been forthcoming, the Commission had issued the attached subpoena/order for each of your clients, LAPAC, Inc. and LAPAC Fund, to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with and assist your clients in the preparation of responses to these subpoenas/orders. However, it is required that your clients submit the information under oath and that they do so within 10 days of your receipt of the subpoenas/orders.

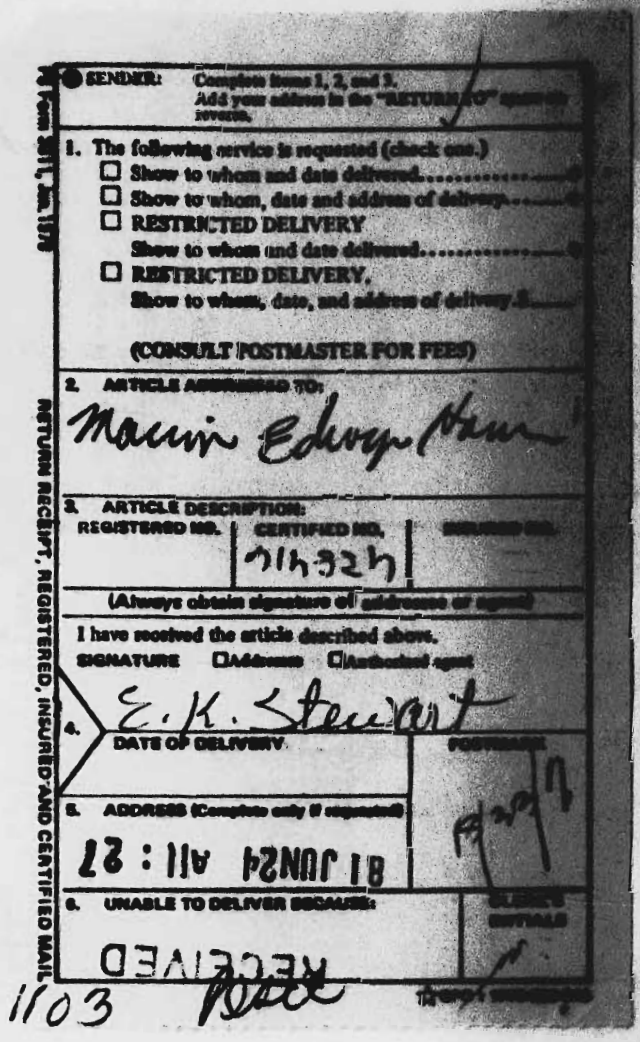
If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoenas/Orders
Interrogatories

8204032105 3



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:
Marvin Edwyn Mann

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 714324 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
E. K. Stewart

4. DATE OF DELIVERY | POSTMARK
81 JUN24 AM 11:27

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS
RECEIVED

1103 Date

PS Form 3811, Mar. 1988 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 820 403 210 54

BEFORE THE FEDERAL ELECTION COMMISSION

June 2, 1981

In the Matter of)
) MUR 1103
Life Amendment Political)
Action Committee, Inc.)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on June 16, 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment:
Interrogatories - 3 pages

8204032-055

Life Amendment Political Action Committee
Paul A. Brown

INTERROGATORIES

1. Please answer the following questions regarding the letter signed by Mrs. Penny Dines.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

   f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

   g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

2. Please answer the following questions regarding the letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

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f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

With reference to LAPAC's reports filed with the Federal Election Commission, please answer the following questions.

3. LAPAC's 1979 Year-End Report shows debts totaling $5,000 owed to Judy and Paul Brown.

   a. Was this $5,000 amount a loan by the Browns to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by the Browns on behalf of LAPAC?

   d. If so, when did the Browns make the expenditure on behalf of LAPAC?

4. LAPAC's 1979 July Report shows a debt of $5,000 owed to Karl Karcher.

   a. Was this $5,000 amount a loan by Mr. Karcher to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by Mr. Karcher on behalf of LAPAC?

   d. If so, when did Mr. Karcher make the expenditure on behalf of LAPAC?

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5. LAPAC's Year-End Report shows a "Repayment of Loan" expenditure to Security National Bank in the amount of $5,138.08.

   a. Was the $5,138.08 amount a loan by the bank to LAPAC?

   b. If so, when did LAPAC receive the loan?

6. LAPAC's 1980 February Report shows a "Repayment of Loan" expenditure to Robert Lepak in the amount of $2,534.30.

   a. Was the $2,534.30 amount a loan by Mr. Lepak to LAPAC?

   b. If so, when did LAPAC receive the loan and when did it repay the loan to Mr. Lepak?

   c. Was the $2,534.30 amount a loan by LAPAC to Mr. Lepak?

   d. If so, when did LAPAC make the loan and when did LAPAC receive repayment from Mr. Lepak?

7. With regard to LAPAC's April 10, 1979 Quarterly, July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980, February 1980, March 1980, April 1980, May 1980 and June 1980 Reports, please state occupation and principal place of business of contributors where this information was not included in the reports.

8. LAPAC's 1979 April Report shows a loan made to David Osborne in the amount of $3,500 and to Nancy Osborne in the amount of $3,000.

   a. Have the Osbornes repaid the loans to LAPAC?

   b. If yes, when did the Osbornes repay the loan?

   c. Did the Osbornes repay the full amount of each loan?

   d. If no, how much did they repay?

   e. Also, if not repaid in full, please explain the circumstances and conditions under which the loan obligations were extinguished and the consideration therefor.

8204032 1058

BEFORE THE FEDERAL ELECTION COMMISSION

June 2, 1981

In the Matter of)
) MUR 1103
Let's All Protect A Child Fund)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on June 16, 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment:
Interrogatories - 4 pages

8204032059

Sean Morton Downey, Jr.

INTERROGATORIES

1. Please state your full name and address.

2. Please state your occupation.

In your answers to the Commission's first set of interrogatories submitted by you with letter dated March 26, 1981, you responded in several instances, "I have no knowledge."

3. Do you know who might have knowledge of information sought by the Commission in its first interrogatories or in these supplemental ones for which you have no knowledge?

4. If yes, please state the name and address of the individual.

The following questions relate to the organization called "Lets All Protect A Child Fund" (hereinafter "LAPAC Fund").

5. Have you ever held any position in LAPAC Fund?

6. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

7. Are you chairman of LAPAC Fund at present?

8. If no, please state the name and address of the individual who is chairman at present.

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9. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1979.

10. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1980.

The following questions relate to a letter signed by you as chairman of LAPAC Fund, dated February 6, 1979, hereto attached as Exhibit A.

11. The letter states that LAPAC Fund "scheduled campaign training schools in all sections of the country for the education and training of pro-lifers."

a. Did LAPAC Fund organize campaign training schools?

b. If yes, please list the location and date for each training school.

c. Please state the name and address of the individual responsible for organizing each of these training schools.

d. What was the purpose of the training schools? Please include a copy of the agenda for each training school, if possible.

e. For each of the training schools, please state whether attendees were given instructions on implementing activities to help elect pro-life candidates.

f. For each of the training schools to which you answered yes in (e), please provide a copy of the instructions if they were in writing. If they were not in writing, please outline the contents of the instructions.

8204032-061

12. The letter states that LAPAC Fund publishes the "Report, a comprehensive overview of political information."

a. Please explain what is meant by "political information."

b. Who subscribes to the Report?

c. How do subscribers learn of the existence of the Report?

d. How many subscribers to the Report were there in 1979?

e. What is the subscription fee for the Report?

f. Is this fee a contribution to LAPAC Fund?

g. Has the Report ever contained a solicitation for contributions to LAPAC Fund?

h. If yes, please provide a copy of each issue in which a solicitation appeared.

13. The letter states:

> We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

a. Did LAPAC Fund use any amount of the donations received to make political contributions or expenditures?

8204032106 2

b. If yes, please list the date, amount and nature of each political contribution or expenditure.

The following questions relate to Christian Family Renewal, Inc.

14. Have you ever held any position in Christian Family Renewal, Inc.?

15. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

16. Please state the address of Christian Family Renewal, Inc. and also state the name and address of the principal officer of Christian Family Renewal, Inc.

8204032106 3

Let's All Protect A Child Fund

FUND

Suite 339, National Press Building 529 14th Street, Washington, D.C. 20

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: "We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

Just recently NBC ran a one hour special on our activities while this past week I appeared on the Phil Donohough show along with my fellow board member Dr. Jack Willke. In addition, PEOPLE magazine has just featured our Director, Paul Brown and his wife Judie in their publication. We are on the move, but we must have your support!

Some of you have already helped the pro-life cause, I know the rest of you are also willing to help.

Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates.

Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Norton Downey
Chairman

SMD/bb

EXHIBIT A

LAPAC Fund is a division of Christian Family Renewal.
All contributions to the LAPAC FUND are totally tax deductible.

8204032106 4

FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JUNE 16, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1103

The attached subpoenas regarding MUR 1103, which were Commission approved on June 15, 1981, by a vote of 6-0, have been signed and sealed this date.

Attachment:
Subpoenas (2)

8204032|065

1080

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
Life Amendment Political Action)
Committee, Inc.)
Let's All Protect a Child Fund)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1103:

1. Issue to Paul A. Brown, on behalf of LAPAC, Inc., an order to answer interrogatories and a subpoena to produce documents.

2. Issue to Sean Morton Downey on behalf of LAPAC Fund an order to answer interrogatories and a subpoena to produce documents.

3. Approve and send the letter to counsel for LAPAC, Inc. and LAPAC Fund, as attached to the General Counsel's June 2, 1981 Report.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

6/15/81
Date

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

Received in Office of Commission Secretary: 6-11-81, 9:37
Circulated on 48 hour vote basis: 6-11-81, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

June 2, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 JUN 11 A 9: 37

In the Matter of)
)
Life Amendment Political Action) MUR 1103
Committee, Inc.)
Let's All Protect A Child Fund)

GENERAL COUNSEL'S REPORT

On March 18, 1981, the Commission sent interrogatories to counsel for respondent LAPAC, Inc. No response was received within the given time period for submission of answers. On May 7, 1981, in connection with issuance of interrogatories to respondent LAPAC Fund, the Office of General Counsel informed counsel that answers for both his clients were due within 10 days.

As answers have not been forthcoming, the Office of General Counsel recommends that the Commission issue a subpoena to produce documents and an order to answer interrogatories to both respondents in this matter. The Office of General Counsel considers this a necessary measure as respondents have been, and continue to be, unresponsive to Commission inquiries and communications.

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Recommendations

1. Issue to Paul A. Brown on behalf of LAPAC, Inc. an order to answer interrogatories and a subpoena to produce documents.

2. Issue to Sean Morton Downey on behalf of LAPAC Fund an order to answer interrogatories and a subpoena to produce documents.

3. Approve and send the attached letter to counsel for LAPAC, Inc. and LAPAC Fund.

Attachments

1. Two Authorizations to Issue Subpoena/Order
2. Letter to Counsel with Attached Subpoenas/Orders and Interrogatories

6/10/81
Date

Charles N. Steele
General Counsel

8204032106 69

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENA/ORDER

The Commission hereby authorizes the issuance of a subpoena/order to the following person in connection with MUR 1103:

NAME: Paul A. Brown, Director and Treasurer

ADDRESS: Life Amendment Political Action Committee, Inc.
National Press Building
539 14th Street, N.W., Suite 357

CITY, STATE: Washington, D.C. 20045

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Vernon W. Thomson
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

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8204032107 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE SUBPOENA/ORDER

The Commission hereby authorizes the issuance of a subpoena/order to the following person in connection with MUR 1103:

NAME: Sean Morton Downey, Chairman

ADDRESS: LAPAC Fund
National Press Building
539 14th Street, N.W., Suite 339

CITY, STATE: Washington, D.C. 20045

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Vernon W. Thomson
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

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8204032107 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

On March 18, 1981, the Commission sent interrogatories to you to be answered by your client, Paul A. Brown on behalf of LAPAC, Inc., in connection with the above-captioned matter. In addition, on May 7, 1981, the Commission sent interrogatories to you to be answered by Sean Morton Downey on behalf of LAPAC Fund.

As no responses to these interrogatories have been forthcoming, the Commission had issued the attached subpoena/order for each of your clients, LAPAC, Inc. and LAPAC Fund, to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with and assist your clients in the preparation of responses to these subpoenas/orders. However, it is required that your clients submit the information under oath and that they do so within 10 days of your receipt of the subpoenas/orders.

If you have any questions, please direct them to Dolores Pesce at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoenas/Orders
Interrogatories

8204032107 4

Sean Morton Downey, Jr.

INTERROGATORIES

1. Please state your full name and address.

2. Please state your occupation.

In your answers to the Commission's first set of interrogatories submitted by you with letter dated March 26, 1981, you responded in several instances, "I have no knowledge."

3. Do you know who might have knowledge of information sought by the Commission in its first interrogatories or in these supplemental ones for which you have no knowledge?

4. If yes, please state the name and address of the individual.

The following questions relate to the organization called "Lets All Protect A Child Fund" (hereinafter "LAPAC Fund").

5. Have you ever held any position in LAPAC Fund?

6. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

7. Are you chairman of LAPAC Fund at present?

8. If no, please state the name and address of the individual who is chairman at present.

8204032075

9. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1979.

10. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1980.

The following questions relate to a letter signed by you as chairman of LAPAC Fund, dated February 6, 1979, hereto attached as Exhibit A.

11. The letter states that LAPAC Fund "scheduled campaign training schools in all sections of the country for the education and training of pro-lifers."

a. Did LAPAC Fund organize campaign training schools?

b. If yes, please list the location and date for each training school.

c. Please state the name and address of the individual responsible for organizing each of these training schools.

d. What was the purpose of the training schools? Please include a copy of the agenda for each training school, if possible.

e. For each of the training schools, please state whether attendees were given instructions on implementing activities to help elect pro-life candidates.

f. For each of the training schools to which you answered yes in (e), please provide a copy of the instructions if they were in writing. If they were not in writing, please outline the contents of the instructions.

82040321076

12. The letter states that LAPAC Fund publishes the "Report, a comprehensive overview of political information."

a. Please explain what is meant by "political information."

b. Who subscribes to the Report?

c. How do subscribers learn of the existence of the Report?

d. How many subscribers to the Report were there in 1979?

e. What is the subscription fee for the Report?

f. Is this fee a contribution to LAPAC Fund?

g. Has the Report ever contained a solicitation for contributions to LAPAC Fund?

h. If yes, please provide a copy of each issue in which a solicitation appeared.

13. The letter states:

> We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

a. Did LAPAC Fund use any amount of the donations received to make political contributions or expenditures?

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b. If yes, please list the date, amount and nature of each political contribution or expenditure.

The following questions relate to Christian Family Renewal, Inc.

14. Have you ever held any position in Christian Family Renewal, Inc.?

15. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

16. Please state the address of Christian Family Renewal, Inc. and also state the name and address of the principal officer of Christian Family Renewal, Inc.

8204032107 8

LAPAC FUND

Let's All Protect A Child Fund | Suite 339, National Press Building 529 14th Street, Washington, D.C. 20

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

Just recently NBC ran a one hour special on our activities while this past week I appeared on the Phil Donohough show along with my fellow board member Dr. Jack Willke. In addition, PEOPLE magazine has just featured our Director, Paul Brown and his wife Judie in their publication. We are on the move, but we must have your support!

Some of you have already helped the pro-life cause, I know the rest of you are also willing to help.

Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates.

Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing am amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Morton Downey
Chairman

SMD/bb

EXHIBIT A

LAPAC Fund is a division of Christian Family Renewal.
All contributions to the LAPAC FUND are totally tax deductible.

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Life Amendment Political Action Committee
Paul A. Brown

INTERROGATORIES

1. Please answer the following questions regarding the letter signed by Mrs. Penny Dines.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

   f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

   g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

2. Please answer the following questions regarding the letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

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f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

With reference to LAPAC's reports filed with the Federal Election Commission, please answer the following questions.

3. LAPAC's 1979 Year-End Report shows debts totaling $5,000 owed to Judy and Paul Brown.

a. Was this $5,000 amount a loan by the Browns to LAPAC?

b. If so, when did LAPAC receive the loan?

c. Was this $5,000 amount an expenditure by the Browns on behalf of LAPAC?

d. If so, when did the Browns make the expenditure on behalf of LAPAC?

4. LAPAC's 1979 July Report shows a debt of $5,000 owed to Karl Karcher.

a. Was this $5,000 amount a loan by Mr. Karcher to LAPAC?

b. If so, when did LAPAC receive the loan?

c. Was this $5,000 amount an expenditure by Mr. Karcher on behalf of LAPAC?

d. If so, when did Mr. Karcher make the expenditure on behalf of LAPAC?

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5. LAPAC's Year-End Report shows a "Repayment of Loan" expenditure to Security National Bank in the amount of $5,138.08.

   a. Was the $5,138.08 amount a loan by the bank to LAPAC?

   b. If so, when did LAPAC receive the loan?

6. LAPAC's 1980 February Report shows a "Repayment of Loan" expenditure to Robert Lepak in the amount of $2,534.30.

   a. Was the $2,534.30 amount a loan by Mr. Lepak to LAPAC?

   b. If so, when did LAPAC receive the loan and when did it repay the loan to Mr. Lepak?

   c. Was the $2,534.30 amount a loan by LAPAC to Mr. Lepak?

   d. If so, when did LAPAC make the loan and when did LAPAC receive repayment from Mr. Lepak?

7. With regard to LAPAC's April 10, 1979 Quarterly, July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980, February 1980, March 1980, April 1980, May 1980 and June 1980 Reports, please state occupation and principal place of business of contributors where this information was not included in the reports.

8. LAPAC's 1979 April Report shows a loan made to David Osborne in the amount of $3,500 and to Nancy Osborne in the amount of $3,000.

   a. Have the Osbornes repaid the loans to LAPAC?

   b. If yes, when did the Osbornes repay the loan?

   c. Did the Osbornes repay the full amount of each loan?

   d. If no, how much did they repay?

   e. Also, if not repaid in full, please explain the circumstances and conditions under which the loan obligations were extinguished and the consideration therefor.

8204032|082

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 7, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

This letter is to acknowledge your correspondence of March 26, 1981, through which you submitted Answers to Interrogatories on behalf of your client, Let's All Protect A Child Fund.

The Commission seeks further information from your client regarding this matter. Please have your client submit answers to the enclosed interrogatories within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath.

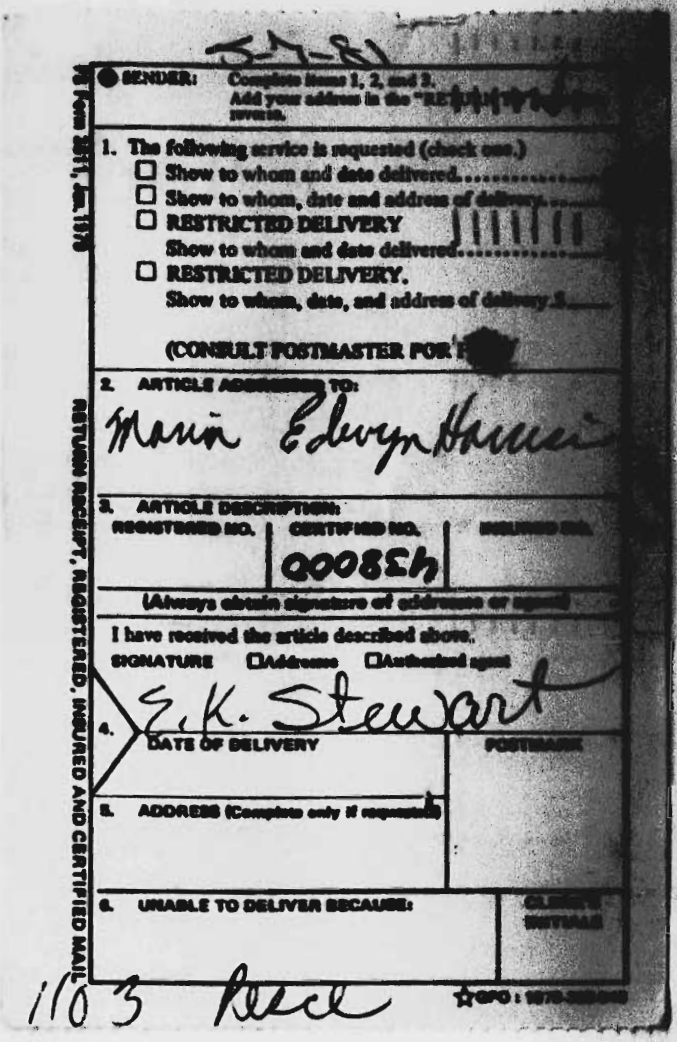
Also, the Commission reminds you that Answers to Interrogatories of another client, LAPAC, Inc., were due on April 2, 1981. Should LAPAC fail to submit the Answers by the end of the above-mentioned ten day period, the Commission will proceed with enforcement without this additional information.

If you have any questions, please contact Dolores Pesce, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8204032|0083



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 FEE)

2. ARTICLE ADDRESSED TO:
Marion Edwyn Harris

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 000854 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
E. K. Stewart

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1103 Rec'd

☆GPO : 1979-

8204032 | 0084

Sean Morton Downey, Jr.

INTERROGATORIES

1. Please state your full name and address.

2. Please state your occupation.

In your answers to the Commission's first set of interrogatories submitted by you with letter dated March 26, 1981, you responded in several instances, "I have no knowledge."

3. Do you know who might have knowledge of information sought by the Commission in its first interrogatories or in these supplemental ones for which you have no knowledge?

4. If yes, please state the name and address of the individual.

The following questions relate to the organization called "Lets All Protect A Child Fund" (hereinafter "LAPAC Fund").

5. Have you ever held any position in LAPAC Fund?

6. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

7. Are you chairman of LAPAC Fund at present?

8. If no, please state the name and address of the individual who is chairman at present.

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9. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1979.

10. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1980.

The following questions relate to a letter signed by you as chairman of LAPAC Fund, dated February 6, 1979, hereto attached as Exhibit A.

11. The letter states that LAPAC Fund "scheduled campaign training schools in all sections of the country for the education and training of pro-lifers."

    a. Did LAPAC Fund organize campaign training schools?

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82040321007

12. The letter states that LAPAC Fund publishes the "Report, a comprehensive overview of political information."

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f. Is this fee a contribution to LAPAC Fund?

g. Has the Report ever contained a solicitation for contributions to LAPAC Fund?

h. If yes, please provide a copy of each issue in which a solicitation appeared.

13. The letter states:

> We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

a. Did LAPAC Fund use any amount of the donations received to make political contributions or expenditures?

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b. If yes, please list the date, amount and nature of each political contribution or expenditure.

The following questions relate to Christian Family Renewal, Inc.

14. Have you ever held any position in Christian Family Renewal, Inc.?

15. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

16. Please state the address of Christian Family Renewal, Inc. and also state the name and address of the principal officer of Christian Family Renewal, Inc.

0204032-0069

LAPAC FUND

et's All Protect A Child Fund Suite 339, National Press Building 529 14th Street, Washington, D.C. 20

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

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Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Morton Downey
Chairman

SMD/bb

EXHIBIT A

LAPAC Fund is a division of Christian Family Renewal.
All contributions to the LAPAC FUND are totally tax deductible.

8204032090

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
Life Amendment Political)
Action Committee, Inc.)
Let's All Protect A Child Fund)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 6, 1981, the Commission decided by a vote of 5-0 to approve and send the letter and interrogatories, as attached to the General Counsel's April 24, 1981 report, to Marion Edwyn Harrison, counsel for LAPAC Fund.

Commissioners Aikens, Harris, Reiche, Thomson and Tiernan voted affirmatively in this matter; Commissioner McGarry did not cast a vote.

Attest:

5/6/81
Date

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

Report Signed; 5-1-81
Received in Office of the Commission Secretary: 5-4-81, 10:45
Circulated on 48 hour vote basis: 5-4-81, 4:00

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

April 24, 1981

81 MAY 4 A10: 45

In the Matter of)
)
Life Amendment Political Action) MUR 1103
Committee, Inc.)
Let's All Protect A Child Fund)

GENERAL COUNSEL'S REPORT

On March 30, 1981, the Office of General Counsel received Answers to Interrogatories of Sean Morton Downey, Jr. on behalf of Let's All Protect A Child Fund ("LAPAC Fund"). The Commission's investigation seeks information on LAPAC Fund's activities to the end of establishing whether LAPAC Fund is a political committee. Mr. Downey's response failed to provide definitive answers to a number of Commission interrogatories. Accordingly, the Office of General Counsel would like to submit additional clarifying interrogatories to Mr. Downey and also request that he state the name of an individual whom the Commission may contact for information he is unable to provide.

8204032109 3

RECOMMENDATION

Approve and send the attached letter and interrogatories to Marion Edwyn Harrison, counsel for LAPAC Fund.

1 May 1981
Date

Charles N. Steele
General Counsel

Attachments
Letter and Interrogatories to Marion Edwyn Harrison

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

This letter is to acknowledge your correspondence of March 26, 1981, through which you submitted Answers to Interrogatories on behalf of your client, Let's All Protect A Child Fund.

The Commission seeks further information from your client regarding this matter. Please have your client submit answers to the enclosed interrogatories within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath.

Also, the Commission reminds you that Answers to Interrogatories of another client, LAPAC, Inc., were due on April 2, 1981. Should LAPAC fail to submit the Answers by the end of the above-mentioned ten day period, the Commission will proceed with enforcement without this additional information.

If you have any questions, please contact Dolores Pesce, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

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Sean Morton Downey, Jr.

INTERROGATORIES

1. Please state your full name and address.

2. Please state your occupation.

In your answers to the Commission's first set of interrogatories submitted by you with letter dated March 26, 1981, you responded in several instances, "I have no knowledge."

3. Do you know who might have knowledge of information sought by the Commission in its first interrogatories or in these supplemental ones for which you have no knowledge?

4. If yes, please state the name and address of the individual.

The following questions relate to the organization called "Lets All Protect A Child Fund" (hereinafter "LAPAC Fund").

5. Have you ever held any position in LAPAC Fund?

6. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

7. Are you chairman of LAPAC Fund at present?

8. If no, please state the name and address of the individual who is chairman at present.

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9. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1979.

10. Please state the name and address of any individual who had access to the financial records of LAPAC Fund in 1980.

The following questions relate to a letter signed by you as chairman of LAPAC Fund, dated February 6, 1979, hereto attached as Exhibit A.

11. The letter states that LAPAC Fund "scheduled campaign training schools in all sections of the country for the education and training of pro-lifers."

    a. Did LAPAC Fund organize campaign training schools?

    b. If yes, please list the location and date for each training school.

    c. Please state the name and address of the individual responsible for organizing each of these training schools.

    d. What was the purpose of the training schools? Please include a copy of the agenda for each training school, if possible.

    e. For each of the training schools, please state whether attendees were given instructions on implementing activities to help elect pro-life candidates.

    f. For each of the training schools to which you answered yes in (e), please provide a copy of the instructions if they were in writing. If they were not in writing, please outline the contents of the instructions.

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12. The letter states that LAPAC Fund publishes the "Report, a comprehensive overview of political information."

a. Please explain what is meant by "political information."

b. Who subscribes to the Report?

c. How do subscribers learn of the existence of the Report?

d. How many subscribers to the Report were there in 1979?

e. What is the subscription fee for the Report?

f. Is this fee a contribution to LAPAC Fund?

g. Has the Report ever contained a solicitation for contributions to LAPAC Fund?

h. If yes, please provide a copy of each issue in which a solicitation appeared.

13. The letter states:

> We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

a. Did LAPAC Fund use any amount of the donations received to make political contributions or expenditures?

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b. If yes, please list the date, amount and nature of each political contribution or expenditure.

The following questions relate to Christian Family Renewal, Inc.

14. Have you ever held any position in Christian Family Renewal, Inc.?

15. If yes, what position(s) have you held? Please give inclusive dates during which you held each position.

16. Please state the address of Christian Family Renewal, Inc. and also state the name and address of the principal officer of Christian Family Renewal, Inc.

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LAPAC FUND

Let's All Protect A Child Fund | Suite 339, National Press Building 529 14th Street, Washington, D.C. 20

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

Just recently NBC ran a one hour special on our activities while this past week I appeared on the Phil Donohough show along with my fellow board member Dr. Jack Willke. In addition, PEOPLE magazine has just featured our Director, Paul Brown and his wife Judie in their publication. We are on the move, but we must have your support!

Some of you have already helped the pro-life cause, I know the rest of you are also willing to help.

Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates.

Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Morton Downey
Chairman

SMD/bb

EXHIBIT A

LAPAC Fund is a division of Christian Family Renewal.
All contributions to the LAPAC FUND are totally tax deductible.

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GEC 4383
+
GEC 4384

BARNETT ALBRA & CASEY
1919 K Street, N.W.
Washington, D.C. 20006

TELEPHONE & TELECOPIER
(202) 785-0500

CABLE ALBAR

TELEX 89-2445

March 26, 1981

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

Re: MUR #1103

Dear Mr. Steele:

We attach Answer to Interrogatories of Sean Morton Downey, Jr., Esquire, subscribed and sworn to before a Notary Public in Clark County, Nevada on January 20, 1981 and received in this office of March 25, 1981.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Dolores Pesce

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
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FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.] MUR 1103

ANSWER TO INTERROGATORIES
OF SEAN MORTON DOWNEY, JR., ESQUIRE

I. A. What is the purpose or goal of Let's All Protect A Child Fund ("LAPAC Fund")? Please explain.

Educational. It is a division of Christian Family Renewal, Inc., upon information and belief an Oregon nonprofit corporation.

B. What kind of activities are sponsored by LAPAC Fund? Please explain.

LAPAC Fund once sponsored an educational conference. I am aware of nothing else LAPAC Fund has done.

C. Is LAPAC Fund incorporated? If so, where, and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

No.

D. Is LAPAC Fund a nonprofit organization? Please provide documentation.

See IA, above.

E. Is LAPAC Fund a membership organization?

No.

1. If so, who can become a member?

Not applicable.

2. How does someone become a member?

Not applicable.

3. Must members pay dues?

Not applicable.

II. A. Attached is a copy of a letter from LAPAC Fund dated February 1979 and signed by you. From this letter it appears that LAPAC Fund is soliciting contributions. Is LAPAC Fund soliciting contributions?

No letter is attached.

1. If so, from whom is LAPAC Fund soliciting contributions?

See IIA, above.

2. Has LAPAC Fund received contributions?

I have no knowledge.

a. If so, what is the total amount of contributions LAPAC Fund has received?

I have no knowledge.

b. Over what period of time?

I have no knowledge.

III. Has LAPAC Fund made any expenditures?

I have no knowledge.

A. If so, what is the total amount of expenditures LAPAC Fund has made?

I have no knowledge.

B. Over what period of time?

I have no knowledge.

C. Has LAPAC Fund made any contributions to candidates for office?

Upon information and belief, no.

1. If so, please list the candidates and the offices sought.

Not applicable.

IV. LAPAC Fund and Life Amendment PAC have the same address. You serve as Chairman of both committees.

A. Is there connection or affiliation between either or both committees and any other committees or organizations? Please explain.

No.

B. Is there a connection or affiliation between either or both committees and any other committees or organizations? Please explain.

LAPAC Fund is a division of Christian Family Renewal, Inc., upon information and belief an Oregon nonprofit corporation. There is no connection between LAPAC Fund and Life Amendment Political Action Committee, Inc. and no connection between Life Amendment Political Action Committee, Inc. and Christian Family Renewal, Inc.

V. A. What is the purpose or goal of Christian Family Renewal? Please explain.

Educational.

B. What kinds of activities are sponsored by Christian Family Renewal? Please explain.

Educational.

C. Is Christian Family Renewal incorporated?

Upon information and belief, yes.

1. If so, where and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

I have acess to no such documentation.

D. Is Christian Family Renewal a non-profit organization? If so, please provide documentation.

Upon information and belief, yes. However, I have access to no such documentation.

E. Is Christian Family Renewal a membership organization?

Upon information and belief, no.

1. If so, who can become a member?

Not applicable.

2. How does someone become a member.

Not applicable.

3. Must members pay dues?

Not applicable.

F. Has Christian Family Renewal made any contributions to candidates for office?

Upon information and belief, no.

1. If so, please list the candidates and the offices sought.

Not applicable.

G. Is LAPAC Fund the separate segregated fund of Christian Family Renewal?

No. Upon information and belief, neither has anything to do with politics or political contributions.

SEAN MORTON DOWNEY, JR.

STATE OF NEVADA]
COUNTY OF CLARK] ss.

Subscribed and sworn to before me, a Notary Public, this 30th day of January, 1981.

Notary Public

My commission expires July 27, 1981.

BEVERLY J. WELCH
NOTARY PUBLIC - STATE OF NEVADA
COUNTY OF CLARK
My Appointment Expires July 27

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

RECEIVED
U.S. POSTAGE
WASHINGTON D. C.
81 MAR 30 P 3:47
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1271708

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

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

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FEDERAL ELECTION COMMISSION
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Ms. Dolores Pesce
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

8204032108

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

This letter is to acknowledge your correspondence of February 4, 1981, through which you submitted Answers to Interrogatories on behalf of your client, Life Amendment Political Action Committee, Inc.

The Commission seeks further information from your client regarding this matter. Please have your client submit answers to the enclosed interrogatories within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath. We have also enclosed Federal Election Commission Form 3X on which your client should indicate any amendments to reports previously filed with the Commission.

If you have any questions, please contact Dolores Pesce, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8204032109

3-1881

PS Form 3811, Jan. 1979

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:
Marion E. Hamlin

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	LCh6H6	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

E.K. Stewart

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1103 Peck

☆GPO : 1979-289-847

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

3/12/81

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

Dear Mr. Harrison:

This letter is to acknowledge your correspondence of February 4, 1981, through which you submitted Answers to Interrogatories on behalf of your client, Life Amendment Political Action Committee, Inc.

The Commission seeks further information from your client regarding this matter. Please have your client submit answers to the enclosed interrogatories within ten days of receipt of this letter. Where appropriate, statements should be submitted under oath. We have also enclosed Federal Election Commission Form 3X on which your client should indicate any amendments to reports previously filed with the Commission.

If you have any questions, please contact Dolores Pesce, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

2040321111

Life Amendment Political Action Committee
Paul A. Brown

INTERROGATORIES

1. Please answer the following questions regarding the letter signed by Mrs. Penny Dines.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

   f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

   g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

2. Please answer the following questions regarding the letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson.

   a. What was the cost of printing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

   d. What was the cost of mailing this letter? (Please provide verification for this expenditure in the form of an invoice, cancelled check, etc.)

   e. Were any copies of the letter distributed by means other than mail?

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f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

With reference to LAPAC's reports filed with the Federal Election Commission, please answer the following questions.

3. LAPAC's 1979 Year-End Report shows debts totaling $5,000 owed to Judy and Paul Brown.

   a. Was this $5,000 amount a loan by the Browns to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by the Browns on behalf of LAPAC?

   d. If so, when did the Browns make the expenditure on behalf of LAPAC?

4. LAPAC's 1979 July Report shows a debt of $5,000 owed to Karl Karcher.

   a. Was this $5,000 amount a loan by Mr. Karcher to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by Mr. Karcher on behalf of LAPAC?

   d. If so, when did Mr. Karcher make the expenditure on behalf of LAPAC?

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5. LAPAC's Year-End Report shows a "Repayment of Loan" expenditure to Security National Bank in the amount of $5,138.08.

   a. Was the $5,138.08 amount a loan by the bank to LAPAC?

   b. If so, when did LAPAC receive the loan?

6. LAPAC's 1980 February Report shows a "Repayment of Loan" expenditure to Robert Lepak in the amount of $2,534.30.

   a. Was the $2,534.30 amount a loan by Mr. Lepak to LAPAC?

   b. If so, when did LAPAC receive the loan and when did it repay the loan to Mr. Lepak?

   c. Was the $2,534.30 amount a loan by LAPAC to Mr. Lepak?

   d. If so, when did LAPAC make the loan and when did LAPAC receive repayment from Mr. Lepak?

7. With regard to LAPAC's April 10, 1979 Quarterly, July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980, February 1980, March 1980, April 1980, May 1980 and June 1980 Reports, please state occupation and principal place of business of contributors where this information was not included in the reports.

8. LAPAC's 1979 April Report shows a loan made to David Osborne in the amount of $3,500 and to Nancy Osborne in the amount of $3,000.

   a. Have the Osbornes repaid the loans to LAPAC?

   b. If yes, when did the Osbornes repay the loan?

   c. Did the Osbornes repay the full amount of each loan?

   d. If no, how much did they repay?

   e. Also, if not repaid in full, please explain the circumstances and conditions under which the loan obligations were extinguished and the consideration therefor.

8204032114

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1103
National Right to Life Committee, Inc.	)	
Life Amendment Political Action Committee, Inc.	)	
Let's All Protect A Child Fund	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 16, 1981 the Commission decided by a vote of 4-0 to approve and send the letter and interrogatories, as attached to the General Counsel's March 5, 1981 report, to Marion Edwyn Harrison, counsel for LAPAC.

Commissioners Aikens, Harris, McGarry and Tiernan voted affirmatively in this matter.

Attest:

3-16-81
Date

Marjorie W. Emmons
Secretary to the Commission

Report signed: 3-11-81
Received in Office of the Commission Secretary: 3-11-81, 5:03
Circulated on 48 hour vote basis: 3-12-81, 11:00

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[redacted]

BEFORE THE FEDERAL ELECTION COMMISSION

March 5, 1981

In the Matter of	)	
	)	
National Right to Life Committee, Inc.	)	MUR 1103
Life Amendment Political Action Committee, Inc.	)	
Let's All Protect A Child Fund	)	

81 MAR 11 P5:

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

GENERAL COUNSEL'S REPORT

On November 18, 1980, the Commission made reason to believe findings concerning respondents Life Amendment Political Action Committee, Inc. (hereinafter "LAPAC") and Let's All Protect A Child Fund (hereinafter "LAPAC Fund"). The Commission notified both respondents of its reason to believe finding by letter dated November 19, 1980; interrogatories were sent to both respondents at that time.

On December 17, 1980, the Commission approved a 20 day extension of time for response to interrogatories, requested by Paul A. Brown on behalf of both LAPAC and LAPAC Fund. On Decmeber 19, 1980, the Commission received a letter from Marion Edwyn Harrison, counsel for LAPAC, stating he would submit Answers to Interrogatories upon review of this matter. The Commission received Answers to Interrogatories from Mr. Harrison on behalf of LAPAC on February 4, 1981. In the same correspondence, Mr. Harrison stated he would submit answers on behalf of LAPAC Fund as soon as he received them from his client.

The Office of General Counsel's examination of LAPAC's Answers to Interrogatories indicates that further information

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is required before proceeding in this matter. Accordingly, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories to counsel for LAPAC.

Recommendation

Approve and send the attached letter and interrogatories to Marion Edwyn Harrison, counsel for LAPAC.

11 March 1981
Date

Charles N. Steele
General Counsel

Attachments
Letter and Interrogatories to Counsel for LAPAC

8204032111 8

Attachment 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1103

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If you have any questions, please contact Dolores Pesce, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8204032111119

Life Amendment Political Action Committee
Paul A. Brown

INTERROGATORIES

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   b. How many copies of the letter were printed?

   c. How many copies of the letter were mailed?

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   e. Were any copies of the letter distributed by means other than mail?

   f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

   g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

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   e. Were any copies of the letter distributed by means other than mail?

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f. If so, how many? (Please discuss the means of distribution and document any expenditures incurred in the distribution.)

g. Please explain and document any other expenditures, besides those for printing and distribution, which LAPAC incurred with regard to this letter.

With reference to LAPAC's reports filed with the Federal Election Commission, please answer the following questions.

3. LAPAC's 1979 Year-End Report shows debts totaling $5,000 owed to Judy and Paul Brown.

   a. Was this $5,000 amount a loan by the Browns to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by the Browns on behalf of LAPAC?

   d. If so, when did the Browns make the expenditure on behalf of LAPAC?

4. LAPAC's 1979 July Report shows a debt of $5,000 owed to Karl Karcher.

   a. Was this $5,000 amount a loan by Mr. Karcher to LAPAC?

   b. If so, when did LAPAC receive the loan?

   c. Was this $5,000 amount an expenditure by Mr. Karcher on behalf of LAPAC?

   d. If so, when did Mr. Karcher make the expenditure on behalf of LAPAC?

82040321121

8204032122

5. LAPAC's Year-End Report shows a "Repayment of Loan" expenditure to Security National Bank in the amount of $5,138.08.

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   a. Was the $2,534.30 amount a loan by Mr. Lepak to LAPAC?

   b. If so, when did LAPAC receive the loan and when did it repay the loan to Mr. Lepak?

   c. Was the $2,534.30 amount a loan by LAPAC to Mr. Lepak?

   d. If so, when did LAPAC make the loan and when did LAPAC receive repayment from Mr. Lepak?

7. With regard to LAPAC's April 10, 1979 Quarterly, July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980, February 1980, March 1980, April 1980, May 1980 and June 1980 Reports, please state occupation and principal place of business of contributors where this information was not included in the reports.

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   a. Have the Osbornes repaid the loans to LAPAC?

   b. If yes, when did the Osbornes repay the loan?

   c. Did the Osbornes repay the full amount of each loan?

   d. If no, how much did they repay?

   e. Also, if not repaid in full, please explain the circumstances and conditions under which the loan obligations were extinguished and the consideration therefor.

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-5572
CABLE ALL OFFICES ALBAR

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
RUDY YESSIN***
MICHAEL E. LANNON*
ST. JOHN BARRETT
RICHARD A. GLADSTONE
CHARLES DAWSON BARNETT*
GREGORY S. DICKENSON**
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOSEPH L. HAMILTON*
JOHN S. KECK*
JOHN B. LYNN
HUGH MacMILLAN, JR.**
IVAN H. RICH, JR.*
JACK E. RUCK*
JOHN F. SHERLOCK III
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1179
LOUISVILLE, KENTUCKY 40201
(502) 585-6131

BARNETT, ALAGIA & PROSPERI**
249 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
(305) 832-2886

BARNETT, ALAGIA & YESSIN***
P.O. DRAWER B
FRANKFORT, KENTUCKY 40601
(502) 227-7326

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
JAMES L. COORSSEN*
PATRICIA C. ANDERSON
STEVEN G. BOLTON***
FRANKLIN DRAKE*
JOHN E. EVANS*
RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
DONALD F. MINTMIRE
JEFFREY S. RITTER*

OF COUNSEL
RUFUS E. WILSON

February 4, 1981

By hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

Re: MUR 1103

Dear Mr. Steele:

We submit herewith Answers to Interrogatories of Mr. Paul A. Brown, Treasurer, Life Amendment Political Action Committee, Inc.

We shall submit the Answers of Mr. Sean Morton Downey, Jr., when we receive them. He lives in the West and evidently has been traveling.

We shall submit a further response at that time.

Sincerely,

Mary Cheryl Matheis

for MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
81 FEB 4 P3:43

5204032123

2040321120

FEDERAL ELECTION COMMISSION

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.] MUR 1103

ANSWER TO INTERROGATORIES
OF MR. PAUL A. BROWN

1. Attached is a copy of a letter signed by Mrs. Penny Dines. In the letter, Mrs. Dines states that Sean Morton Downey, Chairman of Life Amendment Political Action Committee, Inc., asked her to write the letter explaining why people should support Life Amendment PAC.

a. Did Mr. Downey ask Mrs. Dines to write this letter?

Upon information and belief, yes.

i. If so, on whose behalf was the letter written? Please explain.

Life Amendment Political Action Committee, Inc. ("LAPAC").

ii. For what purpose was the letter written? Please explain.

To solicit funds for LAPAC.

iii. Who paid for the printing and mailing of this letter?

LAPAC.

iv. To whom was the letter sent?

A selected LAPAC list.

2. Attached is a copy of a letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson, Chairman and Advisory Chairman of Life Amendment PAC. The postscript at the end of the letter advocates the election of Don Lyon for the 16th Congressional District of Illinois.

a. Was this communication authorized by the candidate, Don Lyon?

Upon information and belief, no.

b. Did LAPAC make the expenditure for the letter?

Yes.

3. Life Amendment PAC and Let's All Protect A Child Fund (LAPAC Fund) have the same address. Mr. Downey serves as Chairman of both committees.

a. Is there a connection or affiliation between the two committees? Please explain.

No.

b. Is there a connection or affiliation between either or both of these committees and any other committees or organizations? Please explain.

LAPAC is wholly independent and has no connection with any other organization.

Let's All Protect A Child Fund is a division of Christian Family Renewal, Inc., an Oregon corporation. There is not now, and never has been, any connection between LAPAC and Let's All Protect A Child Fund. It is my understanding that at one point in time Mr. Sean Morton Downey, Jr. was listed as Chairman of that fund. His activity in that regard, if any, had, and has, nothing to do with LAPAC.

PAUL A. BROWN

DISTRICT OF COLUMBIA]
CITY OF WASHINGTON] ss.

Subscribed and sworn to before me, a Notary Public, this 31st day of January, 1981.

PAMELA L. VENNERDROW
Notary Public

My commission expires Apr. 14, 1984.

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

820403 0112

By hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

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

2004031128

By hand

Ms. Michele D. Brown
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20045

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 18, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Brown, Treasurer
Life Amendment Political
Action Committee, Inc.
529 14th Street, N.W.
Suite 357
Washington, D.C. 20045

Re: MUR 1103

Dear Mr. Brown:

On December 17, 1980, the Commission approved your request on behalf of Life Amendment PAC, Inc. and Let's All Protect A Child Fund for a 20 day extension of time in which to respond to the Commission's reason to believe notification. Your response was originally due on December 1, 1980. You have been given 20 additional days in which to respond, therefore, your response should be submitted to the Commission by December 22, 1980.

Sincerely,

Charles N. Steele
General Counsel

8204032129

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Brown, Treasurer
Life Amendment Political
Action Committee, Inc.
529 14th Street, N.W.
Suite 357
Washington, D.C. 20045

Re: MUR 1103

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Sincerely,

Charles N. Steele
General Counsel

mb 12/18/80

8204032 1130

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1103
Life Amendment PAC, Inc.)
Let's All Protect A Child Fund)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 17, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1103:

1. Grant the Life Amendment PAC, Inc., and Let's All Protect A Child Fund an extension of time until December 22, 1980, in which to respond to the Commission's reason to believe finding.

2. Send the letter to Paul A. Brown as submitted with the General Counsel's December 12, 1980 memorandum.

Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan voted affirmatively.

Attest:

12-18-80
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 12-12-80, 4:35
Circulated on 48 hour vote basis: 12-15-80, 4:00

6204032-13

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1980

1980 DEC 12 P4:35

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time MUR 1103

Attached is a copy of a letter from Mr. Paul A. Brown, treasurer of Life Amendment PAC, Inc. Mr. Brown requests a 20 day extension of time in which to respond to the Commission's reason to believe finding. He makes this request because Life Amendment PAC, Inc. has just moved its office and he is presently pulling together information the Commission requested. He states also that he signed for the letter addressed to Sean Morton Downey of Let's All Protect A Child Fund and will be responding to that letter also.

The Office of General Counsel recommends that the Commission approve Mr. Brown's request for a 20 day extension of time in which to respond to the reason to believe notification. Mr. Brown's response was originally due on December 1, 1980. Therefore, his response should be submitted by December 22, 1980.

Recommendation

The Office of General Counsel recommends:

1) that Life Amendment PAC, Inc. and Let's All Protect A Child Fund be granted an extension of time until December 22, 1980, in which to respond to the Commission's reason to believe finding; and,

2) that the attached letter be sent to Paul A. Brown.

