



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TLR # 1107

Date Filmed 9/18/80 Camera No. --- 2

Cameraman gpc

FEDERAL ELECTION COMMISSION

Memorandum to the Commission

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 |
| ☒ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☐ (5) Internal Documents | |

Signed

Michelle D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Letter to Stephen Binder, ~~and~~ Return Receipt,
Proposed Conciliation Agreement

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):

- | | |
|--|---|
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| ☐ (5) Internal Documents | |

Signed

Michele D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Letter from Richard L. Gundersen

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- | | |
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Signed

Michelle D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Certification 7/24/80

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):

- | | |
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Signed

Michelle D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Interim Investigative Report

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):

- | | |
|--|---|
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Signed

Michelle D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Letter to James Anderson

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- | | |
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Signed

Michelle D. Brown

date

8/21/00

FEDERAL ELECTION COMMISSION

Letter to Steven Binder

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Signed

Michelle D. Brown

date

8/21/80

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Certification 6/19/80

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 |
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| ☐ (5) Internal Documents | |

Signed

Michelle D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Memorandum from Majette Emmons to Charles N. Steele

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):

- | | |
|--|---|
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Signed

Michele D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Memorandum to the Commission

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Signed

Michelle D. Brown

date

8/21/80

FEC 9-21-77

FEDERAL ELECTION COMMISSION

Memorandum from Marjorie Emmons to Charles W. Stale

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):

- | | |
|--|---|
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| ☐ (5) Internal Documents | |

Signed Michelle D. Brown
date 8/21/80

00040210817

FEDERAL ELECTION COMMISSION

Letter from Steven Binder

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- | | |
|--|---|
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| ☐ (5) Internal Documents | |

Signed

Michele D. Brown

date

8/21/80

FEDERAL ELECTION COMMISSION

Letter from James Anderson

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Signed

Michelle D. Brown

date

8/21/80

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

OGC

● 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: *Stephen R Brink*
1200 13th Avenue
Denver, Colorado 80290

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 444772

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
AUG 25 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

AUG 25 1980

☆ GPO : 1979-288-848

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

OGC

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

1. The following service is requested (check one.)
☐ Show to whom and date delivered.....
☐ Show to whom, date and address of delivery.....
☐ RESTRICTED DELIVERY
 Show to whom and date delivered.....
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery.\$.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *James Johnson*
730 - Seventeenth St
Denver, Colorado 80202

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 445474

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
AUG 24 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

AUG 24 1980

☆ GPO : 1979-288-848



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James M. Anderson, Treasurer
C.M.B.D.A. Political Action Committee
730 Seventeenth Street
Suite 840
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Anderson:

On August 19, 1980, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441b(a). Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles M. Steele
General Counsel

Enclosure

Conciliation Agreement

10821

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James M. Anderson, Treasurer
C.M.B.D.A. Political Action Committee
730 Seventeenth Street
Suite 840
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Anderson:

On , 1980, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441b(a). Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

m6/8/20/80

RECEIVED

909261

BEFORE THE FEDERAL ELECTION COMMISSION

JUL 25 PM 1:00

30 JUL 25 P2:44

5064

CERT. MAIL

In the Matter of)

Colorado Municipal Bond Dealers)
Association Political Action)
Committee)

MUR 1107

CONCILIATION AGREEMENT

This matter has been initiated by the Federal Election Commission (hereinafter "the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities and an investigation has been conducted after the Commission found reason to believe that Colorado Municipal Bond Dealers Association Political Action Committee ("Respondent") violated 2 U.S.C. §441b(a) by accepting a corporate contribution from the Colorado Municipal Bond Dealers Association, Inc.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding and this agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- 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:

2. Respondent received \$3,510 from CMBDA.
3. Respondent contributed \$1,000 for the primary election and \$500 for the general election to federal candidate Senator Haskell, \$1,000 for the primary election and \$500 for the general election to federal candidate Senator Armstrong, and \$500 to state candidate Tom Wiens. Ten dollars were used for administrative expenses.
4. \$3,000 of CMBDA's contribution to Respondent was used in connection with a federal election in violation of 2 U.S.C. § 441b(a).

WHEREFORE, Respondent agrees:

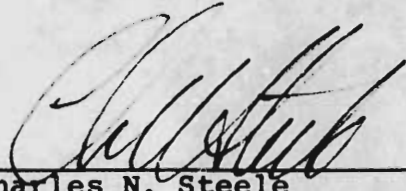
- V. Respondent received \$3,000 from CMBDA in violation of 2 U.S.C. § 441b(a).
- VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of *Ten hundred & Fifty dollars* ~~five hundred dollars~~ *\$250* ~~(\$500)~~, pursuant to 2 U.S.C. § 437g(a)(5)(A).
- VII. Respondent agrees that it shall not undertake any activity in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

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

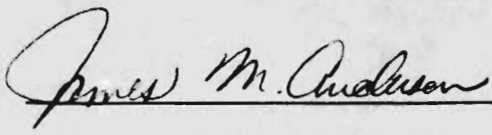
- IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.
- X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective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

20 August 1980
Date



Charles N. Steele
General Counsel
Federal Election Commission

July 20, 1980
Date



BY: CMBDA P.A.C.
ITS: Treasurer

00040010825



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stephen D. Binder, Vice President
E.F. Hutton and Company, Inc.
Terrace Building
1200 Broadway
Denver, Colorado 80290

Re: MUR 1107

Dear Mr. Binder:

On August 19, 1980, the Commission accepted the conciliation agreement signed by Richard L. Gunderson and the civil penalty in settlement of a violation of 2 U.S.C. § 441b(a). Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stephen D. Binder, Vice President
E.F. Hutton and Company, Inc.
Terrace Building
1200 Broadway
Denver, Colorado 80290

Re: NUR 1107

Dear Mr. Binder:

On , 1980, the Commission accepted the conciliation agreement signed by Richard L. Gunderson and the civil penalty in settlement of a violation of 2 U.S.C. § 441b(a). Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Conciliation Agreement

mb 8/20/80

'80 JUL 16 PM 12:54

In the Matter of)
)
Colorado Municipal Bond Dealers) MUR 1107
Association Inc.)

This matter has been initiated by the Federal Election Commission (hereinafter "the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities and an investigation has been conducted after the Commission found reason to believe that Colorado Municipal Bond Dealers Association, Inc. ("Respondent") violated 2 U.S.C. §441b(a) by making a corporate contribution to the Colorado Municipal Bond Dealers Association Political Action Committee.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding and this agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- 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, Colorado Municipal Bond Dealers Association, Inc. was a corporation during 1978 although its corporate status had been suspended.
2. Respondent contributed \$3,510 to its separate segregated fund, the Colorado Municipal Bond Dealers Association Political Action Committee ("CMBDA PAC"). CMBDA PAC contributed \$1,000 for the primary election and \$500 for the general election to federal candidate Senator Haskell, \$1,000 for the primary election and \$500 for the general election to federal candidate Senator Armstrong, and \$500 to state candidate Tom Wiens. Ten dollars were used for administrative expenses.
3. \$3,000 of Respondent's contribution to CMBDA PAC was used in connection with a federal election in violation of 2 U.S.C. § 441b(a).
4. Respondent's corporate status was revoked on January 1, 1979.

WHEREFORE, Respondent agrees:

- V. Respondent contributed \$3,000 to CMBDA PAC in violation of 2 U.S.C. § 441b(a).
- VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of ^{two hundred and fifty} ~~five hundred~~ dollars (\$²⁵⁰~~500~~), pursuant to 2 U.S.C. § 437g(a)(5)(A).
- VII. 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.

GENERAL CONDITIONS

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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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

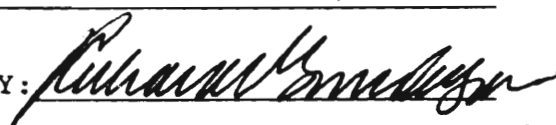
20 August 1980
Date



Charles N. Steele
General Counsel
Federal Election Commission

July 11, 1980
Date

COLORADO MUNICIPAL BOND
DEALERS ASSOCIATION, INC.

BY: 

ITS: President & Chairman

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1107
Colorado Municipal Bond Dealers)
Association Political Action)
Committee)
Colorado Municipal Bond Dealers)
Association Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 19, 1980 the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1107:

1. Approve the conciliation agreement as attached to the General Counsel's August 12, 1980 memorandum.
2. CLOSE THE FILE on this matter.
3. Allow the Colorado Municipal Bond Dealers Association Political Action Committee to terminate its reporting requirements.
4. Approve and authorize the sending of the letters to the respondents, as attached to the above-named memorandum.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche voted affirmatively for the actions.