Attachments
Letter from Paul A. Brown
Letter to Paul A. Brown

8204032113

ACCT 34984 M. Brown

LIFE AMENDMENT POLITICAL ACTION COMMITTEE

P.O. Box 14263 • Ben Franklin Station, Washington, D.C. 20044
Suite 357 • 529 - 14th Street, N.W., Washington, D.C. 20045
Phone: (202) 638-3961

December 1, 1980

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
80 DEC 5 AM 11:31

Mr. John Warren McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. McGarry:

SUBJECT: MUR 1103

This is in response to your letter of November 19th in the above-cited matter.

Please be advised that we are currently discussing the matter with our attorney and securing the information that was requested.

However, due to the fact that LAPAC has been in the process of moving its offices, and in fact, moved just this past week-end, we herewith request an additional 20 days extension to respond.

We appreciate your understanding of the rather confused situation we face as a result of the move and look forward to your response.

Sincerely,

Paul A. Brown
Treasurer/Director

P.S. This will also serve as a response to the letter on the same subject addressed to Mr. Sean Morton Downey, which was signed for by me.

"Protecting the American Family and the Preborn Child...
Through Political Action!"

Authorized and paid for by LAPAC, Inc., Paul A. Brown, Treasurer

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Brown, Treasurer
Life Amendment Political
Action Committee, Inc.
529 14th Street, N.W.
Suite 357
Washington, D.C. 20045

Re: MUR 1103

Dear Mr. Brown:

On , 1980, the Commission approved your request on behalf of Life Amendment PAC, Inc. and Let's All Protect A Child Fund for a 20 day extension of time in which to respond to the Commission's reason to believe notification. Your response was originally due on December 1, 1980. You have been given 20 additional days in which to respond, therefore, your response should be submitted to the Commission by December 22, 1980.

Sincerely,

Charles N. Steele
General Counsel

8204032135

RECEIVED
GCC 3604
80 DEC 19 A 9:14

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-5572
CABLE ALL OFFICES ALBAR

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1170
LOUISVILLE, KENTUCKY 40201
(502) 585-4131

BARNETT, ALAGIA & PROSPERI**
240 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
(305) 832-8880

BARNETT, ALAGIA & YESSIN***
P.O. DRAWER B
FRANKFORT, KENTUCKY 40601
(502) 227-7269

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
RUDY YESSIN***
MICHAEL E. LANNON*
ST. JOHN BARRETT
RICHARD A. GLADSTONE
CHARLES DAWSON BARNETT*
GREGORY B. DICKENSON**
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOSEPH L. HAMILTON*
JOHN S. KECK*
JOHN B. LYNN
HUGH MacMILLAN, JR.**
IVAN H. RICH, JR.*
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RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
DONALD F. MINTMIRE
JEFFREY S. RITTER*

OF COUNSEL
RUFUS E. WILSON

December 16, 1980

80 DEC 19 A 9:36
OFFICE OF GENERAL COUNSEL

8204032136

John Warren McGarry, Esquire
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 1103

Dear Mr. McGarry:

We have just received from our client Life Amendment Political Action Committee, Inc. ("LAPAC") your letter to LAPAC dated November 19, 1980.

Your letter shows a copy to me but, in fact, I received no copy.

MUR 1103 has been dormant since I wrote to Charles N. Steele, Esquire, General Counsel, Federal Election Commission, under date of February 29. Under date of February 26, 1980 I requested specificity. The Federal Election Commission never responded.

LAPAC naturally assumed upon receiving your November 19 letter that, a copy having been sent to me, I was attending to the matter.

RECEIVED
80 DEC 19 A 8:14

BARNETT, ALAGIA & CAREY

I am just leaving for the taking of an extensive deposition in New York and will respond substantively as soon as I return and can review this long dormant file.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

8204032137

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FEC
3600
80 DEC 18 P12:33

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 785-5572
CABLE ALL OFFICES ALBAR

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN S. SOLOMON*
RUDY YESSIN***
MICHAEL E. LAMMON*
ST. JOHN BARRETT
RICHARD A. GLADSTONE
CHARLES DAWSON BARNETT*
GREGORY S. DICKENSON**
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOSEPH L. HAMILTON*
JOHN S. KECK*
JOHN S. LYNN
HUGH MacMILLAN, JR.**
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JACK E. RUCK*
JOHN F. SHERLOCK III
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1170
LOUISVILLE, KENTUCKY 40201
(502) 589-5121

BARNETT, ALAGIA & PROSPERI**
240 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
(305) 820-8888

BARNETT, ALAGIA & YESSIN***
P.O. DRAWER B
FRANKFORT, KENTUCKY 40601
(502) 227-7220

BERNARD H. BARNETT
HARRISON GRIFFIN HARRISON
RICHARD M. TRAUTWEIN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
JAMES L. COOPERSON*
PATRICIA C. ANDERSON
STEVEN G. SOLTON***
FRANKLIN DRAKE*
JOHN S. EVANS*
RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
DONALD F. MINTMIRE
JEFFREY S. RITTER*

OF COUNSEL
RUFUS E. WILSON

December 16, 1980

8204032113 8

John Warren McGarry, Esquire
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 1103

Dear Mr. McGarry:

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LAPAC naturally assumed upon receiving your November 19 letter that, a copy having been sent to me, I was attending to the matter.

80 DEC 18 P3:23
GENERAL COUNSEL
RECEIVED

I am just leaving for the taking of an extensive deposition in New York and will respond substantively as soon as I return and can review this long dormant file.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

8204032139

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

8204013140

WASHINGTON DC
17 DEC 1980
PM

THE WHITE HOUSE
180TH ANNIVERSARY
1800 - 1980
D.C.

John Warren McGarry, Esquire
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

DEC 19 A8:49

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

9204032 14

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

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1990 DEC 18 PM 12:34
FEC

LIFE AMENDMENT POLITICAL ACTION COMMITTEE

P.O. Box 14263 • Ben Franklin Station, Washington, D.C. 20044
Suite 357 • 529 - 14th Street, N.W., Washington, D.C. 20045
Phone: (202) 638-3961

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
80 DEC 5 AM 11:31

December 1, 1980

Mr. John Warren McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. McGarry:

SUBJECT: MUR 1103

This is in response to your letter of November 19th in the above-cited matter.

Please be advised that we are currently discussing the matter with our attorney and securing the information that was requested.

However, due to the fact that LAPAC has been in the process of moving its offices, and in fact, moved just this past week-end, we herewith request an additional 20 days extension to respond.

We appreciate your understanding of the rather confused situation we face as a result of the move and look forward to your response.

Sincerely,

Paul A. Brown
Treasurer/Director

P.S. This will also serve as a response to the letter on the same subject addressed to Mr. Sean Morton Downey, which was signed for by me.

8204032142

"Protecting the American Family and the Preborn Child...
Through Political Action!"

Authorized and paid for by LAPAC, Inc., Paul A. Brown, Treasurer

LIFE AMENDMENT POLITICAL
ACTION COMMITTEE, INC.
BENJAMIN FRANKLIN STATION
P.O. BOX 14263
WASHINGTON, D C 20044

82040322114

Forward to Office of General Counsel

Mr. John Warren McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

USA 15¢

RECEIVED
80 DEC 4 AM 11:40

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey
Suite 339
National Press Building
529 14th Street, N.W.
Washington, D.C. 20045

Re: MUR: 1103

Dear Mr. Downey:

The Federal Election Commission notified you on January 25, 1980, of a complaint which alleges that your committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to you at that time. As of this date, we have received no response from you in this matter.

Upon further review of the allegations contained in the complaint, the Commission on November 18, 1980, determined that there is reason to believe that your committee has violated 2 U.S.C. §§ 433 and 434. Specifically, it appears that Let's All Protect A Child Fund is a political committee as defined by 2 U.S.C. § 431(d),1/ and therefore, should have filed a Statement of Organization and disclosure reports as required by 2 U.S.C. § 433 and § 434. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission also requests that you answer the interrogatories which are enclosed with this letter. Please submit your answers within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

1/ As the alleged violations occurred before the Federal Election Campaign Act was amended on January 8, 1980, by Pub. L. 96-187, all citations to the Act pertaining to the violations are to the Act as it existed before being amended.

8204032144

In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and any other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A).2/

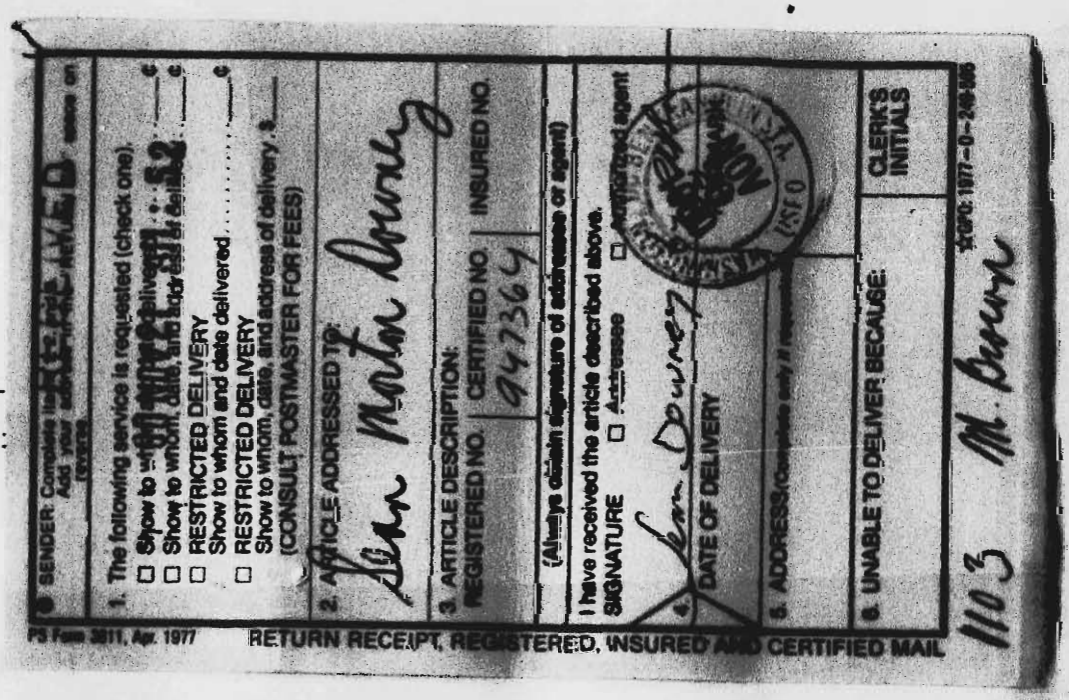
If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

JOHN WARREN McGARRY
Vice-Chairman

Enclosure

Interrogatories



2/ Th:

8204032145

FEDERAL ELECTION COMMISSION

Sean Morton Downey MUR 1103

INTERROGATORIES

I. A. What is the purpose or goal of Let's All Protect A Child Fund ("LAPAC Fund")? Please explain.

B. What kind of activities are sponsored by LAPAC Fund? Please explain.

C. Is LAPAC Fund incorporated? If so, where, and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

D. Is LAPAC Fund a non-profit organization? Please provide documentation.

E. Is LAPAC Fund a membership organization?

1. If so, who can become a member?

2. How does someone become a member?

3. Must members pay dues?

II. A. Attached is a copy of a letter from LAPAC Fund dated February 1979 and signed by you. Form this letter it appears that LAPAC Fund is soliciting contributions. Is LAPAC Fund soliciting contributions?

1. If so, from whom is LAPAC Fund soliciting contributions?

2. Has LAPAC Fund received contributions?

a. If so, what is the total amount of contributions LAPAC Fund has received?

b. Over what period of time?

8204032146

III. Has LAPAC Fund made any expenditures?

A. If so, what is the total amount of expenditures LAPAC Fund has made?

B. Over what period of time?

C. Has LAPAC Fund made any contributions to candidates for office?

1. If so, please list the candidates and the offices sought.

IV. LAPAC Fund and Life Amendment PAC have the same address. You serve as Chairman of both committees.

A. Is there connection or affiliation between the two committees? Please explain.

B. Is there a connection or affiliation between either or both committees and any other committees or organizations? Please explain.

V. A. What is the purpose or goal of Christian Family Renewal? Please explain.

B. What kinds of activities are sponsored by Christian Family Renewal? Please explain.

C. Is Christian Family Renewal incorporated?

1. If so, where and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

8204032147

D. Is Christian Family Renewal a non-profit organization? If so, please provide documentation.

E. Is Christian Family Renewal a membership organization?

1. If so, who can become a member?

2. How does someone become a member?

3. Must members pay dues?

F. Has Christian Family Renewal made any contributions to candidates for office?

1. If so, please list the candidates and the offices sought.

G. Is LAPAC Fund the separate segregated fund of Christian Family Renewal?

8204032148

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Brown, Director
and Treasurer
Life Amendment Political
Action Committee
National Press Building
529 14th Street, N.W., Suite 357
Washington, D.C. 20045

Re: MUR 1103

Dear Mr. Brown:

The Federal Election Commission notified Sean Morton Downey, also a Director of your committee, on January 25, 1980, of a complaint which alleges that your committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to him at that time.

Upon further review of the allegations contained in the complaint, the Commission, on November 18, 1980 determined that there is reason to believe that Life Amendment PAC has violated 2 U.S.C. § 435(b)1/ by its omission of a notice on the solicitation letter signed by Mrs. Penny Dines, § 441d by its omission of an authorization or non-authorization statement on a letter signed by Mildred Jefferson and Mr. Downey (copies of these letters are enclosed); § 434(b)(2)(presently 2 U.S.C. § 434(b)(3)(A) and § 431(13)(A)) by its failure to report occupations and principal places of business; § 434(b)(12) (presently 2 U.S.C. § 434(b)(8)) by its failure to continuously report debts and obligations until extinguished or to report the circumstances and conditions of the extinguishment of the debt; and § 434(b)(5) (presently 2 U.S.C. § 434(b)(3)(E)) by

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1/ As the alleged violations occurred before the Federal Election Campaign Act was amended on January 8, 1980, by Pub. Law 96-187, all citations to the Act pertaining to violations are to the Act as it existed before being amended.

8204032149

its failure to report loans from Karl Karcher, Judy Brown, Security National Bank, Robert Lepak, and yourself, or § 434(b)(9) (presently 2 U.S.C. § 434(b)(5)(A)) by its failure to report expenditures made by Karl Karcher, Judy Brown and yourself on behalf of the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission also requests that you answer the interrogatories which are enclosed with this letter. Please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

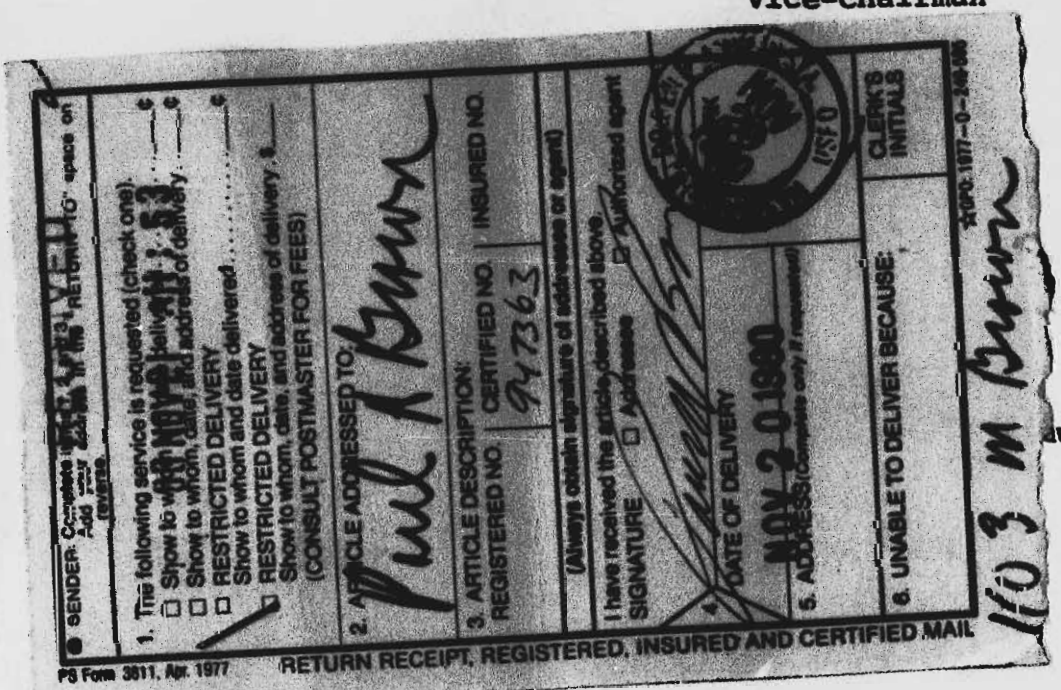
In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)2/.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

JOHN WARREN McGARRY
Vice-Chairman



aw 96-187.

FEDERAL ELECTION COMMISSION

Paul A. Brown MUR 1103

INTERROGATORIES

1. Attached is a copy of a letter signed by Mrs. Penny Dines. In the letter, Mrs. Dines states that Sean Morton Downey, Chairman of Life Amendment Political Action Committee, Inc., asked her to write the letter explaining why people should support Life Amendment PAC.

   a. Did Mr. Downey ask Mrs. Dines to write this letter?

      i. If so, on whose behalf was the letter written? Please explain.

      ii. For what purpose was the letter written? Please explain.

      iii. Who paid for the printing and mailing of this letter?

      iv. To whom was the letter sent?

2. Attached is a copy of a letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson, Chairman and Advisory Chairmain of Life Amendment PAC. The postscript at the end of the letter advocates the election of Don Lyon for the 16th Congressional District of Illinois.

   a. Was this communication authorized by the candidate, Don Lyon?

   b. Did LAPAC make the expenditure for the letter?

3. Life Amendment PAC and Let's All Protect A Child Fund (LAPAC Fund) have the same address. Mr. Downey serves as Chairman of both committees.

   a. Is there a connection or affiliation between the two committees? Please explain.

   b. Is there a connection or affiliation between either or both of these committees and any other committees or organizations? Please explain.

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MRS. PENNY DINES
RENO, NEVADA

OCT 22 REC'D

Dear Friend:

I am writing to you because of my involvement with a pro-life organization dedicated to electing pro-life officials to public office. The organization is the Life Amendment Political Action Committee, Inc.

A few months ago I received a letter from LAPAC telling about the gains they made last fall in getting many more pro-life candidates elected to Congress. It was very encouraging. Finally, I thought, the tide seems to be turning in our favor, and I was helping, if only in a small way.

The letter went on to explain why it was so important to keep the momentum going, looking ahead to more races coming up. But of course this would take money and the Committee was depending on its supporters to provide necessary funds.

Unfortunately, I was already over my household budget for the month, and we were really feeling the "pinch." (As any housewife knows, trying to stick to a food budget these days is no easy task!) But I did manage to scrape together a few dollars which I sent, along with a short note saying how I wished it could be more...that I really believed LAPAC was performing a crucial role in the whole pro-life fight...and that I hoped others felt the same way I did.

About a week later, I received a call (right in the middle of doing the children's laundry!) from Sean Morton Downey, Jr., Chairman of LAPAC's Board of Directors. He said he had read my letter and was very moved by it.

"Would you be willing," he asked, "to write a similar letter, explaining in you own words why people should support LAPAC?" I was silent for a minute. Then I asked, "You mean like a 'one contributor to another' kind of letter?"

"Exactly," he answered.

Well, after giving all my reasons why I wasn't

capable, that these things were better left to professionals, etc...Sean would hear none of it. (He is a very persuasive person--thank goodness he's on our side!)

Anyway, here I am sitting at my old Royal typewriter, wondering what to write next. It would be so much easier if we could just sit down over a cup of coffee and talk about it.

Since that isn't possible, I'll get to the heart of the matter right away.

Why do I support LAPAC? There are many other worthy organizations devoted to the pro-life cause. As much as I'd like to, I simply can't support all of them. I chose LAPAC because the abortion issue, rightly or wrongly, has become a political issue, and it will be decided in the political arena, at the state and federal levels.

LAPAC, it seems to me, is the perfect vehicle to fight our fight. It is a political action committee, solely dedicated to electing pro-life candidates who will actively support the single most important goal of LAPAC -- the passage of the Human Life Amendment to our Constitution.

And LAPAC is making solid progress. More and more LAPAC-supported candidates are getting sent to Congress. Last fall, they helped elect 37 to do the battle for us. And their effect is already being felt.

Just recently I read in the newspaper that Medicaid-funded abortions were cut by an astounding 99% as a result of the Hyde amendment banning federal funding of "abortions on demand." In terms of actual lives saved, it means 200,000 babies were born in the last 11 months who would otherwise have been aborted. Praise the Lord!

But all is not rosy. Many states -- big ones, like New York, New Jersey, Pennsylvania, Illinois, Michigan, California -- are using their own money to allow the killing to continue because the Hyde amendment only applies to federal funding.

Which means probably well over 1,000,000 babies will be killed this year! And we still don't have enough pro-life votes in Congress to produce the 2/3 majority needed to pass the Human Life Amendment -- the only measure that will effectively stop the killings.

So we can't sit back and rest on our laurels. Not for a minute.

LAPAC doesn't plan to. LAPAC was instrumental in two congressional elections on April 3, 1979 in California and Wisconsin, and I am thrilled to report that both pro-life challengers won their elections. The one in California where the pro-lifer won by a stunning landslide was where LAPAC was most active. Another special election will soon be held in Illinois and LAPAC will be active again...if we all help them now.

LAPAC also has targeted for defeat some of the major obstacles to the passage of our Human Life Amendment. I'm speaking of influential senators like George McGovern, Birch Bayh, Bob Packwood, Frank Church, and others. The more pressure LAPAC is able to put on these politicians over the coming months, the more chance we have of either changing their minds or defeating them come election time.

But none of this can be accomplished without funds, and LAPAC used what little they had last fall in helping to elect 37 more pro-life fighters to Congress. Unlike a lot of other organizations, LAPAC can't turn to Big Brother, Big Business or Big Labor for funding. It seems that saving babies is "too controversial." So, I guess that just leaves us -- you and me and others who believe enough to <u>give</u>, sometimes even when it hurts.

How <u>much</u> should you give? LAPAC suggests $15, $25, $50, or $100. They need hundreds of such amounts in each category to effectively carry out their political action plan. Just take the special elections I mentioned. Mr. Downey told me the cost of providing one LAPAC professional to work in the campaign exceeded $3,000.

Maybe you should ask yourself how much is it worth to save one baby's life? Obviously, it's priceless. But it's something to think about when you consider some of the less essential things we all tend to spend our money on at times.

It just occurred to me, and I'll leave you with this passing thought. Many of my friends contribute to all kinds of "endangered species" causes -- things like Save the Whales, Save the Bald Eagle, Save the Egrets. But when I ask them about saving babies, the most endangered and precious species of all, they back off. I suppose it's a matter of knowing where your

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priorities lie.

I know where mine lie. And I believe you do too.

LAPAC has enclosed a contribution form and a First Class postage-paid reply envelope." Please use them now.

God Bless you,

Penny Dines

Mrs. Penny Dines
On behalf of LAPAC

P.S. LAPAC also suggests that you write to your State Legislature asking that they follow the example of the Hyde Amendment and stop using your taxpayer money to fund abortions. I think it's an excellent idea. In fact, it's the very next letter that's going in my typewriter!

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BENJAMIN FRANKLIN STATION • P.O. BOX 14183 • WASHINGTON, D.C. 20044 • (202) 333-3951

My Dear Pro-Life Friend:

Abortionist Senator Robert Packwood of Oregon was quoted in the February issue of Congressional Quarterly: "if right to life groups can defeat eight or ten House members and one or two Senators, OTHERS WILL GET THE MESSAGE."

You and you alone have the great opportunity to deliver that message loud and clear to the abortionists in the Congress on Tuesday, March 21, 1978 by casting your vote for Don Lyon in the Republican primary.

Congressman John B. Anderson has consistently voted anti-life on every major issue. He has ignored the will of the people. In his campaign he continues to court such anti-life people as Nelson Rockefeller (Rockefeller raised $11,000.00 at a Washington D. C. cocktail party for Anderson) who through his millions has funded the deaths of more unborn children than any one person in history. Other Anderson supporters under the guise of the word "pro-choice" have voted to use your hard-earned tax dollars to fund the deaths of over 300,000 unborn children each year. Anderson has done the same.

In the early years of the Civil Rights movement, many many Congressmen consistently voted against the struggle. However, as the tide turned so did many of these men who remain in the Congress today. They feared for their political lives. A grass-roots movement changed America.

Now, another and even more powerful grass-roots movement, middle America, is revolting against the legal murder of our future generations. They are repulsed by this federally financed killing and are ready to do something about it.

No matter how clever the argument, we all know when life begins. The few who claim they don't are on the Supreme Court. They have ruled abortion is legal up to the moment of birth, UP TO THE MOMENT OF BIRTH. Mr. Anderson supports these decisions.

Your vote in the Republican primary will make the difference. If you vote pro-life on Tuesday, March 21, the 16th Congressional District of Illinois will be the spark that will ignite the fuse to make 1978 the year of life.

This is the year pro-life people must and will be heard. In this election you will take into the polling booth, in your hands, power over the life or death of millions of unborn children. Make no mistake about it, the choice is yours.

Don Lyon has pledged to support pro-life legislation and a Human Life Amendment. Life Amendment Political Action Committee proudly endorses Don Lyon and urges all pro-life people to support his campaign on Tuesday, March 21, 1978.

The choice is yours, we only hope and pray that you will join in this effort to save the babies, who, without your important vote, will never see the light of God's beautiful day.

FOR LIFE,

Morton Downey, Jr.
Chairman, LAPAC

Mildred F. Jefferson
Mildred F. Jefferson, M.D.
Advisory Chairman, LAPAC

P.S. AS A PRO-LIFER IN THIS ELECTION YOUR VOTE MEANS LIFE FOR THE UNBORN. PLEASE MARK YOUR CALENDAR TO VOTE ON TUESDAY, MARCH 21, FOR DON LYON AND HAVE TEN PRO-LIFE FRIENDS DO THE SAME.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1103
National Right to Life Committee, Inc.	)	
Life Amendment Political Action Committee	)	
Let's All Protect A Child Fund	)	

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on November 18, 1980, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions regarding MUR 1103:

1. Incorporate into MUR 961 the portion of Ms. Harmon's complaint regarding the issue of whether or not Life Amendment PAC is the separate segregated fund of the National Right to Life Committee.

2. Find REASON TO BELIEVE that the Life Amendment PAC violated:

   a. 2 U.S.C. § 435(b) by its omission of a notice on the solicitation letter signed by Mrs. Penny Dines;

   b. 2 U.S.C. § 441d by its omission of an authorization or non-authorization statement on the Downey-Jefferson letter;

   c. 2 U.S.C. § 434(b)(2) (presently 2 U.S.C. § 434(b)(3)(A) and § 431(13)(A)) by its failure to report occupations and principal places of business;

(Continued)

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d. 2 U.S.C. §434(b)(12) (presently 2 U.S.C. § 434(b)(8)) by its failure to continuously report debts and obligations until extinguished or to report the circumstances and conditions of the extinguishment of the debt; and

e. 2 U.S.C. § 434(b)(5)(presently 2 U.S.C. § 434(b)(3)) by its failure to report loans from Karl Karcher, Judy Brown, Paul Brown, Security National Bank and Robert Lepak, or 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(5)(A)) by its failure to report expenditures made by Karl Karcher, Judy Brown and Paul Brown on behalf of the committee.

3. Find REASON TO BELIEVE that Let's All Protect A Child Fund is a political committee and violated 2 U.S.C. § 433 and § 434 by its failure to file a Statement of Organization and disclosure reports with the Commission.

4. Approve and authorize sending of the letters listed as Attachment VIII to the First General Counsel's Report dated November 10, 1980 on MUR 1103.

Commissioners Harris, McGarry, Reiche, and Tiernan voted affirmatively. Commissioners Aikens and Friedersdorf dissented.

Attest:

11-18-80

Date

Lena L. Stafford

Recording Secretary

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FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: NOVEMBER 14, 1980

SUBJECT: OBJECTION - MUR 1103 - First General Counsel's Report dated 11-10-80; Received in OCS 11-10-80, 5:05

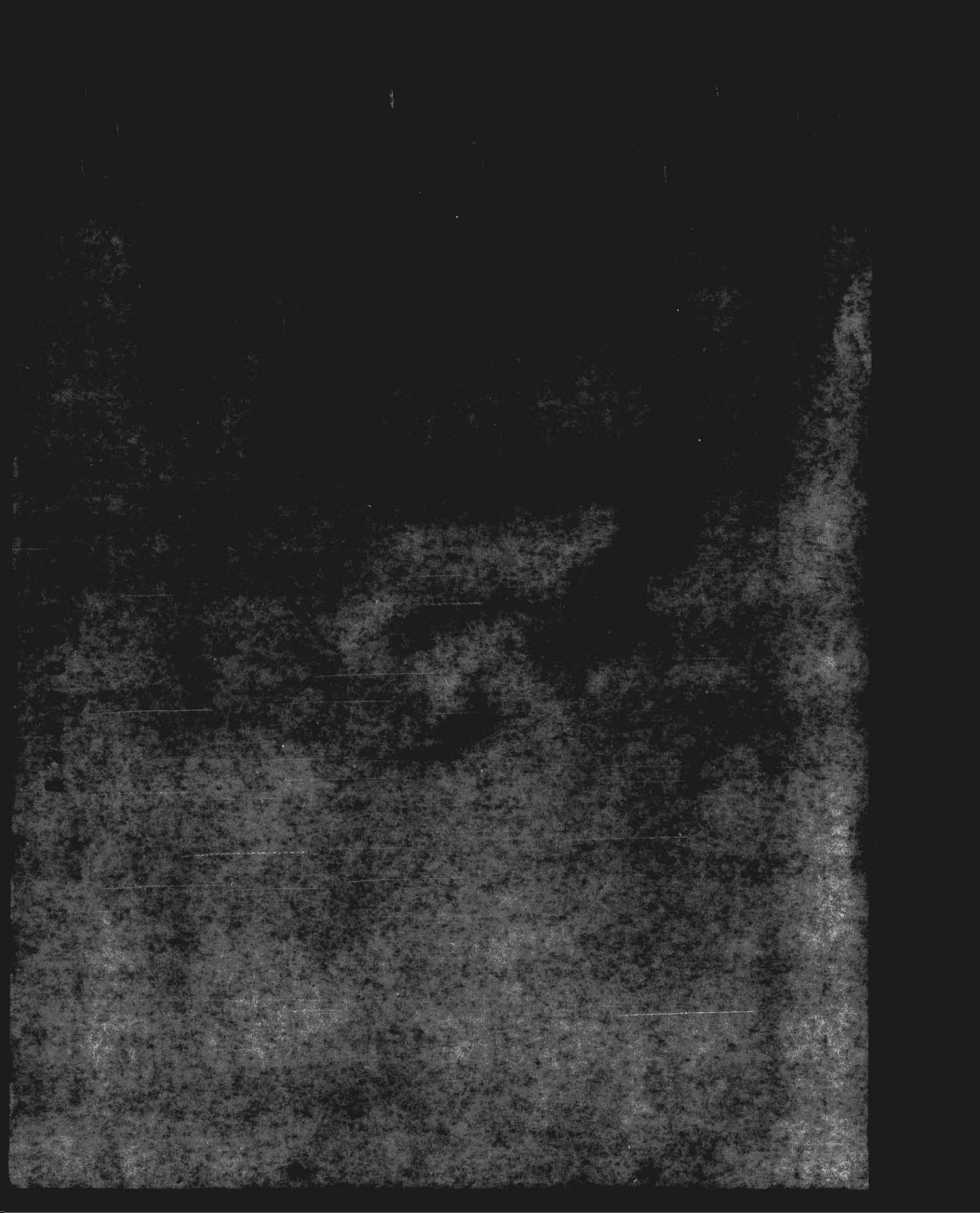
The above-named document was circulated on a 48 hour vote basis at 11:00, November 12, 1980.

Commissioner Aikens submitted an objection at 11:41, November 14, 1980.

This matter will be placed on the Executive Session Agenda for Tuesday, November 18, 1980.

Commissioner Friedersdorf submitted an "Objection For The Record" on November 13, 1980; however, his Executive Assiatant decided that the matter need not be held over until the December 2, 1980 meeting.

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 11-10-80

MUR 1103
DATE COMPLAINT RECEIVED
BY OGC 12/15/79
STAFF MEMBER:
Michele D. Brown

COMPLAINANT'S NAME: Gail Harmon on behalf of National Abortion Rights Action League

RESPONDENT'S NAME: National Right to Life Committee, Inc., Life Amendment Political Action Committee, Let's All Protect A Child Fund

RELEVANT STATUTE: 2 U.S.C. § 433(a); § 434; § 434(b)(2), (5), (9), and (12); § 435(b); § 441b(b)(4)(A); and § 441d

INTERNAL REPORTS CHECKED: Life Amendment Political Action Committee's Disclosure Reports

FEDERAL AGENCIES CHECKED: None

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SUMMARY OF ALLEGATIONS

Gail Harmon, on behalf of National Abortion Rights Action League, has filed an updated version of her earlier complaint, MUR 961. The updated complaint and its attachments are included as Attachment I. Ms. Harmon again alleges 1/ that Life Amendment Political Action Committee is the separate segregated fund of the National Right to Life Committee, Inc., and, as such its solicitations for contributions should be limited to the membership of the National Right to Life Committee. Ms. Harmon feels that Life Amendment PAC has violated 2 U.S.C. § 441b(b)(4)(A) by soliciting contributions from beyond the membership of National Right to Life Committee. Ms. Harmon alleges this is a knowing and willful violation because Life Amendment PAC continues to solicit contributions from the general public even after the filing of the original complaint.

1/ As the alleged violations occurred before the Act was amended on January 8, 1980, by Pub. Law 96-187, all citations to the Act and the Regulations are to them as they existed before amendment.

Ms. Harmon then makes new allegations. She alleges that Life Amendment PAC actually paid for a solicitation letter signed by Mrs. Penny Dines and therefore, a 2 U.S.C. § 435(b) notice should have appeared on the letter.

Ms. Harmon also alleges that Life Amendment PAC has been filing incomplete reports with the Commission.

The final allegation is that an organization called Let's All Protect A Child Fund (LAPAC Fund) has been soliciting contributions and that this committee is a political committee which should register and file reports with the Commission.

FACTUAL AND LEGAL ANALYSIS

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The Office of General Counsel sent letters to the respondents to notify them of the complaint and to give them an opportunity to demonstrate that no further action should be taken in this matter. Marion Harrison responded on behalf of Life Amendment PAC and Jim Bopp responded on behalf of the National Right to Life Committee, Inc. Both attorneys responded to the re-submitted allegations only and did not comment on the new allegations. A letter was also sent to Sean Morton Downey because he is the Chairman of Life Amendment PAC and the Chairman of Let's All Protect A Child Fund; however, he did not respond.

A. Separate Segregated Fund

With respect to her earlier complaint in which she alleges that Life Amendment PAC is the separate segregated fund of National Right to Life Committee, Inc. and therefore should be limited to soliciting only the members of National Right to Life Committee, Ms. Harmon provides a new example of what she feels is an unlawful solicitation: "On June 6, LAPAC (Life Amendment PAC), paid $800 to Christian Family Renewal for Pro-Life Fundraising Ads." Ms. Harmon feels this constitutes a knowing and willful violation because Life Amendment PAC continues to solicit from the general public even after she filed her first complaint with the Commission.

Because we are already addressing the issue of whether Life Amendment PAC is the separate segregated fund of National Right to Life Committee, Inc. in MUR 961, the Office of General Counsel recommends that this portion of the complaint be incorporated into MUR 961.

B. Notice on Letters

Ms. Harmon alleges that Life Amendment PAC actually paid for a solicitation letter signed by Penny Dines and therefore,

Life Amendment PAC should have placed a notice on the letter as required by 2 U.S.C. § 435(b). The Dines letter is included as Attachment II.

Mrs. Dines states in the solicitation letter that Sean Morton Downey, the Chairman of Life Amendment PAC, asked her to write the letter. During the investigation of MUR 961, Life Amendment PAC provided the Commission with copies of its solicitation letters and a list of all of its mailings. Mrs. Dines' letter was included in this submission as was the list typed on the stationery of Creative Mailing Consultants of America, Inc. which shows that the "Reno (Dines) Package" (Mrs. Dines letter) was sent to people on five different mailing lists. The list typed on the stationary of Creative Mailing Consultants of America is included as Attachment III. The reports of Life Amendment PAC show expenditures to Creative Mailing Consultants of America for the purpose of "direct mail." It appears that Life Amendment PAC did pay the costs of the solicitation letter. The letter does not, however, contain a notice stating that copies of the committee's reports have been filed with the Commission and are available for purchase as was required by 2 U.S.C. § 435(b).

The Federal Election Campaign Act Amendments of 1979, Pub. L. No. 96-187, which became effective January 8, 1980, repealed 2 U.S.C. § 435(b). Accordingly, committees are no longer required to place notices on their solicitations that copies of reports are on file with the Commission and are available for purchase. However, the Dines letter was sent during 1979, prior to January 8, 1980, the effective date of the 1979 Amendments. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Life Amendment PAC violated 2 U.S.C. § 435(b).

Upon review of the attachments which Ms. Harmon submitted with her complaint, the Office of General Counsel also noticed that a letter written by Sean Morton Downey, Jr. and Mildred F. Jefferson, Chairman and Advisory Chairman of Life Amendment PAC, advocated the election of Don Lyon for the 16th Congressional District of Illinois. The Downey-Jefferson letter is included as Attachment IV. However, the letter did not contain an authorization or non-authorization statement as is required by 2 U.S.C. § 441d. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Life Amendment PAC violated 2 U.S.C. § 441d.

C. Disclosure Reports

Ms. Harmon alleges that Life Amendment PAC has been filing incomplete reports. The disclosure reports have been reviewed to determine if information is missing. The July 10, 1979 Quarterly, October 10, 1979 Quarterly, 1979 Year-End, January 1980,

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February 1980, March 1980, April 1980, May 1980 and June 1980 Reports were reviewed. Life Amendment PAC failed to report occupations and principal places of business for 102 of 208 contributors. The Office of General Counsel recommends that the Commission find reason to believe that Life Amendment PAC violated 2 U.S.C. § 434(b)(2)(presently 2 U.S.C. § 434(b)(3)(A) and 2 U.S.C. § 431(13)(A)) by its failure to report occupations and principal places of business of contributors.

Ms. Harmon attaches copies of Commission Requests for Additional Information which question several transactions of Life Amendment PAC. The copies of RFAI's submitted by Ms. Harmon are included at Attachment V. Life Amendment PAC reported an operating expenditure to Barbara Baroody listing the purpose as an expense "for work in Royer campaign" rather than reporting it as an in-kind contribution to another committee. Life Amendment corrected this in a response to the RFAI.

Life Amendment PAC listed loans to David and Nancy Osborne as operating expenditures. In its response to the RFAI, Life Amendment PAC corrected the error by moving the item to Line 21A-Loans, Loan Repayments, and Contribution Refunds Made. However, Life Amendment PAC does not report the loan continuously until the extinguishment of the debt. The committee states that the Osbornes have repaid the debt, however, no repayment has been shown on the reports. The Office of General Counsel recommends that the Commission find reason to believe that Life Amendment PAC has violated 2 U.S.C. § 434(b)(12) (presently 2 U.S.C. § 434(b)(8)) by failing to report an outstanding debt until it is extinguished, or if it has been extinguished, by failing to report the circumstances and conditions under which it was extinguished.

Life Amendment PAC reports a debt of $5,000 owed to Karl Karcher, however, the committee never reported receiving the $5,000 from Mr. Karcher. The same situation arises with debts totalling $5,000 from Judy and Paul Brown. Karcher and the Browns may have given money to the committee or possibly they made expenditures on behalf of the committee and the debts were for reimbursements.

On September 24, 1980, the Reports Analysis Division sent a referral update to the Office of General Counsel. This is included as Attachment VI. According to the referral, Life Amendment PAC reports a loan repayment of $5,138 to Security National Bank. The committee had not reported previously the receipt of this loan or an outstanding debt owed to Security National Bank.

The RAD referral also includes an operating expenditure to Robert Lepak in the amount of $2,534.30 which appeared on the January monthly report. The particulars of the expenditure are

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"repayment of loan - same period." It is not clear whether this is a loan to Mr. Lepak or a loan repayment from Life Amendment PAC to Mr. Lepak. If it is a loan made by Life Amendment PAC to Mr. Lepak and if Mr. Lepak repaid the loan in the same period as the particulars indicate, Life Amendment PAC should have reported a receipt from Mr. Lepak. If this is a loan repayment, that is, if Life Amendment PAC is repaying a loan it received from Mr. Lepak, then the committee should have, in a report previous to this one, reported a receipt from Mr. Lepak.

It is recommended that the Commission find reason to believe that Life Amendment PAC violated 2 U.S.C. § 434(b)(5) (presently 2 U.S.C. § 434(b)(3)(E)) by failing to report the loans from Karl Karcher, Judy Brown, Paul Brown, Security National Bank and Robert Lepak, or if Mr. Karcher and the Browns made expenditures on behalf of the committee, Life Amendment PAC violated § 434(b)(9) (presently 2 U.S.C. § 434(b)(5)(A)) by failing to report the expenditures Mr. Karcher and the Browns made on its behalf.

D. Reporting as a Political Committee

Ms. Harmon bases her allegation in part on a February 1979, solicitation letter signed by Sean Morton Downey on behalf of Let's All Protect A Child Fund which states that LAPAC Fund "was established to 'educate and train pro-lifers ... to go out and help win elections for more pro-life candidates.'" Ms. Harmon alleges that LAPAC Fund, a division of Christian Family Renewal, is a political committee and therefore, it should register and file reports with the Commission.

2 U.S.C. § 431(d) (presently 2 U.S.C. § 431(4)(A)) defines a political committee as "any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1,000." Mr. Downey, writing as Chairman of LAPAC Fund, requests that the contributor make "a one-time donation or join our LAPAC Fund Finance Council by raising and contributing an amount of $50 per month." At a rate of $50 per contributor, presumably it would not take very long for LAPAC Fund to reach the $1,000 threshold.

The next question, then, is whether or not the money was used for the purpose of influencing a federal election. Mr. Downey states in the February letter that:

> "Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational

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> process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates."

Mr. Downey also says that LAPAC Fund publishes a report "of political information." The purpose of the education, it seems, is to educate the pro-lifers to be able to help in the election of those candidates supporting the pro-life position.

2 U.S.C. § 431(f) (presently 2 U.S.C. § 431(9)) defines the term "expenditure." According to § 431(f)(4)(B) (presently 2 U.S.C. § 431(9)(B)(ii)), "nonpartisan activity designed to encourage individuals to register to vote, or to vote" does not fall under the definition of an expenditure.

The Advisory Opinions have been examined to see if they offer clarification with regard to what kinds of activities would determine whether a committee is a political committee. Advisory Opinion 1975-81 discusses whether the committee, a non-profit corporation "organized for the purpose of assuming that, 'in the 1976 presidential election ... the American voters, in each state, have the option of supporting an independent conservative alternative slate of electors for the offices of President and Vice President'", is a political committee, and, if so, what it must do to comply with the Act. Advisory Opinion 1975-81 is included as Attachment VII.

"The Commission concludes that such activities (assuring the appearance of independent conservative electors on the ballot) clearly place an organization within the definition of 'political committee' set out in 2 U.S.C. § 431(d)." The opinion states further that the fact that the committee does not support named candidates is not relevant. " ... [i]f Congress had desired to restrict the 'purpose test' of 2 U.S.C. § 431(e) and (f) to particular Federal candidates, it would have limited coverage to the specifically defined word 'candidate' [2 U.S.C. § 431(b)] and certainly would not have qualified 'person' by inclusion of the word 'any.'"

LAPAC Fund's aim to have "their people" help win elections for pro-life candidates seems to follow along the same lines as the committee discussed in the Advisory Opinion. The Office of General Counsel recommends that the Commission find reason to believe that LAPAC Fund is a political committee as defined by 2 U.S.C. § 431(d) (presently 2 U.S.C. § 431(4)) and, therefore, is in violation of 2 U.S.C. § 433 and § 434. The interrogatories to be included with the letter probe the activities of LAPAC Fund and its contributions and expenditures. The interrogatories are included as Attachment VIII.

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RECOMMENDATIONS

1. The Office of General Counsel recommends that the Commission incorporate into MUR 961 the portion of Ms. Harmon's complaint regarding the issue of whether or not Life Amendment PAC is the separate segregated fund of the National Right to Life Committee.

2. The Office of General Counsel recommends that the Commission find reason to believe that Life Amendment PAC violated:

   a. 2 U.S.C. § 435(b) by its omission of a notice on the solicitation letter signed by Mrs. Penny Dines;

   b. 2 U.S.C. § 441d by its omission of an authorization or non-authorization statement on the Downey-Jefferson letter;

   c. 2 U.S.C. § 434(b)(2) (presently 2 U.S.C. § 434 (b)(3)(A) and § 431(13)(A)) by its failure to report occupations and principal places of business;

   d. 2 U.S.C. § 434(b)(12) (presently 2 U.S.C. § 434 (b)(8)) by its failure to continuously report debts and obligations until extinguished or to report the circumstances and conditions of the extinguishment of the debt; and

   e. 2 U.S.C. § 434(b)(5) (presently 2 U.S.C. § 434 (b)(3)) by its failure to report loans from Karl Karcher, Judy Brown, Paul Brown, Security National Bank and Robert Lepak, or 2 U.S.C. § 434(b)(9) (presently 2 U.S.C. § 434(b)(5)(A)) by its failure to report expenditures made by Karl Karcher, Judy Brown and Paul Brown on behalf of the committee.

3. The Office of General Counsel recommends that the Commission find reason to believe that Let's All Protect A Child Fund is a political committee and violated 2 U.S.C. § 433 and § 434 by its failure to file a Statement of Organization and disclosure reports with the Commission.

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4. The Office of General Counsel recommends that the Commission approve and authorize the sending of the attached letters.

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Attachments

I. Complaint
II. Penny Dines Letter
III. CMCA List
IV. Downey-Jefferson Letter
V. Requests for Additional Information
VI. RAD Referral
VII. AO 1975-81
VIII. Letters and Interrogatories to Respondents

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 NOV 30 AM 11:59

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN R SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

MUR1103

November 29, 1979

Charles N. Steele, Esquire
Acting General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

SC5188

Dear Mr. Steele:

Today I am filing updated versions of several complaints previously filed by National Abortion Rights Action League against anti-abortion political committees.

Since the original complaints presented complex and politically sensitive issues, and NARAL was mindful of the administrative burdens placed on the Federal Election Commission, we chose not to file a petition in the District Court upon the passage of 90 days after the filing of the complaints.

Thanks to direct mail fundraising campaigns by National Right to Life Committee we are aware the F.E.C. is investigating at least some of our "groundless" complaints. Attachment "A" We trust that the investigation has been prompt and thorough; we appreciate better than most people any difficulties you may have conciliating or negotiating with anti-abortionists. However, since the complaint against Pro-Life Action Council of Iowa is almost a year old and NARAL's other complaints almost 6 months old, we feel we must place ourselves in a posture to seek judicial review of your investigation and conciliation efforts.

Sincerely,

Gail M. Harmon

Gail M. Harmon

GMH/dmw

cc: Karen Mulhauser
Harriet Matthews

79 NOV 30 PM 2:33
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Attachment I (76 pages)

8204032169

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN R SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

November 29, 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 the following complaint of violations of Federal election laws by Life Amendment Political Action Committee ("LAPAC").