Attest:

8-19-80
Date

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

Received in Office of the Commission Secretary: 8-12-80, 11:25
Circulated on a tally vote basis: 8-12-80, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen D. Binder, President
Colorado Municipal Bond Dealers
Association, Inc.
828 Seventeenth Street
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Binder:

The Federal Election Commission notified you in a surface violation letter dated April 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission, the Commission determined, on March 20, 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

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.

Letter to: Stephen D. Binder

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosure

Notification of Reason to Believe Finding

75 Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
Stephen Binder

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *9441065* CERTIFIED NO. INSURED NO.

4. I have received the article described above
 SIGNATURE ☐ Addressee ☐ Authorized agent
Stephen Binder

5. ADDRESS (Complete only if requested)
 DATE OF DELIVERY *4-3-80*

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS
1980 APR 3

Michele 1107-7M. Brown

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE MAR 29 1980 MUR NO. 1107
RESPONDENT Colorado Municipal Bond Dealers Assoc., Inc., Colorado Municipal Bond Dealers Assoc. Political Action Committee STAFF MEMBER(S) & TEL. NO. Michele D. Brown
(202) 523-4175

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On December 21, 1979, the Reports Analysis Division referred this matter to the Office of General Counsel indicating that the Colorado Municipal Bond Dealers Association, Inc. (CMBDA), had made a corporate contribution of \$3,510 to the Colorado Municipal Bond Dealers Association Political Action Committee (CMBDA PAC).

FACTUAL BASIS AND LEGAL ANALYSIS

On August 18, 1978, CMBDA PAC received \$3,010 from CMBDA. CMBDA PAC contributed \$1,500 each to Senator Haskell on August 21, 1978, and Senator William Armstrong on September 7, 1978, designating \$1,000 for the primary elections and \$500 for the general elections. An unitemized operating expenditure of \$9.65 was listed on the October 10 Quarterly Report. On November 16, 1978, CMBDA PAC received \$500 from CMBDA. This amount was contributed to the Tom Wiens for State Treasurer Committee on November 9, 1978. An unitemized receipt of \$.15 and an unitemized operating expenditure of \$.50 were listed on the 30 Day Post General Report.

The Reports Analysis Division sent a surface violation letter to CMBDA PAC on March 8, 1979, stating that corporate contributions are prohibited by the Federal Election Campaign Act and recommending that, if the Committee had accepted corporate contributions, the

funds should be refunded immediately. The treasurer responded by saying that CMBDA was not a corporation at the time the contribution was made because its corporate status had been suspended and that CMBDA was a trade organization with CMBDA PAC as its separate segregated fund.

In checking with the Corporate Division of the Secretary of State's Office in Colorado, it was determined that for a corporation to maintain its status, it must file a corporate report along with a fee every other year. If the report is not filed, then the corporation's corporate status is suspended. If, within three years, the corporation wishes to be reinstated, it must file the corporate report and pay a penalty and a reinstatement fee. If this is not done within three years, the corporation is dissolved.

At the time of the contributions to CMBDA PAC, the corporate status of CMBDA had been suspended. On January 1, 1979, the corporation was dissolved.

Although CMBDA PAC did not file an amended Statement of Organization, James M. Anderson, the committee's treasurer, did state in a letter dated November 15, 1979, that CMBDA is the connected organization of CMBDA PAC. The Reports Analysis Division accepted this letter as adequate notification of CMBDA PAC's wish to amend its status.

If CMBDA is a corporation and CMBDA PAC is its separate segregated fund, then under 2 U.S.C. § 441b(b)(2)(C), CMBDA may provide funds for "the establishment, administration, and solicitation of contributions to a separate segregated fund." Of the \$3,010 contribution to CMBDA PAC by CMBDA, only \$10 was used for unitemized operating expenses. The \$3,000 which CMBDA PAC received was contributed by CMBDA PAC to federal candidates, Senators Haskell and Armstrong.^{1/} Therefore, CMBDA may have violated 2 U.S.C. § 441b(a) by contributing \$3,000 to CMBDA PAC and CMBDA PAC may have violated the same section by accepting the contribution.

If CMBDA is not a corporation, it would fall within the definition of a political committee (2 U.S.C. § 431(d)) and would be in violation of 2 U.S.C. §§ 433 and 434 for its failure to file a Statement of Organization and to file required disclosure

^{1/} The \$500 contribution to CMBDA PAC which was subsequently contributed to the Tom Wiens for State Treasurer Committee is not included in the figure because in Colorado corporations may contribute to State candidates.

reports with the Commission. There would be no violation of 2 U.S.C. § 441a(a)(1)(c) as CMBDA's contributions to CMBDA PAC were less than \$5,000. If CMBDA has corporate members and if corporate monies (dues, membership fees, etc.) were commingled with monies contributed to CMBDA PAC a 2 U.S.C. § 441b(a) violation would have occurred.

It is the opinion of the Office of General Counsel that CMBDA was a corporation when it contributed to CMBDA PAC and was in violation of 2 U.S.C. § 441b(a), even though its corporate status had been suspended. To suspend, as defined in Black's Law Dictionary, is "to discontinue temporarily, but with an expectation or purpose of resumption." At the time of the contribution, CMBDA's corporate status could have been reinstated by filing a corporate report and paying a penalty and reinstatement fee. This was a possibility until January 1, 1979, at which time the corporation was dissolved.

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe that Colorado Municipal Bond Dealers Association, Inc., violated 2 U.S.C. § 441b(a) by making a corporate contribution to Colorado Municipal Bond Dealers Political Action Committee, and;
2. reason to believe that Colorado Municipal Bond Dealers Political Action Committee violated 2 U.S.C. § 441b(a) by accepting the contribution.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen D. Binder, President
Colorado Municipal Bond Dealers
Association, Inc.
828 Seventeenth Street
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Binder:

The Federal Election Commission notified you in a surface violation letter dated April 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

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.

00040010837

Page 2

Letter to: Stephen D. Binder

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Enclosure

Notification of Reason to Believe Finding

mb 3/24/80



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James M. Anderson, Treasurer
Colorado Municipal Bond Dealers
Association Political Action
Committee
730 Seventeenth Street
Suite 840
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Anderson:

The Federal Election Commission notified you in the surface violation letter dated March 8, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on March 20, 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the 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.

Letter to: James M. Anderson

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Robert O. Tiernan

ROBERT O. TIERNAN
Chairman

Enclosure

Notification of Reason to Believe Finding

US Form 3811, Aug. 1978

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

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

2. ARTICLE ADDRESSED TO:
James M. Anderson

3. ARTICLE DESCRIPTION: REGISTERED NO. *644260* CERTIFIED NO. INSURED NO.

4. I have received the article described above:
 SIGNATURE *James M. Anderson* ☐ Addressee ☐ Authorized agent
 (Always obtain signature of addressee or agent)

5. ADDRESS (Complete only if requested):
 DATE OF DELIVERY *3-28-80*
 POSTMARK *CO MAINE 28 MAR 1980*

6. UNABLE TO DELIVER BECAUSE:

Michele D. Brown

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE MAR 11 1980 MUR NO. 1107
RESPONDENT Colorado Municipal Bond Dealers Assoc., Inc., Colorado Municipal Bond Dealers Assoc. Political Action Committee STAFF MEMBER(S) & TEL. NO. Michele D. Brown (202) 523-4175

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On December 21, 1979, the Reports Analysis Division referred this matter to the Office of General Counsel indicating that the Colorado Municipal Bond Dealers Association, Inc. (CMBDA), had made a corporate contribution of \$3,510 to the Colorado Municipal Bond Dealers Association Political Action Committee (CMBDA PAC).

FACTUAL BASIS AND LEGAL ANALYSIS

On August 18, 1978, CMBDA PAC received \$3,010 from CMBDA. CMBDA PAC contributed \$1,500 each to Senator Haskell on August 21, 1978, and Senator William Armstrong on September 7, 1978, designating \$1,000 for the primary elections and \$500 for the general elections. An unitemized operating expenditure of \$9.65 was listed on the October 10 Quarterly Report. On November 16, 1978, CMBDA PAC received \$500 from CMBDA. This amount was contributed to the Tom Wiens for State Treasurer Committee on November 9, 1978. An unitemized receipt of \$.15 and an unitemized operating expenditure of \$.50 were listed on the 30 Day Post General Report.

The Reports Analysis Division sent a surface violation letter to CMBDA PAC on March 8, 1979, stating that corporate contributions are prohibited by the Federal Election Campaign Act and recommending that, if the Committee had accepted corporate contributions, the

funds should be refunded immediately. The treasurer responded by saying that CMBDA was not a corporation at the time the contribution was made because its corporate status had been suspended and that CMBDA was a trade organization with CMBDA PAC as its separate segregated fund.

In checking with the Corporate Division of the Secretary of State's Office in Colorado, it was determined that for a corporation to maintain its status, it must file a corporate report along with a fee every other year. If the report is not filed, then the corporation's corporate status is suspended. If, within three years, the corporation wishes to be reinstated, it must file the corporate report and pay a penalty and a reinstatement fee. If this is not done within three years, the corporation is dissolved.

At the time of the contributions to CMBDA PAC, the corporate status of CMBDA had been suspended. On January 1, 1979, the corporation was dissolved.

Although CMBDA PAC did not file an amended Statement of Organization, James M. Anderson, the committee's treasurer, did state in a letter dated November 15, 1979, that CMBDA is the connected organization of CMBDA PAC. The Reports Analysis Division accepted this letter as adequate notification of CMBDA PAC's wish to amend its status.

If CMBDA is a corporation and CMBDA PAC is its separate segregated fund, then under 2 U.S.C. § 441b(b)(2)(C), CMBDA may provide funds for "the establishment, administration, and solicitation of contributions to a separate segregated fund." Of the \$3,010 contribution to CMBDA PAC by CMBDA, only \$10 was used for unitemized operating expenses. The \$3,000 which CMBDA PAC received was contributed by CMBDA PAC to federal candidates, Senators Haskell and Armstrong.^{1/} Therefore, CMBDA may have violated 2 U.S.C. § 441b(a) by contributing \$3,000 to CMBDA PAC and CMBDA PAC may have violated the same section by accepting the contribution.

If CMBDA is not a corporation, it would fall within the definition of a political committee (2 U.S.C. § 431(d)) and would be in violation of 2 U.S.C. §§ 433 and 434 for its failure to file a Statement of Organization and to file required disclosure

^{1/} The \$500 contribution to CMBDA PAC which was subsequently contributed to the Tom Wiens for State Treasurer Committee is not included in the figure because in Colorado corporations may contribute to State candidates.

reports with the Commission. There would be no violation of 2 U.S.C. § 441a(a)(1)(c) as CMBDA's contributions to CMBDA PAC were less than \$5,000. If CMBDA has corporate members and if corporate monies (dues, membership fees, etc.) were commingled with monies contributed to CMBDA PAC a 2 U.S.C. § 441b(a) violation would have occurred.

It is the opinion of the Office of General Counsel that CMBDA was a corporation when it contributed to CMBDA PAC and was in violation of 2 U.S.C. § 441b(a), even though its corporate status had been suspended. To suspend, as defined in Black's Law Dictionary, is "to discontinue temporarily, but with an expectation or purpose of resumption." At the time of the contribution, CMBDA's corporate status could have been reinstated by filing a corporate report and paying a penalty and reinstatement fee. This was a possibility until January 1, 1979, at which time the corporation was dissolved.

Based on the foregoing analysis, the Federal Election Commission has found:

1. reason to believe that Colorado Municipal Bond Dealers Association, Inc., violated 2 U.S.C. § 441b(a) by making a corporate contribution to Colorado Municipal Bond Dealers Political Action Committee, and;
2. reason to believe that Colorado Municipal Bond Dealers Political Action Committee violated 2 U.S.C. § 441b(a) by accepting the contribution.

60040210843



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James M. Anderson, Treasurer
Colorado Municipal Bond Dealers
Association Political Action
Committee
730 Seventeenth Street
Suite 840
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Anderson:

The Federal Election Commission notified you in the surface violation letter dated March 8, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on , 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the 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.

Page 2

Letter to: James M. Anderson

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Enclosure

Notification of Reason to Believe Finding

mb 3/24/80

40040210845

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1107
Colorado Municipal Bond Dealers	)	
Association, Inc.	)	
Colorado Municipal Bond Dealers	)	
Association Political Action	)	
Committee	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 20, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1107:

1. Find REASON TO BELIEVE that Colorado Municipal Bond Dealers Association, Inc., violated 2 U.S.C. §441b(a) by making a corporate contribution to Colorado Municipal Bond Dealers Association Political Action Committee.
2. Find REASON TO BELIEVE that Colorado Municipal Bond Dealers Association Political Action Committee violated 2 U.S.C. §441b(a) by accepting a corporate contribution from the Colorado Municipal Bond Dealers Association, Inc.
3. Approve and send the letters to the Colorado Municipal Bond Dealers Association, Inc., and the Colorado

(Continued)

CERTIFICATION

Page 2

MUR 1107

First General Counsel's Report

Dated: March 10, 1980

Municipal Bond Dealers Association
Political Action Committee as attached
to the above-named report.

Attest:

3/20/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 3-10-80, 10:26
Circulated on 48 hour vote basis: 3-10-80, 4:00

60040010847



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

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

DATE: MARCH 12, 1980

SUBJECT: ADDITIONAL OBJECTION TO MUR 1107 - First
General Counsel's Report dated 3-10-80

You were notified at 12:55 this date of an objection
by Commissioner Aikens to the above-named document.

Commissioner Friedersdorf has also submitted an
objection.

00040010848



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

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

DATE: MARCH 12, 1980

SUBJECT: OBJECTION - MUR 1107 - First General
Counsel's Report dated 3-10-80; Received
in OCS 3-10-80, 10:26

The above-named document was circulated on a 48
hour vote basis at 4:00, March 10, 1980.

Commissioner Aikens submitted an objection at
11:41, March 12, 1980, thereby placing MUR 1107 on the
Executive Session Agenda for Tuesday, March 18, 1980.

March 10, 1960

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1107

Please have the attached First GC Report on MUR 1107
distributed to the Commission on a 48 hour tally basis.
Thank you.

0004010850

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

9-10-80

MUR # 1107

STAFF MEMBER(S)

M. Brown

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Colorado Municipal Bond Dealers Association, Inc.
Colorado Municipal Bond Dealers Association
Political Action Committee

RELEVANT STATUTE: 2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: Colorado Municipal Bond Dealers Association
Political Action Committee

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On December 21, 1979, the Reports Analysis Division referred this matter to the Office of General Counsel indicating that the Colorado Municipal Bond Dealers Association, Inc. (CMBDA), had made a corporate contribution of \$3,510 to the Colorado Municipal Bond Dealers Association Political Action Committee (CMBDA PAC). The RAD referral is included as Attachment 1.

RECEIVED
MAR 10 10:26

FACTUAL AND LEGAL ANALYSIS

On August 18, 1978, CMBDA PAC received \$3,010 from CMBDA. CMBDA PAC contributed \$1,500 each to Senator Haskell on August 21, 1978, and Senator William Armstrong on September 7, 1978, designating \$1,000 for the primary elections and \$500 for the general elections. An unitemized operating expenditure of \$9.65 was listed on the October 10 Quarterly Report. On November 16, 1978, CMBDA PAC received \$500 from CMBDA. This amount was contributed to the Tom Wiens for State Treasurer Committee on November 9, 1978. An unitemized receipt of \$.15 and an unitemized operating expenditure of \$.50 were listed on the 30 Day Post General Report.

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In checking with the Corporate Division of the Secretary of State's office in Colorado, it was determined that for a corporation to maintain its status, it must file a corporate report along with a fee every other year. If the report is not filed, then the corporation's corporate status is suspended. If, within three years, the corporation wishes to be reinstated, it must file the corporate report and pay a penalty and a reinstatement fee. If this is not done within three years, the corporation is dissolved.

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^{1/} The \$500 contribution to CMBDA PAC which was subsequently contributed to the Tom Wiens for State Treasurer Committee is not included in the figure because in Colorado, corporations may contribute to State candidates.

If CMBDA is not a corporation, it would fall within the definition of a political committee (2 U.S.C. § 431(d)) and would be in violation of 2 U.S.C. §§ 433 and 434 for its failure to file a Statement of Organization and to file required disclosure reports with the Commission. There would be no violation of 2 U.S.C. § 441a(a)(1)(c) as CMBDA's contributions to CMBDA PAC were less than \$5,000. If CMBDA has corporate members and if corporate monies (dues, membership fees, etc.) were commingled with monies contributed to CMBDA PAC a 2 U.S.C. § 441b(a) violation would have occurred.

It is the opinion of the Office of General Counsel that CMBDA was a corporation when it contributed to CMBDA PAC and was in violation of 2 U.S.C. § 441b(a), even though its corporate status had been suspended. To suspend, as defined in Black's Law Dictionary, is "to discontinue temporarily, but with an expectation or purpose of resumption." At the time of the contribution, CMBDA's corporate status could have been reinstated by filing a corporate report and paying a penalty and reinstatement fee. This was a possibility until January 1, 1979, at which time the corporation was dissolved.

Recommendations

1. Find reason to believe that Colorado Municipal Bond Dealers Association, Inc., violated 2 U.S.C. § 441b(a) by making a corporate contribution to Colorado Municipal Bond Dealers Association Political Action Committee.

2. Find reason to believe that Colorado Municipal Bond Dealers Association Political Action Committee violated 2 U.S.C. § 441b(a) by accepting a corporate contribution from the Colorado Municipal Bond Dealers Association, Inc.