LAPAC is popularly regarded as the political action Committee of the National Right to Life Committee ("NRLC"). For reasons discussed in detail below, LAPAC is NRLC's separate segregated fund or connected organization and as such it has violated and continues to violate the §441(b) restrictions on solicitation of the general public.

As of April 30, 1979, LAPAC's officers were Sean Morton Downey, Chairman and Paul Brown, Treasurer. (See F.E.C. Form 1 attached as (Exhibit "A") Downey is sole "honorary Director" of NRLC and its Washington lobbyist. (See NRLC letter from Carolyn Gerster marked "B", p. 4 of transcript of Weekend of Week End #10, January 2, 1979 attached as Exhibit "C" and February 28, 1979 letter from Downey, Exhibit "D"). LAPAC's Board of Directors consisted of the two officers, Downey and Brown, and Felitia Goeken, Jean Doyle, Carolyn Gerster, Robert L. Sassone and J.C. Willke; simultaneously, Goeken is also Secretary of NRLC, Gerster, its President, Willke its Vice President for Special Projects; all three serve on the Executive Committee of NRLC's Board of Directors while Jean Doyle is also a member of its Board. See NRLC and LAPAC letterheads attached Exhibits "B" and "E" respectively. During the 1978 elections, Mildred Jefferson, immediate past President of NRLC, was described as LAPAC's Advisory Chairman (Exhibit "F") and its Honorary Chairman (Exhibit "G"). Paul Brown's wife, Judie Brown, was Executive Director of NRLC. As Paul Brown is coyly quoted in Bill Peterson's article in the "Washington Post," "You might say we are (LAPAC) in bed with the National Right to Life Committee." ("Washington Post," February 11, 1979 attached and marked "H").

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The overlap and intimate relationships between the Board of Directors, officers and staff of NRLC and LAPAC is sufficient to demonstrate that NRLC is a connected organization of LAPAC, one which "establishes (or) administers" the political committee.1/

The practical, day-to-day, aspects of this symbiotic relationship were dramatized in a television program "NBC Weekend" shown in January of this year. On the show, Paul Brown, LAPAC Director, and Sean Morton Downey, NRLC's lobbyist, met to discuss the vulnerability of their Deadly Dozen Hit List and demonstrated the interplay between their electoral politics and lobbying activities by arranging appointments with the Congressmen on the hit list to lobby them on the Right to Life issue.2/

Without a doubt LAPAC and NRLC are connected organizations and LAPAC is a separate segregated fund of NRLC.3/ Their interwined relationship contains most of the factors deemed significant in AOR 1977-2: a) The relationship between organizers of the committee and the alleged parent, in that case a trade association; b) whether the committee decision makers are employees of the parent, currently or at the time of organization of the committee; c) the extent to which the committee used the parent's membership list to launch solicitation drives; d) the extent to which the parent's policy makers selct the candidates or groups to whom contributions flow.

1/ NRLC's failure to provide continuing financial support to LAPAC is irrelevant in light of the use of the word "or" in the regulation which establishes the test as "establish, administer or financially supports."

2/ A transcript of the program is attached as "B" and a related letter from Reuven Frank of NBC news is attached and marked "I". Since the transcript generally identifies the participants only as Man "M" and Women "W," the Frank letter is helpful to confirm the dramatis personae. The cited conversation starts at page 44.

3/ "Separate segretated fund" is not specifically defined in either Federal election law or the regulations. The term "separate segregated fund" is used interchangeably with the term "connected organization."

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Accordingly, LAPAC may only solicit contributions from NRLC members. In applying this standard, the Federal Election Commission will have to look beyond Right-to-Life's exaggerated claims of millions of members. It's sworn lobbying reports filed with the U.S. Senate and House of Representatives (attached and marked "J") indicate newsletters going to only 10,000 people.

The Right-to-Life movement appears to operate principally through local organizations. State and local Right-to-Life groups disclaim formal affiliation with NRLC but frequently members of local groups can, for an additional contribution, receive copies of the NRLC newsletter. Query whether receiving NRLC's newsletter in exchange for a larger contribution to a local group constitutes membership in NRLC.

LAPAC has illegally solicited the general public by direct mail requests for funds (attached as "K") and by advertizing and selling tickets to a fundraiser in January 1978 at the John F. Kennedy Center in Washington, D.C. 4/ The Peterson Article explains that LAPAC solicits the general public. Expenses of $1,400 for postage in August and September of 1978 and of $15,730.63 in September 1978 for fundraising suggest a massive direct mail campaign. The January fundraiser was advertized in the Catholic review, the Catholic standard, and the Arlington Catholic Herald. (See LAPAC's April 10, 1978, F.E.C. Report, Exhibit "L"). Flyers describing the fundraising event were also distributed in metropolitan Washington shopping centers.

After the filing of NARAL's April 30, 1979, complaint alleging that LAPAC is a separate segregated fund of NRLC, LAPAC continued to solicit the general public. Individuals who are members of no anti-abortion organization received a letter allegedly written by Mrs. Penny Dines "on behalf of LAPAC." (Exhibit "K") Although its written in the folksy tone of the housewife, it is reasonable to assume that the large costs of printing and mailing this solicitation were not paid by the lady whose budget is already "feeling the pinch." We doubt that it is a coincidence that in its July 10

4/ AO's 1976-27 and 1977-25 indicate that solications include informing people of a fundraising activity and broadcasting radiospots advertizing a fundraision concert.

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quarterly report, LAPAC indicated direct mail postage expenses of approximately $12,000 and other major direct mail expenses for printing and computer services. To continue the charade that this letter constituted a private solicitation, LAPAC violated another section of the F.E.C.A. by omitting the disclosure statement required by §435(b).

On June 6, LAPAC paid $800 to Christian Family Renewal for Pro-Life Fundraising Ads. We assume the solicitation went beyond the membership of NRLC, an organization, as far as we know, totally unrelated to Christian Family Renewal. We request that you investigate this matter further.

In March of 1979, Sean Morton Downey signed a direct mail solicitation on behalf of LAPAC Fund (Let's All Protect A Child Fund), described as a division of Christian Family Renewal, a §501(c)(3) tax deductible organization. According to the letter, LAPAC fund was established to "educate and train pro-lifers...to go out and help win elections for more pro-life candidates." We request that you investigate whether or not the LAPAC Fund is a political committee which should register with the F.E.C. In this connection I am enclosing copies of correspondence with the Internal Revenue Service because, as you probably know, §501(c)(3) organizations are prohibited from engaging in political activity.

We also note that LAPAC continues to file incomplete reports. Information on large donors is frequently omitted; furthermore, on its first quarter of 1979 report, no candidate contributions are reported in line 22 although at least one in-kind contribution of $2,400 appears on page 79031253926. We also wonder whether or not additional in-kind contributions were not made through the many fees for professional services rendered at the same time and in some cases by the same person responsible for the in-kind contribution. (See Exhibit "N").

Since LAPAC is NRLC's separate segregated fund, it is prohibited from soliciting contributions from the general public. §441(b) Nevertheless even after the filing of the April complaint, continues to do so. In light of the gross disregard of the applicable the regulations and advisory opinions, we believe that this continuing violation must be knowing and willful.

Accordingly we request that the Federal Election Commission immediately investigate this complaint and impose appropriate fnes for violations.

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To prevent illegally solicited funds from being used in the 1980 elections, we request that LAPAC be instructed to return those funds to the donors.5/

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

GHM/dds

Attachments

Signed and subscribed before me this 29th day of November 1979.

Katherine Katsaros
Notary Public

[illegible] 1981

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5/ Since under F.E.C. reporting requirements LAPAC must keep the names of its donors, returning the illegally solicited money should not prove underly burdensome.

Box 14263, Ben Franklin Station

Washington, D.C. 20044

Name of Affiliated and/or Connected Organizations	Mailing Address and ZIP Code	Relationship
None		

8204032175

None to date

None

Mr. Paul A. Dana

Box 14263
Ben Franklin Station
Washington, D.C. 20044

8204032 1177

Dear Mr Ewalt,

Enclosed is a check of Life Amendment Political Action Committee, Inc. in favor of Sean Hector Downey, Jr. 1100 Sunset Blvd, Suit 1002. Los Angeles, Ca. 90028.

Thank You

Treasurer

committee, Inc.
National Press Building, Suite 341
[illegible]th Street, N.W. Washington, D.C. 20045

DIRECTORS
[illegible]
Executive Committee

Dear Right to Life Supporter:

This is the most exciting letter I have ever written!

I can't tell you how happy I am to share with you the news about many stunning and significant victories we've seen in this election just as occurred in the recent primaries.

Did you know that pro-abortion Senators Brooke of Massachusetts and Hathaway of Maine have lost their seats? I especially wanted to open with this good news.

Here's more:

In the Senate, at least six pro-life men have been elected to seats that were held by pro-abortion people.

In Minnesota David Durenberger took the Humphrey seat and Rudy Boschwitz won over Wendel Anderson.

In Iowa -- an exquisite upset -- Roger Jepson defeated Sen. Richard Clark.

In New Hampshire Gordon Humphrey defeated pro-abortion Sen. Thomas McIntyre.

Colorado saw William Armstrong defeat Floyd Haskell.

In So. Dakota Larry Pressler will replace pro-abortion Sen. James Abourezk.

Also we note that pro-life Senator Jesse Helms was re-elected in North Carolina.

More good news...

Three of the most important victories by pro-life men in governership races were: Al Quie of Minnesota, Edward King of Massachusetts and James Rhodes of Ohio.

Of the House seats, we had equally good news. First of all... ALL strong pro-life incumbents were returned to the House and all reasonably close races where abortion was a major issue were won by pro-life people with the exception of Senator Robert Griffin of Michigan. Next, you'll want to know that two very vocal pro-abortion Congresswomen were defeated: Rep. Martha Keys of Kansas

(over, please)

and Rep. Helen Meyner of New Jersey.

Now let me mention a few of the "Good News Victories" from other states: in Wyoming, pro-lifer Richard Cheney won over Bill Bagley. In Indiana, Joel Deckard defeated pro-abortion Congressman David Cornwell. In Illinois, strong pro-life Representative Henry Hyde was re-elected and pro-life newcomer Daniel Crane upset Rep. Terry Bruce. Also in Illinois, a strong friend of pro-life, Congressman Martin Russo, was returned to office. Rep. Robert Dornan of California and Rep. Robert Bauman of Maryland were re-elected. In Minnesota, pro-lifer Arlen Erdahl won the congressional seat vacated by Al Quie when he decided to run for governor.

By the time this letter reaches you, no doubt you will know of many more national and local pro-life public officials who were elected or returned to office. In almost all of these races it is an unquestionable fact that the magnificent effort given by thousands of right to life workers in NRLC's Voter Identification Project meant the difference of victory to people who will work to save the lives of thousands of tiny babies.

> My friend...I can tell you this...the politicians out there are getting the message. They are beginning to realize what the people of this country think about the heinous abortion laws which allow the merciless killing of tiny babies.

Yes, we lost a few, but in balance we're way ahead.

The pro-abortionists, just a few years ago were fully expecting us to go away. They hoped that we would be just another protest movement that would falter and fade.

<u>But were they ever wrong!</u>

The issue of whether or not to allow the legalized killing of unborn babies to continue has become, in more and more areas, <u>THE</u> issue. In addition to being the issue in the November 7 election, it was the deciding factor in taking pro-abortion Senator Clifford Case (R-NJ), and Congressman Donald Fraser (DFL-MINN) out of public life in the primaries.

We are winning our goal to restore to the Constitution what we had all assumed was already there, and that is equal protection, under law, of all innocent human lives whether born or unborn. This is what the Human Life Amendment will do.

The way all amendments (since the original ten) have been passed to date, has been through the U. S. Senate and House of Representatives with a two-thirds vote. We are close to this in the House. We are closer to it in the Senate now than we were before this election, but still, more Senators must be replaced and we must change the minds of others. We're convinced that three-fourths of the states will ratify the Human Life Amendment once we get over our problem with Congress and they pass it.

<u>Can it be done?</u>

0 2 0 4 0 3 2 1 1 7 9

Yes, we're convinced that it can if we start to work now!

How will we do it?

Well, it all began less than two years ago. That's when we formed the National Right to Life Committee's Voter Identification Project. If your local or state Right to Life group is not already involved in this extremely effective program, it will be before the 1980 elections roll around.

> For that is the date we have set for full nationwide participation. That is when pro-lifers will win the majority of all targeted seats in city, county, and state elections...as well as in U.S. Senate and House of Representative races.

Let me explain how "Voter Identification" works -- and why it can't fail to produce the promised results -- if we are successful in expanding from our current projects to a nationwide campaign.

Briefly, "Voter Identification" starts with a skillfully designed telephone survey of all registered voters -- precinct by precinct -- to reveal those who are pro-life, those who are pro-abortion, and those who are still undecided on this crucial issue.

It will require a real dedication and a lot of hard work by all of you, but you can all help -- even those who are "shut-in" by illness or injury. All you need is a little time and a phone.

You'll also need direction, trained leaders, the lists to call, the reports to fill out and the instruction booklets. Finally, you'll need to store the information in retrievable form, on computer tapes. Of course, this will cost money, far more money than NRLC has now. That is why I am asking you in this letter to be as generous as you can with financial help now.

A huge job? Certainly it is! But one that can be accomplished if we all work together. We need your support now.

And especially: we need your prayers!!!

What will the Voter Identification Project tell us? Well, as an example, the first area to complete the 100,000 phone calls necessary to canvass two entire Congressional districts, was Cincinnati.

What was the result? Cincinnati found out that 75% of its registered voters opposed all abortion (except to save the mother's life), 10% were undecided, and only 15% approved abortion, including those who only approved it for rape pregnancies or other rare reasons. It is no accident that all four Congressmen from Southwestern Ohio are pro-life.

From the very earliest survey results -- up until the present time --

(over, please)

our experience has sh[illegible] that pro-lifers outnumber [illegible] abortionists by a majority as high as f[illegible] to one in some areas. And [illegible] no significant areas have pro-abortionists [illegible]r outnumbered pro-lifers!

This proves what we have been saying all along — that the majority of Americans are pro-life.

Since National Right to Life's Voter I.D. Project has now substantiated this fact, the minds of many politicans have been changed!!!

Are there other benefits from this program? Yes, very many. The identification of pro-life voters will substantially enlarge and strengthen your pro-life group. Also, you can mail or contact the undecided to try to sway them, as well as go to the pro-lifers to strengthen them, to educate them, to ask for help and most importantly, to get them out to vote. The possibilities are vast.

A large order? Yes, but one that could be accomplished across the entire USA in the next two years. No! Let's not say "can be" but rather "must be." The Voter Identification Project can change the course of history in the next two years!

The pro-life movement may not have the backing of the abortion elitists, but we do have real people power. NRLC has 1,800 affiliated chapters in all 50 states. You are represented through your local chapter and through your state Right to Life group on the board of directors of the NRLC.

Your check for $50, $25, $15 or more will enable us to keep our momentum sizzling and expand it as wide as we can in the next election...as well as... to continue all of our other projects and activities which are now coordinated out of our Washington office.

Please help us with as large a contribution as you can. You will find an envelope enclosed for your convenience. I know I can count on you again. Thank you.

Yours for the Right to Life

Carolyn Gerster, M.D.

Carolyn Gerster, M.D.
President

P.S. In September, we were surprised and saddened when our capable Washington lobbyist, Thea Rossi Barron, submitted her resignation. We are pleased, for her, that she has started working in the new position she wanted. She is a full-time lobbyist for a foreign country. Clouds, however, often have silver linings. I'm pleased to tell you that we have engaged the services of Mr. Sean Morton Downey, Esq. as our new lobbyist. He has had vast political experience and already has been of great help in Congress. Together with Mr. Charles Donnovan and Barbara Barrody, our new political researchers, we expect to sharply increase our visibility, activity and influence on Capitol Hill.

CG:pp/ru

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WEEKEND #10

January 21, 1979

National Broadcasting Company

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WEEKEND

MUSIC

ANNOUNCER

Lloyd Dobyns is on assignment. Tonight's program is recorded by Linda Ellerbee.

MUSIC

LE

Good evening. I'm Linda Ellerbee and this is Weekend -- but with a difference.

This program will be about one subject.

That subject is not abortion -- that is it's not a debate about the merits of the issue.

It is a story about the anti-abortion movement -- and its political power -- power many Americans weren't aware it had until last November's election.

There have been other movements recently to cut taxes, promote gay rights, legalize marijuana...

But the movement to outlaw abortion has probably been the most underestimated, and it has become a real force in American politics.

SOF LE

January 22, 1978.

More than 70 thousand people marched to the capitol building -- the biggest demonstration

SOF LE

in America since the end of the Vietnam War.

Seventy thousand people -- one issue.

One goal -- to return to the days when abortion was against the law, and to re-write the constitution to accomplish that.

And to get into politics to accomplish that.

HEARTBEAT

WOMAN (W)

Did you know that the heart of an unborn baby begins to be formed at three weeks, after conception?

Did you know also that over a million babies had their hearts stopped each year, in a very painful way, by abortion?

MAN (M)

Vote Mary J. Tobin, Row I.

LE

On their hit list for last November -- three U.S. Senators -- Clark, MacIntrye and Haskell.

SAVITCH

Eighty per cent of the precincts reporting from the State of New Hampshire, right now -- and you cansee the incumbent, there -- the democrat, Thomas MacIntyre, is trailing in it.

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SAVITCH

That race is very close and, as you can see, there, Thomas MacIntrye is in danger of losing his senate seat.

BRINKLEY

We have a projection in Colorado. We project that the Republican, William Armstrong, is winning, has won the senate seat from Colorado.

Floyd Haskell, the Democrat, one of the more liberal members of the senate, defeated by a Republic, William Armstrong, in Colorado.

Jessica.

SAVITCH

Dick Clark is very, very popular in the State of Iowa and, he is, despite his liberal voting record has done very well.

The abortion issue has become an issue in the State of Iowa and it would be interesting to see how that breaks down.

LE

Tomorrow is the 6th Anniversary of the Supreme Court decision legalizing abortion. There will be marches -- but this isn't a story about marches.

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LE

It's a report on strategy, technique and impact of a new political force -- how it presents its arguments.

Some of the pictures and some of the words are not pretty.

We have edited out some of these -- but not all, because they are what this movement is showing and saying.

We'll begin after this.

COMM. MESSAGE: AFCO

COMM. MESSAGE: KARISTAN RUGS

COMM. MESSAGE: EX-LAX

STATION MESSAGE: BACKSTAIRS AT THE WHITE HOUSE

LE

The anti-abortion movement has political clout. That surprised a lot of journalists and political analysts who believed those people make a lot of noise -- but not much difference.

It did not surprise those people -- people like Sean Morton Downey: singer, Washington lobbyist for the Right To Life Committee, in Iowa last October to get Senator Dick Clark.

SINGING: GOD BLESS AMERICA

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LE

And while they catch up the other side is moving ahead.

M

In 1980, we have planned, we have a list we call "our deadly dozen." This consists of six senators and six members of the House of Representatives. All 12 of these gentlemen are what we consider vulnerable, and given the proper pro-life effort in political action, we can and we will defeat all of them.

Heading up the list would be Birch Bayh of Indiana and Bob Packwood orOregon. Both of these gentlemen would be what I consider a true thorn in the side ofthe pro-life movement. Frank Leahey of Vermont, John Culver again in the State of Iowa, George McGovern in South Dakota and Frank Church in Idaho.

LE

Do you think you will defeat these men?

M

All six.

In the House, we're going to go back to Illinois where John Anderson will be running

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M

again. In the State of Virginia, Joe Fisher... din't win by that big a margin this last time and, again we feel if we do our voter identification program and things like that, he can be beaten. Congressman Hollenbeck, in New Jersey, i n the Tenth, or Ninth Congressional District is also on our list. Also, Moe Udall, in the Second Congressional District, of Arizona, he ran against a guy who was no opposition at all and didn't win by that big a margin. Edgar, in Pennsylvania. And finally, we're going to ad Father Drinan to our list to make the number 12. He represents a real thorn in the side of the prop-life movement and he again can and should be beaten.

Okay, the hit list for 1980 consists of Senator Packwood in Oregon.

LE

It may be a grass roots movement, but at the top, it's being played just like political hardball, which it is.

M

Church won his last election by 14 per cent, which would be a big challenge.

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W

Right.

M

But if you really figure in the population, the make-up of Idaho, there's no party registration for one thing. The other thing, Idaho has a very large Mormon population.

MK

How large a population?

M

About 250 thousand people...

M

Okay, so they're..

M

..which is a considerable voting bloc...

W

Good.

M

..they can be organized and turned out to vote.

M

They are solidly on the pro-life side, and all we have to do is get the message to them.

M

Alright.

D 2 0 4 0 3 2 1 - 8 9 -

MAN

Birch Bayh, Indiana. A lot of the press quoted me as saying I hated Birch Bayh, and I tried to correct it. I don't hate Birch Bayh, I don't particularly like his voting record, but once..

M

Ten per cent..

M

..an article's out you can't get it back.

M

..at this point, our leadership on the Senate floor is almost entirely Republican. All right, we do have Eagleton and some people like that. All right, but I think we can, I think we can take people like Fritz Hollings, for instance, of South Carolina, he's got a fifty per cent rating, I think it's simply a case of getting in and educating Fritz Holliggs to what his constituency really wants.

M

All right. Well not only constituency but I honestly don't believe these guys know what's going on, I honestly don't believe they know just how much killing is going on.

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PHONE RINGING

M (on phone)

Yeah, this is he speaking. Who's this? (pause) Ah,yes, how are you, Tim?

W

We can - you know what I'd like to see done?

M

(name)o r Senator Culver. Okay, what's~~xx~~ a good date for you?

W

Is to give a comprehensive overview of a political campaign, how it is run, how it is put together, the nuts and bolts of a political campaign, which a lot of people who are, you know heve no, ~~xxxx~~ have not been politically active as many of our people..

LE

Barbara Barodi organized anti-abortion forces against Senator McIntyre in New Hampshire. McIntyre lost~~x~~.

W

Where does the media fit in?

M

Okay, that's important.

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W

Excuse me. What?

M

Now just what we were talking about.

W

What have you got?

M

You see this hit list up here?

M

John (inaudible)

W

Really!

M

They'd like to see me on the 16th of January.

W

Very good. Very good. Yes.

M

That's beautiful.

M

Okay, MacGovern in South Dakota.

W

Good.

M

Republicans outregister the democrats by one

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M

per cent, 46 to 45 per cent. MacGovern's last election he won by 6 per cent, and abortion was not an issee.

M

I'm quite friendly with George. As you know, we went up and saw George, and he says that he'd like to be "talked to" on the issue a little bit more. He says he's not necessarily opposed to a human life amendment.

I don't know whether he's (inaudible) or not, but I do have an appointment with him on the 24th of January.

W

Okay.

M

All right.

M

He made a total about-face in Cambodia.

M

Yeah, I know.

M

And the last thing he said, Sean, was to remember that he did have an open mind on the issue.

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M

Yeah.

M

If he would change, you know.

M

If he would change, and become a leader in this area, it would be a tremendous help.

M

I think we should let him know that we would not, not just put up opposition, we'll draw the opposition, but I think we would actively get out and support his reelection.

W

Right, because..

M

Yes, just don't want to get off his back, we want to get on his bandwagon and help him.

M

If he's on our bandwagon.

M

Right.

M

Okay. The next thing that we should consider is the handbook on political action andto show

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M

people basically how they can get involved, and how simple it is to do it.

M

Okay. What you got to do then is explain, in this book, wwe have to make this book very basic.

M

The pro-life movement does not work the same way that the political parties do, by going directly to neighborhoods.

The voter identification program, which we've got going in some areas, is extremely important because that, that identifies where our pro-life strength is, it identifies the people by name, address, whatever.

W

Who they are. They've already been identified they only need to be called on.

M

And they would cross the party line.See. That's our strength, we will cross the party line.

M

Okay. And I spoke to some people from the American Legion. There's Foreign Wars, there's the American Legion, there's a group of veterans

8204032-1195

NATIONAL RIGHT TO LIFE committee, inc.

NATIONAL OFFICE — Suite 317, National Press Bldg. — 529 14th Street, N.W. — Washington, D. C. 20045 — (202) 638-4396

February 28, 1979

Dear Congressman:

In order to reflect the balanced opinion of the United States Congress, an equitable distribution of pro-life ideology should be represented in any new make-up which will be the new House Select Committee on Population.

The House Select Committee on Population, which is dominated by pro-abortionists, has, to no one's surprise, generated a typical pro-abortion report. Four interesting factors are:

a) The report is pro-abortion propaganda in that it concludes further population growth will have very serious and detrimental results, thereby contributing to the pro-abortion premise that "we must kill them because the world is too small."

b) The report totally lacks any scientific data to support its conclusions, in spite of the effort of the Committee to generate such data.

c) The report contains glaring errors such as an exaggeration of one alleged problem by a factor of ten and several Orwellian reversals where all available data indicates one thing and the Committee without factual backing, claims the opposite is true.

d) When glaring errors were called to the attention of the Chairman, he attempted to "stonewall" in a manner consistent with the worst traditions of American politics.

This Committee should not be reconstituted unless pro-life Congressmen are permitted to ask appropriate questions to determine whether the charges in this letter are correct. A more detailed analysis of the output of this Committee and a copy of the Chairman's stonewalling letter is available upon request.

Your friend for life,

Sean Morton Downey, Jr.
Legislative Consultant, NRLC

b 2 0 4 0 3 2 1 1 9 6

BENJAMIN FRANKLIN STATION • P.O. BOX 14283 • WASHINGTON, D.C. 20044 • (202) 639-3961

My Dear Pro-Life Friend:

Abortionist Senator Robert Packwood of Oregon was quoted in the February issue of Congressional Quarterly: "if right to life groups can defeat eight or ten House members and one or two Senators, OTHERS WILL GET THE MESSAGE."

You and you alone have the great opportunity to deliver that message loud and clear to the abortionists in the Congress on Tuesday, March 21, 1978 by casting your vote for Don Lyon in the Republican primary.

Congressman John B. Anderson has consistently voted anti-life on every major issue. He has ignored the will of the people. In his campaign he continues to court such anti-life people as Nelson Rockefeller (Rockefeller raised $11,000.00 at a Washington D. C. cocktail party for Anderson) who through his millions has funded the deaths of more unborn children than any one person in history. Other Anderson supporters under the guise of the word "pro-choice" have voted to use your hard-earned tax dollars to fund the deaths of over 300,000 unborn children each year. Anderson has done the same.

In the early years of the Civil Rights movement, many many Congressmen consistently voted against the struggle. However, as the tide turned so did many of these men who remain in the Congress today. They feared for their political lives. A grass-roots movement changed America.

Now, another and even more powerful grass-roots movement, middle America, is revolting against the legal murder of our future generations. They are repulsed by this federally financed killing and are ready to do something about it.

No matter how clever the argument, we all know when life begins. The few who claim they don't are on the Supreme Court. They have ruled abortion is legal up to the moment of birth, UP TO THE MOMENT OF BIRTH. Mr. Anderson supports these decisions.

Your vote in the Republican primary will make the difference. If you vote pro-life on Tuesday, March 21, the 16th Congressional District of Illinois will be the spark that will ignite the fuse to make 1978 the year of life.

This is the year pro-life people must and will be heard. In this election you will take into the polling booth, in your hands, power over the life or death of millions of unborn children. Make no mistake about it, the choice is yours.

Don Lyon has pledged to support pro-life legislation and a Human Life Amendment. Life Amendment Political Action Committee proudly endorses Don Lyon and urges all pro-life people to support his campaign on Tuesday, March 21, 1978.

The choice is yours, we only hope and pray that you will join in this effort to save the babies, who, without your important vote, will never see the light of God's beautiful day.

FOR LIFE,

Morton Downey, Jr.
Chairman, LAPAC

Mildred F. Jefferson
Mildred F. Jefferson, M.D.
Advisory Chairman, LAPAC

P.S. AS A PRO-LIFER IN THIS ELECTION YOUR VOTE MEANS LIFE FOR THE UNBORN. PLEASE MARK YOUR CALENDAR TO VOTE ON TUESDAY, MARCH 21, FOR DON LYON AND HAVE TEN PRO-LIFE FRIENDS DO THE SAME.

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, INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

Dear Friend of Life:

The death count in the abortion war against the unborn citizens of America is rising daily.

No one knows exactly how many of our country's unborn children die at the hands of the abortionists. The numbers you read are estimated from trends shown in the showcase abortion clinics.

The actual number of abortions done in the United States each year may now be well over one and one-half million.

Please think what this means. We know that every successful abortion means one dead baby. What we do not know is what has happened to the thousands and thousands of women and girls who are the victims of the abortionists.

Some of them are dead -- like the 18-year-old in Illinois whose socially-prominent abortionist let her walk out of the clinic bleeding to death from a torn uterus that was still holding the incomplete remains of her unborn child. Some have been permanently mutilated -- like the 25-year-old in Dallas whose uterus was so badly damaged during her Supreme Court-approved abortion that she had to undergo a hysterectomy in order to save her life.

Countless others have suffered complications which will result in high medical costs of psychiatric, obstetric and gynecologic care in addition to the already high bills for the abortions done in that money-making business.

This high cost will be paid for by YOUR taxes and YOUR insurance premiums unless you are willing to do something about it.

I'm writing to you on behalf of LAPAC in the sincere hope that not only do you object to the willful destruction of human life that abortion represents, but that you will decide to join us in our increasingly successful campaign to restore the legal protection of life and get the government out of the abortion business.

LAPAC, Life Amendment Political Action Committee, is working to return the government of the people to the people. It is a national political action committee which is dedicated specifically to electing men and women to office who will support a Human Life Amendment to the U. S. Constitution which will protect life from its beginning to its natural end.

The Human Life Amendment will restore to the Constitution what we thought was already there until the 1973 U. S. Supreme Court's decision on abortion limited the protection of the Constitution to those already born.

The democratic process of amending the U. S. Constitution is a hard political job that depends on having the right people in office. Winning elections

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requires hard work from many people and a great deal of money.

LAPAC must be able to help defend pro-life legislators (who are the targets of our well-funded opponents) and defeat those who are anti-life.

Never before has the right-to-life movement been in a position to influence the outcome of so many elections, both locally and nationally. Winning key seats in the 1978 elections could shorten the right-to-life battle by more than ten years.

We need your help today. Some of the primary elections are <u>less than one month away</u>. Your check for $200, $100, $50, $25, $15 or more will allow us to help more candidates through television and radio ads and might make the winning difference.

In order to continue and maintain the gains we have made in protecting the unborn child, your generous contribution is vital.

LAPAC cannot exist without your support. Please send your contribution in the enclosed envelope today to help us win the fight for life. When we win, that victory will not be for ourselves, but for America and all mankind.

Sincerely for Life,

Mildred F. Jefferson, M.D.
Honorary Chairperson, LAPAC

P.S. Please send your donation as soon as possible. The anti-life organizations are gaining ground in the political arena each day — and we must have your support in order to combat their insidious threats. Please don't delay. Use the postage-paid envelope enclosed.

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...In order to represent you and your pro-life interests, we must know how you stand on the issues involved. Please circle the appropriate answer and return the survey in the enclosed envelope along with your donation. All names will be kept confidential.

1. How do you feel about President Carter's non-position on the anti-abortion question?

   a. Favorable b. Opposed c. Undecided

2. Do you know how your senators and congressmen stand and vote on the abortion issue?

   a. Yes b. No

   If not, would you like to hear from them on this life and death issue?

   a. Yes b. No

3. Since the January 22, 1973 Supreme Court decision legalized abortion on demand, would you support an amendment to the Constitution (Human Life Amendment) to reverse this decision?

   a. Yes b. No c. Undecided

4. Are you in favor of LAPAC creating a national anti-abortion rating which would publish and evaluate your elected officials on their stand on abortion?

   a. Yes b. No c. Undecided

5. Do you believe that pro-life candidates should be supported regardless of party?

   a. Yes b. No

6. Do you agree with President Carter and other political figures that abortions should not be funded by the government to finance elective abortions for the poor?

   a. Yes b. No c. Undecided

7. Do you believe that LAPAC should start a national Pro-Life Party?

   a. Yes b. No

8. Would you like your opinions on these national survey questions relayed to President Carter and the House and Senate? (Opinions only would be furnished; names would be kept confidential.)

   a. Yes b. No

9. Do you believe that LAPAC should launch a nation-wide fund drive to elect pro-life officials?

   a. Yes b. No c. Undecided

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Foes of Abortion Aim at Hill 'Deadly Dozen'

By Bill Peterson
Washington Post Staff Writer

he anti-abortion movement's political command center National Press Building, s being sent out that the s turned and politicians better

ve proven our point," declares Brown, director of the move- political, action committee. a pro-life vote. We've come political force."

ay last year, a young assist- the telephone asking a fe in Wisconsin to donate $15 and to be used to defeat con- senators in areas "where ng pro-life vote of 5 to 8 per- an make a difference." "We've this works," the woman is in places like Iowa where we Jepsen and in those ces in Minnesota" where ck both seats.

n's newsletters take the same They boast of replacing "abor- Dick Clark, Tom McIntyre Floyd Haskell" with "strong fe leaders Roger Jepsen, Gor- Humphrey and Bill Armstrong" nate races in Iowa, New Hamp- and Colorado.

ese claims, according to those familiar with the campaigns, are an imagination at best, a gross exag- tion at worst.

hat they did was to look at elections e people who happened to oppose positions last and then they said won them," says Karen Mulhauser, of the National Abortion Rights on League (NARAL), leading "pro- e" group.

said 'we won them,'" says Karen Mulhauser, head of the National Abortion Rights Action League (NARAL), lead- 'pro-choice' group.

But her comments illustrate the difficulty groups like NARAL and candidates who support their views face in dealing with the volatile politics of abortion.

It's a problem that is certain to intensify in months ahead, posing special headaches for liberals in the House and Senate attempting to judge the real or imagine ballot power of pro-life forces.

Brown's group, the Life Amendment Political Action Commitee (LAPAC), has already raised hackles on Capitol Hill by issuing a 1980 'hit list'—dubbed the "deadly dozen."

The list is headed by such well-known liberals as Sen. Birch Bayh (D-Ind.), Sen. George McGovern (D-S.D.), Sen. Frank Church (D-Idoho) and Rep. Morris Udall (D-Ariz). NARAL's Mulhauser charges this indicates "they're out to get liberals and they're joining forces with the rest of the right wing. They simply don't target conservatives."

The list does have a decidedly left-of-center cast. Only three Rpublicans, all modrates—Sen. Robert Packwood of Oregon, Rep. John Anderson or Illinois and Rep. Harold C. Hollenbeck of New Jersey—appear on it.

The others named are: Sen. Patrick J. Leahy (D-Vt.), Sen. John Culver (D-Iowa), Rep. Robert Edgar (D-Pa.), Rep. Joseph Fisher (D-Va., and Rep. Robert Drinan (D-Mass.)

But there's no clear pattern to those on the list. Bayh, McGovern, Packwood and Drinan, a Catholic priest, are longtime targets of anti-abortion forces. Hollenbeck, however, voted with the anti-abortion forces 40 percent of the time last year, according to a NARAL index.



SEN. FRANK CHURCH

REP. JOSEPH FISHER

... targets of anti-abortionists, the senator is outraged, House member puzzled.

While Fisher is on the list, Rep. Herb Harris, a Democrat from a neighboring Northern Virginia district, is not, although their voting records on abortions questions are identical.

"I'm puzzled by it, but I'm not losing any sleep about it," says Fisher, the father of seven. I gues I'm saddened more than anything. I don't like to be on anyone's hit list."

Church was outraged when he found himself among "the deadly dozen."

"The accusation that I advocated abortion on demand is an outlandish baldfaced lie," he told a press conference in sue my position has always been decidedly conservative . . . I intend to pin to the wall any allegations that misrepresent my position."

In drawing up the list, LAPAC considered the voting records and vulnerability of candidates as well as the strength of pro-life groups in their areas. "We can't go out and defeat everyone we don't like" say LAPAC director Brown. 'So we picked a few where we think we can make a difference."

Th group's ultimate litmus test for any officeholder is whether or not he supports a constitutional amendment prohibiting abortion.

With a budget last year of only $100,000, LAPAC has few real resources of its own. It was formed as an independent political action commitee, supposedly free from any formal ties to other anti-abortion groups—a legal distinction that permits it to raise money from the general public rather than the membership of any on group.

But LAPAC opponents question how independent it realy is. LAPAC's chairman is Sean Morton Downey Jr., a longtime lobyist for the National Right to Life Committee. Brown's wife is the director of that group. 'You might say we're in bed with the National Right to Life Committee," Brown says.

Last fall, LAPAC made cash contributions to several candidates, set up a telephone bank in New Hampshire manned by Barbara. Baroody, a Brown assistant, and paid for the printing of 30,000 leaflets in Iowa attacking Sen. Dick Clark's stand on abortion. Clark opposed constitutional amendment and had voted to permit abortions under some conditions.

The Sunday. before election, pro-life groups passed out the leaflets in Catholic church parking lots across th state. When Clark was defeated, 5 percent to 48 percent, Brown was quick to claim credit.

"We wanted to prove that the pro-life vote was for real last fall," he says. 'We did that. We showed that people will cross party lines to vote on this single issue."

Brown claims local groups in more than 20 states are considering starting political action committees modeled after LAPAC. "We're going to haunt to death anyone who runs in 1980," he says. "We can and will make it so difficult that they'll have to give us our amendment.

No one doubts the fervor of those in the pro-life movement—or their ability to mobilize quickly. (Brown claims can generate 50,000 letters to Congr almost at the drop of a hat.) And Right to Life Party candidate for G ernor in New York State last fall tracted more than 100,000 vote enough to automatically qualify newly formed party on future ballot

But many observers still quest their real power at the ballot box.

"I think they have some influence, I don't think too many people will v against me, because of my position one issue, particularly if they've he what I have to say about it," says R Fisher, who has been attached in a abortion leaflets passed out in churc before his last two elections.

Even Iowa—supposedly the m dramatic example of single-issue poli in last fall's election—is not as clear a case as some believe.

When the Des Moines Register veyed voters laving th polls on elec day, it found 8 percent of them tey'd voted for Jepsen because of stand on abortion. In an election dec by only 28,000 votes, this would enough to tip the balance. But in a zing its own poll results, the newsp concluded, "the abortion issue was decisive."

There's no denying, however, the pro-life—and other single- groups have got a good number of ticians scared half to death. "T groups are a dangerous trend in A ican politics," complains Bayh, ec the sentiments of many liberals plaints NARAL's Mulhauser. "We being out-organized."

"We are not outnumbered."

The great irony about this is groups are gaining political clout time when every major poll taken o subject shows that a majority of ican support a woman's right to whether she wants an abortion.

NBC National Broadcasting Company, Inc.
Thirty Rockefeller Plaza
New York, N.Y. 10020 212-664-4611

Lester M. Crystal
President
News Division

February 13, 1979

Ms. Karen Mulhauser
Executive Director
National Abortion Rights
Action League
825 15th Street, N.W.
Washington, D.C. 20005

Dear Ms. Mulhauser:

Fred Silverman has asked me to respond to your letter concerning our January 21 WEEKEND report on the anti-abortion movement.

I think it should be made clear at the outset that the responsibility of NBC News is to inform the public of the various contrasting views on the subject of abortion. The WEEKEND report did not ignore the pro-abortion view. Indeed, you were one of the pro-abortion spokespersons shown at some length in the program, along with Bill Baird, Abortion Activist, and Pat Gavett of the Religious Coalition for Abortion Rights.

I understand that the criticism is not that we ignored your views, but that this WEEKEND report was devoted mostly to the anti-abortion movement. At the outset of the program, Linda Ellerbee stated:

> "This program will be about one subject.
>
> That subject is not abortion -- that is it's not a debate about the merits of the issue.
>
> It is a story about the anti-abortion movement -- and its political power -- power many Americans weren't aware it had until last November's election."

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On January 23, NIGHTLY NEWS reported about the anti-abortion demonstration that occurred in Washington protesting the Supreme Court decision on abortion. The report aired contrasting interviews with Nellie Gray of the March for Life; Gloria Steinem, a pro-abortion spokesperson; and Eleanor Smeal, President of NOW.

I cite these reports as only examples of coverage NBC News has given the subject during the few days surrounding the WEEKEND report of which you complain. It amply illustrates that our coverage of this subject has been extensive and full. During the past year, hardly a week has gone by in which NIGHTLY NEWS, TODAY, MEET THE PRESS or some other NBC program has not covered some aspect of the debate on the subject. NBC News has not ignored your position, and it will continue to cover the contrasting views, including your own, as long as the debate continues.

I would now like to turn to some of the specific objections you had to the WEEKEND report. WEEKEND did not say that the anti-abortion movement was the most effective single issue political movement in the country. What WEEKEND said was:

> "There have been other movements recently to cut taxes, promote gay rights, legalize marijuana...but the movement to outlaw abortion has probably been the most underestimated, and it has become a real force in American politics."

We think that statement was accurate and, indeed, we think that you would agree.

You complain that information provided by NARAL was consciously excluded from the report. Since WEEKEND made extensive use of your appearance, it is clear that we did not ignore NARAL views. Because this was a report about the anti-abortion movement as a political force, we necessarily had to make editorial judgments about what to include, and exclude, from the program.

You complain that WEEKEND went to the Democratic Mid-Term Convention in Memphis for the purpose of filming anti-abortion strength. In fact, we went to Memphis to find out how the anti-abortion movement functions. WEEKEND aired what it found. There were a few "pro-life" pickets outside the convention hall. Sean Downey spoke to them with a bullhorn. The report made it evident that not only was the "pro-life" group excluded from the convention, but that Sean Downey was rebuffed by his old friend, Senator Kennedy.

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WEEKEND thought this aspect of the anti-abortion movement was a timely and newsworthy subject, because the political ramifications of the movement are a relatively new development which, to the surprise of many observers, has become significant.

Although this was the aim of this particular WEEKEND report, we want you to know that NBC News has endeavored to cover the contrasting views, not only within the WEEKEND report itself, but throughout our general news programming. For example, the next morning, on January 22, TODAY devoted an entire half-hour to covering the abortion controversy as it has developed in various parts of the country. In a report from Washington, NBC News correspondent Tom Pettit reported about the position of Sean Morton Downey, hired lobbyist for the National Right to Life Movement, and of Carol Warner, his counterpart at your organization, the National Abortion Rights Action League. Pettit's report covered Senator Jesse Helms (Republican, North Carolina) who supports a constitutional amendment to bar abortions entirely, and his opposite, Pat Schroeder (Democrat, Colorado), who is seeking reinstatement of federal funds for abortion.

NBC News correspondent Norma Quarles reported from Fort Wayne, Indiana, about the protest pickets outside of the abortion clinic, run by the Women's Health Organization. She interviewed Kimi Molach, representing Lutherans for Life, who oppose abortion, and Mary Collins, representing the Women's Health Organization, which intends to carry on the work of the clinic and has filed a law suit to stop the picketing.

Also in the same TODAY report, NBC News correspondent Robert Abernethy reported about the positions of various religious groups. Interviewed in the report were Bishop James C. Kelly of the Conference of Catholic Bishops, who explained the Catholic position against abortion; Rabbi Harold S. White, who explored the Jewish position, which corresponds to that of pro-abortionists; and Dr. James Childress, a Protestant minister, who explained that the Protestant position is largely that of individual conscience.

On January 20, the day before the WEEKEND report you complain of, NIGHTLY NEWS reported about the debate going on in Amarillo, Texas, concerning prospective legislative action in the Texas legislature that would limit abortion. Interviewed in the report were Patricia Beyea of the ACLU, who called on women to fight for the right to reproductive freedom, and Martin Nussbaum, member of the Right to Life Committee, who argued that abortion is willful destruction of human life. Also interviewed was Amy Long, a nineteen year old unmarried mother, who said she does not oppose abortion, but who could not do it herself.

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You complain that the supposed success of the hit lists for 1978 and the anticipated success for 1980 seemed to be the center of the show. Whether or not the performance of the anti-abortion movement was strong in 1978 depends, I suppose, on one's point of view. From the point of view of the anti-abortionists, they were pleased to have gotten their issues on the ballot and to have gotten the vote they did, whether or not they won. WEEKEND reported about their aims for 1980, but it did not venture a forecast concerning how well they will do.

You complain that WEEKEND did not air the comments of Senators McIntyre or Haskell concerning whether they lost their elections because of this issue. WEEKEND tried to get their statements, but they refused to comment one way or the other.

Finally, you complain that WEEKEND reported that there have been charges of Catholic Church involvement in the anti-abortion movement and an FEC complaint about illegal practices by the Pro-Life Action Committee in Iowa, but that none of these charges had been proved. WEEKEND did not intend to imply that these charges were "unsubstantiated" and "hollow," as you argue. Until official action of some kind is taken, we can have no opinion concerning the merits of these charges.

We do regret your reaction to the program. Please be assured that it is our plan to continue to cover the story, as accurately and as fairly as we can, over the period of time available to us, from the various points of view. In the meantime, we do thank you for giving us this opportunity to explain our position to you.

Sincerely,

Lester M Leyshkel

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PLACE AN "X" BELOW THE APPROPRIATE LETTER OR FIGURE IN THE BOX AT THE RIGHT OF THE "REPORT" HEADING BELOW:

"PRELIMINARY" REPORT (Registration): If this is a "Preliminary" Report (Registration), place an "X" in the box at the letter "P" and fill out page 1 only.

"QUARTERLY" REPORT: To indicate which one of the four calendar quarters is covered by this Report, place an "X" below the appropriate figure. Fill out both page 1 and page 2 and as many additional pages as may be required. The first additional page should be numbered as page "3," and the rest of such pages should be "4," "5," "6," etc. Preparation and filing in accordance with instructions will accomplish compliance with all quarterly reporting requirements of the Act.

Year: 19 78 ←

REPORT

PURSUANT TO FEDERAL REGULATION OF LOBBYING ACT

P	QUARTER			
	1st	2d	3d	4th
	X			

(Mark one square only)

NOTE on ITEM "A."—(a) IN GENERAL. This "Report" form may be used by either an organization or an individual, as follows:
(i) "Employee".—To file as an "employee," state (in Item "B") the name, address, and nature of business of the "employer." (If the "employee" is a firm [such as a law firm or public relations firm], partners and salaried staff members of such firm may join in filing a Report as an "employee.")
(ii) "Employer".—To file as an "employer," write "None" in answer to Item "B."
(b) SEPARATE REPORTS. An agent or employee should not attempt to combine his Report with the employer's Report:
(i) Employers subject to the Act must file separate Reports and are not relieved of this requirement merely because Reports are filed by their agents or employees.
(ii) Employees subject to the Act must file separate Reports and are not relieved of this requirement merely because Reports are filed by their employers.

A. ORGANIZATION OR INDIVIDUAL FILING

1. State name, address, and nature of business.

National Right to Life Committee, Inc.
Suite 341, National Press Building
529 14th Street, NW
Washington DC 20045

2. If this Report is for an Employer, list names of agents or employees who will file Reports for this Quarter.

NOTE on ITEM "B."—*Reports by Agents or Employees.* An employee is to file, each quarter, as many Reports as he has employers; except that: (a) If a particular undertaking is jointly financed by a group of employers, the group is to be considered as one employer, but all members of the group are to be named, and the contribution of each member is to be specified; (b) if the work is done in the interest of one person but payment therefor is made by another, a single Report—naming both persons as "employers"—is to be filed each quarter.