3. Approve and send the attached letters to the Colorado Municipal Bond Dealers Association, Inc., and the Colorado Municipal Bond Dealers Association Political Action Committee.

Attachments

1. RAD Referral
2. Letter from CMBDA PAC's treasurer
3. Letters to respondents
4. Notification of reason to believe finding

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

D
RAD

REPORTS ANALYSIS REFERRAL SHEET

DATE December 21, 1979 ANALYST Mark Kleinman MK
TO: Office of General Counsel TEAM CHIEF Steve Mims SM
THROUGH: STAFF DIRECTOR AS COMPLIANCE REVIEW CB/ AS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS STH

CANDIDATE/COMMITTEE: CMBDA Political Action Committee
TREASURER: James Anderson
ADDRESS: 730 Seventeenth Street, Suite 840
Denver, CO 80202

ALLR 1107

AFFILIATE(S): None

ALLEGATION(S): Receipt of corporate contributions.

CITE: 2 U.S.C. 441b

ATTACHMENT(S) #2

DATE INITIATED: 3-8-79

MANNER IN WHICH REVIEW WAS INITIATED:

- ☒ Normal Review ☐ Other:
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 8-18-78 TO 12-7-78

TOTAL RECEIPTS \$ 3510 TOTAL EXPENDITURES \$ 3509

CASH ON HAND \$ 0 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: Surface Violation letter sent 3-8-79 ATTACHMENT #2
Response 3-16-79 #3
Response 4-2-79 #5
Failure to register letter sent 4-16-79 #6
Response 5-21-79 #8

CONTINUED PAGE TWO

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: 3-26-79 #4
Telecon: 5-15-79 #7
Telecon: 5-30-79 #9
Telecon: 7-19-79 #12
Telecon: 11-15-79 #13

REASON(S) FOR REFERRAL: ATTACHMENT
Exceeds threshold

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Committee has not refunded corporate contributions due to a lack of funds. It is now shown as a debt. ATTACHMENT #11
Committee wishes to terminate but may not do so until all debts are extinguished. SEE ATTACHMENT #14

Transfers in were from connected organization and used for Federal activity SEE ATTACHMENT #14
ATTACHMENT #15

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

PAGE TWO

RESULTS OF REVIEW:

Response 6-14-79
Response 11-19-79 and October 10 Quarterly
Report

ATTACHMENT

#10
#14

ATTACHMENT #1

80040210058
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978

DATE 21NOV79
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION		
		PRIMARY	GENERAL	PRIMARY	GENERAL					

CHBDA POLITICAL ACTION COMMITTEE							ID# C00102004			
CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC/ COLO MUNICIPAL										
1978 STATEMENT OF ORGANIZATION						24AUG78	4	78FEC/083/3227		
REQUEST FOR ADDITIONAL INFORMATION						18SEP78	3	78FEC/085/1862		
STATEMENT OF ORGANIZATION- AMENDMENT						26SEP78	3	78FEC/086/0892		
STATEMENT OF ORGANIZATION- AMENDMENT						7DEC78	1	78FEC/099/2742		
10 DAY PRE-PRIMARY						3,010	1,500	18AUG78 - 28AUG78	5	78FEC/083/5596
REQUEST FOR ADDITIONAL INFORMATION								18AUG78 - 28AUG78	3	79FEC/118/3703
10 DAY PRE-PRIMARY - AMENDMENT								18AUG78 - 28AUG78	2	79FEC/120/1676
OCTOBER 10 QUARTERLY						0	1,509	29AUG78 - 10OCT78	4	78FEC/091/1622
10 DAY PRE-GENERAL						500	500	10OCT78 - 23OCT78	5	78FEC/094/0581
REQUEST FOR ADDITIONAL INFORMATION								10OCT78 - 23OCT78	1	79FEC/121/3113
10 DAY PRE-GENERAL - AMENDMENT								10OCT78 - 23OCT78	2	79FEC/122/4018
30 DAY POST-GENERAL - TERMINATED						500	500	23OCT78 - 7DEC78	5	78FEC/099/2743
30 DAY POST-GENERAL - AMENDMENT								23OCT78 - 7DEC78	2	79FEC/122/4016
30 DAY POST-GENERAL - AMENDMENT								23OCT78 - 7DEC78	4	79FEC/129/1110
TOTAL						4,010	0	4,009	0	44 TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW

300401085

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 20NOV79
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CMBDA POLITICAL ACTION COMMITTEE								
CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC; COLO MUNICIPAL								
	1979 MISCELLANEOUS TRANSACTION TO F.E.C.					19MAR79	2	79FEC/122/3360
	MISCELLANEOUS TRANSACTION TO F.E.C.					2APR79	2	79FEC/122/3691
	MISCELLANEOUS TRANSACTION FROM F.E.C.					16APR79	2	79FEC/131/2280
	MISCELLANEOUS TRANSACTION TO F.E.C.					24MAY79	2	79FEC/128/0394
	MISCELLANEOUS TRANSACTION TO F.E.C.					11OCT79	2	79FEC/140/2619
	STATEMENT OF ORGANIZATION- AMENDMENT					19NOV79	1	79FEC/141/2959
	JULY 10 QUARTERLY	0		0		30NOV78 -10JUL79	3	79FEC/132/0799
	OCTOBER 10 QUARTERLY	0		0		30NOV78 -10OCT79	4	79FEC/141/2960

ID# C00102004

ALL REPORTS HAVE RECEIVED BASIC REVIEW

ATTACHMENT #2

60040210860

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

James M. Anderson, Treasurer
CMBDA Political Action Committee
624 Seventeenth Street
Denver, Colorado 80202

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General and 30 Day Post-General Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donor. These returns of the contribution should be reported immediately. The contribution should be reflected as a contribution refund on your receipts and expenditures. If the identification of the contributors to the contributions are incomplete or incorrect on the return, please submit a statement which would clarify these items for the public record. You may do so by amending the return by letter.

Please notify the Commission within fifteen
of this letter of the determination made on this
any questions concerning this matter, please do n
Mark Kleinman (800)424-9530, our Reports Analyst
local telephone number is 523-4048.

Opuntia

Orlando B. Po
Staff Director

Enclosure Certified Mail: Return Receipt Request

1. SENDER Complete items 1, 2, and 3 Add your address in the RETURN TO space on reverse							
1. The following service is requested (check one): ☐ Show to whom and date delivered c ☒ Show to whom, date, and address of delivery c ☐ RESTRICTED DELIVERY Show to whom and date delivered c ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)							
2. ARTICLE ADDRESSED TO: CMBDA Political Action Committee							
3. ARTICLE DESCRIPTION: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 5px;">REGISTERED NO.</td> <td style="width: 33%; padding: 5px;">CERTIFIED NO.</td> <td style="width: 33%; padding: 5px;">INSURED NO.</td> </tr> <tr> <td style="height: 40px; vertical-align: bottom;">438233</td> <td></td> <td></td> </tr> </table>		REGISTERED NO.	CERTIFIED NO.	INSURED NO.	438233		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.					
438233							
(Always obtain signature of addressee or agent!)							
I have received the article described above. <table style="width: 100%;"> <tr> <td style="width: 33%;">SIGNATURE</td> <td style="width: 33%; text-align: center;">☐ Addressee</td> <td style="width: 33%; text-align: center;">☐ Authorized agent</td> </tr> </table> Sarah E. Buck		SIGNATURE	☐ Addressee	☐ Authorized agent			
SIGNATURE	☐ Addressee	☐ Authorized agent					
4. DATE OF DELIVERY MAR 13 1975	POSTMARK 						
5. ADDRESS (Complete only if requested)							
6. UNABLE TO DELIVER BECAUSE:							
CLERK'S INITIALS							

NY 100-104741-104745

ATTACHMENT #3

60040210862

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full					
CMBDA Political Action Committee					
Full Name, Mailing Address and ZIP Code Colorado Municipal Bond Dealers Association, Inc. c/o Mr. Dunn Krahl 6-30-72 828 Seventeenth Street, Dv. 80202		Principal Place of Business Same		Date (month, day, year) 8/23/78	Amount of each R this Period \$500.00
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
Full Name, Mailing Address and ZIP Code		Principal Place of Business		Date (month, day, year)	Amount of each R this Period
		Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
Full Name, Mailing Address and ZIP Code		Principal Place of Business		Date (month, day, year)	Amount of each R this Period
		Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
Full Name, Mailing Address and ZIP Code		Principal Place of Business		Date (month, day, year)	Amount of each R this Period
		Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
Full Name, Mailing Address and ZIP Code		Principal Place of Business		Date (month, day, year)	Amount of each R this Period
		Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
Full Name, Mailing Address and ZIP Code		Principal Place of Business		Date (month, day, year)	Amount of each R this Period
		Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S			
SUBTOTAL of receipts (this page optional)				\$	
TOTAL this period (last page this line number only)				\$	

NOTE: THE AMOUNT SHOWN AS RECEIVED BY THE COMMITTEE ON 8-23-78
WAS AN ERROR BY THE COMMITTEE. THAT SAME AMOUNT
WAS INCLUDED IN THE \$3010 CONTRIBUTED ON 8-18-78.
REFER TO ATTACHMENT #14 FOR ADDITIONAL DETAILS.

non Commission
reet, N.W.
gion, D.C. 20463

ITEMIZED RECEIPTS

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

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

Page _____ of _____

Line Number _____

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

CMBDA Political Action Committee

Full Name, Mailing Address and ZIP Code

Colorado Municipal Bond Dealers
Association, Inc.
c/o Mr. Dunn Krah
828 Seventeenth Street
Denver, Colorado 80202

Receipt for:

☐ Primary ☐ General ☐ Other

Principal Place of Business

Same

Occupation

Date (month,
day, year)

8/18/78

Amount of each
this Period

\$3,010.00

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$ 3,010.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

SUBTOTAL of receipts this page (optional).