B. EMPLOYER—State name, address, and nature of business. If there is no employer, write "None."

NONE

NOTE ON ITEM "C."—(a) The expression "in connection with legislative interests," as used in this Report, means "in connection with attempting, directly or indirectly, to influence the passage or defeat of legislation." "The term 'legislation' means bills, resolutions, amendments, nominations, and other matters pending or proposed in either House of Congress, and includes any other matter which may be the subject of action by either House"—§ 302 (e).
(b) Before undertaking any activities in connection with legislative interests, organizations and individuals subject to the Lobbying Act are required to file a "Preliminary" Report (Registration).
(c) After beginning such activities, they must file a "Quarterly" Report at the end of each calendar quarter in which they have either received or expended anything of value in connection with legislative interests.

C. LEGISLATIVE INTERESTS, AND PUBLICATIONS in connection therewith:

1. State approximately how long legislative interests are to continue. If receipts and expenditures in connection with legislative interests have terminated, place an "X" in the box at the left, so that this Office will no longer expect to receive Reports. ☐

2. State the general legislative interests of the person filing and set forth the *specific* legislative interests by reciting: (a) Short titles of statutes and bills; (b) House and Senate numbers of bills, where known; (c) citations of statutes, where known; (d) whether for or against such statutes and bills.

3. In the case of those publications which the person filing has caused to be issued or distributed, in connection with legislative interests, set forth: (a) description, (b) quantity distributed, (c) date of distribution, (d) name of printer or publisher (if publications were paid for by person filing) or name of donor (if publications were received as a gift).

(Answer items 1, 2, and 3 in the space below. Attach additional pages if more space is needed.)

1. Indefinitely

2. Promoting passage of: a. Human Life Amendment to the Constitution, S J Res 15 and H J Res 198, and other similar amendments;
   b. Opposing government funding of abortions;
   c. Alternative to abortion legislation.

3. NATIONAL RIGHT TO LIFE NEWS, Monthly, 10,000 copies. ←
   Union Advocate, St. Paul, MN 55103

4. *If* this is a "Preliminary" Report (Registration) rather than a "Quarterly" Report, state below what the nature and amount of anticipated expenses will be; and if for an agent or employee, state also what the daily, monthly, or annual rate of compensation is to be. *If this is a "Quarterly" Report, disregard this Item "C 4" and fill out Items "D" and "E" on the back of this page.* Do not attempt to combine a "Preliminary" Report (Registration) with a "Quarterly" Report. ←

AFFIDAVIT

State or Territory: City of Washington
District of Columbia } ss:

I, the undersigned affiant, being duly sworn, say: (1) That I have examined the attached Report, numbered consecutively from page 1 through page ____ and the same is true, correct, and complete as I verily believe. (*Be sure to fill in number of last page.*)

[*If the Report is for an individual, strike out paragraph "2."*] ←

(2) That I am Office Manager of the above-named organization, for whom this Report is filed, and that I am authorized to make this affidavit for and on behalf of such person.

(Print or type name below signature) (Signed) Judith A. Brown Affiant
(Typed)

Subscribed and sworn to before me on June 12, 1978

(Print or type name below signature) (Signed) [illegible] (Official authority for administering oath)
(Typed)

My Commission Expires Nov. 30, 1978

Issued 6-4-58 by the Secretary of the Senate and the Clerk of the House of Representatives. (Supersedes Form Issued 1-1-51.)

MRS. PENNY DINES
RENO, NEVADA

OCT 22 REC'D

Dear Friend:

I am writing to you because of my involvement with a pro-life organization dedicated to electing pro-life officials to public office. The organization is the Life Amendment Political Action Committee, Inc.

A few months ago I received a letter from LAPAC telling about the gains they made last fall in getting many more pro-life candidates elected to Congress. It was very encouraging. Finally, I thought, the tide seems to be turning in our favor, and I was helping, if only in a small way.

The letter went on to explain why it was so important to keep the momentum going, looking ahead to more races coming up. But of course this would take money and the Committee was depending on its supporters to provide necessary funds.

Unfortunately, I was already over my household budget for the month, and we were really feeling the "pinch." (As any housewife knows, trying to stick to a food budget these days is no easy task!) But I did manage to scrape together a few dollars which I sent, along with a short note saying how I wished it could be more...that I really believed LAPAC was performing a crucial role in the whole pro-life fight...and that I hoped others felt the same way I did.

About a week later, I received a call (right in the middle of doing the children's laundry!) from Sean Morton Downey, Jr., Chairman of LAPAC's Board of Directors. He said he had read my letter and was very moved by it.

"Would you be willing," he asked, "to write a similar letter, explaining in you own words why people should support LAPAC?" I was silent for a minute. Then I asked, "You mean like a 'one contributor to another' kind of letter?"

"Exactly," he answered.

Well, after giving all my reasons why I wasn't

capable, that these things were better left to professionals, etc...Sean would hear none of it. (He is a very persuasive person--thank goodness he's on our side!)

Anyway, here I am sitting at my old Royal typewriter, wondering what to write next. It would be so much easier if we could just sit down over a cup of coffee and talk about it.

Since that isn't possible, I'll get to the heart of the matter right away.

Why do I support LAPAC? There are many other worthy organizations devoted to the pro-life cause. As much as I'd like to, I simply can't support all of them. I chose LAPAC because the abortion issue, rightly or wrongly, has become a political issue, and it will be decided in the political arena, at the state and federal levels.

LAPAC, it seems to me, is the perfect vehicle to fight our fight. It is a political action committee, solely dedicated to electing pro-life candidates who will actively support the single most important goal of LAPAC -- the passage of the Human Life Amendment to our Constitution.

And LAPAC is making solid progress. More and more LAPAC-supported candidates are getting sent to Congress. Last fall, they helped elect 37 to do the battle for us. And their effect is already being felt.

Just recently I read in the newspaper that Medicaid-funded abortions were cut by an astounding 99% as a result of the Hyde amendment banning federal funding of "abortions on demand." In terms of actual lives saved, it means 200,000 babies were born in the last 11 months who would otherwise have been aborted. Praise the Lord!

But all is not rosy. Many states -- big ones, like New York, New Jersey, Pennsylvania, Illinois, Michigan, California -- are using their own money to allow the killing to continue because the Hyde amendment only applies to federal funding.

Which means probably well over 1,000,000 babies will be killed this year! And we still don't have enough pro-life votes in Congress to produce the 2/3 majority needed to pass the Human Life Amendment -- the only measure that will effectively stop the killings.

So we can't sit back and rest on our laurels. Not for a minute.

LAPAC doesn't plan to. LAPAC was instrumental in two congressional elections on April 3, 1979 in California and Wisconsin, and I am thrilled to report that both pro-life challengers won their elections. The one in California where the pro-lifer won by a stunning landslide was where LAPAC was most active. Another special election will soon be held in Illinois and LAPAC will be active again...if we all help them now.

LAPAC also has targeted for defeat some of the major obstacles to the passage of our Human Life Amendment. I'm speaking of influential senators like George McGovern, Birch Bayh, Bob Packwood, Frank Church, and others. The more pressure LAPAC is able to put on these politicians over the coming months, the more chance we have of either changing their minds or defeating them come election time.

But none of this can be accomplished without funds, and LAPAC used what little they had last fall in helping to elect 37 more pro-life fighters to Congress. Unlike a lot of other organizations, LAPAC can't turn to Big Brother, Big Business or Big Labor for funding. It seems that saving babies is "too controversial." So, I guess that just leaves us -- you and me and others who believe enough to <u>give</u>, sometimes even when it hurts.

How <u>much</u> should you give? LAPAC suggests $15, $25, $50, or $100. They need hundreds of such amounts in each category to effectively carry out their political action plan. Just take the special elections I mentioned. Mr. Downey told me the cost of providing one LAPAC professional to work in the campaign exceeded $3,000.

Maybe you should ask yourself how much is it worth to save one baby's life? Obviously, it's priceless. But it's something to think about when you consider some of the less essential things we all tend to spend our money on at times.

It just occurred to me, and I'll leave you with this passing thought. Many of my friends contribute to all kinds of "endangered species" causes -- things like Save the Whales, Save the Bald Eagle, Save the Egrets. But when I ask them about saving babies, the most endangered and precious species of all, they back off. I suppose it's a matter of knowing where your

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priorities lie.

I know where mine lie. And I believe you do too.

LAPAC has enclosed a contribution form and a First Class postage-paid reply envelope." Please put them now.

God Bless you,

Penny Dines

Mrs. Penny Dines
On behalf of LAPAC

P.S. LAPAC also suggests that you write to your State Legislature asking that they follow the example of the Hyde Amendment and stop using your taxpayer money to fund abortions. I think it's an excellent idea. In fact, it's the very next letter that's going in my typewriter!

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8204032122







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April 10 Quarter 4

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1-24

Paul D. R

LAPAC, INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

Dear Friend of Life:

The death count in the abortion war against the unborn citizens of America is rising daily.

No one knows exactly how many of our country's unborn children die at the hands of the abortionists. The numbers you read are estimated from trends shown in the showcase abortion clinics.

The actual number of abortions done in the United States each year may now be well over one and one-half million.

Please think what this means. We know that every successful abortion means one dead baby. What we do not know is what has happened to the thousands and thousands of women and girls who are the victims of the abortionists.

Some of them are dead — like the 18-year-old in Illinois whose socially-prominent abortionist let her walk out of the clinic bleeding to death from a torn uterus that was still holding the incomplete remains of her unborn child. Some have been permanently mutilated — like the 25-year-old in Dallas whose uterus was so badly damaged during her Supreme Court-approved abortion that she had to undergo a hysterectomy in order to save her life.

Countless others have suffered complications which will result in high medical costs of psychiatric, obstetric and gynecologic care in addition to the already high bills for the abortions done in that money-making business.

This high cost will be paid for by YOUR taxes and YOUR insurance premiums unless you are willing to do something about it.

I'm writing to you on behalf of LAPAC in the sincere hope that not only do you object to the willful destruction of human life that abortion represents, but that you will decide to join us in our increasingly successful campaign to restore the legal protection of life and get the government out of the abortion business.

LAPAC, Life Amendment Political Action Committee, is working to return the government of the people to the people. It is a national political action committee which is dedicated specifically to electing men and women to office who will support a Human Life Amendment to the U. S. Constitution which will protect life from its beginning to its natural end.

The Human Life Amendment will restore to the Constitution what we thought was already there until the 1973 U. S. Supreme Court's decision on abortion limited the protection of the Constitution to those already born.

The democratic process of amending the U. S. Constitution is a hard political job that depends on having the right people in office. Winning elections

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

LAPAC FUND

Let's All Protect A Child Fund | Suite 339, National Press Building | 529 14th Street, Washington, D.C. 20

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

Just recently NBC ran a one hour special on our activities while this past week I appeared on the Phil Donohough show along with my fellow board ~~member~~ Dr. Jack Willke. In addition, PEOPLE magazine has just featured our Director, Paul Brown and his wife Judie in their publication. We are on the move, but we must have your support!

Some of you have already helped the pro-life cause, I know the rest of you are also willing to help.

Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates.

Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing am amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Morton Downey
Chairman

SMD/bb

LAPAC Fund is a division of Christian Family Renewal.
All contributions to the LAPAC FUND are totally tax deductible.

8204032116

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 505
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

November 13, 1979

Mr. Robert Saranow
U.S. Custom House
300 S. Ferry House
Terminal Island
Los Angeles, California 90731

Dear Mr. Saranow:

In April of this year, the District Director referred to you my letter describing a probably improper activity of Christian Family Renewal, a §501(c)(3) organization. Enclosed is a copy of that correspondence.

The LAPAC Fund (Let's All Protect a Child Fund) of Christian Family Renewal has a name remarkably similar to LAPAC, Life Amendment Political Action Committee, a political committee registered with the Federal Election Commission. We ask you to investigate whether the similar names were chosen to deceive the hurried reader and more important whether the letter represents a scheme to use a §501(c)(3) organization to raise money for a political committee.

Enclosed for your further information is a copy of LAPAC's July 10, 1979 report filed with the F.E.C. On the page numbered 7903 132 0827 (at left hand margin), LAPAC reports paying Christian Family Renewal $800 for pro-life fundraising ads. We request that you investigate this matter further. If the $800 payment was for the fundraising letter enclosed with my original materials, this indicates that "Let's All Protect a Child Fund" was not a tax deductible project of Christian Family Renewal but really a fraudulent attempt to raise tax deductible money through a §501(c)(3) organization and then transfer such funds to a political committee.

It occurs to me that the $800 payment may be an attempt to sanitize the transactions by characterizing it as an ad for LAPAC. Such after-the-fact cosmetic work is not permissable. It does not make the letter any less fraudulent and clearly destroys the basis for tax deductions by the individual contributors.

You should also be alert to other possible illegalities. If the letter was mailed on LAPAC's behalf under the bulk mail permit of Christian Family Renewal, that is a violation of the Post Office

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regulations. The F.E.C. is investigating whether or not LAPAC may solicit contributions from the general public or whether its close relationship to National Right to Life Committee limits it to soliciting funds only from NRLC members. Accordingly, the whole solicitation my violate another federal statute.

I trust you will investigate this matter carefully.

Sincerely,

Gail H. Harmon

GHH/dmw
Enclosures

cc: Karen Mulhauser
Harriet Matthews

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FEC FORM 3
REVISED
January, 1979
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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)

FEC RECEIVED
FEDERAL ELECTION COMMISSION
APR 16 PM 2:59

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

1 Life Amendment Political Action Comm. Inc.
Name of Candidate or Committee (in full)

2 I.D. No. C00082297
Committee

P O Box 14263 Ben Franklin Stn.
Address (number and street)

3 -
Office Sought, District or State (if applicable)

Washington DC 20044
City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election 1979

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)

☐ Tenth day report preceding _____ election (primary, general or convention)
on _____ (date) in the State of _____
☐ Thirtieth day report following _____ election (primary, general or convention)
on _____ (date) in the State of _____

☐ 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 1/1/79 Through 3/31/79

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 79		$ 1194.21
7 Cash on hand at beginning of reporting period	$ 1194.21	
8 Total receipts (from line 19)	$ 51561.73	$ 51561.73
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	$ 52755.94	$ 52755.94
9 Total expenditures (from line 25)	$ 51306.08	$ 51306.08
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	$ 1449.86	$ 1449.86
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)	$ 6,000 —	

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

4-14-79
(Date)

Paul A Brown
(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (R0106)
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.

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because your goals are the saving of human lives [illegible]
donation to help in waging the battle. Enclosed is my check made payable to LAPAC for:

☐ $200 ☐ $100 ☐ $50 ☐ $25 ☐ $15 ☐ $_____ (other)

NAME _____

ADDRESS _____ CITY _____ STATE _____ ZIP _____

PHONE _____

DATE _____ SIGNATURE _____

The Life Amendment Political Action Committee must have the support of all those who believe in pro-life. Please list below the names and addresses of any friends or associates you know would be interested in supporting LAPAC both financially and physically in its efforts to elect a pro-life congress.

NAME _____ NAME _____

ADDRESS _____ ADDRESS _____

CITY, STATE, ZIP _____ CITY, STATE, ZIP _____

NAME _____ NAME _____

ADDRESS _____ ADDRESS _____

CITY, STATE, ZIP _____ CITY, STATE, ZIP _____

Please return this list with your donation in the enclosed postage-paid envelope.

8204032120

FIRST CLASS
PERMIT NO. 448
Washington, D.C.

BUSINESS REPLY MAIL
No postage stamp necessary if mailed in the United States

POSTAGE WILL BE PAID BY

LAPAC INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE
P.O BOX 14263 • BEN FRANKLIN STATION
WASHINGTON, D C 20044

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

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD
Life Amendment Political Action Comm. Inc.	FROM: 1/1/79 TO: 3/31/79

RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
19. Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	$ 4362.38	
(b) Unitemized	$ 47199.35	
(c) Sales and collections included above: Less by items on memo Schedule B (c) ( )		
(d) Subtotal of contributions from individuals	$ 51561.73	$ 51561.73
20. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committees (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	$ —	$
21. Other Income:		
(a) Itemized (use Schedule A)	$ —	
(b) Unitemized	$ —	
(c) Subtotal of other income	$ —	$
22. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	$ —	
(b) Unitemized	$ —	
(c) Subtotal of loans and loan repayments received	$	$
23. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	$ —	
(b) Unitemized	$ —	
(c) Subtotal of refunds, rebates, returns of deposits	$ —	$
24. Total Receipts	$ 51561.73	$ 51561.73

EXPENDITURES	Column A This Period	Column B Calendar Year-To-Date
25. Operating Expenditures:		
(a) Itemized (use Schedule B)	$ 51306.08	
(b) Unitemized	$ -0-	
(c) Subtotal of operating expenditures	$ 51306.08	$ 51306.08
26. 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	$	$
27. Transfers Out to Political Committees:		
(a) To affiliated/authorized committees (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	$	$
28. Independent Expenditures (use Schedule E)	$	$
29. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)	$	$
30. Total Expenditures	$ 51306.08	$ 51306.08

RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES	
25. 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)	$ —

FORM F3P
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for
Line Number 13

(Use Separate Schedules for each numbered line)

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
J.H. Brown 2018 Middlegreen Dr. Stafford, VA 22554 ☐ Primary ☒ General ☐ Other	7/11/78	$1,500	$	$1,500

NATURE OF OBLIGATION (Details of Debt):
Loan due 6-1-79 @ 5%

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
Doris Storms 2180 Woodlawn Eugene, OR 97401 ☐ Primary ☐ General ☐ Other	7/1/78	$4,500	$ —	$4,500

NATURE OF OBLIGATION (Details of Debt):
Loan due 6-1-79 @ 5%

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
☐ Primary ☐ General ☐ Other		$	$	$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	$	$	$6,000.00
TOTAL this period (last page this line number only)	$	$	$6,000.00

Carry outstanding balance only to appropriate line of summary

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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 1 of 4 for Line Number 22A

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full
Fifth Amendment Political Victory Committee Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C.	advance postage return mail Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	500.00
P.A. Brown P.O. Box 14363 DIRECTOR Washington D.C. 20045	retainer Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	2,000.00
Harolds Printing 216-5th Ave. Brookings, S.D.	payment on account Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	350.00
CMCA Inc. 9800 Edgeworth Ave. Capitol Heights, MD.	payment on account direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	2,000.00
Nevada Bell RENO, NEVADA	phone ~~expense~~ Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	100.00 270.00
IBM - D.C. P.O. Box 417 Philadelphia PA 19105	Typewriters Expenditure for: ☐ Primary ☐ General ☐ Other	1-8-79	270.00
Postmaster D.C.	advance postage fee for 1979 Expenditure for: ☐ Primary ☐ General ☐ Other	1-9-79	75.00
Postmaster .DC. 318-337	annual business fee Expenditure for: ☐ Primary ☐ General ☐ Other	1-9-79 1-9-79	35.00 30.00
SUBTOTAL of expenditures this page (optional)			$ 5630.00
TOTAL this period (last page this line number only)			$

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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 20b, 21b, and 22b, 23b, and 23c of FEC FORM 3

(Page 1 of 16, 29)
(Line Number 20B)

Use Separate Schedule 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
Columbia Travel 910 Nat. Press Bldg Washington, D.C.	Air Fare - expense Expenditure for: ☐ Primary ☐ General ☐ Other	1-11-79	569 00
Instagraint 1850 K. St. N.W. Washington, D.C.	Newsletter Expenditure for: ☐ Primary ☐ General ☐ Other	1-12-79	95.55
Columbia Travel 910 Nat. Press Bldg. Washington, D.C.	air fare Expenditure for: ☐ Primary ☐ General ☐ Other	1-16-79	90.00
Jim Dager P. O. Box 109 Roaden Hall Washington, D.C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	1-16-79	43.50
Master Charge Bank of Va Richmond, VA	travel expense Expenditure for: ☐ Primary ☐ General ☐ Other	1-17-79	200 00
~~Jim Dager~~ Jim Dager P.O. Box 109 Roaden Hall Washington, D.C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	1-22-79	55 50
cash	Human Life Amendment passouts - questionnaires fee for above Expenditure for: ☐ Primary ☐ General ☐ Other	1-22-79	150 00
Barbara Baroody Greenfield Crossing Farm Lincolnia, VA 321-339	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	1-23-79	545 00
SUBTOTAL of expenditures this page (optional)			$ 1748.55
TOTAL this period (last page this line number only)			$

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 23a of FEC FORM 3

Page 3 of 14
Line Number 20b

Use Separate Schedule 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
Postmaster D.C.	stamps Expenditure for: ☐ Primary ☐ General ☐ Other	1-23-79	200 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Southern office Supply VIRGINIA	Envelopes Expenditure for: ☐ Primary ☐ General ☐ Other	1-29-79	129.21
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Cd I Telephone D.C.	telephone expense Expenditure for: ☐ Primary ☐ General ☐ Other	1-31-79	284.23
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Insta Print 1850 K St, N.W. Wash, D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-1-79	259.94
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Dager P.O. Box 109 Reader Hall Wash. D.C.	Expenditure for: ☐ Primary ☐ General ☐ Other	2-1-79	46.56
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
P.A. Brown P.O. Box 14263 Washington DC 20044	retainer Expenditure for: ☐ Primary ☐ General ☐ Other	2-2-79	1,500 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-5-79	77 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Dager P.O. Box 109 Reader Hall Washington D.C. 20064 357-3116	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-6-79	72.00
SUBTOTAL of expenditures this page (optional)			$ 3568.88
TOTAL this period (last page this line number only)			$

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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 28a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 4 of 4 for Line Number 22a

Also Separate Schedules for (each numbered line)

Name of Candidate or Committee in Full
Equal 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
Barbara Baroody Creek Crossing Farms Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-8-79	250 00
Postmaster D. C.	advance postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-8-79	150 00
Barbara Baroody Creek Crossing Farms Lincoln, VA	expenses Expenditure for: ☐ Primary ☐ General ☐ Other	2-8-79	20 00
P. A. Brown P.O. Box 14263 Washington, D. C	retainer Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	500 00
Insta Print 6185 K. Street, N.W. Washington, D.C.	supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	38.22
National Press Bldg. 710 Nat. Press Bldg Washington, D.C.	rent Expenditure for ☐ Primary ☐ General ☐ Other	2-9-79	415.60
Cash	envelope stuffing Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	70 00
Nellie Wilson Suite 341 Nat. Press Bldg. Washington D.C. 347-354	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-12-79	100 00
SUBTOTAL of expenditures this page (optional)			$ 1543.82
TOTAL this period (last page this line number only)			$

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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 5 of 14
Line Number 20 B

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full
Equal 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
Southern office Supply	supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-12-79	13.67
Insta Print 1850 L St. N.W. Wash. D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-13-79	45.89
J. Jim Dager P.O. Box 109 Reeder Hall D. of C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-13-79	74 00
Devol ~~Director~~ Funeral Home 2222 Wisconsin Ave. Wash, D.C.	funeral expense. Baby Elizabeth PEACE. Aborted Baby shown to NOW Meeting Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	100 00
Mount Olivette Funeral Home Bladensburg Rd, N.E. Washington, D.C.	cemetary plot - Baby Elizabeth PEACE Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	70 00
Columbia Travel Bldg. #910 NATL PRESS Bldg. WASHINGTON, DC 20045	Air fare Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	996.25
Postmaster - D.C. Wash, D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	200 00
CMCA 8500 Edgewood Ave. Capitol Heights, MD.	postage bi-mailing Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	6,300 00
CSI-263 SUBTOTAL of expenditures this page (optional)			$ 7799.81
TOTAL this period (last page this line number only)			$

FEC 2004032827

FORM 3 (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 20b, 21a, and 21b, 22b, and 23b of FEC FORM 3

Page 6 of 6 for Line Number 23A

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full: Life Commitment Political Action Committee, Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sean M. Downey 2155 Howard Dr. Sparks, NE 89431	expense reimbursement Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	4,100 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Dager P.O. Box 69 Reunion Hall D.C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-21-79	90 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Columbia Travel 910 Nat. Press Bldg. Wash. D.C.	travel expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	81 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Continental Telephone 13th St., N.W. Washington, D.C.	telephone expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	170.53
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Barbara Burroody Creek Crossing Farm Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	500 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Book of States	Book Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	21.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
IBM P.O. Box 413 Philadelphia, PA	typewriter rental Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	105 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Printing Shop of Kensington 3831 Plyers Mill Rd. Kensington, MD. 384-371	paper supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	112.53
SUBTOTAL of expenditures this page (optional)			$ 2080.06
TOTAL this period (last page this line number only)			$

FEC 2.2.8 Q 3 21 Q 4 22 D 23

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 9 of 14 for Line Number 22a

Use Separate Schedule(s) 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
P.A. Brown P.O. Box 14263 Washington, D.C.	Travel expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	200 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D. of C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	300 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Insta Print 1250 K. St., N.W. D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	97.03
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Dager Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-24-79	166.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dan Shields Box 109 Reardon Hall D.C	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-27-79	31.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dennis DeKlerk Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-27-79	31.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-28-79	100 26
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C. 372-379	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-1-79	200 00
SUBTOTAL of expenditures this page (optional)			$ 1126.03
TOTAL this period (last page this line number only)			$

SCHEDULE B
REVISED
January, 1979
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 9 of 11 for Line Number 20F
(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full
Life Environment Political Action Committee Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
U.P.S.	parcel pickup	☐ Primary ☐ General ☐ Other	3-2-79	42.48
Barbara Bonnedy Creek Crossing Farm Linden, VA	professional services	☐ Primary ☐ General ☐ Other	3-2-79	500.00
P.A. Brown P.O. Box 14263 D.C.	consulting fee	☐ Primary ☐ General ☐ Other	3-2-79	1,500.00
Liz McCulley Box 109 Reardon Hall D.C.	professional services	☐ Primary ☐ General ☐ Other	3-2-79	28.00
Jim Dozer Box 109 Reardon Hall D.C.	professional services	☐ Primary ☐ General ☐ Other	3-6-79	113.10
Cap Telephone 13th St., N.W. D.C.	phone expense	☐ Primary ☐ General ☐ Other	3-6-79	1042.55
Insta Print 1950 K St N.W. D.C.	printing	☐ Primary ☐ General ☐ Other	3-1-79	3.50
Postmaster D.C. 380-389	express mail	☐ Primary ☐ General ☐ Other	3-7-79	10.84
SUBTOTAL of expenditures this page (optional)				$ 3240.47
TOTAL this period (last page this line number only)				$

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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 23a of FEC FORM 3

Page 9 of 10 for Line Number

(Use Separate Schedule 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	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Dennis Doblock Box 109 Rawdon Ho 11 D.C.	professional services	☐ Primary ☐ General ☐ Other	3-8-79	38.25
Dan Sheldo Box 109 Rawdon Ho 11 D.C.	professional services	☐ Primary ☐ General ☐ Other	3-8-79	24.00
Postmaster D.C.	stamps	☐ Primary ☐ General ☐ Other	3-9-79	70.00
P.A. Brown P.O. Box 14263 Washington D.C.	consulting fee	☐ Primary ☐ General ☐ Other	3-9-79	500.00
Jack Polikow 1347 Newton St. D.C. 20017	professional services	☐ Primary ☐ General ☐ Other	3-9-79	24.00
Jim Doger Box 109 Rawdon Ho 11 D.C.	professional services	☐ Primary ☐ General ☐ Other	3-13-79	147.00
Barbara Baroody Creek Crossing Farm Lincoln, VA	professional services	☐ Primary ☐ General ☐ Other	3-13-79	200.00
Postmaster D.C. 390-397	advance postage	☐ Primary ☐ General ☐ Other	3-15-79	200.00

SUBTOTAL of expenditures this page (optional)	$ 1205.25
TOTAL this period (last page this line number only)	$

FEC FORM 3
(1978)
APR. 1978
Federal Election Commission
S.W. 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 10 of 10 for Line Number 22a

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee to 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
Dave Osborne 966 Avery Dr. Palm Springs, CA	30 day load Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	$3,500 ⁰⁰
Nancy Osborne 966 Avery Dr. Palm Springs, CA	30 day load Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	$3,000 ⁰⁰
710 Nat. Press Bldg National Press Bldg Washington, D.C.	press release Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	35 ⁰⁰
Postmaster D.C.	Postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 ⁰⁰
Drawbridge Motor Inn. Lexington, KY	deposit-convention room rental Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 ⁰⁰
Heckt Co. 7th & E. D.C.	calculator Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79 3-16-79	75.12 31.00
Nette Wilson 341 Nat. Press Bldg. Wash, D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	150 ⁰⁰
Dan Shields Box 109 Rayburn Hall 348-405 D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	76.50
SUBTOTAL of expenditures this page (optional)			$ 7257.62
TOTAL this period (last page this line number only)			$

SCHEDULE B
(FECFORM 3)
Rev. 7/77, 10/78
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 11 of 14 for Line Number 23a

Use Separate Schedule 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
Barbara Baroody Creek Crossing Farms Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	750.00
CMCA 8600 Edgewood Capitol Heights, MD.	direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	2,500.00
Jack Politan 1347 Newton St. D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	45.50
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	75.00
Barbara Baroody Creek Crossing Farms Lincoln, VA.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-19-79	500.00
Jim Dager Box 109 - Reardon Hill D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	279.00
CMCA Inc. 8600 Edgewood Dr. Capitol Heights, MD.	direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	4,000.00
Carmie Richesin 310 Nat. Press Bldg. Washington, D.C. 406-413	S. Staffley dinner Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	50.00
SUBTOTAL of expenditures this page (optional)			$ 8199.50
TOTAL this period (last page this line number only)			$

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FORM F
(FEC)
(Rev. 1978
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES
(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20b, 21b, and 22b, 23b, and 23c of FEC FORM 3

Page 12 of 14 for Line Number 23

(Use Separate Schedule 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
CMCA Inc. 9900 Edgeworth Dr. Capitol Heights, MD	direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	2,500 00
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	100 00
Postmaster D.C.	advance postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-22-79	200 00
UPS	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-22-79	23.60
Harolds Printing Co 216 5th Ave. Brookings, S.D. 57006	printing on account Expenditure for: ☐ Primary ☑ General ☐ Other	3-22-79	319.19
National Press Bldg 710 Nat. Press Bldg Wash, D.C.	rent Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	207 80
C & P Telephone Co. Box 2123 Wash. D.C.	Telephone Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	1609.32
Jack Pelton 414-421	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	52.50
SUBTOTAL of expenditures this page (optional)			$ 4612.41
TOTAL this period (last page this line number only)			$

SCHEDULE B
REVISED
January, 1979
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 20b, 21b, and 22b, 23b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number _____

Use Separate Schedule 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
Barbara Baroody Creek Farm Crossing Lincoln, VA 22078	expenses for work in Roger campaign - 11 C.D. Californ general Election Expenditure for: ☐ Primary ☐ General ☑ Other	Feb-ch	$ 2,400
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$
TOTAL this period (last page this line number only)			$

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ES 04/17/79

CONTRIBUTOR LISTING
FOR
LAPAC

PAGE: 1

	CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
1	MR. FRANK CAPRA PO BOX 98 LA QUINTA, CA 92253	producer La Quinta, Ca	02/01/79 $250.00 QTR TOTAL YEAR TOTAL
1	MR. FELIX S. CONIG 150 STROUD AVE STATEN ISLAND, NY 10312	U.S. Postal Service Staten Island	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
1	MRS. CLARE J. DEGRAFF 2360 RIDGEWOOD SE GRAND RAPIDS, MI 49506	Housewife	02/01/79 $500.00 QTR TOTAL YEAR TOTAL
1	MR. ROBERT T. FRASER 3314 WARRINGTON RD SHAKER HEIGHTS, OH 44120		01/01/79 $200.00 QTR TOTAL YEAR TOTAL
1	J. JAKUBOWSKY 68 YOUNG AVE PELHAM, NY 10803		01/01/79 $500.00 QTR TOTAL YEAR TOTAL
1	MR. WILLIAM A. JUNGMANN 101 E WHEELOCK PKWY ST PAUL, MN 55117	Railroad worker St. Paul	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
1	MR. & MRS. EDW V. MALLON 27 PARKWAY MONTCLAIR, NJ 07042	retired	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
1	MR. HERBERT F. MCVAY 12485 CONQUISTADOR WAY SAN DIEGO, CA 92128		03/01/79 $200.00 QTR TOTAL

8204032128

7 CONTRIBUTORS LISTED

FOR
LAPAC

DATE: 04/17/79

PAGE: 2

	CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
13	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife.	01/01/79 $122.93 QTR TOTAL YEAR TOTAL
14	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife	03/01/79 $133.65 QTR TOTAL YEAR TOTAL
34	MRS. STEPHANIE SIEGAL 412 SO HANLEY CLAYTON, MO 63105	Housewife	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
	J. VOUKUHLER 2220 W CRESCENT. FLAGSTAFF, AZ 86001		03/01/79 $500.00 QTR TOTAL YEAR TOTAL
1	MR. EUGENE J. ZIEGMAN 259 PASADENA AVE ELYRIA, OH 44035		03/01/79 $250.00 QTR TOTAL YEAR TOTAL

[illegible]

[illegible]
[illegible] Election Commission
[illegible]
[illegible], D.C. [illegible]

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the [illegible] Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleiman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0125.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

P20003212

TO: _____

_____

REQUEST FOR ADDITIONAL INFORMATION FOR THE _____ REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD _____ THROUGH _____, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (X):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

2 ___ Detailed Summary (Page 2) Line(s):___ Column(s):___ Totals:___ ___omitted or ___incorrect

2 X Schedule Totals: X disagree with Detailed Summary (Page 2) or ___omitted SEE OTHER

7 ___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

1 X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 20a

7 ___ Occupation/Principal Place(s) of Business: ___omitted or ___Inadequate for Schedule(s)___ Line(s)___

3 ___ Election Designation: ___omitted or ___Inadequate for Schedule(s)___ Line(s)___

1 ___ Aggregate Year-to-Date Totals: ___ omitted or ___ Inadequate for Schedule(s)___ Line(s)___

0 X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20a SEE PAGE THREE

9 ___ Nature or Purpose of Receipt: ___omitted or ___Inadequate for Schedule(s)___ Line(s)___

___ Inadequate Description of: ___proceeds ___dates ___events ___location of Schedule

___ Signature: ___omitted ___Inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please be advised, for future reports, that in-kind contributions should be shown on Line 22c of the Detailed Summary Page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

[redacted]

Please clarify the entries on Schedule B, Line 21a to:

David Osborne	3-15-79	$3500	"30-Day Loan"
Nancy Osborne	3-15-79	3000	"30-Day Loan"

Please be advised that loans made by your committee should be shown on Line 21a of the Detailed Summary Page and Schedule B accordingly.

Please be further advised that in accordance with Section 104.3 of the Commission's Regulations all loans greater than $500, outstanding at the end of a reporting period, should be disclosed on Line 12 of the Summary Page and Schedule C accordingly.

Please amend your report accordingly.

TO: _____ D. _____

_____ I.D.: _____

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD _____ THROUGH 6-30-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (X):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

X Detailed Summary (Page 2) Line(s): 13 Column(s): A Totals: X X omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 2Ca

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

X Other: SEE PAGE FIVE

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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FEC Form 12
(Revised November 1978)

Please be advised that Section 104.2(b)(11) of the Commission's Regulations requires that the nature of all debts and obligations be provided. Please provide the details for the debts owed to Karl Karcher.

Please be further advised that if the above debt was a loan to your committee, then it should also be disclosed on Line 17a of the Detailed Summary Page and Schedule A accordingly.

The April 10 Quarterly Report filed by your committee reported loans to: David Osborne and Nancy Osborne. The July 10 Quarterly Report fails to show these debts owed to your committee. If these debts have been liquidated they should be listed on the appropriate schedules. If these debts are still outstanding they should be shown on Line 12 of the Summary Page and listed on Schedule C.

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FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

OCT 4 1979

Paul Brown, Treasurer
Life Amendment Political Action Committee
357 National Press Building
Washington, D.C. 20045

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Quarterly & July 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8204032124 3

TO: _____ DATE: _____

_____ I.D. NO.: _____

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-80 THROUGH 3-31-80, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

X Schedule Totals: X disagree with Detailed Summary (Page 2) or ___ omitted SEE OTHER

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20a SEE PAGE THREE

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

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FEC Form 12
(Revised November 1978)

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MRS. PENNY DINES
RENO, NEVADA

OCT 22

Dear Friend:

I am writing to you because of my involvement with a pro-life organization dedicated to electing pro-life officials to public office. The organization is the Life Amendment Political Action Committee, Inc.

A few months ago I received a letter from LAPAC telling about the gains they made last fall in getting many more pro-life candidates elected to Congress. It was very encouraging. Finally, I thought, the tide seems to be turning in our favor, and I was helping, if only in a small way.

The letter went on to explain why it was so important to keep the momentum going, looking ahead to more races coming up. But of course this would take money and the Committee was depending on its supporters to provide necessary funds.

Unfortunately, I was already over my household budget for the month, and we were really feeling the "pinch." (As any housewife knows, trying to stick to a food budget these days is no easy task!) But I did manage to scrape together a few dollars which I sent, along with a short note saying how I wished it could be more...that I really believed LAPAC was performing a crucial role in the whole pro-life fight...and that I hoped others felt the same way I did.

About a week later, I received a call (right in the middle of doing the children's laundry!) from Sean Morton Downey, Jr., Chairman of LAPAC's Board of Directors. He said he had read my letter and was very moved by it.

"Would you be willing," he asked, "to write a similar letter, explaining in you own words why people should support LAPAC?" I was silent for a minute. Then I asked, "You mean like a 'one contributor to another' kind of letter?"

"Exactly," he answered.

Well, after giving all my reasons why I wasn't

Attachment II (4 pages)

capable, that these things were better left to professionals, etc...Sean would hear none of it. (He is a very persuasive person—thank goodness he's on our side!)

Anyway, here I am sitting at my old Royal typewriter, wondering what to write next. It would be so much easier if we could just sit down over a cup of coffee and talk about it.

Since that isn't possible, I'll get to the heart of the matter right away.

Why do I support LAPAC? There are many other worthy organizations devoted to the pro-life cause. As much as I'd like to, I simply can't support all of them. I chose LAPAC because the abortion issue, rightly or wrongly, has become a political issue, and it will be decided in the political arena, at the state and federal levels.

LAPAC, it seems to me, is the perfect vehicle to fight our fight. It is a political action committee, solely dedicated to electing pro-life candidates who will actively support the single most important goal of LAPAC -- the passage of the Human Life Amendment to our Constitution.

And LAPAC is making solid progress. More and more LAPAC-supported candidates are getting sent to Congress. Last fall, they helped elect 37 to do the battle for us. And their effect is already being felt.

Just recently I read in the newspaper that Medicaid-funded abortions were cut by an astounding 99% as a result of the Hyde amendment banning federal funding of "abortions on demand." In terms of actual lives saved, it means 200,000 babies were born in the last 11 months who would otherwise have been aborted. Praise the Lord!

But all is not rosy. Many states -- big ones, like New York, New Jersey, Pennsylvania, Illinois, Michigan, California -- are using their own money to allow the killing to continue because the Hyde amendment only applies to federal funding.

Which means probably well over 1,000,000 babies will be killed this year! And we still don't have enough pro-life votes in Congress to produce the 2/3 majority needed to pass the Human Life Amendment -- the only measure that will effectively stop the killings.

So we can't sit back and rest on our laurels. Not for a minute.

LAPAC doesn't plan to. LAPAC was instrumental in two congressional elections on April 3, 1979 in California and Wisconsin, and I am thrilled to report that both pro-life challengers won their elections. The one in California where the pro-lifer won by a stunning landslide was where LAPAC was most active. Another special election will soon be held in Illinois and LAPAC will be active again...if we all help them now.

LAPAC also has targeted for defeat some of the major obstacles to the passage of our Human Life Amendment. I'm speaking of influential senators like George McGovern, Birch Bayh, Bob Packwood, Frank Church, and others. The more pressure LAPAC is able to put on these politicians over the coming months, the more chance we have of either changing their minds or defeating them come election time.

But none of this can be accomplished without funds, and LAPAC used what little they had last fall in helping to elect 37 more pro-life fighters to Congress. Unlike a lot of other organizations, LAPAC can't turn to Big Brother, Big Business or Big Labor for funding. It seems that saving babies is "too controversial." So, I guess that just leaves us -- you and me and others who believe enough to <u>give</u>, sometimes even when it hurts.

How <u>much</u> should you give? LAPAC suggests $15, $25, $50, or $100. They need hundreds of such amounts in each category to effectively carry out their political action plan. Just take the special elections I mentioned. Mr. Downey told me the cost of providing one LAPAC professional to work in the campaign exceeded $3,000.

Maybe you should ask yourself how much is it worth to save one baby's life? Obviously, it's priceless. But it's something to think about when you consider some of the less essential things we all tend to spend our money on at times.

It just occurred to me, and I'll leave you with this passing thought. Many of my friends contribute to all kinds of "endangered species" causes -- things like Save the Whales, Save the Bald Eagle, Save the Egrets. But when I ask them about saving babies, the most endangered and precious species of all, they back off. I suppose it's a matter of knowing where your

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priorities lie.

I know where mine lie. And I believe you do too.

LAPAC has enclosed a contribution form and a First Class postage-paid reply envelope." Please use them now.

God Bless you,

Penny Dines

Mrs. Penny Dines
On behalf of LAPAC

P.S. LAPAC also suggests that you write to your State Legislature asking that they follow the example of the Hyde Amendment and stop using your taxpayer money to fund abortions. I think it's an excellent idea. In fact, it's the very next letter that's going in my typewriter!

8204032124 0

B

CREATIVE MAILING CONSULTANTS OF AMERICA, INC.
8800 Edgeworth Drive • Capitol Heights • Maryland 20027 • Telephone (301) 350-5800

LAPAC - LISTING OF ALL MAILINGS TO DATE JULY 18, 1979

KEY	LIST DESCRIPTION	PACKAGE
L1	LAPAC Prospect File	Jefferson
L2		"
L3	NRTL Master File	"
L4		Boone
L5	Pro-Life Activists	Jefferson
L6		Boone
L7	Anti-Abortion Catholic Contributors	"
L8	Issue Oriented Catholic Contributors	"
L9	Contributors to Conservative & Moderate Causes	"
L10	Anti-Abortion Petitioners	"
L11	St. John's Missions	"
L12	LAPAC Prospect/Donor File	Death Valley
L13	IOWA Names given to Paul Brown	Jefferson
L14	Civil American Liberties League Active Donors	"
L15	Our Little Brothers & Sisters	"
L16	Christian Appalachian Project	"
L17	Donors to Republican Candidates	"
L18	Catholic Digest Active Book Club Members	"
L19	Christian Family Renewal House File	"
L20	LAPAC Donor File	Brown/Downey
L21	LAPAC Prospect File	"
L22	Christian Family Renewal House File	"
L23	LAPAC Donor File	Reno (Dines)
L24	LAPAC Prospect File	"
L25	Christian Family Renewal House File	"
L26	Human Life Center	"
L27	CDG Hi $ Donors	"
L28	LAPAC Donor File	2nd LIFEGRAM
n/a	LAPAC Donor	1st LIFEGRAM

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MEMBER
Direct Mail Marketing Association, Inc. / Association of Direct Marketing Agencies / Associated Third Class Mail Users

- Attachment III (1 page)

BENJAMIN FRANKLIN SECTION • P.O. BOX 14283 • WASHINGTON, D.C. 20044 • (202) 638-3881

My Dear Pro-Life Friend:

Abortionist Senator Robert Packwood of Oregon was quoted in the February issue of Congressional Quarterly: "if right to life groups can defeat eight or ten House members and one or two Senators, OTHERS WILL GET THE MESSAGE."

You and you alone have the great opportunity to deliver that message loud and clear to the abortionists in the Congress on Tuesday, March 21, 1978 by casting your vote for Don Lyon in the Republican primary.

Congressman John B. Anderson has consistently voted anti-life on every major issue. He has ignored the will of the people. In his campaign he continues to court such anti-life people as Nelson Rockefeller (Rockefeller raised $11,000.00 at a Washington D.C. cocktail party for Anderson) who through his millions has funded the deaths of more unborn children than any one person in history. Other Anderson supporters under the guise of the word "pro-choice" have voted to use your hard-earned tax dollars to fund the deaths of over 300,000 unborn children each year. Anderson has done the same.

In the early years of the Civil Rights movement, many many Congressmen consistently voted against the struggle. However, as the tide turned so did many of these men who remain in the Congress today. They feared for their political lives. A grass-roots movement changed America.

Now, another and even more powerful grass-roots movement, middle America, is revolting against the legal murder of our future generations. They are repulsed by this federally financed killing and are ready to do something about it.

No matter how clever the argument, we all know when life begins. The few who claim they don't are on the Supreme Court. They have ruled abortion is legal up to the moment of birth, UP TO THE MOMENT OF BIRTH. Mr. Anderson supports these decisions.

Your vote in the Republican primary will make the difference. If you vote pro-life on Tuesday, March 21, the 16th Congressional District of Illinois will be the spark that will ignite the fuse to make 1978 the year of life.

This is the year pro-life people must and will be heard. In this election you will take into the polling booth, in your hands, power over the life or death of millions of unborn children. Make no mistake about it, the choice is yours.

Don Lyon has pledged to support pro-life legislation and a Human Life Amendment. Life Amendment Political Action Committee proudly endorses Don Lyon and urges all pro-life people to support his campaign on Tuesday, March 21, 1978.

The choice is yours, we only hope and pray that you will join in this effort to save the babies, who, without your important vote, will never see the light of God's beautiful day.

FOR LIFE,

Morton Downey, Jr.
Chairman, LAPAC

Mildred F. Jefferson
Mildred F. Jefferson, M.D.
Advisory Chairman, LAPAC

P.S. AS A PRO-LIFER IN THIS ELECTION YOUR VOTE MEANS LIFE FOR THE UNBORN. PLEASE MARK YOUR CALENDAR TO VOTE ON TUESDAY, MARCH 21, FOR DON LYON AND HAVE TEN PRO-LIFE FRIENDS DO THE SAME.

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.

Attachment IV (1 page)

[illegible]

[illegible]
[illegible] Committee
[illegible]
[illegible], D.C. 20463

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Quarterly & July 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0025.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

ATTACHMENT 1 (2 pages)

7903125 3927

04/17/79

CONTRIBUTOR LISTING
FOR
LAPAC

PAGE: 1

CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
MR. FRANK CAPRA PO BOX 98 LA QUINTA, CA 92253	producer La Quinta, ca	02/01/79 $250.00 QTR TOTAL YEAR TOTAL
MR. FELIX S. CONIO 150 STROUD AVE STATEN ISLAND, NY 10312	U.S. Postal Service Staten Island	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
MRS. CLARE J. DEGRAFF 2360 RIDGEWOOD SE GRAND RAPIDS, MI 49506	Housewife	02/01/79 $500.00 QTR TOTAL YEAR TOTAL
MR. ROBERT T. FRASER 3316 WARRINGTON RD SHAKER HEIGHTS, OH 44120		01/01/79 $200.00 QTR TOTAL YEAR TOTAL
J. JAKUBOWSKY 65 YOUNG AVE PELHAM, NY 10803		01/01/79 $500.00 QTR TOTAL YEAR TOTAL
MR. WILLIAM A. JUNGMANN 101 E WHEELOCK PKWY ST PAUL, MN 55117	Railroad worker St. Paul	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
MR. & MRS. EDW V. MALLON 37 PARKWAY MONTCLAIR, NJ 07042	retired	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
MR. HERBERT F. MCVAY 13665 CONQUISTADOR WAY SAN DIEGO, CA 92129		03/01/79 $200.00 QTR TOTAL

7 CONTRIBUTORS FOR LAPAC

	CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
43	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife.	01/01/79 $122.00 QTR TOTAL YEAR TOTAL
	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife	03/01/79 $133.00 QTR TOTAL YEAR TOTAL
34	MRS. STEPHANIE SIEGAL 412 SO HANLEY CLAYTON, MO 63105	Housewife	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
J	J. VOUKUHLER 2220 W CRESCENT FLAGSTAFF, AZ 86001		03/01/79 $500.00 QTR TOTAL YEAR TOTAL
21	MR. EUGENE J. ZIEGMAN 259 PASADENA AVE ELYRIA, OH 44035		03/01/79 $250.00 QTR TOTAL YEAR TOTAL

TO: _____

_____

REQUEST FOR ADDITIONAL INFORMATION FOR THE _____ REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD _____ THROUGH _____, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

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2 ___ Detailed Summary (Page 2) Line(s):___ Column(s):___ Totals:___ ___omitted or ___incorrect

2 _X_ Schedule Totals: _X_ disagree with Detailed Summary (Page 2) or ___omitted SEE OTHER

7 ___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

_ _X_ Full Name(s)/Mailing Address(es): _X_omitted or ___ inadequate for Schedule(s) _B_ Line(s) 20a

7 ___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

3 ___ Election Designation: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

_ ___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s)___ Line(s)___

3 _X_ Nature or Purpose of Expenditure: ___ omitted or _X_ inadequate for Schedule(s) _B_ Line(s) 20a SEE PAGE THREE

0 ___ Nature or Purpose of Receipt: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Inadequate Description of: ___proceeds ___dates ___events ___location of Schedule

___ Signature: ___omitted ___inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

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FEC Form 12
(Revised November 1978)

OCT 4 [illegible]

[illegible] POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
FEC [illegible]

Please clarify the entries on Schedule B, Line 20a as:

David Osborne	3-15-79	$3500	"30-Day Loan"
Nancy Osborne	3-15-79	3000	"30-Day Loan"

Please be advised that loans made by your committee should be shown on Line 21a of the Detailed Summary Page and Schedule B accordingly.