\$

TOTAL this period (last page this line number only).

\$

Name of Candidate or Committee in Full			
CMBDA Political Action Committee			
Full Name, Mailing Address and ZIP Code Colorado Municipal Bond Dealers Association, Inc. c/o Mr. Dunn Krahel 828 17th St., Denver, CO 80202	Principal Place of Business Same	Date (month, day, year) 11/6/78	Amount of each Receipt this Period \$500.00
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
	☐ Check if Contributor is self-employed		
Receipt for: ☐ Primary ☐ General ☐ Other	Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$ 500.00
TOTAL this period (last page this line number only)			\$ 500.00

PRESIDENT & CHAIRMAN OF THE BOARD:

Steven D. Binder
E. F. Witten & Company Inc.

VICE PRESIDENT & VICE-CHAIRMAN:

Richard L. Gundersen
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephen R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:

Robert J. Coenrad
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Baettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

COLORADO MUNICIPAL BOND
DEALERS ASSOCIATION, INC.

RECEIVED
FEDERAL ELECTION COMMISSION
'79 MAR 19 PM 3:29

March 16, 1979

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C. 20463

Re: 2SV1/79-4

Dear Mr. Potter:

The corporation which we received campaign donations from was the Colorado Municipal Bond Dealers Association, Inc. The CMBDA is a not-for-profit trade organization and it has established separate, segregated funds for the contributions to political candidates.

I hope this additional information clarifies the problem which you suggested in your letter of March 8, 1979.

Very truly yours,

CMBDA POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA/tp

ATTACHMENT #4

00040210860

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 3-26-79

RE: SV --- Corporate contributions

I spoke with Mr. James Anderson (303) 534-0221, because the Colorado Municipal Bond Dealers Association, Inc. had their incorporation suspended as of 11-3-75. The contributions in question are not corporate contributions. Instead the committee will be sent M letter because the amount contributed to CMBDA Political Action Committee is in excess of \$1000.

James Anderson, Treasurer PAC
(303) 534-0221

30040310860

ATTACHMENT #5

PRESIDENT & CHAIRMAN OF THE BOARD:

Steven D. Binder
E. F. Hutton & Company Inc.

VICE PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephen R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:

Robert J. Coonrod
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Boettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

COLORADO MUNICIPAL BOND

DEALERS ASSOCIATION, INC.

March 28, 1979

1663122367
Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C. 20463

Dear Mr. Potter:

Upon additional checking, I have determined that the Colorado Municipal Bond Dealers Association, Inc. is no longer a corporation under the laws of the State of Colorado. Further, if it is required, the CMBDA Political Action Committee will make every effort to refund contributions which are not allowed under the Federal regulations.

Thank you for the assistance you have given our Committee in complying with the Federal regulations.

Very truly yours,

CMBDA POLITICAL ACTION COMMITTEE

James M. Anderson
James M. Anderson
Treasurer

JMA/tp

ATTACHMENT #6

0004021087

In reply please refer to: 2SVL/73-76



FEDERAL ELECTION COMMISSION

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

April 16, 1979

Steven Binder, Treasurer
Colorado Municipal Bond Dealers
Association, Inc.

E.F. Hutton
1700 Broadway
Denver, Colorado 80202

Dear Mr. Binder:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by CMDBA Political Action Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Mark Kleiman, in our Reports Analysis Division at (800)424-9530. Our local number is (702)523-4043.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

ATTACHMENT #7

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 5-15-79

RE: M letter

I spoke with Stephen Binder, Chairman of the Colorado Municipal Bond Dealers Association, Inc. (303) 861-5000, regarding the unregistered status. I explained that if the committee did not wish to register that it should refund the amount in excess of \$1000.

The caller stated that the committee --- Association did not wish to register and would request a refund.

Stephen Binder, Chairman of Association
(303) 861-5000

000100100676

ATTACHMENT #8

Binder
 & Company Inc.

PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Henifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR.

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:
Stephan R. Levy
First National Bank of Denver

DIRECTOR:
Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:
Robert J. Conrad
Kirchner, Moore & Co.

DIRECTOR:
Dennis F. Caughlin
Caughlin & Company

DIRECTOR:
J. R. Green
Boettcher & Company

DIRECTOR:
Joseph Imhoff
Monifen, Imhoff & Samford, Inc.

**COLORADO MUNICIPAL BOND
DEALERS ASSOCIATION, INC.**

'73 MAY 24 PM 1:09

May 21, 1979

Mark Kleinman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20403

Re: The Colorado Municipal Bond Dealers Association
Political Action Committee

Dear Mr. Kleinman:

Pursuant to our telephone conversation of Tuesday, May 15, the Board of Directors of the Colorado Municipal Bond Dealers Association will take action on requesting a refund of monies forwarded to the Political Action Committee for campaign contributions for 1978. The Board meeting will be held on June 2.

I will forward to you the resolution passed by the Board. In the meantime if you have any questions, please feel free to call me or Jim Anderson.

Respectfully,

Steven Brill

Steven D. Binder
President

SDB/emc

ATTACHMENT #9

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: ROBERT SNOW

DATE: 5-30-79

RE: M letter --- Corporate contributions

I spoke with Stephen Binder (303) 861-5000, Chairman of PAC and President of the Colorado Municipal Bond Dealers Association, Inc., to explain that the transfers in from the Association were corporate contributions. Although we had noted that the incorporation status of the Association was suspended, in speaking with Mr. Binder he stated that the Association had failed to renew its incorporation papers. (Note: after conferring with the Office of General Counsel - Brad Litchfield, it was determined that the transfers in question were to be treated as corporate contributions because the incorporation status change should not alter the status of the money held in that account) The issue is to be handled as an SV and not an M letter situation.

I stated that the Association must seek a full refund of all monies contributed to the PAC. Secondly, I urged that the Association submit a letter to the Commission stating that the refund had been requested. I further suggested that the PAC submit a letter to the Commission to indicate that the refund was underway (if not already made).

Stephen Binder, Chairman of PAC
(303) 861-5000

Note: On 5-31-79 James Anderson, Treasurer of PAC called, and I advised him of the above-mentioned details.

James Anderson, Treasurer of PAC
(303) 534-0221

ATTACHMENT #10

FEDERAL ELECTION COMMISSION
C.M.B.D.A. POLITICAL ACTION COMMITTEE
624 Seventeenth Street
Denver, Colorado 80202

June 14, 1979

Mr. Steven D. Binder, Chairman
Colorado Municipal Bond Dealers Association, Inc.
c/o E. F. Hutton & Co, Inc.
1700 Broadway
Denver, Colorado 80202

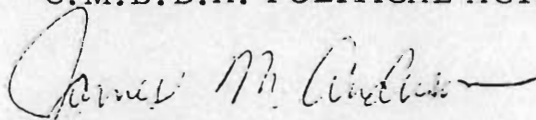
Dear Steve:

I understand that the Board of Directors of the Colorado Municipal Bond Dealers Association passed a resolution at their regular meeting of June 1, 1979, requesting a refund of a contribution in the amount of \$3,000.00. The request for this refund was at the advice of the Federal Election Commission, who alleges that the contribution was not legal.

The C.M.B.D.A. Political Action Committee will attempt to refund this contribution. However, the PAC currently has no funds from which to reimburse the Association. We will, however, commit any funds we receive to first pay this obligation.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE


James M. Anderson
Treasurer

JMA/tp

cc: Mr. Robert Snow
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463
Re: C00102004

COLORADO MUNICIPAL BOND DEALERS ASSOCIATION, INC.

Minutes of the regular meeting held June 1, 1979 @ 12:00 Noon at the Petroleum Club.
Presiding and conducting the meeting was Association President Steven Binder.

Those present:

Steven D. Binder, Chairman

Directors:

James Anderson

Frank Bernardi

Duke Coonrad

Jack Green

Richard Gunderson

Joseph Imhoff

Michael Sullivan

Guests:

Scot Barker, Gerwin-Newman & Associates

Dean Howell, Gerwin and Company

It was moved by Director Gunderson and seconded by Director Coonrad that the minutes of the regular meeting held on May 4, 1979 be approved. The motion was passed by voice vote.

Director Green moved and it was seconded by Director Sullivan to approve the minutes of the Board's special meeting held on May 14, 1979. The motion was carried by voice vote.

Director Anderson moved and it was seconded by Director Imhoff to approve the Treasurer's Report submitted by Director Sullivan. The motion passed by voice vote. (Report Attached)

Michael Sullivan, the Board's Treasurer, discussed the Association's income from origination fees. Currently, the origination fees are not covering the monthly operating costs. He suggests that the Board look into the possibility of increasing fees. No formal action was taken on this suggestion.

COMMITTEE REPORTS:

Colorado State Legislature Committee Report: Director Coonrad reported that major bills that the Association was concerned with have been decided. The Legislature is currently only discussing the Appropriations Bill.

Report of the CMBDA Political Action Committee: It was reported by Director Anderson that the Federal Election Commission has indicated that the contribution which the Association made to the CMBDA Political Action Committee was not a legal contribution under the current election laws. The Federal Election Commission has suggested that the Association request a return of the contributions. It was moved by Director Anderson and seconded by Director Sullivan that the Association request that the CMBDA Political Action Committee return a contribution of \$3,000, in that the contribution was illegal. The motion was carried by voice vote.

Activity Committee: Director Coughlin was absent, but it was reported by Director Anderson that the Municipal Securities Rulemaking Board breakfast has been set for Thursday, June 7, 1979 at the Brown Palace to discuss the MSRB's rules with Chairman of the Municipal Securities Rulemaking Board, Mr. Robert Brown. Invitations for this meeting were sent out on May 23, 1979.

The golf tournament is scheduled for July 19, 1979.

ATTACHMENT #11

00040210884

18
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)

RECEIVED
FEDERAL ELECTION
COMMISSION
JUL 13 PM 2:56

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 **C.M.B.D.A. Political Action Committee**

Name of Candidate or Committee (in full)

624 17th Street

Address (number and street)

Denver, Colorado 80202

City, State and ZIP Code

2 I.D. No. **C00102004**

Candidate/Committee

3 Office Sought, State/District (if applicable)

☐ Check if address is different than previously reported.

Year of Election

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

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

☐ Termination Report

☒ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for:

☐ October 10 Quarterly Report

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

(which report)

☐ January 31 Annual Report

☐ Monthly Report _____
(month)

on _____ in the State of _____
(date)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

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

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>Nov 30, 1978</u> Through <u>July 10, 1979</u>		
6 Cash on hand January 1, 19		\$ 0
7 Cash on hand at beginning of reporting period	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 0
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 0
9 Total expenditures (from line 25)	\$ 0	\$ 0
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$	\$
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)	\$ 0	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,000	

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

7/11/79

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further
information,
Contact:

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

or call 800/424-9530

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

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

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

ATTACHMENT #12

TELECON TO THE FILES: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 7-19-79

RE: SV --- corporate contribution

I spoke with Mr. James Anderson (303) 534-0221 regarding Q2 - 79 reporting problem. He must show the debt owed to Colorado Municipal Bond Dealers Association, Inc. on a Schedule C. I also stated that he should include a statement that he will make every attempt to repay the debt. Committee will be registered until payment is made.

(303) 534-0221
James Anderson, Treasurer

4004010887

ATTACHMENT #13

00040710838

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 11-15-79

RE: Third Quarter Report and Other matters including terminating
the PAC

I spoke with James Anderson, Treasurer (303) 893-1222, after having been referred by Stephen Binder Chairman of PAC after having been referred by Michael Sullivan to Stephen Binder. (Note: there was some question by the other callers as to whether James Anderson was still the Treasurer since he had been in the process of opening a new company)

He told me that he was sending in the Third Quarter Report for 1979. I told him to include the following points in a cover letter.

1. I had spoken with Stephen Binder regarding the relationship between the CMBDA Political Action Committee and the Colorado Municipal Bond Dealers Association. He had indicated that the above-mentioned association should be considered the PAC's connected organization. I asked Mr. Anderson and he concurred. Thus, I told him to include the fact that the Association was the PAC's connected organization.
2. I asked if the committee wished to terminate. He indicated that this was the case. I told him that it was complicated by the \$3500 debt owed by the committee to the Association because of an illegal corporate contribution. I told him to include the fact that the committee wished to terminate and that we would take it from there. Note: this is not the usual debt settlement situation, so it needs to be looked at further before we decide on the best course of action.

I further asked if the correct amount of the debt owed should not be \$3500 instead of the \$3000 listed on their previous July 10 Quarterly Report. (I had spoken with Stephen Binder regarding this matter and he had indicated that the committee received \$3000 from the Association in August and \$500 in November.

The caller concurred with all of the above and indicated that he would mail the report to the Commission today.

James Anderson, Treasurer
(303) 893-1222

RECEIVED
FEDERAL ELECTION
COMMISSION

C.M.B.D.A. POLITICAL ACTION COMMITTEE

730 Seventeenth Street, Suite 840

Denver, Colorado 80202

(303)893-1222

NOV 19 AM 8:57

November 15, 1979

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

Attention: Mr. Mark Kleinman

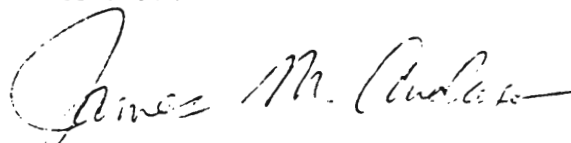
Re: I.D. No. C00102004

Gentlemen:

Please find enclosed our Quarterly Report for October 10. The Committee has had no activity in the past eleven months. We have an outstanding obligation to the Colorado Municipal Bond Dealers Association, Inc., which Association is a connected organization. The Colorado Bond Dealers Association has agreed to forgive this debt. Therefore, we would like to request the Commission's permission to terminate the C.M.B.D.A. Political Action Committee.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA:tp

Enclosures

cc: Mr. Steven D. Binder, President
Colorado Municipal Bond Dealers Association, Inc.

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)

RECEIVED
FEDERAL ELECTION
COMMISSION

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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 C.M.B.D.A. Political Action Committee

Name of Candidate or Committee (in full)

730 Seventeenth Street, Suite 840

Address (number and street)

Denver, Colorado 80202

City, State and ZIP Code

☒ Check if address is different than previously reported.

2 I.D. No. C00102004

Candidate/Committee

3 Office Sought, State/District (if applicable)

Year of Election

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 in the State of (date)

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

on in the State of (date)

☐ Termination Report

☐ Amendment for:

(which report)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

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

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Nov. 30, 1978 through October 10, 1979		
6 Cash on hand January 1, 1979		\$ -0-
7 Cash on hand at beginning of reporting period	\$ -0-	
8 Total receipts (from line 19)	\$ -0-	\$ -0-
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ -0-	\$ -0-
9 Total expenditures (from line 25)	\$ -0-	\$ -0-
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$	\$
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)	\$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,500	

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

11/15/79

(Date)

James M. Anderson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further
information,
Contact:

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

or call 800-424-9530

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

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

NAME OF CANDIDATE OR COMMITTEE

C.M.B.D.A. Political Action Committee

REPORT COVERING THE PERIOD

FROM: 11/30/78

TO: 10/10/79

RECEIPTS

**Column A
This Period**

**Column B
Calendar Year-To-Date**

14. Contributions from Individuals (including contributions in-kind):

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Sales and collections included above:

List by event on memo Schedule D (\$)

(d) Subtotal of contributions from individuals \$ -0-

\$ -0-

15. Transfers from Political Committees:

(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount). \$

(b) Funds from other committees (itemize on Schedule A regardless of amount). \$

(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) \$

(d) Subtotal of transfers in and contributions in-kind from political committees \$

\$

16. Other Income:

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Subtotal of other income \$

\$

17. Loans and Loan Repayments Received:

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Subtotal of loans and loan repayments received. \$

\$

18. Refunds, Rebates, Returns of Deposits:

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Subtotal of refunds, rebates, returns of deposits \$

\$

19. Total Receipts.

\$ -0-

\$ -0-

EXPENDITURES

20. Operating Expenditures:

(a) Itemized (use Schedule B) \$

(b) Unitemized \$

(c) Subtotal of operating expenditures \$

\$

21. Loans, Loan Repayments, and Contribution Refunds Made:

(a) Itemized (use Schedule B) \$

(b) Unitemized \$

(c) Subtotal of loans and loan repayments made and contribution refunds \$

\$

22. Transfers Out to Political Committees:

(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount). \$

(b) To other committees (itemize on Schedule B regardless of amount) \$

(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount). \$

(d) Subtotal of transfers out. \$

\$

23. Independent Expenditures (use Schedule E).

\$

\$

24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)

\$

\$

25. Total Expenditures

\$ -0-

\$ -0-

**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)

\$ -0-

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 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for

Line Number

(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full

C.M.B.D.A. Political Action Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Colorado Municipal Bond Dealers Association
c/o Mr. Steven D. Binder
E. F. Hutton & Company
1700 Broadway, Denver, Colo. 80202

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

\$ 3,500.00

\$

\$ 3,500.00

NATURE OF OBLIGATION (Details of Debt):

Obligation to return contribution as determined by the Federal Election Commission.