Please be further advised that in accordance with Section 104.3 of the Commission's Regulations all loans greater than $500, outstanding at the end of a reporting period, should be disclosed on Line 12 of the Summary Page and Schedule C accordingly.

Please amend your report accordingly.

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TO: _____ D. _____

_____ I.D.: _____

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 15 QUARTERLY REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4-1-79 THROUGH 6-30-79 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

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___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

X Detailed Summary (Page 2) Line(s): 14(a) 14(b) 15 Column(s): A Totals: X X omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 2Ca

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

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X Other: SEE PAGE FIVE

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FEC Form 12
(Revised November 1978)

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
PAGE FIVE

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 4 1978

Paul Brown, Treasurer
Life Amendment Political Action Committee
357 National Press Building
Washington, D.C. 20045

Dear Mr. Brown:

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Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8204032125 8

TO: [redacted] DATE [redacted]

[redacted] I.D. NO.: [redacted]

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 [redacted] REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-79 THROUGH 3-31-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 20a

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FEC Form 12
(Revised November 1978)

RAD 002-93

REPORTS ANALYSIS REFERRAL UPDATE

M Brown

*ORIGIN: OGC

DATE SEPTEMBER 24, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Michele Brown

TEAM CHIEF Bobby Harfel BH

COMPLIANCE REVIEW PS

THROUGH: STAFF DIRECTOR Poe

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

MUR No. 1103

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE --- Additional loan reporting problems on the Year End Report (10-1-79 to 12-31-79) and the February Monthly Report (1-1-80 to 1-31-80). ATTACHMENT #1

RAD has not sent RFAIs to the committee regarding the specific problems mentioned above because MUR 1103 covers the same reporting problems for other reports from the same filer and, according to OGC, a report for MUR 1103 will be forthcoming in the near future.

8204032112660

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment VI (3 pages)

The attached entry shows a repayment of a loan to a bank (Security National Bank) for $5,138. However, no comparable loan was reported as received or as an outstanding debt.

8204032126I

...tion Commission
...Street, N.W.
...hington, 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 7 of 7 for Line Number 20A

(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
SECURITY-NATIONAL BANK	Repayment of Loan Expenditure for: ☐ Primary ☐ General ☒ Other	12-20-79	$5,138.68
IRS PITTSBURGH PA	SS-WHC-FICA Expenditure for: ☐ Primary ☐ General ☒ Other	12-31-79	$1,592.96
Qwest Telephone Comp White, South Dakota	Telephone Bill Expenditure for: ☐ Primary ☐ General ☒ Other	12/15 11/7 12/15	345.72 205.34 179.66
Ellen Dempsey White SD	Travel Expenditure for: ☐ Primary ☐ General ☒ Other	11/23	152.67
WORLD TRAVEL WHITE, SD	AIR FARE TO D.C. Expenditure for: ☐ Primary ☐ General ☒ Other	11/23	357.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ 1971.43
TOTAL this period (last page this line number only)	$ 78118.54

The attached entry is either a loan or a loan repayment to an individual. If it is a loan repayment, made for a loan received, then there is no comparable loan reported as an itemized receipt. If it is a loan made, then the description "Repayment of Loan - Same Period" may be inaccurate because there no repayment reported as an itemized receipt. (Note in either case, the entry should have been reported on Line 21, old forms, of the Detailed Summary Page and Schedule B accordingly.)

82040321263

(Operating, Transfers ...
Loans, Loan Repayments and ...
Supporting Lines 20a, 21a, and 22a, 22b, ...
of FEC FORM 3

nittee in Full
Amendment Political Action Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
...s and ZIP Code ...AE & Kensington ...rs Mill Rd. ...N MD 20795	ENVELOPES	☐ Primary ☐ General ☑ Other	1/24/80	234.29
...dress and ZIP Code ...CAMP ...Moor Ave. ...dria, VA 22304	PRINTING	☐ Primary ☐ General ☑ Other	1/24/80	161.20
...Address and ZIP Code ...APPLICATIONS ...1000 ...16th St. NW ...HINGTON, DC 20005	PRINTING	☐ Primary ☐ General ☑ Other	1/24/80	3.03
...ling Address and ZIP Code ...— Hamilton Caloi ...ett ...1 K St. NW ...gton, DC 20006	LOAN FEES	☐ Primary ☐ General ☑ Other	1/24/80	500.00
...Mailing Address and ZIP Code ...ert B. Lefak ...dian Circle ...rnfield, MASS	Repayment of Loan — June period	☐ Primary ☐ General ☐ Other	1/24/80	2534.30
...me, Mailing Address and ZIP Code ...DRAFT ...20 - 19th St., N.W. ...shington, D.C 20036	PRINTING	☐ Primary ☐ General ☑ Other	1-24-80	5000.00
...Name, Mailing Address and ZIP Code ...ENET TELEPHONE Co. ...CLEARWATER ...WATER, SD 57216	Telephone bill	☐ Primary ☐ General ☑ Other	1-24-80	306.57
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
		☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)				$ 9934.39
TOTAL this period (last page this line number only)				$ 28542.17

aires to expend personal funds and later reimburse himself from the surplus funds carried over to his 1976 campaign effort. The first expenditure would be for contributions to candidates in State and local elections in Louisiana. The second expenditure would be an advance for the purchase of campaign items bearing his name and to be used in connection with his 1976 campaign. The Congressman states that he will be a candidate for re-election in 1976.

It is the Commission's opinion that Congressman Passman can make an advance of personal funds for both purposes and later reimburse himself when he commences his Congressional campaign. In making the second expenditure, the Congressman would clearly become a candidate for purposes of the Federal Election Campaign Act of 1971, as amended, and relevant provisions of Title 18, United States Code, within the Commission's jurisdiction.

The Commission is of the view that contributions from the Congressman's personal funds for candidates in state and local elections are not subject to the limitations of 18 U.S.C. 608(a).[2] However, any payment or gift to State or local candidates from campaign funds may be an "expenditure" for purposes of 608 (a) and (c) if made under circumstances where the gift or payment (1) may be reasonably viewed as consideration for services that would be rendered (or obtained from others) by the State or local candidate to promote the Congressman's candidacy for nomination or election; (2) is made in relatively close time proximity to a primary or other election in which the Congressman is entered; or (3) is otherwise made in connection with a campaign-related activity of the Congressman which involves the receiving or making of other contributions or expenditures as defined in 2 U.S.C. 431 and 18 U.S.C. 591. For purposes of reporting under 2 U.S.C. 434, all disbursements by the Congressman from campaign funds, including reimbursement to the Congressman for an advance previously made from personal funds (which advance would itself have to be reported under 434), would be required to be reported with an appropriate description as to the purpose of the disbursement, the date, identification of the payee, and amount, see 2 U.S.C. 434(b).

With regard to any expenditure from personal funds in 1975, for the purchase of campaign items to be used for the Congressman's 1976 campaign, both the expenditure and the subsequent reimbursement from his 1976 campaign account are to be reported under 2 U.S.C. 434. In addition, the advance from personal funds would be an expenditure under 18 U.S.C. 591(f) and count against the applicable spending limit in 18 U.S.C. 608(c). Also, under 18 U.S.C. 608(a), an advance from personal funds would be charged against the candidate's personal and "immediate family" limitation until it was repaid, and would have to be evidenced by a written instrument fully disclosing the terms and conditions of the advance. See 18 U.S.C. 608(a)(3).

This advisory opinion is issued only on an interim basis pending the promulgation by the Commission of rules and regulations or policy statements of general applicability.

Dated: January 20, 1976.

NEIL STAEBLER,
Vice Chairman for the Federal Election Commission.

[FR Doc.76-2135 Filed 1-23-76;8:45 am]

[2] Contributions to Federal candidates would, of course, be limited under 18 U.S.C. 608(b).

[Notice 1976-10]

ADVISORY OPINION

The Federal Election Commission announces the publication today of Advisory Opinion 1975-81. The Commission's opinions are in response to questions raised by individuals holding Federal office, candidates for Federal office and political committees, with respect to whether any specific transaction or activity by such individual, candidate, or political committee would constitute a violation of the Federal Election Campaign Act of 1971, as amended, of Chapters 95 or 96 of Title 26 United States Code, or of Sections 606, 610, 611, 612, 614, 615, 616, or 617 of Title 18 United States Code.

The Commission points out that these advisory opinions should be regarded as interim rulings which are subject to modification by future Commission regulations of general applicability. In the event that a holding in either opinion is altered by the Commission's regulations, the persons to whom the opinions were issued will be notified.

Advisory Opinions issued in response to requests carrying the designation 1975 will continue to bear the 1975 number assigned to the original request.

ADVISORY OPINION 1975-81

STATUS AND REPORTING REQUIREMENTS OF FREEDOM OF CHOICE, INC.

This advisory opinion is rendered under 2 U.S.C. 437f in response to a request on behalf of Freedom of Choice, Inc. The request was published in the FEDERAL REGISTER on October 20, 1975 (40 FR 49086) and interested parties were given an opportunity to submit written comments pertaining to the request. None were received.

The request concerns the limitations on contributions and expenditures and the registration and reporting requirements applicable to Freedom of Choice, Inc., a non-profit corporation which has been organized for the purpose of assuring that, "in the 1976 presidential election . . . The American voters, in each state, have the option of supporting an independent conservative alternative slate of electors for the offices of President and Vice-President."

Specifically, the request asks whether (1) such an organization is a political committee as defined by the Federal Election Campaign Act of 1971, as amended (the "Act") and (2) assuming the answer to inquiry (1) is affirmative, what must such an organization do to comply with the Act.

The Commission is of the opinion that Freedom of Choice is a political committee which must register with and report to the Commission under the Act. The request states that the subject organization will receive contributions and expend funds for the purpose of assuring that an independent conservative alternative slate of electors will appear on the ballot in the 1976 presidential election in every state in the United States. Additionally, its Articles of Incorporation state that "the Corporation is organized for political purposes including • • • the following specific purpose (a) To secure ballot positions in each of the fifty (50) states for candidates for the office of President and Vice President of the United States." The Commission concludes that such activities clearly place an organization within the definition of "political committee" set out in 2 U.S.C. 431(d).

The term political committee is defined in 2 U.S.C. 431(d), as "any committee, club, association or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding $1000." The term "expenditure" includes payments of money or anything of value made "for the purpose of influencing • • • the election of any person • • • to the office of presidential or vice presidential elector." Hence, any amounts expended by Freedom of Choice to ensure, in the 1976 presidential election, the appearance on the ballot in each state of an "independent conservative alternative slate of electors for the offices of President and Vice President," would clearly be statutory expenditures which, if anticipated to exceed $1000, would constitute Freedom of Choice, Inc. a political committee subject to the reporting and registration requirements of the Act.

The fact that the organization does not presently support named candidates for Federal office or for elections is not particularly relevant for determining its status as a political committee. It is the Commission's opinion that if Congress had desired to restrict the "purpose test" of 2 U.S.C. 431(d) and (f) to particular Federal candidates, it would have limited coverage to the specifically defined word "candidate" [2 U.S.C. 431(b)] and certainly would not have qualified "person" by inclusion of the word "any."

With respect to the second part of the request, it is the Commission's opinion that, at such time as Freedom of Choice anticipates receiving contributions or making expenditures to influence a Federal election in an aggregate amount exceeding $1000 for a calendar year, such organization shall be deemed a political committee. It must then register with and report to the Commission pursuant to the Act. See 2 U.S.C. 432, 433, 434. Further, such organizations will also be subject to the applicable limitations on contributions and expenditures set out in 18 U.S.C. 591 *et seq.*, including 18 U.S.C. 608, 610 and 611.

It appears that, at the present time at least, the limitations of 18 U.S.C. 608(b)(3) would be the only limitation applicable to contributions to Freedom of Choice. The limitations of 18 U.S.C. 608(b)(1) and (2) apply to contributions to candidates.[1] The limitations of section 608(b)(1) and (2) will apply to contributions to Freedom of Choice, if the committee becomes a single candidate committee or a candidate's principal campaign committee or authorized committee. These limitations would also apply to contributions which are made to Freedom of Choice but which are earmarked or otherwise directed by the contributor to a particular candidate. 18 U.S.C. 608(b)(6) and Advisory Opinion 1975-32 (40 FR 5556, November 28, 1975).

In the event that Freedom of Choice becomes a principal campaign committee, an authorized committee, or a single candidate committee the limits of section 608(b) (1) and (2) would apply to funds on hand as of that time. For example, the section 608(b) (1) contribution limit of $1,000 from any person per election would be triggered and would require Freedom of Choice to undertake a review of contributions from any person in excess of $1,000 to determine those situations where the return of any excess would be required.

The limitation of 18 U.S.C. 608(b)(3) applies generally to contributions as defined in 18 U.S.C. 591(e). This definition, like the definition in 2 U.S.C. 431(e), refers to contributions made for the purpose of influencing the

[1] The contribution limit in § 608(b)(3) applies to individuals only and is $25,000 per calendar year; the contribution limits in subsections (b) (1) and (2) are $1000 and $5000 per candidate per election and apply respectively to persons (including individuals) and qualified multicandidate committees.

Attachment VII (2 pages)

nomination or election of any person. Consequently, the limitation on contributions in § 608(b)(2) would be applicable to individual contributors to this committee.

This advisory opinion is issued only on an interim basis pending the promulgation by the Commission of rules and regulations or policy statements of general applicability.

Dated: January 20, 1976.

THOMAS B. CURTIS,
Chairman for the
Federal Election Commission.

[FR Doc.76-2124 Filed 1-23-76;8:45 am]

820932126 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sean Morton Downey
Suite 339
National Press Building
529 14th Street, N.W.
Washington, D.C. 20045

Re: MUR: 1103

Dear Mr. Downey:

The Federal Election Commission notified you on January 25, 1980, of a complaint which alleges that your committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to you at that time. As of this date, we have received no response from you in this matter.

Upon further review of the allegations contained in the complaint, the Commission on , 1980, determined that there is reason to believe that your committee has violated 2 U.S.C. §§ 433 and 434. Specifically, it appears that Let's All Protect A Child Fund is a political committee as defined by 2 U.S.C. § 431(d),1/ and therefore, should have filed a Statement of Organization and disclosure reports as required by 2 U.S.C. § 433 and § 434. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission also requests that you answer the interrogatories which are enclosed with this letter. Please submit your answers within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

1/ As the alleged violations occurred before the Federal Election Campaign Act was amended on January 8, 1980, by Pub. L. 96-187, all citations to the Act pertaining to the violations are to the Act as it existed before being amended.

Attachment VIII (8 pages)

8204032126 7

In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address, and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and any other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A).2/

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter, at (202)523-4175.

Sincerely,

Enclosure

Interrogatories

2/ This citation is to the Act as amended by Pub. L. 96-187.

8204032126 8

FEDERAL ELECTION COMMISSION

Sean Morton Downey MUR 1103

INTERROGATORIES

I. A. What is the purpose or goal of Let's All Protect A Child Fund ("LAPAC Fund")? Please explain.

B. What kind of activities are sponsored by LAPAC Fund? Please explain.

C. Is LAPAC Fund incorporated? If so, where, and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

D. Is LAPAC Fund a non-profit organization? Please provide documentation.

E. Is LAPAC Fund a membership organization?

1. If so, who can become a member?

2. How does someone become a member?

3. Must members pay dues?

II. A. Attached is a copy of a letter from LAPAC Fund dated February 1979 and signed by you. Form this letter it appears that LAPAC Fund is soliciting contributions. Is LAPAC Fund soliciting contributions?

1. If so, from whom is LAPAC Fund soliciting contributions?

2. Has LAPAC Fund received contributions?

a. If so, what is the total amount of contributions LAPAC Fund has received?

b. Over what period of time?

8204032 1269

III. Has LAPAC Fund made any expenditures?

A. If so, what is the total amount of expenditures LAPAC Fund has made?

B. Over what period of time?

C. Has LAPAC Fund made any contributions to candidates for office?

1. If so, please list the candidates and the offices sought.

IV. LAPAC Fund and Life Amendment PAC have the same address. You serve as Chairman of both committees.

A. Is there connection or affiliation between the two committees? Please explain.

B. Is there a connection or affiliation between either or both committees and any other committees or organizations? Please explain.

V. A. What is the purpose or goal of Christian Family Renewal? Please explain.

B. What kinds of activities are sponsored by Christian Family Renewal? Please explain.

C. Is Christian Family Renewal incorporated?

1. If so, where and when were the articles of incorporation filed? Please provide a copy of the articles of incorporation and bylaws.

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D. Is Christian Family Renewal a non-profit organization? If so, please provide documentation.

E. Is Christian Family Renewal a membership organization?

1. If so, who can become a member?

2. How does someone become a member?

3. Must members pay dues?

F. Has Christian Family Renewal made any contributions to candidates for office?

1. If so, please list the candidates and the offices sought.

G. Is LAPAC Fund the separate segregated fund of Christian Family Renewal?

8204032127

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Brown, Director
and Treasurer
Life Amendment Political
Action Committee
National Press Building
529 14th Street, N.W., Suite 357
Washington, D.C. 20045

Re: MUR 1103

Dear Mr. Brown:

The Federal Election Commission notified Sean Morton Downey, also a Director of your committee, on January 25, 1980, of a complaint which alleges that your committee has violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to him at that time.

Upon further review of the allegations contained in the complaint, the Commission, on , 1980 determined that there is reason to believe that Life Amendment PAC has violated 2 U.S.C. § 435(b)1/ by its omission of a notice on the solicitation letter signed by Mrs. Penny Dines, § 441d by its omission of an authorization or non-authorization statement on a letter signed by Mildred Jefferson and Mr. Downey (copies of these letters are enclosed); § 434(b)(2)(presently 2 U.S.C. § 434(b)(3)(A) and § 431(13)(A)) by its failure to report occupations and principal places of business; § 434(b)(12) (presently 2 U.S.C. § 434(b)(8)) by its failure to continuously report debts and obligations until extinguished or to report the circumstances and conditions of the extinguishment of the debt; and § 434(b)(5) (presently 2 U.S.C. § 434(b)(3)(E)) by

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1/ As the alleged violations occurred before the Federal Election Campaign Act was amended on January 8, 1980, by Pub. Law 96-187, all citations to the Act pertaining to violations are to the Act as it existed before being amended.

8204032 1272

its failure to report loans from Karl Karcher, Judy Brown, Security National Bank, Robert Lepak, and yourself, or § 434(b)(9) (presently 2 U.S.C. § 434(b)(5)(A)) by its failure to report expenditures made by Karl Karcher, Judy Brown and yourself on behalf of the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

The Commission also requests that you answer the interrogatories which are enclosed with this letter. Please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)2/.

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202)523-4175.

Sincerely,

cc: Marion Edwyn Harrison

Enclosures
Interrogatories
Copies of Letters (2)

2/ This citation is to Act as amended by Pub. Law 96-187.

8204032127 3

FEDERAL ELECTION COMMISSION

Paul A. Brown MUR 1103

INTERROGATORIES

1. Attached is a copy of a letter signed by Mrs. Penny Dines. In the letter, Mrs. Dines states that Sean Morton Downey, Chairman of Life Amendment Political Action Committee, Inc., asked her to write the letter explaining why people should support Life Amendment PAC.

   a. Did Mr. Downey ask Mrs. Dines to write this letter?

      i. If so, on whose behalf was the letter written? Please explain.

      ii. For what purpose was the letter written? Please explain.

      iii. Who paid for the printing and mailing of this letter?

      iv. To whom was the letter sent?

2. Attached is a copy of a letter signed by Sean Morton Downey, Jr. and Mildred F. Jefferson, Chairman and Advisory Chairmain of Life Amendment PAC. The postscript at the end of the letter advocates the election of Don Lyon for the 16th Congressional District of Illinois.

   a. Was this communication authorized by the candidate, Don Lyon?

   b. Did LAPAC make the expenditure for the letter?

3. Life Amendment PAC and Let's All Protect A Child Fund (LAPAC Fund) have the same address. Mr. Downey serves as Chairman of both committees.

   a. Is there a connection or affiliation between the two committees? Please explain.

   b. Is there a connection or affiliation between either or both of these committees and any other committees or organizations? Please explain.

8204032 1274

D 276
RAD 80L-33

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE SEPTEMBER 24, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Michele Brown

TEAM CHIEF Bobby Werfel BW

COMPLIANCE REVIEW RS

THROUGH: STAFF DIRECTOR RSC

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

MUR No. 1103

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE --- Additional loan reporting problems on the Year End Report (10-1-79 to 12-31-79) and the February Monthly Report (1-1-80 to 1-31-80). ATTACHMENT #1

RAD has not sent RFAIs to the committee regarding the specific problems mentioned above because MUR 1103 covers the same reporting problems for other reports from the same filer and, according to OGC, a report for MUR 1103 will be forthcoming in the near future.

8204032127 5

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

The attached entry shows a repayment of a loan to a bank (Security National Bank) for $5,138. However, no comparable loan was reported as received or as an outstanding debt.

8204032 1276

...lection Commission
...K Street, N.W.
...shington, D.C. 20463

...NIZED 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 ___ of ___ for Line Number ...

(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
Security National Bank	Repayment of loan)	12-26-79	[redacted]
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code IRS Pittsburgh PA	Particulars of Expenditure 55, W/H. F.I.C.A.	Date (month, day, year) 12-31-79	Amount of each expenditure this period $1,592.96
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code Qwest Telephone Comp. White, South Dakota	Particulars of Expenditure Telephone Bill	Date (month, day, year) 12/15 11/7 12/10	Amount of each expenditure this period 345.72 205.34 179.66
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code Ellen Dempsey White, SD	Particulars of Expenditure Travel	Date (month, day, year) 11/23	Amount of each expenditure this period 152.67
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code World Travel White, SD	Particulars of Expenditure Air Fare to D.C.	Date (month, day, year) 11/23	Amount of each expenditure this period 357.00
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional)	$ 7991.43
TOTAL this period (last page this line number only)	$ 78148.54

80031490434

The attached entry is either a loan or a loan repayment to an individual. If it is a loan repayment, made for a loan received, then there is no comparable loan reported as an itemized receipt. If it is a loan made, then the description "Repayment of Loan - Same Period" may be inaccurate because there no repayment reported as an itemized receipt. (Note in either case, the entry should have been reported on Line 21, old forms, of the Detailed Summary Page and Schedule B accordingly.)

82040321278

Commission
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 5 of [illegible]
Line Number [illegible]

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Life Amendment Political Action Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
80031490467 1 Print Shoppe of Kensington 3830 Plyers Mill Rd. Kensington MD 20795	ENVELOPES Expenditure for: ☐ Primary ☐ General ☒ Other	1/29/80	234.29
2 Amos T. Camp 302 Sworr Ave. Alexandria, VA 22301	PRINTING Expenditure for: ☐ Primary ☐ General ☒ Other	1/24/80	161.20
3 Franks Duplicating Room 1000 [illegible] St. NW Washington, DC 20005	PRINTING Expenditure for: ☐ Primary ☐ General ☒ Other	1/24/80	3.03
4 Barnett, Harris & Carey 1627 K St. NW Wash, DC 20006	Legal Fees Expenditure for: ☐ Primary ☐ General ☐ Other	1/29/80	500.00
5 Robert Lefak Carlin Circle Springfield, Mass	Repayment of Loan + Interest Expenditure for: ☐ Primary ☐ General ☒ Other	1/1/80	2534.30
6 Webcraft 1120 - 19th St., N.W. Washington, D.C 20036	PRINTING Expenditure for: ☐ Primary ☐ General ☒ Other	1-24-80	5000.00
7 Dewer Telephone Co. Clothewater [illegible] SD 57216	Telephone Bill Expenditure for: ☐ Primary ☐ General ☐ Other	1-24-80	306.57
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$ 8939.39
TOTAL this period (last page this line number only)			$ 28542.17

RAD

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE June 5, 1990

ANALYST Mark Kleinman

TO: Office of General Counsel
ATTENTION: Michele Brown

TEAM CHIEF Rob Snow

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR A.L. for A.S.P.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1103

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE - Additional loans reported on Schedule C, but not shown as receipts on Schedule A. (Year End Report) ATTACHMENT #1

8204032112280

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

...ation Commission
...Street, N.W.
...shington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

...Page ... of 21 for
Line Number 13

(Use Separate Schedules for each numbered line)

Name of Candidate and Committee in Full: Taft Committee P.A.C.

YEAR-END REPORT 10-1-79 to 12-31-79

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
J.A. Brown P.O. Box 490 Stafford, VA. 22554 ☐ Primary ☐ General ☑ Other	9/25/79	$ 3000.00	$ —	$ 3000.00

NATURE OF OBLIGATION (Details of Debt):

Loan due and payable 10/1/80
5% interest 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
P.A. Brown P.O. Box 490 Stafford, VA. 22554 ☐ Primary ☐ General ☑ Other	9/28/79	$ 2000.00	$ —	$ 2000.00

NATURE OF OBLIGATION (Details of Debt):

Loan due and payable 10/1/80
5% interest 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
☐ Primary ☐ General ☐ Other		$	$	$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	$	$	$ 5000.00
TOTAL this period (last page this line number only)	$	$	$ 15,000.00

Carry outstanding balance only to appropriate line of summary.

82040321281

ALTHOUGH THE DATES OF THE LOANS ARE DURING THE OCTOBER 10 QUARTERLY REPORTING PERIOD, THEY WERE NOT DISCLOSED ON THAT REPORT. (SCHEDULE C ATTACHED)

8204032120 82

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

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page Number 13

(Use Separate Schedules for each numbered line)

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
P.H. BROWN 2018 MIDSHIPMAN DR. STAFFORD, VA. 22554 ☐ Primary ☐ General ☑ Other	6/1/78	$ 1500.00	$ —	$ 1500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 1-1-80
5% INTEREST WAIVED

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
DORIS STORMS 2180 WOODACRES EUGENE, OREGON 97401 ☐ Primary ☐ General ☑ Other	8/1/78	$ 4500.00	$ —	$ 4500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 1-1-80
5% INTEREST FOR 12 MONTHS PAID (SEE PAGE 78 - FORM SCHEDULE B.)

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
KARL KARCHER 1206 N. HARBOR BLVD. ANAHEIM, CA 92800 ☐ Primary ☐ General ☑ Other	5/25/79	$ 5000.00	$ —	$ 5000.00

NATURE OF OBLIGATION (Details of Debt):
LOAN - DUE + PAYABLE WITHIN 12 MONTHS - OR PRIOR TO 6/1/80 - 0 - INTEREST

SUBTOTALS this period this page (optional)	$	$	$
TOTAL this period (last page this line number only)	$	$	$ 11000.00

Carry outstanding balance only to appropriate line of summary.

82040321283

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

DATE 9/24

TO: Phyllis / Staff Director

FROM: Bobby Ge.

REMARKS:

Expedite - OGC is about to complete rpt on this Conte

666
MUR 1103

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-8070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

March 7, 1980

906842

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20453

Dear Mr. Steele:

I am sure you tire, as I do, of the correspondence between Mr. Harrison and myself. The tone of his several letters, however, demands a reply.

In the third paragraph of his letter of February 29, 1980, he states that in the third paragraph of my letter of of February 11, 1980, I mistated the facts. My paragraph reads:

> In November of 1979 LAPAC similarly mistated the facts saying that it had filed (FEC) complaints against NARAL. As of early February no such complaints have been filed.

The enclosed LAPAC fundraising appeal states that LAPAC "has placed on retainer two attorneys who have filed charges against NARAL with ...and the Federal Election Commission for various omissions from their lobbying and FEC reports." In fact no FEC complaints had been filed as of the date of my letter.

Presumably Mr. Harrison's letter is based entirely on my failure to specifically reiterate that the complaints which LAPAC said it had filed but had not filed were those with the agency in question, the Federal Election Commission. This is obvious, however, since the letter is written to an employee of the FEC, since it refers to other claims of filing FEC complaints and since the Lobbying Act issue is not within jurisdiction of the FEC

Mr. Harrison devotes a great deal of spleen and rhetoric to an argument which relies on word games and lacks substance.

9204032128 5

In addition, his description of the matter concerning lobbying reports filed with the Clerk of the House is misleading. I doubt you wish to hear any more about that controversy, but if you do, please feel free to contact me.

Mr. Harrison repeatedly argues by insult, intimidation and rhetoric, thus avoiding addressing the substance of various arguments. I trust that his technics will not mislead the Commission.

Sincerely,

Gail M. Harmon

Gail M. Harmon

GMH/dds

Enclosure

cc: M. E. Harrison
Michelle Brown

8204032 1286

LAPAC INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

IF THE NATIONAL ABORTION RIGHTS ACTION LEAGUE THINKS FOR ONE MINUTE THAT IT CAN HARASS THE PRO-LIFE MOVEMENT WITH IMPUNITY, THEY HAVE ANOTHER THING COMING!!

Dear Friend of Life:

About six months ago the National Abortion Rights Action League (NARAL) filed charges against LAPAC and seven other pro-life organizations for election irregularities (their term) and other so-called abuses of the Federal Election Law. A year earlier they launched other charges through the Justice Department claiming "cover-up" by a pro-life group in their lobbying report.

Part of the anti-life strategy is to tie-up the pro-life movement in legalities and make us waste time and money defending ourselves against ridiculous charges. Even if the charges are groundless, we must still use an attorney to defend ourselves. This is costly, and worse yet, impossible for some local pro-life groups who can't afford a good attorney.

About a month ago our attorney turned in our most recent answer to the Federal Election Commission. This was in response to charges filed against us by NARAL. Over 500 pages of material had to be gathered and the time and expense in answering these charges is enormous. What are the local, city and state groups to do when charged by NARAL? Can they afford a good attorney? The answer to that is generally NO. We can't afford one either, but our only other alternative is to close-up shop and get out of the movement and that is precisely what NARAL wants.

It is now time for some pro-life group to put an end to this nonsense! It is time for some pro-life group to take the offensive! It is time to research NARAL and their reports and if possible, file some charges of our own!

LAPAC is pleased to announce that we are doing just that. We have on retainer two attorneys who have filed charges against NARAL with the Justice Department, the clerks of the House and Senate, and the Federal Election Commission for various omissions from their lobbying and FEC reports. We have a good case, documented evidence and all material necessary to win our case. My friends, we are on the attack! Let's let the abortionists know what it is like. It is still a free country and we demand they comply with the law, just like everyone else.

(over, please)

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

8204032128.87

A copy of a suppressed (what's new?) press release is included in this letter. I hope you will try to spread the word to all local groups and investigate the abortionists and their compliance with all laws. If you find a violation, let us know. My friends, we also need your financial help. The burden of proof is now on NARAL but we must initiate all legal action and that costs money. Attorneys don't come cheap, but when they are able to send the message to NARAL and all the abortionists to quit harassing the pro-lifers of this country, then it is worth the effort. If NARAL finds itself answering all sorts of charges then they might give some thought to dropping their strategy of tying-up the pro-life movement in the courts!

We have a case, we can win! We will win! All we need is your help and we need it now. We are doing something for all pro-life groups in America. Please respond generously today. We have enclosed a postage-paid envelope for your convenience.

God is Life, Love Life,

Paul A Brown
Director
LAPAC, INC.

P.S. Your postage-paid reply envelope and contribution form are attached to the enclosed brochure.

8204032 12888

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006

8204032129

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

664

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-8070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

March 7, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20453

Dear Mr. Steele:

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82040321290

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Sincerely,

Gail M. Harmon

GMH/dds

Enclosure

cc: M. E. Harrison
Michelle Brown

8204032129 1

LAPAC INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

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(over, please)

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

820321292

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God is Life, Love Life,

Paul A Brown
Director
LAPAC, INC.

P.S. Your postage-paid reply envelope and contribution form are attached to the enclosed brochure.

8204032129 3

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006

2040321

FILED
FEDERAL ELECTION
WASHINGTON, D.C.
MAR 7
1980

ALWAYS
USE ZIP
CODE

'80 MAR 10 PM 3:17

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20453

GOC 571

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 785-5572
CABLE ALL OFFICES BALEMAR

RECEIVED
FEDERAL ELECTION COMMISSION
80 MAR 3 AM 9:44

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN D. SOLOMON*
M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
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 III
LEE C. SUMMERS*
MARY JO WINKLER*

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

BARNETT, ALAGIA & PROSPERI**
249 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 655-1580

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 KIBER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

February 29, 1980

82040321295

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

Re: MUR 1103

Dear Mr. Steele:

May we refer to Ms. Gail M. Harmon's letter of February 11 to Ms. Michele D. Brown, copies to various people.

We are not disposed to respond in kind every time Ms. Harmon writes a communication to somebody in the Federal Election Commission which is neither a sworn complaint nor a proper pleading.

However, in the third paragraph of her letter she misstates a fact pertaining to our client Life Amendment Political Action Committee, Inc.

The reason our client stated in November 1979 that it had filed complaints against National Abortion Rights Action League is becaue it had done so. More specifically, it filed a complaint with the Clerk of the House of Representatives and another with the Assistant

Attorney General, Criminal Division, Department of Justice. Copies of all such material were sent to Ms. Harmon. Indeed, on one occasion, I wrote to her. The Clerk of the House ruled her client was in violation of law; her client corrected the violation; there has been no indictment.

Counsel always are well advised to check the facts before making allegations.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Ms. Gail M. Harmon
Life Amendment Political Action Committee, Inc.

8204032 1296

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

20403219

WASHINGTON DC
PM
1 MAR
1980
FEC MAIL SECTION

WE'RE COUNTING ON
YOU
CENSUS '80 APRIL 1

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

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

8204011298

PM
1 MAR

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

GCM 555

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 785-5572
CABLE ALL OFFICES ADDR

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
ST. JOHN BARRETT
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240 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 832-5606

BERNARD H. BARNETT
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W. DAVID KIBER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

RECEIVED
FEDERAL ELECTION
COMMISSION
80 FEB 29 AM 11:59

February 26, 1980

8204032129 9

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

S06557

Re: MUR 1103

Dear Mr. Steele:

We refer to our letter of January 31, 1980, photocopy enclosed.

We now have had an opportunity to attempt to analyze the November 29, 1979 sworn complaint of Ms. Gail M. Harmon, filed on behalf of National Abortion Rights Action League, which you forwarded to us under date of January 25, 1980.

We renew the request set forth in the penultimate paragraph of our January 31 letter. Ms. Harmon's "updated versions of several complaints" are a partially unintelligible stream-of-consciousness series of allegations, innuendos, editorial comments and the like. Although the Federal Election Commission requires no style of pleading in the presentation of formal complaints, a lawyer ought to be held to some minimum of clarity and definitiveness - and the more so when the lawyer files a self-admitted partial rehash of prior filings.

80 FEB 29 P3:16

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

If the Complainant were to succeed (as well she might, in view of the fact the complaint was filed November 29, 1979) in creating a mechanism by which she can litigate in United States District Court, she would be forced in that forum to a recognized standard of particularity.

The Federal Election Commission should require that standard now or, alternatively, let the Complainant fulfill her desire to litigate.

We do not believe under the circumstances that we ought further to attempt to answer the Complainant's vague, cumulative, repetitious and at times unintelligible statements. Most of the complaint appears to relate to organizations which are not our client. To the extent it relates to our client, we believe we have stated a sufficiency, given the nature of the complaint in MUR 961, for the Federal Election Commission forthwith to dismiss both MUR 961 and MUR 1103.

We should be glad to answer with specificity if the complaint is drafted with specificity.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Michele D. Brown
Ms. Gail M. Harmon
Life Amendment Political Action Committee, Inc.

8204032130

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 785-8572
CABLE ALL OFFICES ALBAR

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
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BARNETT & ALAGIA*
[illegible]
LOUISVILLE, KENTUCKY [illegible]
TELEPHONE [illegible]

BARNETT, ALAGIA & PROSPERI**
[illegible]
PALM BEACH, FLORIDA [illegible]
TELEPHONE [illegible]

BERNARD N. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER*
MICHAEL E. LANNON*
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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

January 31, 1980

8204032130 1

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

Re: MUR 1103

Dear Mr. Steele:

We acknowledge receipt on January 29 of your letter of January 25. Inasmuch as I am just leaving for the American Bar Association Midyear Meeting in Chicago, in the House of Delegates of which I serve, I have not read the complete set of enclosures.

Your letter does not identify our client. We assume it is Life Amendment Political Action Committee, Inc.

If so, upon a very quick perusal, it would appear that the sworn complaint of Ms. Gail M. Harmon is merely a rehash or, as she phrases it, "updated versions", "of several complaints previously filed by National Abortion Rights Action League. . . ."

The purpose of another filing, in addition to the obvious harassment, appears to be to initiate the running

of the 90-day period at the conclusion of which Ms. Harmon hopes to have grounds to sue in the United States District Court for the District of Columbia. 2 USCA §437g(a)(9).

Inasmuch as Ms. Harmon follows no style of pleadingbut complains rather as a layman might think aloud, we are unsure what new offense she alleges. May we suggest that you require Ms. Harmon to submit that which in the United States District Court would be termed a more definite statement. At that juncture each of us better might know whereof she complains.

Pursuant to the provisions of 2 USCA §§437g(a)(4)(B) and 437g(a)(12) we waive confidentiality and ask that these proceedings be spread upon the public record.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

8204032130 2

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

3204015

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

BCC 544

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 785-5572
CABLE ALL OFFICES BACO

FEDERAL ELECTION COMMISSION
80 FEB 26 PM 12:06

D. PAUL ALAGIA, JR.
WILLIAM A. CAREY
ALLAN B. SOLOMON*
M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
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 P. MINTMIRE
JACK E. RUCK*
JOHN F. SHERLOCK III
LEE C. SUMMERS*
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1170
LOUISVILLE, KENTUCKY 40201
TELEPHONE (502) 589-4131

BARNETT, ALAGIA & PROSPERI**
249 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 659-5506

BERNARD H. BARNETT
MARION EDWYN HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER*
MICHAEL E. LANNON*
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GARY D. GARRISON*
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

February 26, 1980

8204032130 4

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

SC654

Re: MUR 1103

Dear Mr. Steele:

We refer to our letter of January 31, 1980, photocopy enclosed.

We now have had an opportunity to attempt to analyze the November 29, 1979 sworn complaint of Ms. Gail M. Harmon, filed on behalf of National Abortion Rights Action League, which you forwarded to us under date of January 25, 1980.

We renew the request set forth in the penultimate paragraph of our January 31 letter. Ms. Harmon's "updated versions of several complaints" are a partially unintelligible stream-of-consciousness series of allegations, innuendos, editorial comments and the like. Although the Federal Election Commission requires no style of pleading in the presentation of formal complaints, a lawyer ought to be held to some minimum of clarity and definitiveness - and the more so when the lawyer files a self-admitted partial rehash of prior filings.

RECEIVED
GENERAL COUNSEL
80 FEB 26 P 2:24

If the Complainant were to succeed (as well she might, in view of the fact the complaint was filed November 29, 1979) in creating a mechanism by which she can litigate in United States District Court, she would be forced in that forum to a recognized standard of particularity.

The Federal Election Commission should require that standard now or, alternatively, let the Complainant fulfill her desire to litigate.

We do not believe under the circumstances that we ought further to attempt to answer the Complainant's vague, cumulative, repetitious and at times unintelligible statements. Most of the complaint appears to relate to organizations which are not our client. To the extent it relates to our client, we believe we have stated a sufficiency, given the nature of the complaint in MUR 961, for the Federal Election Commission forthwith to dismiss both MUR 961 and MUR 1103.

We should be glad to answer with specificity if the complaint is drafted with specificity.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
Enc
cc Ms. Michele D. Brown
Ms. Gail M. Harmon
Life Amendment Political Action Committee, Inc.

8204032305

BARNETT, ALAGIA & CAREY
1627 K STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 785-5672
CABLE ALL OFFICES ALBAR

D. PAUL ALAGIA, JR.
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M. BROOKS SENN*
JOSEPH M. DAY*
A. PAUL PROSPERI**
ST. JOHN BARRETT
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JOHN E. EVANS*
RONALD L. GAFFNEY*
WILLIAM S. GLADING
JOHN S. KECK*
KARL F. LOUCKS III*
DONALD F. MINTMIRE
JACK E. RUCK*
JOHN P. SHERLOCK III
LEE C. SUMMERS*
MARY JO WINKLER*

BARNETT & ALAGIA*
[illegible]
LOUISVILLE, KENTUCKY [illegible]
[illegible]

BARNETT, ALAGIA & PROSPERI**
[illegible]
PALM BEACH, FLORIDA [illegible]
[illegible]

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

OF COUNSEL
RUFUS E. WILSON

January 31, 1980

8204032 1306

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

Re: MUR 1103

Dear Mr. Steele:

We acknowledge receipt on January 29 of your letter of January 25. Inasmuch as I am just leaving for the American Bar Association Midyear Meeting in Chicago, in the House of Delegates of which I serve, I have not read the complete set of enclosures.

Your letter does not identify our client. We assume it is Life Amendment Political Action Committee, Inc.

If so, upon a very quick perusal, it would appear that the sworn complaint of Ms. Gail M. Harmon is merely a rehash or, as she phrases it, "updated versions", "of several complaints previously filed by National Abortion Rights Action League. . . ."

The purpose of another filing, in addition to the obvious harassment, appears to be to initiate the running

of the 90-day period at the conclusion of which Ms. Harmon hopes to have grounds to sue in the United States District Court for the District of Columbia. 2 USCA §437g(a)(9).

Inasmuch as Ms. Harmon follows no style of pleadingbut complains rather as a layman might think aloud, we are unsure what new offense she alleges. May we suggest that you require Ms. Harmon to submit that which in the United States District Court would be termed a more definite statement. At that juncture each of us better might know whereof she complains.

Pursuant to the provisions of 2 USCA §§437g(a)(4)(B) and 437g(a)(12) we waive confidentiality and ask that these proceedings be spread upon the public record.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

8204032130 7

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

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'00 FEB 28 PM 12 05

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

D 640
RAD 304-38

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE FEBRUARY 19, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Michele Brown

TEAM CHIEF Steve Mims

COMPLIANCE REVIEW CB/83

THROUGH: STAFF DIRECTOR B.L. for O.R.

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1103

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

LIFE AMENDMENT POLITICAL ACTION COMMITTEE --- October 10 Quarterly Report showing a loan repayment without a comparable loan(or so it seems). Attachment #1

LIFE AMENDMENT POLITICAL ACTION COMMITTEE --- January 31 Year End Report showing $5000 in loans to the committee on Schedule C, without the receipts-being reported on Schedule A. #2

8204032130 9

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

ATTACHMENT #1

8204032310

Note: It would appear, from the description, "Loan Repayment W/in Same Quarter" to Paul Brown for $1,500, that the committee received a loan from Paul Brown of $1,500 during the Third Quarter. (Note: the phrase "W/in same quarter" is comparable to the response to the RFAI in which the loans to Osbornes were "repaid with the same period") The committee does report a loan outstanding of $1,500 to Paul Brown and it is possible that the repayment was for this loan. However, the committee still reports the loan outstanding on the Year End Report. (SEE ATTACHMENTS)

Alternatively, the entry as shown could mean that the committee made a loan to Paul A. Brown for $1,500 and that it was repaid, in which case, the loan repayment has not been shown on Schedule A.

82040321311

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 7
Line Number 20 F

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Life Amendment P.A.C.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Pamela Derby Meadowpines Stafford Va. 22554	Consultant	☐ Primary ☐ General ☒ Other	7/19/79	127.50
Blue Cross - G.H.A. Washington, D.C.	Hospitalization	☐ Primary ☐ General ☒ Other	7/23/79	250.08
Pitney Bowes Washington D.C.	Postage Mach. Lease	☐ Primary ☐ General ☒ Other	7/24/79	64.00
RMRS Systems St. Louis, Mo	postage	☐ Primary ☐ General ☒ Other	7/24/79	200.00
NATIONAL PRESS BLDG. SUITE 710 WASHINGTON, DC 20045	Office rent	☐ Primary ☐ General ☒ Other	7/30/79	533.00
P.A. BROWN P.O. BOX 790 STAFFORD, VA. 22554	LOAN REPAYMENT - W/IN SAME QTR	☐ Primary ☐ General ☐ Other	7/10/79	1500.00
SECURITY NAT'L BANK 14TH & F ST. WASHINGTON, DC 20045	SERVICE CHARGE	☐ Primary ☐ General ☒ Other	9/1/79	123.85
P. A. BROWN P.O. BOX 490 STAFFORD, VA. 22554	CONSULTANT	☐ Primary ☐ General ☒ Other	9/1/79	2300.00
				$ 5098.43
SUBTOTAL of expenditures this page (optional)				$
TOTAL this period (last page this line number only)				

79031400294

LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

BENJAMIN FRANKLIN STATION • P.O. BOX 14263 • WASHINGTON, D.C. 20044 • (202) 638-2661

SEAN MORTON DOWNEY, JR.
CHAIRMAN OF THE BOARD

PAUL A. BROWN
TREASURER/DIRECTOR

RECEIVED
FEDERAL ELECTION COMMISSION
'79 NOV 9 PM 1:58

November 7, 1979

Orlando B. Potter
Staff Director
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Dear Mr. Potter:

RE: Five Page letter of 10/4/79

Please note attached amended copies as you requested in the following order:

FOR: 1/1/79 - 3/31/79 FEC REPORT

1) Page Two FEC Form 3 corrected to reflect B. Baroody as 22C rather than 20A in the amount of $2400. (Corrected report attached)

2) Line 20A - Schedule B - addresses complete

3) Schedule B - Lina 21A - Osborne note was made and repaid within the same period; therefore we can see no place for reflecting this other than Schedule B - Lina 21A and have corrected same.

FOR: 4/1/79 - 6/30/79 FEC REPORT

1) Lines 14A and B corrected

2) Karcher Loan described

3) Osborne loans taken care of with proper notations on the First Quarter Report.

Sincerely,

Paul A. Brown
Treasurer/Director

PAB:j

Encl: AMENDED FEC REPORTS
First and Second Quarter

a copy of our report is on file and available for purchase from the federal election commission, washington, d.c.

8920346132315

FEC
...ED
...RY, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for
Line Number 13
(Use Separate Schedules for each numbered line)

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
P.A. BROWN 2018 MIDSHIPMAN DR. STAFFORD, VA. 22554 ☐ Primary ☐ General ☑ Other	6/1/78	$ 1500.00	$ —	$ 1500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 1-1-80
5% INTEREST WAIVED

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
DORIS STORMS 2180 WOODACRES EUGENE, OREGON 97401 ☐ Primary ☐ General ☑ Other	8/1/78	$ 4500.00	$ —	$ 4500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 1-1-80
5% INTEREST FOR 12 MONTHS PAID (SEE PAGE 7B - FORM SCHEDULE B.)

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
KARL KARCHER 1206 N. HARBOR BLVD. ANAHEIM, CA 92800 ☐ Primary ☐ General ☑ Other	5/25/79	$ 5000.00	$ —	$ 5000.00

NATURE OF OBLIGATION (Details of Debt):
LOAN - DUE + PAYABLE WITHIN 12 MONTHS - OR PRIOR TO 6/1/80 - 0 - INTEREST

SUBTOTALS this period this page (optional)	$	$	$
TOTAL this period (last page this line number only)	$	$	$ 11000.00

Carry outstanding balance only to appropriate line of summary.

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ATTACHMENT #2

NOTE: The poor quality of the reproduction is due to the committee sending in an illegible report. However, the Schedule C attached shows a loan from Paul A. Brown for $2,000 and Judith A. Brown for $3,000 without any comparable receipts reported on Schedule A.

(NOTE: MICROFILM LOCATION OF REPORT IS 80/03/148/3208)

82040321316

Washington, D.C. 20463

(Indicate Primary or General Election for each Entry)

(Use Separate Schedules for each numbered line)

Name of Candidate and Committee as 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
T.A. Brown P.O. Box 456 Edmond, OK 73034	4/15/[illegible]	$ 3.00	$ -	$ 3.00

☐ Primary ☐ General ☐ Other

NATURE OF OBLIGATION (Describe)

Accounting fees 1/1/84

3% interest

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
P.A. Brown P.O. Box 456 Edmond, OK 73034	3/1/[illegible]	$ 20.00	$ -	$ 20

☐ Primary ☐ General ☐ Other

NATURE OF OBLIGATION (Describe)

Loan charges for 1983

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

8204032117

424

BRAMER, BOPP & HAYNES
ATTORNEYS AT LAW
600 FARMERS BUILDING
10 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

ARNOLD H. BRAMER
JAMES BOPP, JR.
DAVID D. HAYNES

TELEPHONE (812) 232-2431

RECEIVED
FEDERAL ELECTION
COMMISSION
80 FEB 19 PM 12:58

February 14, 1980

Ms. Michele D. Brown
FEDERAL ELECTION COMMISSION
1325 K Street N.W.
Washington, DC 20463

Re: MUR 1103

Dear Ms. Brown:

I am in receipt of your letter dated January 25, 1980 regarding the above entitled matter. I am at a complete loss as to why the National Right to Life Committee is being subjected to an additional investigation regarding an identical matter which has already been thoroughly investigated by the Federal Election Commission.

Specifically, on July 2, 1979 the National Right to Life Committee received notice of an investigation regarding whether or not the Life Amendment Political Action Committee was connected to the National Right to Life Committee and this fact was not disclosed to the FEC. This matter was given the identification number MUR 961.

As a result of the investigation of MUR 961, the National Right to Life Committee provided extensive documentation revealing the fact that the LAPAC was not a connected political action committee to the NRLC. As far as we know, this complaint was resolved to the satisfaction of the FEC. Now we will be subjected to an additional complaint on the same matter, but now under a new MUR number.

Please, therefore, refer to the answers and information we have supplied you under MUR 961 regarding this complaint. Since I do not represent the LAPAC and the NRLC has no influence or control over them, I suggest you refer this complaint to them for any additional information they wish to provide you.

I might mention one additional fact. As you review the information submitted under MUR 961, I am sure you will be struck by the ludicrousness of this and NARAL's prior complaint. Not only does the NRLC not control, administer or finance the LAPAC, we have been literally at each others' throats for more than two years. Any actions they have taken are not our responsibility.

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If you need additional information that I can provide, please let me know.

Sincerely,

James Bopp, Jr.
General Counsel to the
National Right to Life Committee, Inc.

kg

0204032119

BRAMES, BOPP & HAYNES
ATTORNEYS AT LAW
900 SYCAMORE BUILDING
10 SOUTH SIXTH STREET
TERRE HAUTE, INDIANA 47807

82040321320

PM
14 FEB
1980

EXPRESS MAIL
NEXT DAY DELIVERY
ASK YOUR POSTMASTER

Ms. Michele D. Brown
FEDERAL ELECTION COMMISSION
1325 K Street N.W.
Washington, DC 20463

80 FEB 19 PM 12

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-8070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

OGC 371

RECEIVED
FEDERAL ELECTION
COMMISSION

80 FEB 11 PM 12:41

80 FEB 14 AM 10:20

February 11, 1980

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

Dear Ms. Brown: RE: MUR 1103

Enclosed is a fundraising letter from National Right-to-Life Committee which characterizes as "groundless" the above-referenced complaint.

You also might be interested to note that the letter dated January 1980 states that they "have taken the offensive against NARAL by filing two complaints with the FEC." The FEC press office tells me no such complaints have been filed to date.

In November of 1979 LAPAC similarly mistated the facts saying that it had filed complaints against NARAL. As of early February no such complaints have been filed.

I realize that false statements in fundraising letters are not violations of the federal election law, but I wanted to bring them to your attention as you review other statements and materials submitted by these groups. I certainly hope such mistatements are not typical of these organizations.

Furthermore, the people investigating NARAL's complaint that National Right to Life Committee's voter identification project constitutes an illegal corporate expenditure in connection with an election might be interested to note that NRLC is apparently planning to continue the program even though the complaint has not been resolved.

Sincerely,

Gail Harmon

GMH/dds

Gail M. Harmon

Enclosure

cc: Charles Steele
FEC Commissioners
Karen Mulhauser
Counsel for LAPAC
Counsel for NRLC

820403211321

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Ann O'Donnell, R.N.
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Mrs. Sylvia Brown
MISSOURI
Ann O'Donnell, R.N. *
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Mrs. Suzanne Morris
NEBRASKA
Mrs. Mary Ann Trahon
NEVADA
Mrs. Ruth McGroarty
NEW HAMPSHIRE
Earl Appleby, Jr.
NEW JERSEY
Mrs. Mary Ellen Mulholland
NEW MEXICO
Ronald V. Dorn, Jr., M.D.
NEW YORK
Joanne Head, R.N.
NORTH CAROLINA
Mrs. David G. O'Steen
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PENNSYLVANIA
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WASHINGTON
Danielle Van Gerbaud, Esq.
WEST VIRGINIA
Dr. Wanda Franz
WISCONSIN
James Hotop
WYOMING
Mrs. Mary Schroeder
GUAM
Miss Sarah Thomas
AT LARGE DIRECTORS
Mrs. Robert (Jo) Higgins, R.N.
President, Nat'l Nurses for Life
*Member, Executive Committee

national RIGHT TO LIFE committee, inc.

national office
National Press Building, Suite 341
529 14th Street, N.W., Washington, D.C. 20045

NATIONAL RIGHT TO LIFE COMMITTEE FILES TWO COMPLAINTS WITH FEDERAL ELECTION COMMISSION AGAINST NATIONAL ABORTION RIGHTS ACTION LEAGUE

Dear Friend of Life: January 1980

Yes -- because of the gratifying support of so many - NRLC has been able to move from fighting for its life in a defensive position to a vigorous offensive against NARAL.

Because of your help, we can strike back within the legal system at those forces of evil that have sought to deny our civil rights and limit our activities toward a Human Life Amendment.

We have taken the offensive against NARAL by filing two complaints with the Federal Election Commission reporting their violations of federal election laws.

After an intensive investigation of NARAL's activities by our attorneys, and with the help of grass-roots pro-lifers, we found flagrant violations of the federal election law by NARAL.

While they were filing groundless complaints against us, NARAL was acting as if the law did not apply to them. Those who would destroy the National Right to Life Committee must be made to understand that they cannot operate outside the law.

To be sure, they are still there...like sharks circling in the water...waiting to tear us to shreds.

We must never forget there are still powerful forces that we must fight daily if we are to reach our goal - a Human Life Amendment by 1982.

Yet, though we were locked in a strangle-hold of harassment and resultant paperwork during recent urgent times, we managed:

1 --to get our new Citizen's Lobby Program organized and running. The first training meeting will be held in Washington on January 21st. Those who attend will be well-versed on the best approach to take with the Congressmen and Senators they will be contacting.

2 --to sponsor a National Legislative Day on December 15th, to which we invited representatives of every leading pro-life lobbying group in the nation's capitol, as well as representatives of Right to Life state organizations from all across the country.

over, please...

8 2 4 0 3 2 1 3 2 3

In an all-day session, we mapped out our legislative goals for the coming year. We agreed that the Bauman and Volkmer Amendments to the Child Health Assurance Bill (HR4962), already passed by the House of Representatives, should be given the highest priority by our legislative and lobbying staff.

If we are successful in passing this innovative legislation in the Senate, unamended, it could:

Eliminate the annual anguish we face in tying the Hyde Amendment to appropriation bills.

And, as the New York Times has stated: "...pull the legal rug from under state courts that have been inclined to rule that Federal law requires states to pay for abortions..."

3 --to successfully delay the approval of In Vitro Fertilization experimentation. We have collected over thirty thousand signatures in opposition to this outrage which could destroy thousands of God's smallest human creations.

4 --to move The National Right to Life News from the midwest into our Washington national offices. Here, at the hub of the press corps, this life-line of the pro-life movement is better able to monitor events as they occur, and at the same time effect operating cost efficiencies--so important in these inflationary times.

5 --to lay the foundation for the National Right to Life Political Action Committee and to give it a formal launching with a press conference in the nation's capitol on January 22nd.

Through this committee we plan to translate our growing political power into increased pro-life majorities in the House and in the Senate. This power comes from the only true source of power in this country - the people! We are extremely proud of this grass-roots organization.

6 --to gear up our all-important Voter Identification Project in order to increase our educational efforts in this important election year.

The Voter Identification Project reveals those who are pro-life, those who are pro-abortion, and those who are still undecided.

With these results, we can educate the undecided and spread the word about the horrors of abortion.

There are leaders to be trained, lists to be called, reports to be filled out, and hundreds of instruction booklets and other materials to be printed. Finally, we will need to store the information in retrievable form, on computer tapes.

But this is not all...

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Most significantly, the results can be used by pro-life political action committees to support and endorse candidates for political office who will act to stop abortions. In this election year, the success of this project is critical in our fight to get a Human Life Amendment on the law books of this country.

7 --to have our attorneys prepare a comprehensive sixty-five page brief that is now part of the evidence to be considered by the Supreme Court when it rules on the constitutionality of the Hyde Amendment.

This is one of the most important cases on the abortion issue since the January 22, 1973 decision, which made abortion on demand the law of our country.

The time for filing briefs expired on January 10th. Even though we were sorely taxed and greatly harassed, prompt action could be generated because of our support. A decision had to be made promptly and our counsel given the go-ahead, or it would be too late.

I knew, based on your response to my last letter, that you would want me to act decisively.

Exciting news - Yes! But remember the circling sharks!

Make no mistake about it, we have a real fight on our hands if we are to win our struggle to save the lives of innocent, tiny babies.

But we are winning -- and we cannot afford to slip backwards now. Too many lives depend on us.

I know that I can continue to count on your support. Your donation of $50, $25, $15, or $100 - or whatever you can afford to give is needed now more than ever.

YES, NOW MORE THAN EVER. Because I have saved the most vital news for the last. It is A BLUEPRINT FOR WINNING IN THE '80's and it is in the hands of your state director even as you read this letter.

Let me tell you about it.

During the past three months, the National Right to Life Committee has held a series of regional meetings all around the country. Grass-roots pro-lifers gathered in Massachusetts, Virginia, Indiana, Georgia, Idaho, Oklahoma, South Dakota, and Oregon for intensive one-day meetings with me, with NRLC leadership, and with state directors. Many questions were asked. Thousands of replies, comments and requests were received. Exploratory meetings, listening sessions, were met with gratifying enthusiasm and co-operation everywhere.

From these in-depth meetings has come a detailed, comprehensive and realistic plan. It maps out what we - all of us - must do in order to mount the kind of a campaign it is going to take to pass a Human Life Amendment out of

8 0 4 0 3 2 1 3 2

the Congress, and just as importantly, to have it ratified in the state legislatures.

Only your National Right to Life Committee, the largest, most mature, and most accountable pro-life organization in the country - with grass-roots input from every state - could have conceived such an ambitious undertaking and carried it through to completion.

Yes, the cost of winning will be high. But if we follow the blueprint we have drawn up - WE WILL WIN IN THE '80's!

Yes, we will have to sacrifice - but we knew we would be called upon to do that when we committed our own lives to the saving of others' - those precious flames of life which are snuffed out every day in America's abortion chambers.

> "I have set before you life and death, the blessing and the curse. Choose life then, that you and your descendants may live..." --Deuteronomy 30: 19-20

Won't you please send your sacrifice today? I have enclosed a postpaid envelope and ask you to write your check now for $50, $25, $15 or even $100 if you possibly can. Only you can make the choice for life a reality.

Sincerely, for the Right to Life,

Carolyn Gerster, M.D.

Carolyn Gerster, M.D.
President

CG:p

P.S. - Please look again at our letterhead. We are not just a few people who have put our names on stationary and then mailed to ask for funds. We are the only pro-life organization governed by a board of directors representing the grass-roots movements of every state. Even if your contribution helps to save the life of only one helpless baby, the blessings you will receive will be inestimable. I am anxiously waiting to hear from you.

C.G.

National
RIGHT TO LIFE
National Press Building, Suite 341
529 14th Street, N.W., Washington, D.C. 20045

Yes, Dr. Gerster!
I want to be a member of NRLC and the winning plan which is going to achieve a Human Life Amendment!

Signature

I enclose the amount of $_____
as my personal sacrifice to help save babies' lives.

20002HARRK3277TH X 010

K E HARROLD
327 7TH ST NE
WASHINGTON DC 20002

PLEASE FOLD AND MAIL TODAY WITH YOUR GIFT

PLEASE: Be sure your correct address and zip code!

The National Right to Life Committee is leading the battle to save babies' lives.

With your help, A Blueprint for Winning, and God's guidance, we will return the protection of America's laws to our unborn children. Your support and your prayers are crucial to the success of A Blueprint for Winning.

Your contribution of $15, $25, $50, or even $100 will speed the day of victory over the forces of evil!

(Every contribution is sincerely appreciated and will be acknowledged.)

Do you have friends and relatives who would be patrons of our fight for life? Fill in their names and addresses below.

Name _____

Address _____

City _____

State _____ Zip _____

Use the back of this form if you need space for more names.

PLEASE SIGN THIS CARD AND MAIL IT ALONG WITH YOUR CHECK.

820032326

SHELDON, HARMON, ROISMAN & WEISS
1025 15TH STREET, N.W.
SUITE 500
WASHINGTON, D.C. 20005

80 FEB 13 PM 12:41

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

62040131327

MUR 1103
359

006273

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

February 11, 1980

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

Dear Ms. Brown: RE: MUR 1103

Enclosed is a fundraising letter from National Right-to-Life Committee which characterizes as "groundless" the above-referenced complaint.

You also might be interested to note that the letter dated January 1980 states that they "have taken the offensive against NARAL by filing two complaints with the FEC." The FEC press office tells me no such complaints have been filed to date.

In November of 1979 LAPAC similarly mistated the facts saying that it had filed complaints against NARAL. As of early February no such complaints have been filed.

I realize that false statements in fundraising letters are not violations of the federal election law, but I wanted to bring them to your attention as you review other statements and materials submitted by these groups. I certainly hope such mistatements are not typical of these organizations.

Furthermore, the people investigating NARAL's complaint that National Right to Life Committee's voter identification project constitutes an illegal corporate expenditure in connection with an election might be interested to note that NRLC is apparently planning to continue the program even though the complaint has not been resolved.

Sincerely,

Gail Harmon

GMH/dds Gail M. Harmon

Enclosure

cc: Charles Steele
FEC Commissioners
Karen Mulhauser
Counsel for LAPAC
Counsel for NRLC

8204032128

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WYOMING
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GUAM
Miss Sarah Thomas
AT LARGE DIRECTORS
Mrs. Robert (Jo) Higgins, R.N.
President, Nat'l Nurses for Life
*Member, Executive Committee

national RIGHT TO LIFE committee, inc.

national office
National Press Building, Suite 341
529 14th Street, N.W., Washington, D.C. 20045

**NATIONAL RIGHT TO LIFE COMMITTEE
FILES TWO COMPLAINTS
WITH FEDERAL ELECTION COMMISSION
AGAINST NATIONAL ABORTION RIGHTS ACTION LEAGUE**

Dear Friend of Life: January 1980

Yes -- because of the gratifying support of so many - NRLC has been able to move from fighting for its life in a defensive position to a vigorous offensive against NARAL.

Because of your help, we can strike back within the legal system at those forces of evil that have sought to deny our civil rights and limit our activities toward a Human Life Amendment.

We have taken the offensive against NARAL by filing two complaints with the Federal Election Commission reporting their violations of federal election laws.

After an intensive investigation of NARAL's activities by our attorneys, and with the help of grass-roots pro-lifers, we found flagrant violations of the federal election law by NARAL.

While they were filing groundless complaints against us, NARAL was acting as if the law did not apply to them. Those who would destroy the National Right to Life Committee must be made to understand that they cannot operate outside the law.

To be sure, they are still there...like sharks circling in the water...waiting to tear us to shreds.

We must never forget there are still powerful forces that we must fight daily if we are to reach our goal - a Human Life Amendment by 1982.

Yet, though we were locked in a strangle-hold of harassment and resultant paperwork during recent urgent times, we managed:

1 --to get our new Citizen's Lobby Program organized and running. The first training meeting will be held in Washington on January 21st. Those who attend will be well-versed on the best approach to take with the Congressmen and Senators they will be contacting.

2 --to sponsor a National Legislative Day on December 15th, to which we invited representatives of every leading pro-life lobbying group in the nation's capitol, as well as representatives of Right to Life state organizations from all across the country.

over, please...

8 2 0 0 3 2 1 3 3 0

In an all-day session, we mapped out our legislative goals for the coming year. We agreed that the Bauman and Volkmer Amendments to the Child Health Assurance Bill (HR4962), already passed by the House of Representatives, should be given the highest priority by our legislative and lobbying staff.

If we are successful in passing this innovative legislation in the Senate, unamended, it could:

Eliminate the annual anguish we face in tying the Hyde Amendment to appropriation bills.

And, as the New York Times has stated: "...pull the legal rug from under state courts that have been inclined to rule that Federal law requires states to pay for abortions..."

3 --to successfully delay the approval of In Vitro Fertilization experimentation. We have collected over thirty thousand signatures in opposition to this outrage which could destroy thousands of God's smallest human creations.

4 --to move The National Right to Life News from the midwest into our Washington national offices. Here, at the hub of the press corps, this life-line of the pro-life movement is better able to monitor events as they occur, and at the same time effect operating cost efficiencies--so important in these inflationary times.

5 --to lay the foundation for the National Right to Life Political Action Committee and to give it a formal launching with a press conference in the nation's capitol on January 22nd.

Through this committee we plan to translate our growing political power into increased pro-life majorities in the House and in the Senate. This power comes from the only true source of power in this country - the people! We are extremely proud of this grassroots organization.

6 --to gear up our all-important Voter Identification Project in order to increase our educational efforts in this important election year.

The Voter Identification Project reveals those who are pro-life, those who are pro-abortion, and those who are still undecided.

With these results, we can educate the undecided and spread the word about the horrors of abortion.

There are leaders to be trained, lists to be called, reports to be filled out, and hundreds of instruction booklets and other materials to be printed. Finally, we will need to store the information in retrievable form, on computer tapes.

But this is not all...

8 2 4 0 3 2 1 3 3 1

Most significantly, the results can be used by pro-life political action committees to support and endorse candidates for political office who will act to stop abortions. In this election year, the success of this project is critical in our fight to get a Human Life Amendment on the law books of this country.

7 --to have our attorneys prepare a comprehensive sixty-five page brief that is now part of the evidence to be considered by the Supreme Court when it rules on the constitutionality of the Hyde Amendment.

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Carolyn Gerster, M.D.

Carolyn Gerster, M.D.
President

CG:p

P.S. - Please look again at our letterhead. We are not just a few people who have put our names on stationary and then mailed to ask for funds. We are the <u>only</u> pro-life organization governed by a board of directors representing the grass-roots movements of <u>every</u> state. Even if your contribution helps to save the life of only one helpless baby, the blessings you will receive will be inestimable. I am anxiously waiting to hear from you.

C.G.

National Right to Life

National Press Building, Suite 341
[illegible] 14th Street, N.W., Washington, D.C. 20045

Yes, Dr. Gerster!
I want to be a member of NRLC and the winning plan which is going to achieve a Human Life Amendment!

Signature _____

I enclose the amount of $_____
as my personal sacrifice to help save babies' lives.

20002HARRK3277TH X 010

K E HARROLD
327 7TH ST NE
WASHINGTON DC 20002

PLEASE: Be sure to have your name, address and zip code on this card

PLEASE FOLD AND MAIL TODAY WITH YOUR GIFT

The National Right to Life Committee is leading the battle to save babies' lives.

With your help, A Blueprint for Winning, and God's guidance, we will return the protection of America's laws to our unborn children. Your support and your prayers are crucial to the success of A Blueprint for Winning.

Your contribution of $15, $25, $50, or even $100 will speed the day of victory over the forces of evil!

(Every contribution is sincerely appreciated and will be acknowledged.)

Do you have friends and relatives who would be patrons of our fight for life? Fill in their names and addresses below.

Name _____

Address _____

City _____

State _____ Zip _____

Use the back of this form if you need space for more names.

PLEASE SIGN THIS CARD AND MAIL IT ALONG WITH YOUR CHECK.

20040321330

SHELDON, HARMON, ROISMAN & WEISS
1025 15TH STREET, N.W.
SUITE 500
WASHINGTON, D.C. 20005



Charles N. Steele
General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

8204134

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1627 K STREET, N.W.
WASHINGTON, D.C. 20006
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240 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
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W. DAVID KISER*
MARY CHERYL MATHEIS
[illegible] RICH*

OF COUNSEL
RUFUS E. WILSON

RECEIVED
FEDERAL ELECTION
COMMISSION
'80 FEB 4 PM 3
0061

January 31, 1980

82040321335

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

Re: MUR 1103

Dear Mr. Steele:

We acknowledge receipt on January 29 of your letter of January 25. Inasmuch as I am just leaving for the American Bar Association Midyear Meeting in Chicago, in the House of Delegates of which I serve, I have not read the complete set of enclosures.

Your letter does not identify our client. We assume it is Life Amendment Political Action Committee, Inc.

If so, upon a very quick perusal, it would appear that the sworn complaint of Ms. Gail M. Harmon is merely a rehash or, as she phrases it, "updated versions", "of several complaints previously filed by National Abortion Rights Action League . . ."

The purpose of another filing, in addition to the obvious harassment, appears to be to initiate the running

80 FEB 5 AM :00

of the 90-day period at the conclusion of which Ms. Harmon hopes to have grounds to sue in the United States District Court for the District of Columbia. 2 USCA §437g(a)(9).

Inasmuch as Ms. Harmon follows no style of pleadingbut complains rather as a layman might think aloud, we are unsure what new offense she alleges. May we suggest that you require Ms. Harmon to submit that which in the United States District Court would be termed a more definite statement. At that juncture each of us better might know whereof she complains.

Pursuant to the provisions of 2 USCA §§437g(a)(4)(B) and 437g(a)(12) we waive confidentiality and ask that these proceedings be spread upon the public record.

Sincerely,

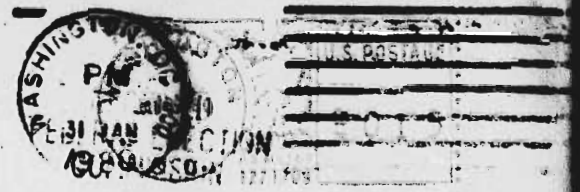
MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

9204032133 6

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

6204073



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

ACR 258

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COMMISSION

'80 FEB 2 AM 9:17

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

January 31, 1980

Michele D. Brown
General Counsel's Office
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

C0E107

Dear Ms. Brown:

Re: MUR 1103

Enclosed is the letter I mentioned to you in which Mr. Harrison on LAPAC's behalf "waives confidentiality as to any complaint filed with the FEC against it."

You also should know that we believe LAPAC previously waived confidentiality by discussing the complaints in direct mail solicitation material.

I hope we can discuss this matter early next week.

Sincerely,

Gail Harmon

Gail M. Harmon

GMH/dds

Enclosure

8204032138

30 JAN 4 10:50
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FEDERAL ELECTION COMMISSION

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1627 K STREET, N.W.
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GARY D. GARRISON*
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHEIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

November 30, 1979

9204032139

Ms. Gail M. Harmon
Sheldon, Harmon & Weiss
1725 I Street, N.W., Suite 506
Washington, D. C. 20006

Re: Life Amendment Political Action Committee, Inc.

Dear Ms. Harmon:

Thank you for sending us a copy of your letter of November 28 to Charles N. Steele, Esquire, Acting General Counsel, Federal Election Commission ("FEC"), enclosing therewith what appears to be an undated photocopy of a letter from Life Amendment Political Action Committee, Inc. ("LAPAC") to an unidentified addressee.

Your letter does not identify your client. We assume, in view of prior correspondence, it is National Abortion Rights Action League. If it is otherwise or personal, you might want to advise.

The precise nature of your complaint to FEC also is unclear.

1. Perhaps you complain because you contend LAPAC ". . . characterizes [FEC's] investigations as 'groundless' and 'ridiculous'."

In the first place, under the First Amendment, LAPAC has a right so to characterize an FEC investigation.

However, LAPAC has not done so. If one reads the second paragraph of the LAPAC letter which you enclose (the only place the words "groundless" and "ridiculous" are used by LAPAC), one finds that LAPAC refers to *your client's charges* as groundless and ridiculous, not to FEC's investigations of those charges.

2. Perhaps you complain because LAPAC filed charges against your client with the Assistant Attorney General, Criminal Division, Department of Justice, with respect to a matter over which FEC has no jurisdiction. In that event, we do not understand why you complain *to FEC*.

3. Perhaps you complain, to use your language, the tenor of which speaks for itself, because ". . . LAPAC's attorneys did not bother to verify the most elementary facts . . . [and should] act more responsibly when filing complaints with the FEC." Inasmuch as LAPAC's attorneys have filed no complaint with the FEC pertaining to your client, we again are unsure whereof you complain.

We do not understand your suggestion of waiver of confidentiality. Our client routinely waives, and has waived, confidentiality as to any complaint filed with FEC against it, and it has filed no complaint with FEC on its own.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Charles N. Steele, Esquire
Life Amendment Political Action Committee, Inc.

8204032-1340

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006

80 FEB 2 AM 9:17

Michele D. Brown
General Counsel's Office
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

8004032134

348

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A. PAUL PROSPERI**
ST. JOHN BARNETT
CHARLES DAWSON BARNETT*
FRANKLIN DRAKE*
JOHN E. EVANS*
RONALD L. GAFFNEY*
WILLIAM E. GLADING
JOHN S. KECK*
KARL F. LOUCKS II**
DONALD F. MINTMIRE
JACK E. RUCK*
JOHN F. SHERLOCK III
LEE C. SUMMERS*
MARY JO WINKLER*

BARNETT & ALAGIA*
KENTUCKY HOME LIFE BUILDING
BOX 1170
LOUISVILLE, KENTUCKY 40201
TELEPHONE (502) 583-1421

BARNETT, ALAGIA & PROSPERI**
240 ROYAL PALM WAY
PALM BEACH, FLORIDA 33480
TELEPHONE (305) 659-5455

BERNARD H. BARNETT
BARBARA BOWYER HARRISON
RICHARD M. TRAUTWEIN
JOHN T. MILLER*
MICHAEL E. LAMMON*
RICHARD A. GLADSTONE
PATRICIA C. ANDERSON
ANTHONY G. BROWN*
DARRYL W. DURHAM*
WM. CARL FUST*
GARY D. GARRISON*
JOHN M. HIMMELBERG
W. DAVID KISER*
MARY CHERYL MATHIS
IVAN RICH*

OF COUNSEL
RUFUS E. WILSON

FEDERAL ELECTION COMMISSION
80 FEB 1 PM 1:

COEGS

January 31, 1980

8204032134 2

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

Re: MUR 1103

Dear Mr. Steele:

We acknowledge receipt on January 29 of your letter of January 25. Inasmuch as I am just leaving for the American Bar Association Midyear Meeting in Chicago, in the House of Delegates of which I serve, I have not read the complete set of enclosures.

Your letter does not identify our client. We assume it is Life Amendment Political Action Committee, Inc.

If so, upon a very quick perusal, it would appear that the sworn complaint of Ms. Gail M. Harmon is merely a rehash or, as she phrases it, "updated versions", "of several complaints previously filed by National Abortion Rights Action League . . ."

The purpose of another filing, in addition to the obvious harassment, appears to be to initiate the running

of the 90-day period at the conclusion of which Ms. Harmon hopes to have grounds to sue in the United States District Court for the District of Columbia. 2 USCA §437g(a)(9).

Inasmuch as Ms. Harmon follows no style of pleadingbut complains rather as a layman might think aloud, we are unsure what new offense she alleges. May we suggest that you require Ms. Harmon to submit that which in the United States District Court would be termed a more definite statement. At that juncture each of us better might know whereof she complains.

Pursuant to the provisions of 2 USCA §§437g(a)(4)(B) and 437g(a)(12) we waive confidentiality and ask that these proceedings be spread upon the public record.

Sincerely,

MARION EDWYN HARRISON

MEH:kg
cc Ms. Michele D. Brown
Life Amendment Political Action Committee, Inc.

8204032 1343

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



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

2040

RAD 3015-81

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE January 30, 1980

TO: Office of General Counsel

ATTENTION: Michele Brown

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

ANALYST Mark Kleinman MK

TEAM CHIEF Steve Mi

COMPLIANCE REVIEW CB/PB

MUR No. 1103

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE: SINCE THE RFAIs REFERRED BELOW WERE COMBINED IN THE COMPLAINT FILED FOR MUR 1103 THIS HAS BEEN DEFERRED TO THE OFFICE OF GENERAL COUNSEL FOR ANY FURTHER ACTION.

RESULTS OF RAD ACTION:

RFAI sent for April 10 Quarterly 1979 October 4, 1979	Attachment #1
RFAI sent for July 10 Quarterly 1979 October 4, 1979	#2
Response to April 10 Quarterly RFAI November 9, 1979	#3
Response to July 10 Quarterly RFAI November 9, 1979	#4
Telecon: 11-16-79	#5

NOTE: RAD FINDS BOTH RESPONSES TO BE INADEQUATE

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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ATTACHMENT #1

8204032134 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 4 1979

Paul Brown, Treasurer
Life Amendment Political Action Committee
357 National Press Building
Washington, D.C. 20045

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Quarterly & July 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

#29043180680

...N.W.
Washington, D.C. 20463

...FE AMENDMENT POLITICAL ACTION COMMITTEE

DATE: OCT 4 1979

I.D. NO.: C00082297

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-79 THROUGH 3-31-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: X disagree with Detailed Summary (Page 2) or ___ omitted SEE OTHER

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20a SEE PAGE THREE

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please be advised, for future reports, that in-kind contributions should be shown on Line 22c of the Detailed Summary Page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records. 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration. 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

OCT 4 1979

LIFE AMENDMENT POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
PAGE THREE

Please clarify the entries on Schedule B, Line 20a to:

David Osborne	3-15-79	$3500	"30-Day Loan"
Nancy Osborne	3-15-79	3000	"30-Day Loan"

Please be advised that loans made by your committee should be shown on Line 21a of the Detailed Summary Page and Schedule B accordingly.

Please be further advised that in accordance with Section 104.8 of the Commission's Regulations all loans greater than $500, outstanding at the end of a reporting period, should be disclosed on Line 12 of the Summary Page and Schedule C accordingly.

Please amend your report accordingly.

79031180682
82040321349

...ssion Commission
...E Street, N.W.
...ington, D.C. 20463

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

Line Number _____

(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
Dave Osborne 2966 Avery Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	$3,500 00
Nancy Osborne 2966 Avery Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	$3,000 00
710 Natl. Press Bldg National Press Bldg Washington, D.C.	press release Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	35 00
Postmaster D.C.	Postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 00
Drawbridge Motor Inn. Covington, KY	deposit convention room rental Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 00
Hecht Co. 7th & E. D.C.	calculator Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79 3-16-79	75.12 21.00
Nette Wilson 341 Nat. Press Bldg. Wash, D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	150 00
Dan Nields Box 109 Reardon Hall 398-405 D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	76.50
SUBTOTAL of expenditures this page (optional)			$ 7257.62
TOTAL this period (last page this line number only)			$

by 24 Oct 43 01 32 25 13 39 52 01

Federal Election Commission
[illegible] N.W.
[illegible], D.C. 20463

ITEMIZED
(Operating, Transfers Out, Contributions to Other Committees, Loans, Loan Repayments and Refunds Made)
Supporting Links 20b, 21a, and 22a, 22b, and 22c of FEC FORM 3

Use Separate Schedule(s) 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
Barbara Bolroudy Creek Farm Crossing Lincoln, VA 22078	expenses for work in Roger Campaign - 11th C.D. California special Election Expenditure for: ☐ Primary ☐ General ☑ Other	March	$2,400
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional)	$ MEMO
TOTAL this period (last page this line number only)	$ on

87290430132513962.16

ATTACHMENT #2

8204032135 2

...W.
...D.C. 20463

LIFE AMENDMENT POLITICAL ACTION COMMITTEE

DATE: OCT 4 1979

I.D. NO.: C00082297

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4-1-79 THROUGH 6-30-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

_x_ Detailed Summary (Page 2) Line(s): 14(a) 14(b) Column(s): A Totals: x x omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

3x ___ Full Name(s)/Mailing Address(es): x omitted or ___ inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

_x_ Other: SEE PAGE FIVE

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records. 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

OCT 4 1979

LIFE AMENDMENT POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
PAGE FIVE

Please be advised that Section 104.2(b)(11) of the Commission's Regulations requires that the nature of all debts and obligations be provided. Please provide the details for the debts owed to Karl Karcher.

Please be further advised that if the above debt was a loan to your committee, then it should also be disclosed on Line 17a of the Detailed Summary Page and Schedule A accordingly.

The April 10 Quarterly Report filed by your committee reported loans to: David Osborne and Nancy Osborne. The July 10 Quarterly Report fails to show these debts owed to your committee. If these debts have been liquidated they should be listed on the appropriate schedules. If these debts are still outstanding they should be shown on Line 12 of the Summary Page and listed on Schedule C.

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(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee (as Filed)
LIFE AMENDMENT POLITICAL ACTION COMMITTEE (LAPAC)

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
P.A. BROWN 2018 MIDSHIPMAN DR. STAFFORD, VA. 22554 ☐ Primary ☐ General ☒ Other	8/1/78	$ 1500.00	$ —	$ 1500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 8-1-79
5% INTEREST

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
DORIS STORMS 2180 WOODACRES EUGENE, OREGON 97401 ☐ Primary ☐ General ☒ Other	8/1/78	$ 4500.00	$ —	$ 4500.00

NATURE OF OBLIGATION (Details of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 8-1-79
5% INTEREST

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
Karl Karcher 1206 N. Harbor Blvd. Anaheim, CA 92800 ☐ Primary ☐ General ☐ Other	5/25/79	$ 5,000	$ —	$ 5,000

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	$	$	$ 14000.00
TOTAL this period (last page this line number only)	$	$	$ 14000.00

Carry outstanding balance only to appropriate line of summary.

ATTACHMENT #3

8204032 1356

Note: Response to April 10 Quarterly Report fails to show the repayment of the 2 loans to individuals of $6500, although the committee states that they have been repaid.

8204032 | 357

LIFE AMEND...

[redacted]

November 7, 1979

Orlando B. Potter
Staff Director
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Dear Mr. Potter:

RE: Five Page Letter of
10/4/79

Please note attached amended copies as you requested in the following order:
FOR: 1/1/79 - 3/31/79 FEC REPORT

1) Page Two FEC Form 3 corrected to reflect
B. Kennedy as 22G rather than 20A in
the amount of $2000. (Corrected report
attached)

2) Line 20A - Schedule B - unknown; complete

3) Schedule B - Line 21A - Osborne note was made
and repaid within the same period; therefore
we can see no place for reflecting this other
than Schedule B - Line 21A and have corrected same.

FOR: 4/1/79 - 6/30/79 FEC REPORT

1) Lines 16A and B corrected

2) Karcher Loan described

3) Osborne loans taken care of with proper notations on the
First Quarter Report.

Sincerely,

Paul A. Brown
Treasurer/Director

PAB:j

790314112 48

DETAILED [illegible]

NAME OF CANDIDATE OR COMMITTEE: LONE ARMADILLO Political Action Comm

COVERING THE PERIOD FROM: 4/1/79 TO: [illegible]

	RECEIPTS	Column A This Period	C [illegible]
16.	Contributions from individuals (including contributions to/through [illegible])		
	(a) Itemized (see Schedule A)	$ 4862.23	
	(b) Unitemized	$ 2778.50	
	(c) Sales and collections (included above): List by count on memo Schedule B ($ _____)		
	(d) Subtotal of contributions from individuals	$ 5156.1.73	$ 5157.1.73
17.	Transfers from Political Committees:		
	(a) Funds from affiliated/authorized committees (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 (see Schedule A)	$	
	(b) Unitemized	$	
	(c) Subtotal of other income	$	$
19.	Loans and Loan Repayments Received:		
	(a) Itemized (see Schedule A)	$	
	(b) Unitemized	$	
	(c) Subtotal of loans and loan repayments received	$	$
20.	Refunds, Rebates, Returns of Deposits:		
	(a) Itemized (see Schedule A)	$	
	(b) Unitemized	$	
	(c) Subtotal of refunds, rebates, returns of deposits	$	$
21.	Total Receipts	$ 5756.78	$ 5758.73
	EXPENDITURES		
22.	Operating Expenditures:		
	(a) Itemized (see Schedule B)	$ 4246.08	
	(b) Unitemized	$	
	(c) Subtotal of operating expenditures	$ 4246.08	$ 4246.08
23.	Loans, Loan Repayments, and Contribution Refunds Made:		
	(a) Itemized (see Schedule B)	$ 650.00	
	(b) Unitemized	$	
	(c) Subtotal of loans and loan repayments made and contribution refunds	$ 650.00	$ 650.00
24.	Transfers Out to Political Committees:		
	(a) To affiliated/authorized committees (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)	$ 240.00	
	(d) Subtotal of transfers out	$ 240.00	$ 240.00
25.	Independent Expenditures (see Schedule E)	$	$
26.	Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)	$	$
27.	Total Expenditures	$ 5136.08	$ 5136.08
	RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28.	Total Receipts (from line 16)	$	
29.	Transfers In (from line 18(d))	$	
30.	Net Receipts (Subtract line 29 from line 28)	$	
31.	Total Expenditures (from line 26)	$	

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SCHEDULE B
REVISED
January, 1995
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made
Supporting Lines 21b, 21c, and 21d, 22b, and 23b of FEC FORM 3

Page 1 of 1
Line Number 21b

Use Separate Schedule for each additional item

Name of Candidate or Committee (in Full)
Life Commandment Political Action Committee Inc.

Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Steve Atkinson 2486 Cerro Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	3/6/95	350.00
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Nancy Atkinson 2486 Cerro Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	4/5/95	300.00
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		

SUBTOTAL of expenditures this page (optional) ..... $ 650.00

19931112060

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 23b
of FEC FORM 3

Page 1 of 1
Line Number 22

Use Separate Schedule for each additional item

Name of Candidate or Committee (In Full)
Life Amendment Political Action Committee, Inc.

Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Barbara Baroody Creek Crossing Road Lorton, Va. 22079	professional services - phone calls, postage - D.C.	01/04/79 01/19/79	300.00 750.00 500.00
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Barbara Baroody Creek Crossing Road Lorton, Va. 22079	professional services - phone calls - Legislative Aide of Congressman	3/2/79 3/22	500.00 450.00
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)			$ 2412.00

12031P12049321336

ATTACHMENT #4

8204032136 2

Note: Response to July 10 Quarterly Report fails to provide the loan on Schedule A as stated in RFAI.

8204032136 3

SCHEDULE C
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 15 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page — of — for
Line Number 12
(Use Separate Schedules for each numbered line)

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, Amount, Agreement or Promise	Amount Paid To Date	Outstanding Balance at Close of This Period
P.A. Brown 2018 Midshipman Dr. Stafford, VA. 22554 ☐ Primary ☐ General ☐ Other	8/1/78	$ 1500.00	$ —	$ 1500.00

NATURE OF OBLIGATION (Describe of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 8-1-79
5% INTEREST

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Amount, Agreement or Promise	Amount Paid To Date	Outstanding Balance at Close of This Period
Doris Storms 2180 Woodares Eugene, Oregon 97401 ☐ Primary ☐ General ☐ Other	8/1/78	$ 4500.00	$ —	$ 4500.00

NATURE OF OBLIGATION (Describe of Debt):
LOAN DUE + PAYABLE: EXTENDED TO 8-1-79
5% INTEREST

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Amount, Agreement or Promise	Amount Paid To Date	Outstanding Balance at Close of This Period
Karl Karcher 1206 N. Harbor Blvd. Anaheim, CA 92800 ☐ Primary ☐ General ☐ Other	5/25/79	$ 5,000	$ —	$ 5,000

NATURE OF OBLIGATION (Describe of Debt)
Loan due and payable by 10/1/79
5% Interest.

SUBTOTALS this period this page (optional)	$	$	$ 11000.00
TOTAL this period (last page this line number only)	$	$	$ 11000.00

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79031111295

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
FEC FORM 3, PAGE 2

NAME OF CANDIDATE OR COMMITTEE: Lee Ambrosini — Political Action Committee Inc.

REPORT COVERING THE PERIOD FROM: 4/1/79 TO: 6/30/79

		Column A This Period	Column B Calendar Year to Date
20.	Contributions from Individuals (including contributions to/from affiliated committees):		
	(a) Itemized (see Schedule A)	$ 911.79	
	(b) Unitemized	$ 5289.79	
	(c) Sale and collection refunds/rebates: List by name on memo Schedule B ($)		
	(d) Subtotal of contributions from individuals		
21.	Transfers from Political Committees:		
	(a) From affiliated/authorized committees (Itemize on Schedule A regardless of amount)		
	(b) From other committees (Itemize on Schedule A regardless of amount)		
	(c) Contributions refund from political committees (Itemize on Schedule A regardless of amount)		
	(d) Subtotal of transfers in and contributions refund from political committees		
22.	Other Income:		
	(a) Itemized (see Schedule A)		
	(b) Unitemized		
	(c) Subtotal of other income		
23.	Loans and Loan Repayments Received:		
	(a) Itemized (see Schedule A)		
	(b) Unitemized		
	(c) Subtotal of loans and loan repayments received		
24.	Refunds, Rebates, Returns of Deposits:		
	(a) Itemized (see Schedule A)		
	(b) Unitemized		
	(c) Subtotal of refunds, rebates, returns of deposits		
25.	Total Receipts	$ 5920.1.58	$ 110763.31
	EXPENDITURES		
26.	Operating Expenditures:		
	(a) Itemized (see Schedule B)	$ 6088.54	
	(b) Unitemized	$	
	(c) Subtotal of operating expenditures	$ 60088.54	$ 111066.62
27.	Loans, Loan Repayments, and Contribution Refunds Made:		
	(a) Itemized (see Schedule B)		
	(b) Unitemized		
	(c) Subtotal of loans and loan repayments made and contribution refunds		
28.	Transfers Out to Political Committees:		
	(a) To affiliated/authorized committees (Itemize on Schedule B regardless of amount)		
	(b) To other committees (Itemize on Schedule B regardless of amount)	$ 347.00	
	(c) Contributions refund to other committees (Itemize on Schedule B regardless of amount)		
	(d) Subtotal of transfers out	$ 347.00	$ 347.00
29.	Independent Expenditures (see Schedule E)		
30.	Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)		
31.	Total Expenditures	$ 60355.54	$ 111661.62
	RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
32.	Total Receipts (from line 25)	$ 5920.1.58	
33.	Transfers In (from line 21(a))	$	
34.	Net Receipts (Subtract line 33 from line 32)	$ 59201.58	
35.	Total Expenditures (from line 31)	$ 60355.54	

FEC FORM 3 (2-78)

ATTACHMENT #5

8204032136 6

TELECON TO THE FILE: LIFE AMENDMENT POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 11-16-79

RE: RFAIs and response of 11-7-79

I spoke with Paul Brown 638-3961, regarding a few reporting problems regarding their response to RFAI. The two loans in question to the Osbornes on Q1 79 report were indicated as being repaid within that reporting period. I told Mr. Brown that the repayment had to be disclosed on Line 17A of the Detailed Summary Page and Schedule A accordingly. In addition, the loan from Karl Karcher on the Q2 79 also had to be shown on Line 17A of the Detailed Summary Page.

I also inquired about the entry on Schedule A for I.M. Anonymous for $215 total. I told him about the prohibition about receiving anonymous contributions over $50. He stated that these were simply aggregated by the computer company each time they received a cash contribution. He stated, for example, that the indication 00000008 next to the entry on Schedule A, indicated that there had been 8 anonymous contributions received by the committee. He stated that in no case were the amounts over $50. I decided that it was really not necessary to amend this and that this telecon should cover this matter.