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):

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)

\$

\$

\$

TOTAL this period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

RECEIVED
FEDERAL ELECTION
COMMISSION

C.M.B.D.A. POLITICAL ACTION COMMITTEE

730 Seventeenth Street, Suite 840

Denver, Colorado 80202

(303)893-1222

NOV 19 AM 8:57

November 15, 1979

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

Attention: Mr. Mark Kleinman

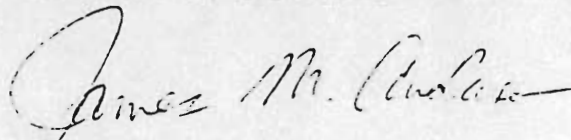
Re: I.D. No. C00102004

Gentlemen:

Please find enclosed our Quarterly Report for October 10. The Committee has had no activity in the past eleven months. We have an outstanding obligation to the Colorado Municipal Bond Dealers Association, Inc., which Association is a connected organization. The Colorado Bond Dealers Association has agreed to forgive this debt. Therefore, we would like to request the Commission's permission to terminate the C.M.B.D.A. Political Action Committee.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA:tp

Enclosures

cc: Mr. Steven D. Binder, President
Colorado Municipal Bond Dealers Association, Inc.

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)

RECEIVED
FEDERAL ELECTION
COMMISSION

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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

1 C.M.B.D.A. Political Action Committee

Name of Candidate or Committee (in full)

2 I.D. No. C00102004

Candidate/Committee

730 Seventeenth Street, Suite 840

Address (number and street)

3 Office Sought, State/District (if applicable)

Denver, Colorado 80202

City, State and ZIP Code

☒ Check if address is different than previously reported.

Year of Election

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

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

☐ Termination Report

☐ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for:

☒ October 10 Quarterly Report

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

(which report)

☐ January 31 Annual Report

☐ Monthly Report _____
(month)

on _____ in the State of _____
(date)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

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

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Nov. 30, 1978 Through October 10, 1979		
6 Cash on hand January 1, 1979		\$ -0-
7 Cash on hand at beginning of reporting period	\$ -0-	
8 Total receipts (from line 19)	\$ -0-	\$ -0-
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ -0-	\$ -0-
9 Total expenditures (from line 25)	\$ -0-	\$ -0-
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$	\$
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)	\$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,500	

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

11/15/79

(Date)

James M. Anderson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further
information,
Contact:

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

or call 800/424-9530

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

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

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
C. M. B. D. A. Political Action Committee		FROM: 11/30/78	TO: 10/10/79
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$)			
(d) Subtotal of contributions from individuals		\$ -0-	\$ -0-
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount).		\$	
(b) Funds from other committees (Itemize on Schedule A regardless of amount).		\$	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received.		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts.		\$ -0-	\$ -0-
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount).		\$	
(b) To other committees (Itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount).		\$	
(d) Subtotal of transfers out		\$	\$
23. Independent Expenditures (use Schedule E).		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)		\$	\$
25. Total Expenditures		\$ -0-	\$ -0-
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).		\$ -0-	

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

C.M.B.D.A. Political Action Committee

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Colorado Municipal Bond Dealers Association
c/o Mr. Steven D. Binder
E. F. Hutton & Company
1700 Broadway, Denver, Colo. 80202

Date (month,
day, year)

**Amount of Original
Debt, Contract,
Agreement or
Promise**

**Cumulative
Payment
To Date**

Outstanding
Science at
Close of
This Period

☐ Primary ☐ General ☐ Other

s 3,500.00

\$

\$ 3,500.00

NATURE OF OBLIGATION (Details of Debt):

Obligation to return contribution as determined by the Federal Election Commission.

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

S

S

S

NATURE OF OBLIGATION (Details of Debt):

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

S

S

S

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)

S

S

\$

TOTAL this period (last page this line number only)

S

S

S

Carry outstanding balance only to appropriate line of summary

ATTACHMENT #15

60111

FEDERAL ELECTION COMMISSION

DATE 11/21/79

COMMITTEE INDEX OF CANDIDATES SUPPORTED - (D) (77-78)

PAGE 1

 COMMITTEE CANDIDATE SUPPORTED OFFICE STATE DST PTY CONTRIBUTIONS TO EXPENDITURES ON BEHALF OF ID#

CMRDA POLITICAL ACTION COMMITTEE
 CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC; COLO MUNICIPAL

C00102004

CANDIDATE	OFFICE	STATE	DST	PTY	CONTRIBUTIONS TO	EXPENDITURES ON BEHALF OF	ID#
ARMSTRONG, WILLIAM L.	SENATE	CO		REP	1,500	0	SBC000040
HASKELL, FLOYD K.		CO		DEM	1,500	0	S2C000019
TOTAL					3,000	0	

00040210901
FEDERAL ELECTION COMMISSION

DATE 21NOV79

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)
SECTION V - CANDIDATE/POLITICAL COMMITTEES

PAGE 1

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
--	----------------	------	-----------	------	----------	--------

ARMSTRONG COMMITTEE; THE
CMBDA POLITICAL ACTION COMMITTEE
78FEC/091/1624 0342019 TRANSFER OUT NON-AFFILIATED

7SEP78 PRIMARY 1,000
OCTOBER 10 QUARTERLY

ARMSTRONG COMMITTEE; THE
CMBDA POLITICAL ACTION COMMITTEE
79FEC/091/1624 0527917 TRANSFER OUT NON-AFFILIATED

7SEP78 GENERAL 500
OCTOBER 10 QUARTERLY

PEOPLE FOR HASKELL
CMBDA POLITICAL ACTION COMMITTEE
79FEC/120/1676 0527915 TRANSFER OUT NON-AFFILIATED

21AUG78 PRIMARY 1,000
10 DAY PRE-PRIMARY AMENDMENT

PEOPLE FOR HASKELL
CMBDA POLITICAL ACTION COMMITTEE
79FEC/120/1676 0527916 TRANSFER OUT NON-AFFILIATED

21AUG78 GENERAL 500
10 DAY PRE-PRIMARY AMENDMENT

PRESIDENT & CHAIRMAN OF THE BOARD:

Steven D. Binder
E. F. Hutton & Company Inc.

VICE PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephen R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernerdi
Besworth, Sullivan & Company

DIRECTOR:

Robert J. Coonrod
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Boettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

COLORADO MUNICIPAL BOND

DEALERS ASSOCIATION, INC.

11:04

March 28, 1979

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C. 20463

Dear Mr. Potter:

Upon additional checking, I have determined that the Colorado Municipal Bond Dealers Association, Inc. is no longer a corporation under the laws of the State of Colorado. Further, if it is required, the CMBDA Political Action Committee will make every effort to refund contributions which are not allowed under the Federal regulations.

Thank you for the assistance you have given our Committee in complying with the Federal regulations.

Very truly yours,

CMBDA POLITICAL ACTION COMMITTEE

James M. Anderson
James M. Anderson
Treasurer

JMA/tp

Attachment 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James M. Anderson, Treasurer
Colorado Municipal Bond Dealers
Association Political Action
Committee
730 Seventeenth Street
Suite 840
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Anderson:

The Federal Election Commission notified you in the surface violation letter dated March 8, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on , 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the 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.

Page 2

Letter to: James M. Anderson

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Enclosure

Notification of Reason to Believe Finding

00040210904



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen D. Binder, President
Colorado Municipal Bond Dealers
Association, Inc.
828 Seventeenth Street
Denver, Colorado 80202

Re: MUR 1107

Dear Mr. Binder:

The Federal Election Commission notified you in a surface violation letter dated April 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that you have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

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.

Page 2

Letter to: Stephen D. Binder

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Enclosure

Notification of Reason to Believe Finding

D
RAD

552

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE December 31, 1979

ANALYST Mark Kleinman MK

TO: Office of General Counsel

TEAM CHIEF Steve Mims SM

THROUGH: STAFF DIRECTOR ASP

COMPLIANCE REVIEW CB/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS ATJH

CANDIDATE/COMMITTEE: OMBDA Political Action Committee

TREASURER: James Anderson

ADDRESS: 730 Seventeenth Street, Suite 840
Denver, CO 80202

AFFILIATE(S): None

ALLEGATION(S): Receipt of
corporate contributions.