He will send in the appropriate amendments for the Q1 and Q2 regarding the loan entries. (*)

Paul Brown, Treasurer
638-3961

(*) as of this date no amendments have been filed MK

9204032113367

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: MUR 1103

Dear Mr. Harrison:

This letter is to notify you that on November 29, 1979, the Federal Election Commission received a complaint which alleges that your client may have violated certain sections 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 1103. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your client in connection with this matter. Your response must be submitted within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

2040321368

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at 523-4175. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

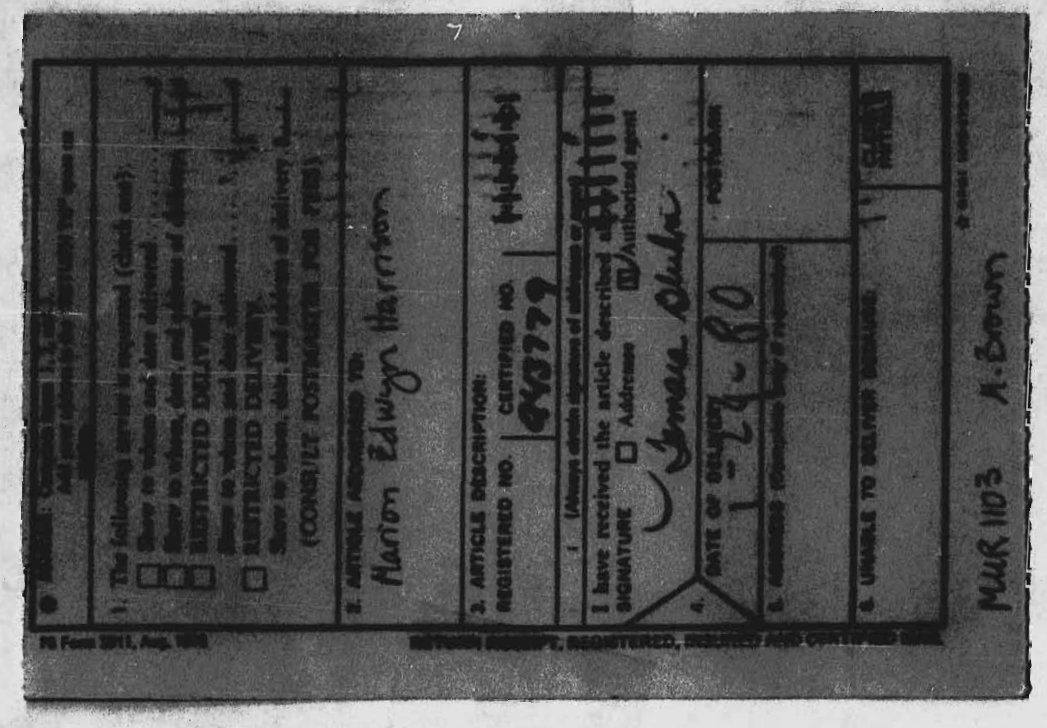
Charles N. Steele
General Counsel

Enclosure

Complaint
Procedures

cc: Gail M. Harmon

8204032139



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Bopp, Jr.
Attorney at Law
Francis & Brames
Suite 101 Sycamore Building
19 South Sixth Street
Terra Haute, Indiana 47807

RE: MUR 1103

Dear Mr. Bopp:

This letter is to notify you that on November 29, 1979, the Federal Election Commission received a complaint which alleges that your client may have violated certain sections 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 1103. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your client in connection with this matter. Your response must be submitted within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

8204032137O

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at (202) 523-4175. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

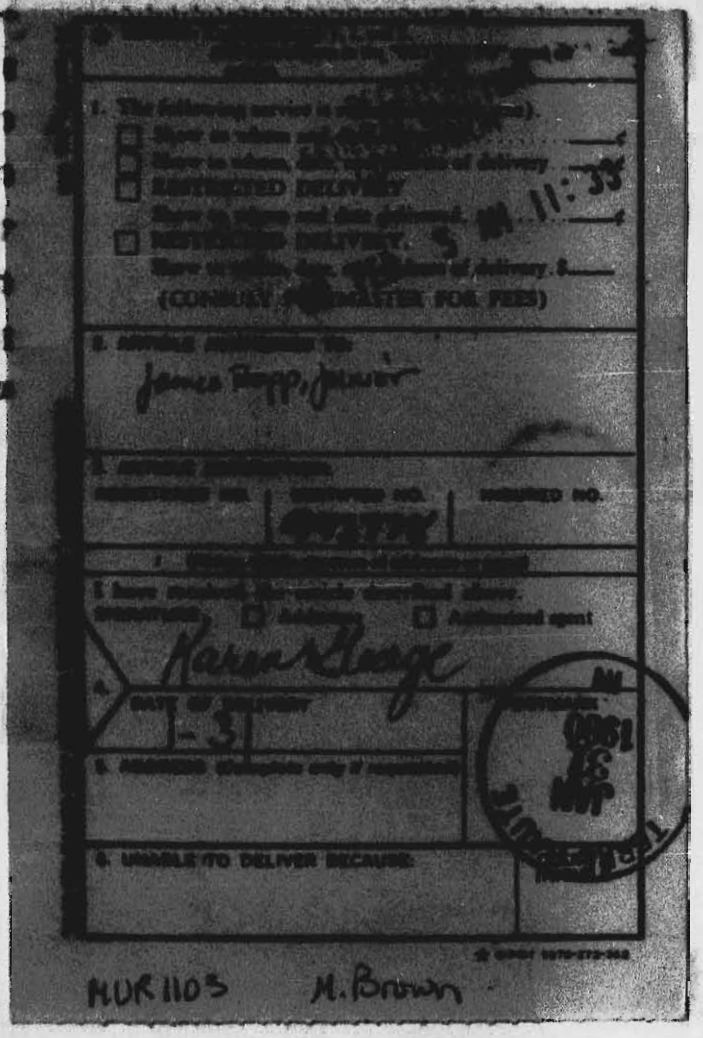
Sincerely,

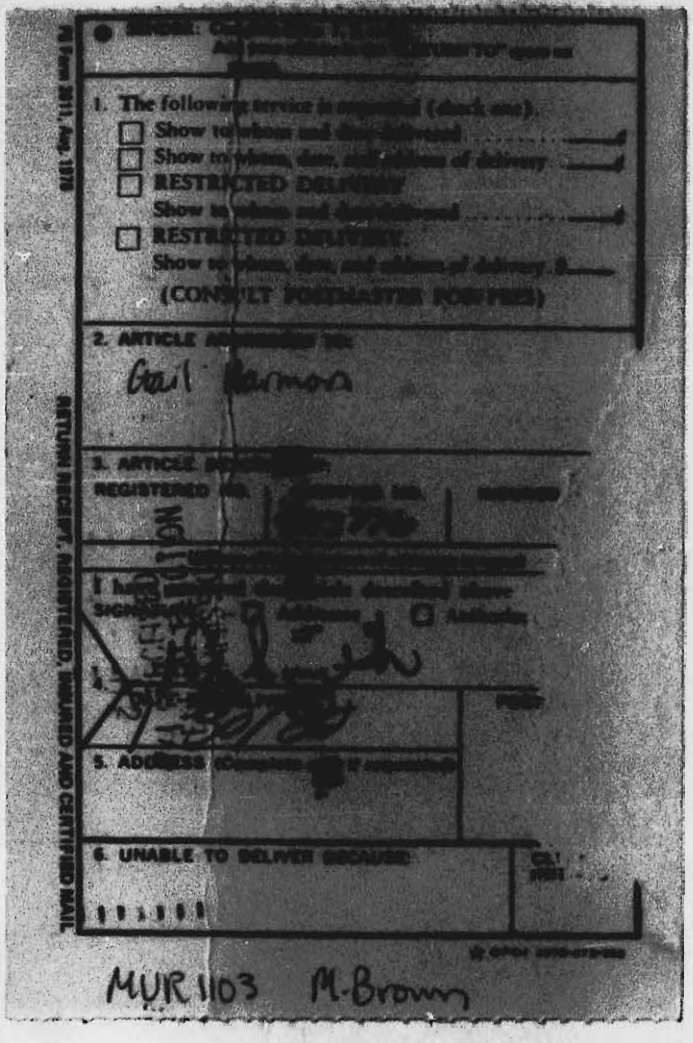
Charles N. Steele
General Counsel

Enclosure

Complaint
Procedures

cc: Gail M. Harmon





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sean Morton Downey, Chairman
Let's All Protect A Child Fund
Suite 339, National Press Building
529 14th Street, N.W.
Washington, D.C. 20004

RE: MUR 1103

Dear Mr. Downey:

This letter is to notify you that on November 29, 1979, the Federal Election Commission received a complaint which alleges that your client may have violated certain sections 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 1103. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your client in connection with this matter. Your response must be submitted within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

8204032 1372

If you have any questions, please contact Michele D. Brown, the staff member assigned to this matter at 523-4175. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Complaint
Procedures

8204032137 3

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 13, 1979

Gail M. Harmon
Sheldon, Harmon and Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Dear Ms. Harmon:

This is to acknowledge receipt of your two complaints of November 29, 1979, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter 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,

Hal Ponder
Assistant General Counsel

Enclosure

GCC 11780
RECEIVED
FEDERAL ELECTION
COMMISSION
'79 NOV 30 AM 11:59

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN R SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

MUR 1103

November 29, 1979

Charles N. Steele, Esquire
Acting General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

905188

Dear Mr. Steele:

Today I am filing updated versions of several complaints previously filed by National Abortion Rights Action League against anti-abortion political committees.

Since the original complaints presented complex and politically sensitive issues, and NARAL was mindful of the administrative burdens placed on the Federal Election Commission, we chose not to file a petition in the District Court upon the passage of 90 days after the filing of the complaints.

Thanks to direct mail fundraising compaigns by National Right to Life Committee we are aware the F.E.C. is investigating at least some of our "groundless" complaints. Attachment "A" We trust that the investigation has been prompt and thorough; we appreciate better than most people any difficulties you may have conciliating or negotiating with anti-abortionists. However, since the complaint against Pro-Life Action Council of Iowa is almost a year old and NARAL's other complaints almost 6 months old, we feel we must place ourselves in a posture to seek judicial review of your investigation and conciliation efforts.

Sincerely,

Gail M. Harmon

Gail M. Harmon

GMH/dmw

cc: Karen Mulhauser
Harriet Matthews

79 NOV 30 PM 12:33
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

9205188137

SHELDON, HARMON & WEISS
1725 I STREET, N. W.
SUITE 506
WASHINGTON, D. C. 20006
TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

November 29, 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 the following complaint of violations of Federal election laws by Life Amendment Political Action Committee ("LAPAC").

LAPAC is popularly regarded as the political action Committee of the National Right to Life Committee ("NRLC"). For reasons discussed in detail below, LAPAC is NRLC's separate segregated fund or connected organization and as such it has violated and continues to violate the §441(b) restrictions on solicitation of the general public.

As of April 30, 1979, LAPAC's officers were Sean Morton Downey, Chairman and Paul Brown, Treasurer. (See F.E.C. Form 1 attached as (Exhibit "A") Downey is sole "honorary Director" of NRLC and its Washington lobbyist. (See NRLC letter from Carolyn Gerster marked "B", p. 4 of transcript of Weekend of Week End #10, January 2, 1979 attached as Exhibit "C" and February 28, 1979 letter from Downey, Exhibit "D"). LAPAC's Board of Directors consisted of the two officers, Downey and Brown, and Felitia Goeken, Jean Doyle, Carolyn Gerster, Robert L. Sassone and J.C. Willke; simultaneously, Goeken is also Secretary of NRLC, Gerster, its President, Willke its Vice President for Special Projects; all three serve on the Executive Committee of NRLC's Board of Directors while Jean Doyle is also a member of its Board. See NRLC and LAPAC letterheads attached Exhibits "B" and "E" respectively. During the 1978 elections, Mildred Jefferson, immediate past President of NRLC, was described as LAPAC's Advisory Chairman (Exhibit "F") and its Honorary Chairman (Exhibit "G"). Paul Brown's wife, Judie Brown, was Executive Director of NRLC. As Paul Brown is coyly quoted in Bill Peterson's article in the "Washington Post," "You might say we are (LAPAC) in bed with the National Right to Life Committee." ("Washington Post," February 11, 1979 attached and marked "H").

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The overlap and intimate relationships between the Board of Directors, officers and staff of NRLC and LAPAC is sufficient to demonstrate that NRLC is a connected organization of LAPAC, one which "establishes (or) administers" the political committee.1/

The practical, day-to-day, aspects of this symbiotic relationship were dramatized in a television program "NBC Weekend" shown in January of this year. On the show, Paul Brown, LAPAC Director, and Sean Morton Downey, NRLC's lobbyist, met to discuss the vulnerability of their Deadly Dozen Hit List and demonstrated the interplay between their electoral politics and lobbying activities by arranging appointments with the Congressmen on the hit list to lobby them on the Right to Life issue.2/

Without a doubt LAPAC and NRLC are connected organizations and LAPAC is a separate segregated fund of NRLC.3/ Their interwined relationship contains most of the factors deemed significant in AOR 1977-2: a) The relationship between organizers of the committee and the alleged parent, in that case a trade association; b) whether the committee decision makers are employees of the parent, currently or at the time of organization of the committee; c) the extent to which the committee used the parent's membership list to launch solicitation drives; d) the extent to which the parent's policy makers selct the candidates or groups to whom contributions flow.

1/ NRLC's failure to provide continuing financial support to LAPAC is irrelevant in light of the use of the word "or" in the regulation which establishes the test as "establish, administer or financially supports."

2/ A transcript of the program is attached as "B" and a related letter from Reuven Frank of NBC news is attached and marked "I". Since the transcript generally identifies the participants only as Man "M" and Women "W," the Frank letter is helpful to confirm the dramatis personae. The cited conversation starts at page 44.

3/ "Separate segretated fund" is not specifically defined in either Federal election law or the regulations. The term "separate segregated fund" is used interchangeably with the term "connected organization."

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Accordingly, LAPAC may only solicit contributions from NRLC members. In applying this standard, the Federal Election Commission will have to look beyond Right-to-Life's exaggerated claims of millions of members. It's sworn lobbying reports filed with the U.S. Senate and House of Representatives (attached and marked "J") indicate newsletters going to only 10,000 people.

The Right-to-Life movement appears to operate principally through local organizations. State and local Right-to-Life groups disclaim formal affiliation with NRLC but frequently members of local groups can, for an additional contribution, receive copies of the NRLC newsletter. Query whether receiving NRLC's newsletter in exchange for a larger contribution to a local group constitutes membership in NRLC.

LAPAC has illegally solicited the general public by direct mail requests for funds (attached as "K") and by advertizing and selling tickets to a fundraiser in January 1978 at the John F. Kennedy Center in Washington, D.C. 4/ The Peterson Article explains that LAPAC solicits the general public. Expenses of $1,400 for postage in August and September of 1978 and of $15,730.63 in September 1978 for fundraising suggest a massive direct mail campaign. The January fundraiser was advertized in the Catholic review, the Catholic standard, and the Arlington Catholic Herald. (See LAPAC's April 10, 1978, F.E.C. Report, Exhibit "L"). Flyers describing the fundraising event were also distributed in metropolitan Washington shopping centers.

After the filing of NARAL's April 30, 1979, complaint alleging that LAPAC is a separate segregated fund of NRLC, LAPAC continued to solicit the general public. Individuals who are members of no anti-abortion organization received a letter allegedly written by Mrs. Penny Dines "on behalf of LAPAC." (Exhibit "K") Although its written in the folksy tone of the housewife, it is reasonable to assume that the large costs of printing and mailing this solicitation were not paid by the lady whose budget is already "feeling the pinch." We doubt that it is a coincidence that in its July 10

4/ AO's 1976-27 and 1977-25 indicate that solications include informing people of a fundraising activity and broadcasting radiospots advertizing a fundraision concert.

8204032137 8

quarterly report, LAPAC indicated direct mail postage expenses of approximately $12,000 and other major direct mail expenses for printing and computer services. To continue the charade that this letter constituted a private solicitation, LAPAC violated another section of the F.E.C.A. by omitting the disclosure statement required by §435(b).

On June 6, LAPAC paid $800 to Christian Family Renewal for Pro-Life Fundraising Ads. We assume the solicitation went beyond the membership of NRLC, an organization, as far as we know, totally unrelated to Christian Family Renewal. We request that you investigate this matter further.

In March of 1979, Sean Morton Downey signed a direct mail solicitation on behalf of LAPAC Fund (Let's All Protect A Child Fund), described as a division of Christian Family Renewal, a §501(c)(3) tax deductible organization. According to the letter, LAPAC fund was established to "educate and train pro-lifers...to go out and help win elections for more pro-life candidates." We request that you investigate whether or not the LAPAC Fund is a political committee which should register with the F.E.C. In this connection I am enclosing copies of correspondence with the Internal Revenue Service because, as you probably know, §501(c)(3) organizations are prohibited from engaging in political activity.

We also note that LAPAC continues to file incomplete reports. Information on large donors is frequently omitted; furthermore, on its first quarter of 1979 report, no candidate contributions are reported in line 22 although at least one in-kind contribution of $2,400 appears on page 79031253926. We also wonder whether or not additional in-kind contributions were not made through the many fees for professional services rendered at the same time and in some cases by the same person responsible for the in-kind contribution. (See Exhibit "N").

Since LAPAC is NRLC's separate segregated fund, it is prohibited from soliciting contributions from the general public. §441(b) Nevertheless even after the filing of the April complaint, continues to do so. In light of the gross disregard of the applicable the regulations and advisory opinions, we believe that this continuing violation must be knowing and willful.

Accordingly we request that the Federal Election Commission immediately investigate this complaint and impose appropriate fnes for violations.

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To prevent illegally solicited funds from being used in the 1980 elections, we request that LAPAC be instructed to return those funds to the donors.5/

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

GHM/dds

Attachments

Signed and subscribed before me this 29th day of November 1979.

Katherine Katsaros
Notary Public

[illegible] N.Y. 1981

8204032-1380

5/ Since under F.E.C. reporting requirements LAPAC must keep the names of its donors, returning the illegally solicited money should not prove underly burdensome.

[illegible]

[illegible]

[illegible]

None to date

None

Dr. Paul A. Penna

Box 14263
Ben Franklin Station
Washington, D.C. 20044

8204032183

Dear Mr. Ewalt,

A check in the amount of $250 from Life Amendment Political Action Committee, Inc. is for Sean Morton Downey, Jr. 1120 Sunset Blvd, Suit 100a. Los Angeles, Ca. 90026.

Treasurer

committee, inc.

Dear Right to Life Supporter:

This is the most exciting letter I have ever written!

I can't tell you how happy I am to share with you the news about many stunning and significant victories we've seen in this election just as occurred in the recent primaries.

Did you know that pro-abortion Senators Brooke of Massachusetts and Hathaway of Maine have lost their seats? I especially wanted to open with this good news.

Here's more:

In the Senate, at least six pro-life men have been elected to seats that were held by pro-abortion people.

In Minnesota David Durenberger took the Humphrey seat and Rudy Boschwitz won over Wendel Anderson.

In Iowa -- an exquisite upset -- Roger Jepson defeated Sen. Richard Clark.

In New Hampshire Gordon Humphrey defeated pro-abortion Sen. Thomas McIntyre.

Colorado saw William Armstrong defeat Floyd Haskell.

In So. Dakota Larry Pressler will replace pro-abortion Sen. James Abourezk.

Also we note that pro-life Senator Jesse Helms was re-elected in North Carolina.

More good news...

Three of the most important victories by pro-life men in governership races were: Al Quie of Minnesota, Edward King of Massachusetts and James Rhodes of Ohio.

Of the House seats, we had equally good news. First of all... ALL strong pro-life incumbents were returned to the House and all reasonably close races where abortion was a major issue were won by pro-life people with the exception of Senator Robert Griffin of Michigan. Next, you'll want to know that two very vocal pro-abortion Congresswomen were defeated: Rep. Martha Keys of Kansas

(over, please)

and Rep. Helen Meyner of New Jersey.

Now let me mention a few of the "Good News Victories" from other states: in Wyoming, pro-lifer Richard Cheney won over Bill Bagley. In Indiana, Joel Deckard defeated pro-abortion Congressman David Cornwell. In Illinois, strong pro-life Representative Henry Hyde was re-elected and pro-life newcomer Daniel Crane upset Rep. Tarry Bruce. Also in Illinois, a strong friend of pro-life, Congressman Martin Russo, was returned to office. Rep. Robert Dornan of California and Rep. Robert Bauman of Maryland were re-elected. In Minnesota, pro-lifer Arlen Erdahl won the congressional seat vacated by Al Quie when he decided to run for governor.

By the time this letter reaches you, no doubt you will know of many more national and local pro-life public officials who were elected or returned to office. In almost all of these races it is an unquestionable fact that the magnificent effort given by thousands of right to life workers in NRLC's Voter Identification Project meant the difference of victory to people who will work to save the lives of thousands of tiny babies.

> My friend...I can tell you this...the politicians out there are getting the message. They are beginning to realize what the people of this country think about the heinous abortion laws which allow the merciless killing of tiny babies.

Yes, we lost a few, but in balance we're way ahead.

The pro-abortionists, just a few years ago were fully expecting us to go away. They hoped that we would be just another protest movement that would falter and fade.

But were they ever wrong!

The issue of whether or not to allow the legalized killing of unborn babies to continue has become, in more and more areas, THE issue. In addition to being the issue in the November 7 election, it was the deciding factor in taking pro-abortion Senator Clifford Case (R-NJ), and Congressman Donald Fraser (DFL-MINN) out of public life in the primaries.

We are winning our goal to restore to the Constitution what we had all assumed was already there, and that is equal protection, under law, of all innocent human lives whether born or unborn. This is this what the Human Life Amendment will do.

The way all amendments (since the original ten) have been passed to date, has been through the U. S. Senate and House of Representatives with a two-thirds vote. We are close to this in the House. We are closer to it in the Senate now than we were before this election, but still, more Senators must be replaced and we must change the minds of others. We're convinced that three-fourths of the states will ratify the Human Life Amendment once we get over our problem with Congress and they pass it.

Can it be done?

0204032385

Yes, we're convinced that it can if we start to work now!

How will we do it?

Well, it all began less than two years ago. That's when we formed the National Right to Life Committee's Voter Identification Project. If your local or state Right to Life group is not already involved in this extremely effective program, it will be before the 1980 elections roll around.

> For that is the date we have set for full nationwide participation. That is when pro-lifers will win the majority of all targeted seats in city, county, and state elections...as well as in U.S. Senate and House of Representative races.

Let me explain how "Voter Identification" works — and why it can't fail to produce the promised results — if we are successful in expanding from our current projects to a nationwide campaign.

Briefly, "Voter Identification" starts with a skillfully designed telephone survey of all registered voters — precinct by precinct — to reveal those who are pro-life, those who are pro-abortion, and those who are still undecided on this crucial issue.

It will require a real dedication and a lot of hard work by all of you, but you can all help -- even those who are "shut-in" by illness or injury. All you need is a little time and a phone.

You'll also need direction, trained leaders, the lists to call, the reports to fill out and the instruction booklets. Finally, you'll need to store the information in retrievable form, on computer tapes. Of course, this will cost money, far more money than NRLC has now. That is why I am asking you in this letter to be as generous as you can with financial help now.

A huge job? Certainly it is! But one that can be accomplished if we all work together. We need your support now.

And especially: we need your prayers!!!

What will the Voter Identification Project tell us? Well, as an example, the first area to complete the 100,000 phone calls necessary to canvass two entire Congressional districts, was Cincinnati.

What was the result? Cincinnati found out that 75% of its registered voters opposed all abortion (except to save the mother's life), 10% were undecided, and only 15% approved abortion, including those who only approved it for rape pregnancies or other rare reasons. It is no accident that all four Congressmen from Southwestern Ohio are pro-life.

From the very earliest survey results -- up until the present time —

(over, please)

our experience has shown that pro-lifers outnumber pro-abortionists by a majority as high as five to one in some areas. And in no significant areas have pro-abortionists ever outnumbered pro-lifers!

This proves what we have been saying all along
— that the majority of Americans are pro-life.

Since National Right to Life's Voter I.D. Project has now substantiated this fact, the minds of many politicans have been changed!!!

Are there other benefits from this program? Yes, very many. The identification of pro-life voters will substantially enlarge and strengthen your pro-life group. Also, you can mail or contact the undecided to try to sway them, as well as go to the pro-lifers to strengthen them, to educate them, to ask for help and most importantly, to get them out to vote. The possibilities are vast.

A large order? Yes, but one that could be accomplished across the entire USA in the next two years. No! Let's not say "can be" but rather "must be." The Voter Identification Project can change the course of history in the next two years!

The pro-life movement may not have the backing of the abortion elitists, but we do have real people power. NRLC has 1,800 affiliated chapters in all 50 states. You are represented through your local chapter and through your state Right to Life group on the board of directors of the NRLC.

Your check for $50, $25, $15 or more will enable us to keep our momentum sizzling and expand it as wide as we can in the next election...as well as... to continue all of our other projects and activities which are now coordinated out of our Washington office.

Please help us with as large a contribution as you can. You will find an envelope enclosed for your convenience. I know I can count on you again. Thank you.

Yours for the Right to Life

Carolyn Gerster, M.D.

Carolyn Gerster, M.D.
President

P.S. In September, we were surprised and saddened when our capable Washington lobbyist, Thea Rossi Barron, submitted her resignation. We are pleased, for her, that she has started working in the new position she wanted. She is a full-time lobbyist for a foreign country. Clouds, however, often have silver linings. I'm pleased to tell you that we have engaged the services of Mr. Sean Morton Downey, Esq. as our new lobbyist. He has had vast political experience and already has been of great help in Congress. Together with Mr. Charles Donnovan and Barbara Barrody, our new political researchers, we expect to sharply increase our visibility, activity and influence on Capitol Hill.

CG:pp/ru

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WEEKEND #10

January 21, 1979

National Broadcasting Company

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WEEKEND

MUSIC

ANNOUNCER

Lloyd Dobyns is on assignment. Tonight's program is recorded by Linda Ellerbee.

MUSIC

LE

Good evening. I'm Linda Ellerbee and this is Weekend — but with a difference.

This program will be about one subject.

That subject is not abortion — that is it's not a debate about the merits of the issue.

It is a story about the anti-abortion movement — and its political power — power many Americans weren't aware it had until last November's election.

There have been other movements recently to cut taxes, promote gay rights, legalize marijuana...

But the movement to outlaw abortion has probably been the most underestimated, and it has become a real force in American politics.

SOF LE

January 22, 1978.

More than 70 thousand people marched to the capitol building — the biggest demonstration

SOF LE

in America since the end of the Vietnam War.

Seventy thousand people -- one issue.

One goal -- to return to the days when abortion was against the law, and to re-write the constitution to accomplish that.

And to get into politics to accomplish that.

HEARTBEAT

WOMAN (W)

Did you know that the heart of an unborn baby begins to be formed at three weeks, after conception?

Did you know also that over a million babies had their hearts stopped each year, in a very painful way, by abortion?

MAN (M)

Vote Mary J. Tobin, Row I.

LE

On their hit list for last November -- three U.S. Senators -- Clark, MacIntrye and Haskell.

SAVITCH

Eighty per cent of the preincts reporting from the State of New Hampshire, right now -- and you cansee the incumbent, there -- the democrat, Thomas MacIntyre, is trailing in it.

0204032-3900

SAVITCH

That race is very close and, as you can see, there, Thomas MacIntrye is in danger of losing his senate seat.

BRINKLEY

We have a projection in Colorado. We project that the Republican, William Armstrong, is winning, has won the senate seat from Colorado.

Floyd Haskell, the Democrat, one of the more liberal members of the senate, defeated by a Republic, William Armstrong, in Colorado.

Jessica.

SAVITCH

Dick Clark is very, very popular in the State of Iowa and, he is, despite his liberal voting record has done very well.

The abortion issue has become an issue in the State of Iowa and it would be interesting to see how that breaks down.

LE

Tomorrow is the 6th Anniversary of the Supreme Court decision legalizing abortion. There will be marches -- but this isn't a story about marches.

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LE

It's a report on strategy, technique and impact of a new political force -- how it presents its arguments.

Some of the pictures and some of the words are not pretty.

We have edited out some of these -- but not all, because they are what this movement is showing and saying.

We'll begin after this.

COMM. MESSAGE: AFCO

COMM. MESSAGE: KARISTAN RUGS

COMM. MESSAGE: EX-LAX

STATION MESSAGE: BACKSTAIRS AT THE WHITE HOUSE

LE

The anti-abortion movement has political clout. That surprised a lot of journalists and political analysts who believed those people make a lot of noise -- but not much difference.

It did not surprise those people -- people like Sean Morton Downey: singer, Washington lobbyist for the Right To Life Committee, in Iowa last October to get Senator Dick Clark.

SINGING: GOD BLESS AMERICA

0204032139 2

LB

And while they catch up the other side is moving ahead.

M

In 1980, we have planned, we have a list we call "our deadly dozen." This consists of six senators and six members of the House of Representatives. All 12 of these gentlemen are what we consider vulnerable, and given the proper pro-life effort in political action, we can and we will defeat all of them.

Heading up the list would be Birch Bayh of Indiana and Bob Packwood orOregon. Both of these gentlemen would be what I consider a true thorn in the side ofthe pro-life movement. Frank Leahey of Vermont, John Culver again in the State of Iowa, George McGovern in South Dakota and Frank Church in Idaho.

LB

Do you think you will defeat these men?

M

All six.

In the House, we're going to go back to Illinois where John Anderson will be running

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M

again. In the State of Virginia, Joe Fisher... din't win by that big a margin this last time and, again we feel if we do our voter identification program and things like that, he can be beaten. Congressman Hollenbeck, in New Jersey, i n the Tenth, ork Ninth Congressional District is also on our list. Also, Moe Udall, in the Second Congressional District, of Arizona, he ran against a guy who was no opposition at all and didn't win by that big a margin. Edgar, in Pennsylvania. And finally, we're going to ad Father Drinan to our list to make the number 12. He represents a real thorn n in thesi de of the prop-life movement and he again can and should be beaten.

Okay, the hit list for 1980 consists of Senator Packwood in Oregon.

LE

It may be a grass roots movement, but at the top, it's being played just like political hardball, which it is.

M

Churchk won his last election by 14 per cent, which would be a big challenge.

8204032-1394

W

Right.

M

But if you really figure in the population, the make-up of Idaho, there's no party registration for one thing. The other thing, Idaho has a very large Mormon population.

MK

How large a population?

M

About 250 thousand people...

M

Okay, so they're..

M

..which is a considerable voting bloc...

W

Good.

M

..they can be organized and turned out to vote.

M

They are solidly on the pro-life side, and all we have to do is get the message to them.

M

Alright.

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MAN

Birch Bayh, Indiana. A lot of the press quoted me as saying I hated Birch Bayh, and I tried to correct it. I don't hate Birch Bayh, I don't particularly like his voting record, but once..

M

Ten per cent..

M

..an article's out you can't get it back.

M

..at this point, our leadership on the Senate floor is almost entirely Republican. All right, we do have Eagleton and some people like that. All right, but I think we can, I think we can take people like Fritz Hollings, for instance, of South Carolina, he's got a fifty per cent rating, I think it's simply a case of getting in and educating Fritz Holliggs to what his constituency really wants.

M

All right. Well not only constituency but I honestly don't believe these guys know what's going on, I honestly don't believe they know just how much killing is going on.

0204032139 6

PHONE RINGING

M (on phone)

Yeah, this is he speaking. Who's this? (pause) Ah, yes, how are you, Tim?

W

We can - you know what I'd like to see done?

M

(name)o r Senator Culver. Okay, what's a good date for you?

W

Is to give a comprehensive overview of a political campaign, how it is run, how it is put together, the nuts and bolts of a political campaign, which a lot of people who are, you know have no, have not been politically active as many of our people..

LE

Barbara Barodi organized anti-abortion forces against Senator McIntyre in New Hampshire. McIntyre lost.

W

Where does the media fit in?

M

Okay, that's important.

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W

Excuse me. What?

M

Now just what we were talking about.

W

What have you got?

M

You see this hit list up here?

M

John (inaudible)

W

Really!

M

They'd like to see me on the 16th of January.

W

Very good. Very good. Yes.

M

That's beautiful.

M

Okay, MacGovern in South Dakota.

W

Good.

M

Republicans outregister the democrats by one

8204032139-8

M

per cent, 46 to 45 per cent. MacGovern's last election he won by 6 per cent, and abortion was not an issue.

M

I'm quite friendly with George. As you know, we went up and saw George, and he says that he'd like to be "talked to" on the issue a little bit more. He says he's not necessarily opposed to a human life amendment.

I don't know whether he's (inaudible) or not, but I do have an appointment with him on the 24th of January.

W

Okay.

M

All right.

M

He made a total about-face in Cambodia.

M

Yeah, I know.

M

And the last thing he said, Sean, was to remember that he did have an open mind on the issue.

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M

Yeah.

M

If he would change, you know.

M

If he would change, and become a leader in this area, it would be a tremendous help.

M

I think we should let him know that we would not, not just put up opposition, we'll draw the opposition, but I think we would actively get out and support his reelection.

W

Right, because..

M

Yes, just don't want to get off his back, we want to get on his bandwagon and help him.

M

If he's on our baddwagon.

M

Right.

M

Okay. The next thing that we should consider is the handbook on political action andto show

82040321-4000

M

people basically how they can get involved, and how simple it is to do it.

M

Okay. What you got to do then is explain, in this book, wwe have to make this book very basic.

M

The pro-life movement does not work the same way that the political parties do, by going directly to neighborhoods.

The voter identification program, which we've got going in some areas, is extremely important because that, that identifies where our pro-life strength is, it identifies the people by name, address, whatever.

W

Who they are. They've already been identified they only need to be called on.

M

And they would cross the party line.See. That's our strength, we will cross the party line.

M

Okay. And I spoke to some people from the American Legion. There's Foreign Wars, there's the American Legion, there's a group of veterans

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National RIGHT TO LIFE committee, inc.

NATIONAL OFFICE — Suite 341, National Press Bldg. — 529 14th Street, N.W. — Washington, D. C. 20045 — (202) 638-4396

February 28, 1979

Dear Congressman:

In order to reflect the balanced opinion of the United States Congress, an equitable distribution of pro-life ideology should be represented in any new make-up which will be the new House Select Committee on Population.

The House Select Committee on Population, which is dominated by pro-abortionists, has, to no one's surprise, generated a typical pro-abortion report. Four interesting factors are:

a) The report is pro-abortion propaganda in that it concludes further population growth will have very serious and detrimental results, thereby contributing to the pro-abortion premise that "we must kill them because the world is too small."

b) The report totally lacks any scientific data to support its conclusions, in spite of the effort of the Committee to generate such data.

c) The report contains glaring errors such as an exaggeration of one alleged problem by a factor of ten and several Orwellian reversals where all available data indicates one thing and the Committee without factual backing, claims the opposite is true.

d) When glaring errors were called to the attention of the Chairman, he attempted to "stonewall" in a manner consistent with the worst traditions of American politics.

This Committee should not be reconstituted unless pro-life Congressmen are permitted to ask appropriate questions to determine whether the charges in this letter are correct. A more detailed analysis of the output of this Committee and a copy of the Chairman's stonewalling letter is available upon request.

Your friend for life,

Sean Morton Downey

Sean Morton Downey, Jr.
Legislative Consultant, NRLC

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BENJAMIN FRANKLIN [illegible] P.O. BOX 14263 • WASHINGTON, D.C. 20044 • (202) [illegible]

My Dear Pro-Life Friend:

Abortionist Senator Robert Packwood of Oregon was quoted in the February issue of Congressional Quarterly: "if right to life groups can defeat eight or ten House members and one or two Senators, OTHERS WILL GET THE MESSAGE."

You and you alone have the great opportunity to deliver that message loud and clear to the abortionists in the Congress on Tuesday, March 21, 1978 by casting your vote for Don Lyon in the Republican primary.

Congressman John B. Anderson has consistently voted anti-life on every major issue. He has ignored the will of the people. In his campaign he continues to court such anti-life people as Nelson Rockefeller (Rockefeller raised $11,000.00 at a Washington D. C. cocktail party for Anderson) who through his millions has funded the deaths of more unborn children than any one person in history. Other Anderson supporters under the guise of the word "pro-choice" have voted to use your hard-earned tax dollars to fund the deaths of over 300,000 unborn children each year. Anderson has done the same.

In the early years of the Civil Rights movement, many many Congressmen consistently voted against the struggle. However, as the tide turned so did many of these men who remain in the Congress today. They feared for their political lives. A grass-roots movement changed America.

Now, another and even more powerful grass-roots movement, middle America, is revolting against the legal murder of our future generations. They are repulsed by this federally financed killing and are ready to do something about it.

No matter how clever the argument, we all know when life begins. The few who claim they don't are on the Supreme Court. They have ruled abortion is legal up to the moment of birth, UP TO THE MOMENT OF BIRTH. Mr. Anderson supports these decisions.

Your vote in the Republican primary will make the difference. If you vote pro-life on Tuesday, March 21, the 16th Congressional District of Illinois will be the spark that will ignite the fuse to make 1978 the year of life.

This is the year pro-life people must and will be heard. In this election you will take into the polling booth, in your hands, power over the life or death of millions of unborn children. Make no mistake about it, the choice is yours.

Don Lyon has pledged to support pro-life legislation and a Human Life Amendment. Life Amendment Political Action Committee proudly endorses Don Lyon and urges all pro-life people to support his campaign on Tuesday, March 21, 1978.

The choice is yours, we only hope and pray that you will join in this effort to save the babies, who, without your important vote, will never see the light of God's beautiful day.

FOR LIFE,

Morton Downey, Jr.
Chairman, LAPAC

Mildred F. Jefferson
Mildred F. Jefferson, M.D.
Advisory Chairman, LAPAC

P.S. AS A PRO-LIFER IN THIS ELECTION YOUR VOTE MEANS LIFE FOR THE UNBORN. PLEASE MARK YOUR CALENDAR TO VOTE ON TUESDAY, MARCH 21, FOR DON LYON AND HAVE TEN PRO-LIFE FRIENDS DO THE SAME.

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

LAPAC, INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

Dear Friend of Life:

The death count in the abortion war against the unborn citizens of America is rising daily.

No one knows exactly how many of our country's unborn children die at the hands of the abortionists. The numbers you read are estimated from trends shown in the showcase abortion clinics.

The actual number of abortions done in the United States each year may now be well over one and one-half million.

Please think what this means. We know that every successful abortion means one dead baby. What we do not know is what has happened to the thousands and thousands of women and girls who are the victims of the abortionists.

Some of them are dead -- like the 18-year-old in Illinois whose socially-prominent abortionist let her walk out of the clinic bleeding to death from a torn uterus that was still holding the incomplete remains of her unborn child. Some have been permanently mutilated -- like the 25-year-old in Dallas whose uterus was so badly damaged during her Supreme Court-approved abortion that she had to undergo a hysterectomy in order to save her life.

Countless others have suffered complications which will result in high medical costs of psychiatric, obstetric and gynecologic care in addition to the already high bills for the abortions done in that money-making business.

This high cost will be paid for by YOUR taxes and YOUR insurance premiums unless you are willing to do something about it.

I'm writing to you on behalf of LAPAC in the sincere hope that not only do you object to the willful destruction of human life that abortion represents, but that you will decide to join us in our increasingly successful campaign to restore the legal protection of life and get the government out of the abortion business.

LAPAC, Life Amendment Political Action Committee, is working to return the government of the people to the people. It is a national political action committee which is dedicated specifically to electing men and women to office who will support a Human Life Amendment to the U. S. Constitution which will protect life from its beginning to its natural end.

The Human Life Amendment will restore to the Constitution what we thought was already there until the 1973 U. S. Supreme Court's decision on abortion limited the protection of the Constitution to those already born.

The democratic process of amending the U. S. Constitution is a hard political job that depends on having the right people in office. Winning elections

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

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requires hard work from many people and a great deal of money.

LAPAC must be able to help defend pro-life legislators (who are the targets of our well-funded opponents) and defeat those who are anti-life.

Never before has the right-to-life movement been in a position to influence the outcome of so many elections, both locally and nationally. Winning key seats in the 1978 elections could shorten the right-to-life battle by more than ten years.

We need your help today. Some of the primary elections are <u>less than one month away</u>. Your check for $200, $100, $50, $25, $15 or more will allow us to help more candidates through television and radio ads and might make the winning difference.

In order to continue and maintain the gains we have made in protecting the unborn child, your generous contribution is vital.

LAPAC cannot exist without your support. Please send your contribution in the enclosed envelope today to help us win the fight for life. When we win, that victory will not be for ourselves, but for America and all mankind.

Sincerely for Life,

Mildred F. Jefferson, M.D.
Honorary Chairperson, LAPAC

P.S. Please send your donation as soon as possible. The anti-life organizations are gaining ground in the political arena each day — and we must have your support in order to combat their insidious threats. Please don't delay. Use the postage-paid envelope enclosed.

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...is crucial that you let your [illegible] how you stand on the issues involved. Please check the appropriate answer and return the survey in the enclosed envelope along with your donation. All names will be kept confidential.

1. How do you feel about President Carter's non-position on the anti-abortion question?

   a. Favorable b. Opposed c. Undecided

2. Do you know how your senators and congressmen stand and vote on the abortion issue?

   a. Yes b. No

   If not, would you like to hear from them on this life and death issue?

   a. Yes b. No

3. Since the January 22, 1973 Supreme Court decision legalized abortion on demand, would you support an amendment to the Constitution (Human Life Amendment) to reverse this decision?

   a. Yes b. No c. Undecided

4. Are you in favor of LAPAC creating a national anti-abortion rating which would publish and evaluate your elected officials on their stand on abortion?

   a. Yes b. No c. Undecided

5. Do you believe that pro-life candidates should be supported regardless of party?

   a. Yes b. No

6. Do you agree with President Carter and other political figures that abortions should not be funded by the government to finance elective abortions for the poor?

   a. Yes b. No c. Undecided

7. Do you believe that LAPAC should start a national Pro-Life Party?

   a. Yes b. No

8. Would you like your opinions on these national survey questions relayed to President Carter and the House and Senate? (Opinions only would be furnished; names would be kept confidential.)

   a. Yes b. No

9. Do you believe that LAPAC should launch a nation-wide fund drive to elect pro-life officials?

   a. Yes b. No c. Undecided

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Foes of Abortion Aim at Hill 'Deadly Dozen'

By Bill Peterson
Washington Post Staff Writer

the anti-abortion movement's cramped political command center in the National Press Building, messengers being sent out that the has turned and politicians better are.

"We've proven our point," declares Brown, director of the move-'s political action committee. ere is a pro-life vote. We've come ge as a political force."

few feet away, a young assist- is on the telephone asking a sewife in Wisconsin to donate $15 fund to be used to defeat con-smen and senators in areas "where rong pro-life vote of 5 to 8 per- can make a difference." "We've ven this works," the woman is , "in places like Iowa where we ted Roger Jepsen and in those Senate races in Minnesota" where ublicans took both seats.

Brown's newsletters take the same k. They boast of replacing "abor-nists Dick Clark, Tom McIntyre Floyd Haskell" with "strong -life leaders Roger Jepsen, Gor- Humphrey and Bill Armstrong" Senate races in Iowa, New Hamp-re and Colorado.

Those claims, according to those st familiar with the campaigns, are an exaggeration at best, a gross exag-ation at worst.

What they did was to look at elections re people who happened to oppose positions last and then they said ey won them,'" says Karen Mulhauser, ad of the National Abortion Rights tion League (NARAL), leading "pro-ice" group.

said 'we won them,'" says Karen Mulhauser, head of the National Abortion Rights Action League (NARAL), lead-'pro-choice' group.

But her comments illustrate the difficulty groups like NARAL and candidates who support their views face in dealing with the volatile politics of abortion.

It's a problem that is certain to intensify in months ahead, posing special headaches for liberals in the House and Senate attempting to judge the real or imagine ballot power of pro-life forces.

Brown's group, the Life Amendment Political Action Commitee (LAPAC), has already raised hackles on Capitol Hill by issuing a 1980 'hit list'—dubbed the "deadly dozen."

The list is headed by such well-known liberals as Sen. Birch Bayh (D-Ind.), Sen. George McGovern (D-S.D.), Sen. Frank Church (D-Idoho) and Rep. Morris Udall (D-Ariz). NARAL's Mulhauser charges this indicates "they're out to get liberals and they're joining forces with the rest of the right wing. They simply don't target conservatives."

The list does have a decidedly left-of-center cast. Only three Rpublicans, all modrates—Sen. Robert Packwood of Oregon, Rep. John Anderson or Illinois and Rep. Harold C. Hollenbeck of New Jersey—appear on it.

The others named are: Sen. Patrick J. Leahy (D-Vt.), Sen. John Culver (D-Iowa), Rep. Robert Edgar (D-Pa.), Rep. Joseph Fisher (D-Va., and Rep. Robert Drinan (D-Mass.)

But there's no clear pattern to those on the list. Bayh, McGovern, Packwood and Drinan, a Catholic priest, are long-time targets of anti-abortion forces. Hollenbeck, however, voted with the anti-abortion forces 40 percent of the time last year, according to a NARAL index; from two-thirds of



SEN. FRANK CHURCH



REP. JOSEPH FISHER

. . . targets of anti-abortionists, the senator is outraged, House member puzzled.

While Fisher is on the list, Rep. Herb Harris, a Democrat from a neighboring Northern Virginia district, is not, although their voting records on abortions questions are identical.

"I'm puzzled by it, but I'm not losing any sleep about it," says Fisher, the father of seven. I gues I'm saddened more than anything. I don't like to be on anyone's hit list."

Church was outraged when he found himself among "the deadly dozen."

The accusation that I advocated abortion on demand is an outlandish bald-faced lie," he told a press conference in Boise last month. 'On the abortion issue my position has always been decidedly conservative . . . I intend to pin to the wall any allegations that misrepresent my position."

In drawing up the list, LAPAC considered the voting records and vulnerability of candidates as well as the strength of pro-life groups in their areas. "We can't go out and defeat everyone we don't like" say LAPAC director Brown. 'So we picked a few where we think we can make a difference."

Th group's ultimate litmus test for any officeholder is whether or not he supports a constitutional amendment prohibiting abortion.

With a budget last year of only $100-000, LAPAC has few real resources of its own. It was formed as an independent political action commitee, supposedly free from any formal ties to other anti-abortion groups—a legal distinction that permits it to raise money from the general public rather than the membership of any on group.

But LAPAC opponents question how independent it realy is. LAPAC's chairman is Sean Morton Downey Jr., a long-time lobyist for the National Right to Life Committee. Brown's wife is the director of that group. "You might say we're in bed with the National Right to Life Committee," Brown says.

Last fall, LAPAC made cash contributions to several candidates, set up a telephone bank in New Hampshire manned by Barbara Baroody, a Brown assistant, and paid for the priating of 30,000 leaflets in Iowa attacking Sen. Dick Clark's stand on abortion. Clark opposed constitutional amendment and had voted to permit abortions under some conditions.

The Sunday. before election, pro-life groups passed out the leaflets in Catholic church parking lots across th state. When Clark was defeated, 5 percent to 48 percent, Brown was quick to claim credit.

"We wanted to prove that the pro-life vote was for real last fall," he says. "We did that. We showed that people will cross party lines to vote on this single issue."

Brown claims local groups in more than 20 states are considering starting political action committees modeled after LAPAC. "We're going to haunt to death anyone who runs in 1980," he says. "We can and will make it so difficult that they'll have to give us our amendment.

No one doubts the fervor of those in the pro-life movement—or their ability to mobilize quickly. (Brown claims can generate 30,000 letters to Congre almost at the drop of a hat.) And Right to Life Party candidate for go ernor in New York State last fall tracted more than 100,000 vote enough to automatically qualify newly formed party on future ballots

But many observers still questi their real power at the ballot box.

"I think they have some influence, b I don't think too many people will vo against me, because of my position one issue, particularly if they've hea what I have to say about it," says R Fisher, who has been attached in an abortion leaflets passed out in church before his last two elections.

Even Iowa—supposedly the m dramatic example of single-issue polit in last fall's election—is not as clear a case as some believe.

When the Des Moines Register veyed voters laving th polls on elect day, it found 8 percent of them tey'd voted for Jepsen because of stand on abortion. In an election deci by only 28,000 votes, this would enough to tip the balance. But in an zing its own poll results, the newspa concluded, "the abortion issue was decisive."

There's no denying, however, the pro-life—and other single-i groups have got a good number of ticians scared half to death. "T groups are a dangerous trend in A ican politics," complains Bayh, ech the sentiments of many liberals. plaints NARAL's Mulhauser. "We being out-organized."

"We are not outnumbered."

The great irony about this is groups are gaining political clout time when every major roll taken o subject shows that a majority of A ican support a woman's right to c whether she wants an abortion.

NBC National Broadcasting Company, Inc.

Thirty Rockefeller Plaza
New York, N.Y. 10020 212-664-4611

Lester M. Crystal
President
News Division

February 13, 1979

Ms. Karen Mulhauser
Executive Director
National Abortion Rights
Action League
825 15th Street, N.W.
Washington, D.C. 20005

Dear Ms. Mulhauser:

Fred Silverman has asked me to respond to your letter concerning our January 21 WEEKEND report on the anti-abortion movement.

I think it should be made clear at the outset that the responsibility of NBC News is to inform the public of the various contrasting views on the subject of abortion. The WEEKEND report did not ignore the pro-abortion view. Indeed, you were one of the pro-abortion spokespersons shown at some length in the program, along with Bill Baird, Abortion Activist, and Pat Gavett of the Religious Coalition for Abortion Rights.

I understand that the criticism is not that we ignored your views, but that this WEEKEND report was devoted mostly to the anti-abortion movement. At the outset of the program, Linda Ellerbee stated:

> "This program will be about one subject.
>
> That subject is not abortion -- that is it's not a debate about the merits of the issue.
>
> It is a story about the anti-abortion movement -- and its political power -- power many Americans weren't aware it had until last November's election."

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On January 23, NIGHTLY NEWS reported about the anti-abortion demonstration that occurred in Washington protesting the Supreme Court decision on abortion. The report aired contrasting interviews with Nellie Gray of the March for Life; Gloria Steinem, a pro-abortion spokesperson; and Eleanor Smeal, President of NOW.

I cite these reports as only examples of coverage NBC News has given the subject during the few days surrounding the WEEKEND report of which you complain. It amply illustrates that our coverage of this subject has been extensive and full. During the past year, hardly a week has gone by in which NIGHTLY NEWS, TODAY, MEET THE PRESS or some other NBC program has not covered some aspect of the debate on the subject. NBC News has not ignored your position, and it will continue to cover the contrasting views, including your own, as long as the debate continues.

I would now like to turn to some of the specific objections you had to the WEEKEND report. WEEKEND did not say that the anti-abortion movement was the most effective single issue political movement in the country. What WEEKEND said was:

> "There have been other movements recently to cut taxes, promote gay rights, legalize marijuana...but the movement to outlaw abortion has probably been the most underestimated, and it has become a real force in American politics."

We think that statement was accurate and, indeed, we think that you would agree.

You complain that information provided by NARAL was consciously excluded from the report. Since WEEKEND made extensive use of your appearance, it is clear that we did not ignore NARAL views. Because this was a report about the anti-abortion movement as a political force, we necessarily had to make editorial judgments about what to include, and exclude, from the program.

You complain that WEEKEND went to the Democratic Mid-Term Convention in Memphis for the purpose of filming anti-abortion strength. In fact, we went to Memphis to find out how the anti-abortion movement functions. WEEKEND aired what it found. There were a few "pro-life" pickets outside the convention hall. Sean Downey spoke to them with a bullhorn. The report made it evident that not only was the "pro-life" group excluded from the convention, but that Sean Downey was rebuffed by his old friend, Senator Kennedy.

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WEEKEND thought this aspect of the anti-abortion movement was a timely and newsworthy subject, because the political ramifications of the movement are a relatively new development which, to the surprise of many observers, has become significant.

Although this was the aim of this particular WEEKEND report, we want you to know that NBC News has endeavored to cover the contrasting views, not only within the WEEKEND report itself, but throughout our general news programming. For example, the next morning, on January 22, TODAY devoted an entire half-hour to covering the abortion controversy as it has developed in various parts of the country. In a report from Washington, NBC News correspondent Tom Pettit reported about the position of Sean Morton Downey, hired lobbyist for the National Right to Life Movement, and of Carol Warner, his counterpart at your organization, the National Abortion Rights Action League. Pettit's report covered Senator Jesse Helms (Republican, North Carolina) who supports a constitutional amendment to bar abortions entirely, and his opposite, Pat Schroeder (Democrat, Colorado), who is seeking reinstatement of federal funds for abortion.

NBC News correspondent Norma Quarles reported from Fort Wayne, Indiana, about the protest pickets outside of the abortion clinic, run by the Women's Health Organization. She interviewed Kimi Molach, representing Lutherans for Life, who oppose abortion, and Mary Collins, representing the Women's Health Organization, which intends to carry on the work of the clinic and has filed a law suit to stop the picketing.

Also in the same TODAY report, NBC News correspondent Robert Abernethy reported about the positions of various religious groups. Interviewed in the report were Bishop James C. Kelly of the Conference of Catholic Bishops, who explained the Catholic position against abortion; Rabbi Harold S. White, who explored the Jewish position, which corresponds to that of pro-abortionists; and Dr. James Childress, a Protestant minister, who explained that the Protestant position is largely that of individual conscience.

On January 20, the day before the WEEKEND report you complain of, NIGHTLY NEWS reported about the debate going on in Amarillo, Texas, concerning prospective legislative action in the Texas legislature that would limit abortion. Interviewed in the report were Patricia Beyea of the ACLU, who called on women to fight for the right to reproductive freedom, and Martin Nussbaum, member of the Right to Life Committee, who argued that abortion is willful destruction of human life. Also interviewed was Amy Long, a nineteen year old unmarried mother, who said she does not oppose abortion, but who could not do it herself.

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You complain that the supposed success of the hit lists for 1978 and the anticipated success for 1980 seemed to be the center of the show. Whether or not the performance of the anti-abortion movement was strong in 1978 depends, I suppose, on one's point of view. From the point of view of the anti-abortionists, they were pleased to have gotten their issues on the ballot and to have gotten the vote they did, whether or not they won. WEEKEND reported about their aims for 1980, but it did not venture a forecast concerning how well they will do.

You complain that WEEKEND did not air the comments of Senators McIntyre or Haskell concerning whether they lost their elections because of this issue. WEEKEND tried to get their statements, but they refused to comment one way or the other.

Finally, you complain that WEEKEND reported that there have been charges of Catholic Church involvement in the anti-abortion movement and an FEC complaint about illegal practices by the Pro-Life Action Committee in Iowa, but that none of these charges had been proved. WEEKEND did not intend to imply that these charges were "unsubstantiated" and "hollow," as you argue. Until official action of some kind is taken, we can have no opinion concerning the merits of these charges.

We do regret your reaction to the program. Please be assured that it is our plan to continue to cover the story, as accurately and as fairly as we can, over the period of time available to us, from the various points of view. In the meantime, we do thank you for giving us this opportunity to explain our position to you.

Sincerely,

Lesta M Lepskl

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PLACE AN "X" BELOW THE APPROPRIATE LETTER OR FIGURE IN THE BOX AT THE RIGHT OF THE "REPORT" HEADING BELOW:

"PRELIMINARY" REPORT (Registration): To register, place an "X" below the letter "P" and fill out page 1 only.

"QUARTERLY" REPORT: To indicate which one of the four calendar quarters is covered by this Report, place an "X" below the appropriate figure. Fill out both page 1 and page 2 and as many additional pages as may be required. The first additional page should be numbered as page "3," and the rest of such pages should be "4," "5," "6," etc. Preparation and filing in accordance with instructions will accomplish compliance with all quarterly reporting requirements of the Act.

Year: 19 78 ←

REPORT

PURSUANT TO FEDERAL REGULATION OF LOBBYING ACT

P	QUARTER			
	1st X	2d	3d	4th

(Mark one square only)

NOTE on ITEM "A."—(a) IN GENERAL. This "Report" form may be used by either an organization or an individual, as follows:
(i) "Employer".—To file as an "employer," state (in Item "B") the name, address, and nature of business of the "employer." (If the "employer" is a firm (such as a law firm or public relations firm), partners and salaried staff members of such firm may join in filing a Report as an "employer.")
(ii) "Employer".—To file as an "employer," write "None" in answer to Item "B."
(b) SEPARATE REPORTS. An agent or employee should not attempt to combine his Report with the employer's Report:
(i) Employers subject to the Act must file separate Reports and are not relieved of this requirement merely because Reports are filed by their agents or employees.
(ii) Employees subject to the Act must file separate Reports and are not relieved of this requirement merely because Reports are filed by their employers.

A. ORGANIZATION OR INDIVIDUAL FILING

1. State name, address, and nature of business.

National Right to Life Committee, Inc.
Suite 341, National Press Building
529 14th Street, NW
Washington DC 20045

2. If this Report is for an Employer, list names of agents or employees who will file Reports for this Quarter.

NOTE on ITEM "B."—*Reports by Agents or Employees.* An employee is to file, each quarter, as many Reports as he has employers; except that: (a) If a particular undertaking is jointly financed by a group of employers, the group is to be considered as one employer, but all members of the group are to be named, and the contribution of each member is to be specified; (b) If the work is done in the interest of one person but payment therefor is made by another, a single Report—naming both persons as "employers"—is to be filed each quarter.

B. EMPLOYER—State name, address, and nature of business. If there is no employer, write "None."

NONE

NOTE ON ITEM "C."—(a) The expression "in connection with legislative interests," as used in this Report, means "in connection with attempting, directly or indirectly, to influence the passage or defeat of legislation." The term "legislation" means bills, resolutions, amendments, nominations, and other matters pending or proposed in either House of Congress, and includes any other matter which may be the subject of action by either House"—§ 302 (e).
(b) Before undertaking any activities in connection with legislative interests, organizations and individuals subject to the Lobbying Act are required to file a "Preliminary" Report (Registration).
(c) After beginning such activities, they must file a "Quarterly" Report at the end of each calendar quarter in which they have either received or expended anything of value in connection with legislative interests.

C. LEGISLATIVE INTERESTS, AND PUBLICATIONS in connection therewith:

1. State approximately how long legislative interests are to continue. If receipts and expenditures in connection with legislative interests have terminated, place an "X" in the box at the left, so that this Office will no longer expect to receive Reports. ☐

2. State the general legislative interests of the person filing and set forth the *specific* legislative interests by reciting: (a) Short titles of statutes and bills; (b) House and Senate numbers of bills, where known; (c) citations of statutes, where known; (d) whether for or against such statutes and bills.

3. In the case of those publications which the person filing has caused to be issued or distributed, in connection with legislative interests, set forth: (a) description, (b) quantity distributed, (c) date of distribution, (d) name of printer or publisher (if publications were paid for by person filing) or name of donor (if publications were received as a gift).

(Answer items 1, 2, and 3 in the space below. Attach additional pages if more space is needed.)

1. Indefinitely

2. Promoting passage of: a. Human Life Amendment to the Constitution, S J Res 15 and H J Res 198, and other similar amendments;
   b. Opposing government funding of abortions;
   c. Alternative to abortion legislation.

3. NATIONAL RIGHT TO LIFE NEWS, Monthly, 10,000 copies. ←
   Union Advocate, St. Paul, MN 55103

4. *If* this is a "Preliminary" Report (Registration) rather than a "Quarterly" Report, state below what the nature and amount of anticipated expenses will be; and if for an agent or employee, state also what the daily, monthly, or annual rate of compensation is to be. *If this is a "Quarterly" Report, disregard this Item "C 4" and fill out Items "D" and "E" on the back of this page.* Do not attempt to combine a "Preliminary" Report (Registration) with a "Quarterly Report." ←

State or Territory City of Washington
District of Columbia } ss:

AFFIDAVIT

I, the undersigned affiant, being duly sworn, say: (1) That I have examined the attached Report, numbered consecutively from page 1 through page ____ and the same is true, correct, and complete as I verily believe. (Be sure to fill in number of last page.)

[If the Report is for an individual, strike out paragraph "2."] ← (2) That I am Office Manager of the above-named organization, for whom this Report is filed, and that I am authorized to make this affidavit for and on behalf of such person.

(Print or type name below signature) (Signed) Judith A. Brasfield Affiant
(Typed)

Subscribed and sworn to before me on June 12, 19 78

[Print or type name below signature] (Signed) Mildred D. Gross (Official authority to administer oaths)
(Typed)

My Commission Expires Nov. 30, 1978

Issued 6-4-62 by the Secretary of the Senate and the Clerk of the House of Representatives. (Superseding Form Issued 1-1-51.)

MRS. PENNY DINES
RENO, NEVADA

OCT 22 [illegible]

Dear Friend:

I am writing to you because of my involvement with a pro-life organization dedicated to electing pro-life officials to public office. The organization is the Life Amendment Political Action Committee, Inc.

A few months ago I received a letter from LAPAC telling about the gains they made last fall in getting many more pro-life candidates elected to Congress. It was very encouraging. Finally, I thought, the tide seems to be turning in our favor, and I was helping, if only in a small way.

The letter went on to explain why it was so important to keep the momentum going, looking ahead to more races coming up. But of course this would take money and the Committee was depending on its supporters to provide necessary funds.

Unfortunately, I was already over my household budget for the month, and we were really feeling the "pinch." (As any housewife knows, trying to stick to a food budget these days is no easy task!) But I did manage to scrape together a few dollars which I sent, along with a short note saying how I wished it could be more...that I really believed LAPAC was performing a crucial role in the whole pro-life fight...and that I hoped others felt the same way I did.

About a week later, I received a call (right in the middle of doing the children's laundry!) from Sean Morton Downey, Jr., Chairman of LAPAC's Board of Directors. He said he had read my letter and was very moved by it.

"Would you be willing," he asked, "to write a similar letter, explaining in you own words why people should support LAPAC?" I was silent for a minute. Then I asked, "You mean like a 'one contributor to another' kind of letter?"

"Exactly," he answered.

Well, after giving all my reasons why I wasn't

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Holland & Knight 10 Sunset Blvd 900 Inwood, CA 90028	1-20-78	$ 8500.00	$ 31.63	$ 11,000.00

Benefit Concert Kennedy Center 1-20-78 -
Entertainment Expense - travel, meal, hotel etc.

Kennedy Center Concert Hall
N. Street, N.W.
Washington, D.C.

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		3-10-78	
		3-7-78	
		3-13-78	
		3-15-78	125.00
		3-16-78	119.36
		3-23-78 3-28-78 3-29-78	
		3-22-78	

April 10

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LAPAC, INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE

Dear Friend of Life:

The death count in the abortion war against the unborn citizens of America is rising daily.

No one knows exactly how many of our country's unborn children die at the hands of the abortionists. The numbers you read are estimated from trends shown in the showcase abortion clinics.

The actual number of abortions done in the United States each year may now be well over one and one-half million.

Please think what this means. We know that every successful abortion means one dead baby. What we do not know is what has happened to the thousands and thousands of women and girls who are the victims of the abortionists.

Some of them are dead -- like the 18-year-old in Illinois whose socially-prominent abortionist let her walk out of the clinic bleeding to death from a torn uterus that was still holding the incomplete remains of her unborn child. Some have been permanently mutilated -- like the 25-year-old in Dallas whose uterus was so badly damaged during her Supreme Court-approved abortion that she had to undergo a hysterectomy in order to save her life.

Countless others have suffered complications which will result in high medical costs of psychiatric, obstetric and gynecologic care in addition to the already high bills for the abortions done in that money-making business.

This high cost will be paid for by YOUR taxes and YOUR insurance premiums unless you are willing to do something about it.

I'm writing to you on behalf of LAPAC in the sincere hope that not only do you object to the willful destruction of human life that abortion represents, but that you will decide to join us in our increasingly successful campaign to restore the legal protection of life and get the government out of the abortion business.

LAPAC, Life Amendment Political Action Committee, is working to return the government of the people to the people. It is a national political action committee which is dedicated specifically to electing men and women to office who will support a Human Life Amendment to the U. S. Constitution which will protect life from its beginning to its natural end.

The Human Life Amendment will restore to the Constitution what we thought was already there until the 1973 U. S. Supreme Court's decision on abortion limited the protection of the Constitution to those already born.

The democratic process of amending the U. S. Constitution is a hard political job that depends on having the right people in office. Winning elections

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

capable, that these things were better left to professionals, etc...Sean would hear none of it. (He is a very persuasive person--thank goodness he's on our side!)

Anyway, here I am sitting at my old Royal typewriter, wondering what to write next. It would be so much easier if we could just sit down over a cup of coffee and talk about it.

Since that isn't possible, I'll get to the heart of the matter right away.

Why do I support LAPAC? There are many other worthy organizations devoted to the pro-life cause. As much as I'd like to, I simply can't support all of them. I chose LAPAC because the abortion issue, rightly or wrongly, has become a political issue, and it will be decided in the political arena, at the state and federal levels.

LAPAC, it seems to me, is the perfect vehicle to fight our fight. It is a political action committee, solely dedicated to electing pro-life candidates who will actively support the single most important goal of LAPAC -- the passage of the Human Life Amendment to our Constitution.

And LAPAC is making solid progress. More and more LAPAC-supported candidates are getting sent to Congress. Last fall, they helped elect 37 to do the battle for us. And their effect is already being felt.

Just recently I read in the newspaper that Medicaid-funded abortions were cut by an astounding 99% as a result of the Hyde amendment banning federal funding of "abortions on demand." In terms of actual lives saved, it means 200,000 babies were born in the last 11 months who would otherwise have been aborted. Praise the Lord!

But all is not rosy. Many states -- big ones, like New York, New Jersey, Pennsylvania, Illinois, Michigan, California -- are using their own money to allow the killing to continue because the Hyde amendment only applies to federal funding.

Which means probably well over 1,000,000 babies will be killed this year! And we still don't have enough pro-life votes in Congress to produce the 2/3 majority needed to pass the Human Life Amendment -- the only measure that will effectively stop the killings.

So we can't sit back and rest on our laurels. Not for a minute.

LAPAC doesn't plan to. LAPAC was instrumental in two congressional elections on April 3, 1979 in California and Wisconsin, and I am thrilled to report that both pro-life challengers won their elections. The one in California where the pro-lifer won by a stunning landslide was where LAPAC was most active. Another special election will soon be held in Illinois and LAPAC will be active again...if we all help them now.

LAPAC also has targeted for defeat some of the major obstacles to the passage of our Human Life Amendment. I'm speaking of influential senators like George McGovern, Birch Bayh, Bob Packwood, Frank Church, and others. The more pressure LAPAC is able to put on these politicians over the coming months, the more chance we have of either changing their minds or defeating them come election time.

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But none of this can be accomplished without funds, and LAPAC used what little they had last fall in helping to elect 37 more pro-life fighters to Congress. Unlike a lot of other organizations, LAPAC can't turn to Big Brother, Big Business or Big Labor for funding. It seems that saving babies is "too controversial." So, I guess that just leaves us -- you and me and others who believe enough to <u>give</u>, sometimes even when it hurts.

How <u>much</u> should you give? LAPAC suggests $15, $25, $50, or $100. They need hundreds of such amounts in each category to effectively carry out their political action plan. Just take the special elections I mentioned. Mr. Downey told me the cost of providing one LAPAC professional to work in the campaign exceeded $3,000.

Maybe you should ask yourself how much is it worth to save one baby's life? Obviously, it's priceless. But it's something to think about when you consider some of the less essential things we all tend to spend our money on at times.

It just occurred to me, and I'll leave you with this passing thought. Many of my friends contribute to all kinds of "endangered species" causes -- things like Save the Whales, Save the Bald Eagle, Save the Egrets. But when I ask them about saving babies, the most endangered and precious species of all, they back off. I suppose it's a matter of knowing where your

priorities lie.

I know where mine lie. And I believe you do too.

LAPAC has enclosed a contribution form and a First Class postage-paid reply envelope." Please use them now.

God Bless you,

Penny Dines

Mrs. Penny Dines
On behalf of LAPAC

P.S. LAPAC also suggests that you write to your State Legislature asking that they follow the example of the Hyde Amendment and stop using your taxpayer money to fund abortions. I think it's an excellent idea. In fact, it's the very next letter that's going in my typewriter!

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LIPTIC FUND

Let's All Protect A Child Fund | Suite 339, National Press Building 529 14th Street, Washington, D.C. 200

February 6, 1979

Dear Protector of Life:

At the Knights of Malta dinner last week, Bishop McCarrick said: We are protecting his most cherished loved ones, the babies, when we work to save the lives of the unborn."

My friends, I have written to you before asking for your help and I am pleased to report that we are closer than ever before to our goal: the passage of a Human Life Amendment. Our election successes in 1978 have gained credibility for the pro-life movement.

Just recently NBC ran a one hour special on our activities while this past week I appeared on the Phil Donohough show along with my fellow board member Dr. Jack Willke. In addition, PEOPLE magazine has just featured our Director, Paul Brown and his wife Judie in their publication. We are on the move, but we must have your support!

Some of you have already helped the pro-life cause, I know the rest of you are also willing to help.

Our Let's All Protect A Child Fund was established to educate to the politics of the pro-life movement and we have scheduled campaign training schools in all sections of the country for the education and training of pro-lifers. When we have completed this educational process, our people, who are already dedicated and enthusiastic will have the necessary knowledge and tools to go out and help win elections for more pro-life candidates.

Let's All Protect A Child Fund also publishes the REPORT, a comprehensive overview of political information gathered from all parts of the country. (Please let us know if you would like to subscribe to the REPORT.)

We need your help in order to carry out the program we have outlined. With your financial support we can get the job done. We would ask that you send us a one-time donation or join our LAPAC Fund Finance Council by raising and contributing am amount of $50.00 per month. All contributions to the Fund are totally tax-deductible.

Help us to stop the killing of God's children. It can be done! We can do it - but WE MUST HAVE YOUR HELP!

God is life. Love LIFE!

Sincerely,

Sean Morton Downey
Chairman

SMD/bb

LAPAC Fund is a division of Christian Family Renewal
All contributions to the LAPAC FUND are totally tax deductible.

8204032142

SHELDON, HARMON & WEISS
1725 I STREET, N.W.
SUITE 506
WASHINGTON, D.C. 20006
TELEPHONE
(202) 833-9070

KARIN R SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAN S. JORDAN, III
ANNE LUZZATTO

November 13, 1979

Mr. Robert Saranow
U.S. Custom House
300 S. Ferry House
Terminal Island
Los Angeles, California 90731

Dear Mr. Saranow:

In April of this year, the District Director referred to you my letter describing a probably improper activity of Christian Family Renewal, a $501(c)(3) organization. Enclosed is a copy of that correspondence.

The LAPAC Fund (Let's All Protect a Child Fund) of Christian Family Renewal has a name remarkably similar to LAPAC, Life Amendment Political Action Committee, a political committee registered with the Federal Election Commission. We ask you to investigate whether the similar names were chosen to deceive the hurried reader and more important whether the letter represents a scheme to use a $501(c)(3) organization to raise money for a political committee.

Enclosed for your further information is a copy of LAPAC's July 10, 1979 report filed with the F.E.C. On the page numbered 7903 132 0827 (at left hand margin), LAPAC reports paying Christian Family Renewal $800 for pro-life fundraising ads. We request that you investigate this matter further. If the $800 payment was for the fundraising letter enclosed with my original materials, this indicates that "Let's All Protect a Child Fund" was not a tax deductible project of Christian Family Renewal but really a fraudulent attempt to raise tax deductible money through a $501(c)(3) organization and then transfer such funds to a political committee.

It occurs to me that the $800 payment may be an attempt to sanitize the transactions by characterizing it as an ad for LAPAC. Such after-the-fact cosmetic work is not permissable. It does not make the letter any less fraudulent and clearly destroys the basis for tax deductions by the individual contributors.

You should also be alert to other possible illegalities. If the letter was mailed on LAPAC's behalf under the bulk mail permit of Christian Family Renewal, that is a violation of the Post Office

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regulations. The F.E.C. is investigating whether or not LAPAC may solicit contributions from the general public or whether its close relationship to National Right to Life Committee limits it to soliciting funds only from NRLC members. Accordingly, the whole solicitation my violate another federal statute.

I trust you will investigate this matter carefully.

Sincerely,

Gail H. Harmon

Gail H. Harmon

GHH/dmw
Enclosures

cc: Karen Mulhauser
Harriet Matthews

8204032 1424

HAND DELIVERED

FOR FORM 3
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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 Running Federal Matching Fund)

HAND DELIVERED
FEDERAL ELECTION COMMISSION
APR 16 PM 2:50

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 Life Amendment Political Action Comm. Inc.
(Name of Candidate or Committee (in full))
PO Box 14263 Ben Franklin Stn.
(Address (number and street))
Washington DC 20044
(City, State and ZIP Code)

2 I.D. No. C0008.2297
(Candidate/Committee)

3 -
(Office Sought, State/District (if applicable))

☐ Check if address is different than previously reported.

Year of Election 1979

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)

☐ Tenth day report preceding _____ election (primary, general or convention) on _____ (date) in the State of _____
☐ Thirtieth day report following _____ election (primary, general or convention) on _____ (date) in the State of _____

☐ 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 1/1/79 Through 3/31/79

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 79		$ 1194.21
7 Cash on hand at beginning of reporting period	$ 1194.21	
8 Total receipts (from line 19)	$ 51561.73	$ 51561.73
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	$ 52755.94	$ 52755.94
9 Total expenditures (from line 28)	$ 51306.08	$ 51306.08
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	$ 1449.86	$ 1449.86
11 Value of committed 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)	$ 6,000 ~~	

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

4-14-79
(Date)

Paul A Brown
(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (R0080)
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.

79031253909

Because your goal is the saving of human life, I am enclosing my maximum donation to help in waging the battle. Enclosed is my check made payable to LAPAC for:

☐ $200 ☐ $100 ☐ $50 ☐ $25 ☐ $15 ☐ $_____ (other)

NAME _____

ADDRESS _____ CITY _____ STATE _____ ZIP _____

PHONE _____

DATE _____ SIGNATURE _____

The Life Amendment Political Action Committee must have the support of all those who believe in pro-life. Please list below the names and addresses of any friends or associates you know would be interested in supporting LAPAC both financially and physically in its efforts to elect a pro-life congress.

NAME _____ NAME _____

ADDRESS _____ ADDRESS _____

CITY, STATE, ZIP _____ CITY, STATE, ZIP _____

NAME _____ NAME _____

ADDRESS _____ ADDRESS _____

CITY, STATE, ZIP _____ CITY, STATE, ZIP _____

Please return this list with your donation in the enclosed postage-paid envelope.

0 2 0 4 0 3 2 1 4 2 6

FIRST CLASS
PERMIT NO. 448
Washington, D.C.

BUSINESS REPLY MAIL
No postage stamp necessary if mailed in the United States

POSTAGE WILL BE PAID BY

LAPAC, INCORPORATED
LIFE AMENDMENT POLITICAL ACTION COMMITTEE
P. O BOX 14263 • BEN FRANKLIN STATION
WASHINGTON, D C 20044

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

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD FROM:	TO:
Life Amendment Political Action Comm. INC.	1/1/79	3/31/79

RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	$ 4262.38	
(b) Unitemized	$ 421.73.35	
(c) Less: Offsets and refunds (explain above): Less by event on memo Schedule D ( )	( )	
(d) Subtotal of contributions from individuals	$ 51561.73	$ 51561.73
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committees (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	$ 51561.73	$ 51561.73

EXPENDITURES	Column A This Period	Column B Calendar Year-To-Date
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	$ 51306.08	
(b) Unitemized	$ -0-	
(c) Subtotal of operating expenditures	$ 51306.08	$ 51306.08
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 committees (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	$ 51306.08	$ 51306.08

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)	$ —

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SCHEDULE C
REVISED
January, 1990
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for Line Number 13

(Use Separate Schedules for each numbered line)

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
H H Brown 2018 Middlegrove Dr. Stafford, VA 22554 ☐ Primary ☐ General ☐ Other	7/1/78	$ 1,500	$	$ 1,500

NATURE OF OBLIGATION (Details of Debt): Loan due 6-1-79 @ 5%

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
Doris Storms 2180 Woodlawn Eugene, OR 97401 ☐ Primary ☐ General ☐ Other	7/1/78	$ 4,500	$ —	$ 4,500

NATURE OF OBLIGATION (Details of Debt): Loan due 6-1-79 @ 5%

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
☐ Primary ☐ General ☐ Other		$	$	$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	$	$	$ 6,000.00
TOTAL this period (last page this line number only)	$	$	$ 6,000.00

Carry outstanding balance only to appropriate line of summary

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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 1 of 4 for Line Number 20A

Use Separate Schedule for each numbered line

Name of Candidate or Committee in Full
Life Conservation Political Action Committee Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C.	advance postage & return mail Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	500.00
P.A. Brown P.O. Box 14263 Director Washington D.C. 20044	reference Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	2,000.00
Harolds Printing 216 - 5th Ave. Brookings, S.D.	payment on account Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	350.00
CMCA Inc. 9800 Edgeworth Ave. Capitol Heights, MD.	payment on account direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	2,000.00
Nevada Bell Reno, Nevada	phone equipment & service Expenditure for: ☐ Primary ☐ General ☐ Other	1-4-79	100.00 270.00
IBM - D.C. P.O. Box 417 Philadelphia, PA 19105	Typewriters Expenditure for: ☐ Primary ☐ General ☐ Other	1-8-79	270.00
Postmaster D.C.	advance postage fee for 1979 Expenditure for: ☐ Primary ☐ General ☐ Other	1-9-79	75.00
Postmaster D.C. 918-327	annual business fee Expenditure for: ☐ Primary ☐ General ☐ Other	1-9-79 1-9-79	35.00 30.00
SUBTOTAL of expenditures this page (optional)			$ 5630.00
TOTAL this period (last page this line number only)			$

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FORM F3
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 20b, 21a, and 22b, 22c, and 23c of FEC FORM 3

Page ✓ of 14 207

Use Separate Schedule 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	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Columbia Travel 910 Nat. Press Bldg Washington, D.C.	Air Fare - expense	☐ Primary ☐ General ☐ Other	1-11-79	569.00
Instaprint 1850 K. St. N.W. Washington, D.C.	Newsletter	☐ Primary ☐ General ☐ Other	1-12-79	95.55
Columbia Travel 910 Nat. Press Bldg. Washington. D.C.	air fare	☐ Primary ☐ General ☐ Other	1-16-79	90.00
Jim Dager P. O. Box 109 Roanoke Hall Washington, D.C. 20064	professional services	☐ Primary ☐ General ☐ Other	1-16-79	43.50
Master Charge Bank of Va Richmond, VA	travel expense	☐ Primary ☐ General ☐ Other	1-17-79	200.00
~~Dusty Point~~ Jim Dager P.O. Box 109 Roanoke Hall Washington, D.C. 20064	professional services	☐ Primary ☐ General ☐ Other	1-22-79	55.00
cash	Human Life Amendment petitions - questionnaires fee for above	☐ Primary ☐ General ☐ Other	1-22-79	150.00
Barbara Broody Goodly Printing Form Lincoln, VA 324-338	professional services	☐ Primary ☐ General ☐ Other	1-23-79	545.00
SUBTOTAL of expenditures this page (optional)				✓ $ 1948.55
TOTAL this period (last page this line number only)				$

FEC FORM 3
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 20b, 21b, and 22b, 23b, and 26b of FEC FORM 3

Page 3 of 14
Line Number 26b

(Use Separate Schedule(s) 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
Postmaster D.C.	stamps Expenditure for: ☐ Primary ☐ General ☐ Other	1-23-79	200 00
Southern Office Supply VIRGINIA	Envelopes Expenditure for: ☐ Primary ☐ General ☐ Other	1-29-79	129.21
Cd I Telephone D.C.	Telephone expense Expenditure for: ☐ Primary ☐ General ☐ Other	1-31-79	284.23
Insta Print 1850 K St, N.W. Wash, D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-1-79	259.94
Jim Dager P.O. Box 109 Reader Hall Wash. D.C.	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	2-1-79	46.50
P.A. Brown P.O. Box 14263 Washington DC 20044	retainer Expenditure for: ☐ Primary ☐ General ☐ Other	2-2-79	1,500 00
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-5-79	77 00
Jim Dager P.O Box 109 Reader Hall Washington D.C. 20064 351-3116	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-6-79	72.00
SUBTOTAL of expenditures this page (optional)			$ 3568.88
TOTAL this period (last page this line number only)			$

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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 4 of 4 for Line Number 20c
(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full
Right Amendment Political Victory Committee Inc.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Barbara Broody Creek Crossing Farms Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-8-79	250 00
Postmaster D. C.	advance postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-6-79	150 00
Barbara Broody Creek Crossing Farms Lincoln, VA	expenses Expenditure for: ☐ Primary ☐ General ☐ Other	2-8-79	20 00
P.A. Brown P.O. Box 14263 Washington, D.C.	retainer Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	500 00
Insta Print 0185-0 K. Street, N.W. Washington, D.C.	supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	38.22
National Press Bldg. 710 Nat. Press Bldg Washington, D.C.	rent Expenditure for: ☐ Primary ☐ General ☐ Other	2-9-79	415.60
cash	envelope stuffing Expenditure for: ☐ Primary ☐ General ☐ Other	2-6-79	70 00
Nellie Wilson Suite 341 Nat. Press Bldg. Washington D.C. 347-354	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-12-79	100 00
SUBTOTAL of expenditures this page (optional)			$ 1543.82
TOTAL this period (last page this line number only)			$

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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 5 of 11
Line Number 22a

(Use Separate Schedule for each numbered line)

Name of Candidate or Committee in Full
Equal 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
Southern office Supply	supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-12-79	13.67
Insta Print 1850 K. St. N.W. Wash. D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-13-79	45.89
J. Jim Dogar P.O. Box 109 Reardon Hall U. of D. of C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-13-79	74 00
Devol ~~Director~~ Funeral Home 2222 Wisconsin Ave. Wash, D.C.	funeral expense. Baby Elizabeth PEACE. Alcohol Baby shown to NOW Meeting Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	100 00
Mount Olivette Funeral Home Bladensburg Rd, N.E. Washington, D.C.	cemetary plot - Baby Elizabeth PEACE Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	70 00
Columbia Travel #910 NAT'L PRESS BLDG. WASHINGTON, DC 20045	Air B-e Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	996.25
Postmaster - D.C. Wash, D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	200 00
CMCA 8800 Edgeworth Ave. Capitol Heights, MD.	postage & mailing Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	6,300 00
355-363 SUBTOTAL of expenditures this page (optional)			$ 7769.81
TOTAL this period (last page this line number only)			$

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FEC FORM 3
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 20b, 21a, and 22b, 22c of FEC FORM 3

Page 6 of 6 for Line Number 23

(Use Separate Schedule 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
Sean M. Rooney 2155 Howard Dr. Sparks, NE 89431	expense reimbursement Expenditure for: ☐ Primary ☐ General ☐ Other	2-16-79	1,000 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Degar P.O. Box 769 Reardon Hall D.C. 20064	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-21-79	90 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Columbia Travel 910 Nat. Press Bldg. Wash, D.C.	travel expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	81 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Continental Telephone (13½ St., N.W. Washington, D.C.	telephone expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	170.53
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Barbara Baroody Creek Crossing Farm Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	500 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Book of States	Book Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	21.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
IBM P.O. Box 413 Philadelphia, PA	typewriter rental Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	105 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Printing Shop of Kensington 3831 Plyers Mill Rd. Kensington, MD. 384-3711	paper supplies Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	112.53
SUBTOTAL of expenditures this page (optional)			$ 2080.06
TOTAL this period (last page this line number only)			$

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FEC FORM 3
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 23a of FEC FORM 3

Use Separate Schedule 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
P.A. Brown P.O. Box 14263 Washington, D.C.	Travel expense Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	200 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D. of C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	300 00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Insta Print 1850 K. St., N.W. D.C.	printing Expenditure for: ☐ Primary ☐ General ☐ Other	2-22-79	97.03
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Jim Dager Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-24-79	166.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dan Shields Box 109 Reardon Hall D.C	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-27-79	31.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Dennis DeKlerk Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	2-27-79	31.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	2-28-79	100 26
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster D.C. 372-379	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-1-79	200 00
SUBTOTAL of expenditures this page (optional)			$ 1126.03
TOTAL this period (last page this line number only)			$

FEC FORM 3
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 9 of 11 for Line Number 20A

Use Separate Schedule 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	Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
U.P.S.	parcel postage	☐ Primary ☐ General ☐ Other	3-2-79	42.48
Barbara Baroody Creek Crossing Farm Lincoln, VA	professional services	☐ Primary ☐ General ☐ Other	3-2-79	500.00
P.A. Brown P.O. Box 14263 D.C.	consulting fee	☐ Primary ☐ General ☐ Other	3-2-79	1,500.00
Liz McCulley Box 109 Reardon Hall D.C.	professional services	☐ Primary ☐ General ☐ Other	3-2-79	28.00
Jim Deger Box 109 Reardon Hall D.C.	professional services	☐ Primary ☐ General ☐ Other	3-6-79	113.10
C&P Telephone 13th St., N.W. D.C.	phone expense	☐ Primary ☐ General ☐ Other	3-6-79	1042.55
Insta Print 1850 K St N.W. D.C.	printing	☐ Primary ☐ General ☐ Other	3-6-79	3.50
Postmaster D.C. 380-389	express mail	☐ Primary ☐ General ☐ Other	3-7-79	10.84
SUBTOTAL of expenditures this page (optional)				$ 3240.47
TOTAL this period (last page this line number only)				$

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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 20b, 21b, and 22b, 23b, and 23c of FEC FORM 3

Page 9 of 47
Line Number

Use Separate Schedule(s) for each numbered line)

Name of Candidate or Committee in Full
Life Amendment Political Victory Committee Fun.

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure / Expenditure for:	Date (month, day, year)	Amount of each expenditure this period
Dennis Doblock Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-8-79	38.25
Dan Sleight Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-8-79	24.00
Postmaster D.C.	stamps Expenditure for: ☐ Primary ☐ General ☐ Other	3-9-79	70.00
P.A. Brown P.O. Box 14263 Washington, D.C.	consulting fee Expenditure for: ☐ Primary ☐ General ☐ Other	3-9-79	500.00
Jack Polikan 1347 Newton St. D.C. 20017	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-9-79	24.00
Jim Doger Box 109 Reardon Hall D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	149.00
Barbara Baroody Creek Crossing Farm Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-13-79	200.00
Postmaster- D.C. 390-397	advance postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200.00
SUBTOTAL of expenditures this page (optional)			$ 1205.25
TOTAL this period (last page this line number only)			$

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FORM E
FEC
(Rev. 1978)
2nd Revision Commission
999 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 23a of FEC FORM 3

Page 10 of 14 for Line Number 20A

Use Separate Schedule 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
Dave Osborne 2966 Avery Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	3,500 00
Nancy Osborne 2966 Avery Dr. Palm Springs, CA	30 day loan Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	3,000 00
710 Nat. Press Bldg National Press Bldg Washington, D.C.	press release Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	35 00
Postmaster D.C.	Postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 00
Drawbridge Motor Inn. Covington, KY	deposit-convention room rental Expenditure for: ☐ Primary ☐ General ☐ Other	3-15-79	200 00
Hecht Co. 7th & E. D.C.	calculator Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79 3-16-79	75.12 31.00
Nette Wilson 341 Nat. Press Bldg. Wash, D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	150 00
Don Shields Box 109 Reardon Hall 398-405 D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	76.50
SUBTOTAL of expenditures this page (optional)			$ 7257.62
TOTAL this period (last page this line number only)			$

SCHEDULE B
REVISED
June 19, 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 20b, 21b, and 22b, 23b, and 23c of FEC FORM 3

Page 11 of 14 for Line Number: 23b

Use Separate Schedule 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
Barbara Baroody Creek Crossing Farms Lincoln, VA	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	750.00
CMCA 8900 Edgeworth Capitol Heights, MD.	direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	3,500.00
Jack Politan 1347 Newton St. D.C.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	45.50
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-16-79	75.00
Barbara Baroody Creek Crossing Farms Lincoln, VA.	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-19-79	500.00
Jim Dozer Box 109 - Reardon Mill D.C.	Particulars of Expenditure professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	279.00
CMCA Inc. 8900 Edgeworth Dr. Capitol Heights, MD.	Particulars of Expenditure direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	4,000.00
Carmie Richesin 310 Nat. Press Bldg. Washington, D.C. 406-413	Particulars of Expenditure Staffing dinner Expenditure for: ☐ Primary ☐ General ☐ Other	3-20-79	50.00
SUBTOTAL of expenditures this page (optional)			$ 8199.50
TOTAL this period (last page this line number only)			$

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FEDERAL ELECTION COMMISSION
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 17 of 44 for Line Number 22a

Date Reported Reflected 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
CMCA Inc. 9901 Edgeworth Dr. Capitol Heights, MD	direct mail Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	2,500 00
Postmaster D.C.	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-21-79	100 00
Postmaster D.C.	stamps postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-22-79	200 00
UPS	postage Expenditure for: ☐ Primary ☐ General ☐ Other	3-22-79	23.60
Harolds Printing Co 216 5th Ave. Brookings, S.D. 57006	printing on account Expenditure for: ☐ Primary ☑ General ☐ Other	3-22-79	319.19
National Press Bldg 710 Nat. Press Bldg Wash, D.C.	rent Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	207 80
C & P Telephone Co. Box 2123 Wash. D.C.	Telephone Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	1609.32
Jack Pelton 414-421	professional services Expenditure for: ☐ Primary ☐ General ☐ Other	3-23-79	52.50
SUBTOTAL of expenditures this page (optional)			$ 4412.41
TOTAL this period (last page this line number only)			$

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SCHEDULE B
REVISED
January, 1979
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 20b, 21a, and 22b, 22c, and 23a of FEC FORM 3

Page 1 of 1 for Line Number

Use Separate Schedule 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
Barbara Baroody Creek Farm Crossing Lincoln, VA 22078	expenses for mail and Roger campaign - U.S. C.D. California special Election Expenditure for: ☐ Primary ☐ General ☒ Other	10-ch	$2,400
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			$
TOTAL this period (last page this line number only)			$

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CONTRIBUTOR LISTING
FOR
LAPAC

E: 04/17/79 PAGE: 1

	CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
1	MR. FRANK CAPRA PO BOX 98 LA QUINTA, CA 92253	producer La Quinta, CA	02/01/79 $250.00 QTR TOTAL YEAR TOTAL
1	MR. FELIX S. CONIG 150 STROUD AVE STATEN ISLAND, NY 10312	U.S. Postal Service Staten Island	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
4	MRS. CLARE J. DEGRAFF 2360 RIDGEWOOD SE GRAND RAPIDS, MI 49506	Housewife	02/01/79 $500.00 QTR TOTAL YEAR TOTAL
1	MR. ROBERT T. FRASER 3314 WARRINGTON RD SHAKER HEIGHTS, OH 44120		01/01/79 $200.00 QTR TOTAL YEAR TOTAL
	J. JAKUBOWSKY 68 YOUNG AVE PELHAM, NY 10803		01/01/79 $500.00 QTR TOTAL YEAR TOTAL
	MR. WILLIAM A. JUNGMANN 101 E WHEELOCK PKWY ST PAUL, MN 55117	Railroad worker St. Paul	01/01/79 $200.00 QTR TOTAL YEAR TOTAL
	MR. & MRS. EDW V. MALLON 27 PARKWAY MONTCLAIR, NJ 07042	retired	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
	MR. HERBERT F. MCVAY 12485 CONQUISTADOR WAY SAN DIEGO, CA 92128		03/01/79 $200.00 QTR TOTAL

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FOR
LAPAC

TE: 04/17/79 PAGE: 2

	CONTRIBUTOR NAME & ADDRESS	EMPLOYER	DONATION HISTORY
44	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife	01/01/79 $122.00 QTR TOTAL YEAR TOTAL
44	MRS. MARY K. ROBERTS 54 WHEELOCK ST CANAJOHARIE, NY 13317	Housewife	03/01/79 $133.40 QTR TOTAL YEAR TOTAL
34	MRS. STEPHANIE SIEGAL 412 SO HANLEY CLAYTON, MO 63105	Housewife	03/01/79 $200.00 QTR TOTAL YEAR TOTAL
J	J. VOUKUHLER 2220 W CRESCENT FLAGSTAFF, AZ 86001		03/01/79 $500.00 QTR TOTAL YEAR TOTAL
1	MR. EUGENE J. ZIEGMAN 259 PASADENA AVE ELYRIA, OH 44035		03/01/79 $250.00 QTR TOTAL YEAR TOTAL

Paul Brown, Treasurer
[illegible] Political Action Committee
[illegible]
Washington, D.C. 20045

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Quarterly & July 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

TO: _____

_____ I.D.NO.: _____

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-79 THROUGH 3-31-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Detailed Summary (Page 2) Line(s):___ Column(s):___ Totals:___ ___omitted or ___incorrect

X Schedule Totals: X disagree with Detailed Summary (Page 2) or ___omitted SEE OTHER

___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Full Name(s)/Mailing Address(es): X omitted or ___ inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Election Designation: ___omitted or ___inadequate for Schedule(s)___ Line(s)___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s)___ Line(s)___

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20a SEE PAGE THREE

___ Nature or Purpose of Receipt: ___omitted or ___inadequate for Schedule(s) ___ Line(s)___

___ Inadequate Description of: ___proceeds ___dates ___events ___location of Schedule

___ Signature: ___omitted ___inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please be advised, for future reports, that in-kind contributions should be shown on Line 22c of the Detailed Summary Page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

OCT 4 [illegible]

[illegible] AMENDMENT POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
PAGE THREE

Please clarify the entries on Schedule B, Line 28a as:

David Osborne	3-15-79	$3500	"30-Day Loan"
Nancy Osborne	3-15-79	3000	"30-Day Loan"

Please be advised that loans made by your committee should be shown on Line 21a of the Detailed Summary Page and Schedule B accordingly.

Please be further advised that in accordance with Section 104.8 of the Commission's Regulations all loans greater than $500, outstanding at the end of a reporting period, should be disclosed on Line 12 of the Summary Page and Schedule C accordingly.

Please amend your report accordingly.

[illegible]

TO: _____ D[illegible]

[illegible] I.D. NO.: [illegible]

REQUEST FOR ADDITIONAL INFORMATION FOR THE July 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 4-1-79 THROUGH 6-30-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

__X__ Detailed Summary (Page 2) Line(s): 12(b) Column(s): A Totals: X __X__ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

__X__ Full Name(s)/Mailing Address(es): __X__ omitted or ___ inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

__X__ Other: SEE PAGE FIVE

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC Form 12
(Revised November 1978)

LIFE AMENDMENT POLITICAL ACTION COMMITTEE
REQUEST FOR ADDITIONAL INFORMATION
PAGE FIVE

Please be advised that Section 104.2(b)(11) of the Commission's Regulations requires that the nature of all debts and obligations be provided. Please provide the details for the debts owed to Karl Karcher.

Please be further advised that if the above debt was a loan to your committee, then it should also be disclosed on Line 17a of the Detailed Summary Page and Schedule A accordingly.

The April 10 Quarterly Report filed by your committee reported loans to: David Osborne and Nancy Osborne. The July 10 Quarterly Report fails to show these debts owed to your committee. If these debts have been liquidated they should be listed on the appropriate schedules. If these debts are still outstanding they should be shown on Line 12 of the Summary Page and listed on Schedule C.

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1722
(1724 is blank)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 4 1978

Paul Brown, Treasurer
Life Amendment Political Action Committee
357 National Press Building
Washington, D.C. 20045

Dear Mr. Brown:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the April 10 Quarterly & July 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

0204032149

TO: [redacted] DATE: [redacted]

[redacted] I.D. NO.: [redacted]

REQUEST FOR ADDITIONAL INFORMATION FOR THE April 10 Quarterly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-79 THROUGH 3-31-79. PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___omitted or ___incorrect

X Schedule Totals: X disagree with Detailed Summary (Page 2) or ___omitted SEE OTHER

___ Date(s): ___omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

X Full Name(s)/Mailing Address(es): X omitted or ___inadequate for Schedule(s) B Line(s) 20a

___ Occupation/Principal Place(s) of Business: ___omitted or ___inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___omitted or ___inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___inadequate for Schedule(s) ___ Line(s) ___

X Nature or Purpose of Expenditure: ___ omitted or X inadequate for Schedule(s) B Line(s) 20a SEE PAGE THREE

___ Nature or Purpose of Receipt: ___omitted or ___inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___dates ___events ___location of Schedule

___ Signature: ___omitted ___inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

___ Other: Please be advised, for future reports, that in-kind contributions should be shown on Line 22c of the Detailed Summary Page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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FEC Form 12
(Revised November 1978)

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1103

Date Filmed 5/13/82 Camera No. --- 2

Cameraman SPC