CITE: 2 U.S.C. 441b

ATTACHMENT(S) #2

DATE INITIATED: 3-8-79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 8-18-78 TO 12-7-78
TOTAL RECEIPTS \$ 3510 TOTAL EXPENDITURES \$ 3509
CASH ON HAND \$ 0 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: Surface Violation letter sent 3-8-79 ATTACHMENT #2
Response 3-16-79 #3
Response 4-2-79 #5
Failure to register letter sent 4-16-79 #6
Response 5-21-79 #8

CONTINUED PAGE TWO

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: 3-26-79 #4
Telecon: 5-15-79 #7
Telecon: 5-30-79 #9
Telecon: 7-19-79 #12
Telecon: 11-15-79 #13

REASON(S) FOR REFERRAL: ATTACHMENT
Exceeds threshold

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Committee has not refunded corporate contributions due to a lack of funds. It is now shown as a debt. ATTACHMENT #11
Committee wishes to terminate but may not do so until all debts are extinguished. SEE ATTACHMENT #14

Transfers in were from connected organization and used for Federal activity SEE ATTACHMENT #14
ATTACHMENT #15

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

061110

#10
#14

ATTACHMENT #1

00040210910

00040210911
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978

DATE 21NOV79
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			

CMBDA POLITICAL ACTION COMMITTEE								ID# C00102004
CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC; COLO MUNICIPAL								
	1978 STATEMENT OF ORGANIZATION					24AUG78	4	78FEC/083/3227
	REQUEST FOR ADDITIONAL INFORMATION					18SEP78	3	78FEC/085/1862
	STATEMENT OF ORGANIZATION- AMENDMENT					26SEP78	3	78FEC/086/0892
	STATEMENT OF ORGANIZATION- AMENDMENT					7DEC78	1	78FEC/099/2742
	10 DAY PRE-PRIMARY	3,010		1,500		18AUG78 - 28AUG78	5	78FEC/083/5596
	REQUEST FOR ADDITIONAL INFORMATION					18AUG78 - 28AUG78	3	79FEC/118/3703
	10 DAY PRE-PRIMARY - AMENDMENT					18AUG78 - 28AUG78	2	79FEC/120/1676
	OCTOBER 10 QUARTERLY	0		1,509		29AUG78 - 10OCT78	4	78FEC/091/1622
	10 DAY PRE-GENERAL	500		500		10OCT78 - 23OCT78	5	78FEC/094/0581
	REQUEST FOR ADDITIONAL INFORMATION					10OCT78 - 23OCT78	1	79FEC/121/3115
	10 DAY PRE-GENERAL - AMENDMENT					10OCT78 - 23OCT78	2	79FEC/122/4018
	30 DAY POST-GENERAL - TERMINATED	500		500		23OCT78 - 7DEC78	5	78FEC/099/2743
	30 DAY POST-GENERAL - AMENDMENT					23OCT78 - 7DEC78	2	79FEC/122/4016
	30 DAY POST-GENERAL - AMENDMENT					23OCT78 - 7DEC78	4	79FEC/129/1118
	TOTAL	4,010	0	4,009	0		44	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW

00040210912

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 20NOV79
PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CMBDA POLITICAL ACTION COMMITTEE								ID# C00102004
CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC; COLO MUNICIPAL								
	1979 MISCELLANEOUS TRANSACTION TO F.E.C.					19MAR79	2	79FEC/122/3360
	MISCELLANEOUS TRANSACTION TO F.E.C.					2APR79	2	79FEC/122/3691
	MISCELLANEOUS TRANSACTION FROM F.E.C.					16APR79	2	79FEC/131/2280
	MISCELLANEOUS TRANSACTION TO F.E.C.					24MAY79	2	79FEC/128/0394
	MISCELLANEOUS TRANSACTION TO F.E.C.					11OCT79	2	79FEC/140/2619
	STATEMENT OF ORGANIZATION- AMENDMENT					19NOV79	1	79FEC/141/2959
	JULY 10 QUARTERLY	0		0		30NOV78 -10JUL79	3	79FEC/132/0799
	OCTOBER 10 QUARTERLY	0		0		30NOV78 -10OCT79	4	79FEC/141/2960

ALL REPORTS HAVE RECEIVED BASIC REVIEW

ATTACHMENT #2

00040110913

In reply please refer to: 2SV1/79-4



FEDERAL ELECTION COMMISSION

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

March 8, 1979

James M. Anderson, Treasurer
CMBDA Political Action Committee
624 Seventeenth Street
Denver, Colorado 80202

Dear Mr. Anderson:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General and 30 Day Post-General Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donor. Returns of the contribution should be reported immediately and should be reflected as a contribution refund on your receipts and expenditures. If the identification of contributions are incomplete or incorrect on the report, please submit a statement which would clarify them for the public record. You may do so by amending your letter.

Please notify the Commission within fifteen days of this letter of the determination made on this matter. Any questions concerning this matter, please do not hesitate to call Mark Kleinman (800)424-9530, our Reports Analyst. His local telephone number is 523-4048.

Sincerely,

Orlando B. Po

Orlando B. Po
Staff Director

Enclosure Certified Mail: Return Receipt Request

PS Form 3811, Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
CMBDA Political Action Committee

3. ARTICLE DESCRIPTION:
REGISTERED NO. **438233** CERTIFIED NO. INSURED NO.
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Sarah E. Buch

4. DATE OF DELIVERY **MAR 13 1979** POSTMARK **MAR 13 1979**

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

2SV1/79-4 N-P

tion Commission
Street, N.W.
ington, D.C. 20463

ITEMIZED RECEIPTS

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

Line Number _____

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

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

CMBDA Political Action Committee

Full Name, Mailing Address and ZIP Code Colorado Municipal Bond Dealers Association, Inc. c/o Mr. Dunn Krah 6-30-72 828 Seventeenth Street, Dr. 80202	Principal Place of Business Same	Date (month, day, year) 8/23/78	Amount of each Re this Period \$500.00
Receipt for: ☐ Primary ☐ General ☐ Other	Occupation ☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Re this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Re this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each R this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each R this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each f this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date . . . S		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$

NOTE: THE AMOUNT SHOWN AS RECEIVED BY THE COMMITTEE ON 8-23-78
WAS AN ERROR BY THE COMMITTEE. THAT SAME AMOUNT
WAS INCLUDED IN THE \$3010 CONTRIBUTED ON 8-18-78.
REFER TO ATTACHMENT #14 FOR ADDITIONAL DETAILS.

00040210916

FILE A
JED
January, 1978
Federal Election Commission
15 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

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

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

Page 1 of A for

Line Number _____

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

CMBDA Political Action Committee

Full Name, Mailing Address and ZIP Code

Colorado Municipal Bond Dealers
Association, Inc. 6-30-72
c/o Mr. Dunn Krahl
828 17th St., Denver, CO 80202

Principal Place of Business

Same

Date (month,
day, year)

11/6/78

Amount of each Receipt
this Period

\$500.00

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

SUBTOTAL of receipts this page (optional)

\$ 500.00

TOTAL this period (last page this line number only)

\$ 500.00

ATTACHMENT #3

616011111

PRESIDENT & CHAIRMAN OF THE BOARD:

Steven D. Binder
E. F. Mutton & Company Inc.

VICE PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephen R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:

Robert J. Conrad
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Baettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

COLORADO MUNICIPAL BOND
DEALERS ASSOCIATION, INC.

RECEIVED
FEDERAL ELECTION
COMMISSION
'79 MAR 19 PM 3:29

March 16, 1979

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C. 20463

Re: 2SV1/79-4

Dear Mr. Potter:

The corporation which we received campaign donations from was the Colorado Municipal Bond Dealers Association, Inc. The CMBDA is a not-for-profit trade organization and it has established separate, segregated funds for the contributions to political candidates.

I hope this additional information clarifies the problem which you suggested in your letter of March 8, 1979.

Very truly yours,

CMBDA POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA/tp

ATTACHMENT #4

000000921

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 3-26-79

RE: SV --- Corporate contributions

I spoke with Mr. James Anderson (303) 534-0221, because the Colorado Municipal Bond Dealers Association, Inc. had their incorporation suspended as of 11-3-75. The contributions in question are not corporate contributions. Instead the committee will be sent M letter because the amount contributed to CMBDA Political Action Committee is in excess of \$1000.

James Anderson, Treasurer PAC
(303) 534-0221

00040210922

ATTACHMENT #5

0010019923

PRESIDENT & CHAIRMAN OF THE BOARD:

Steven D. Binder
E. F. Mutton & Company Inc.

VICE PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephan R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:

Robert J. Conrad
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Boettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

COLORADO MUNICIPAL BOND

DEALERS ASSOCIATION, INC.

March 28, 1979

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C. 20463

Dear Mr. Potter:

Upon additional checking, I have determined that the Colorado Municipal Bond Dealers Association, Inc. is no longer a corporation under the laws of the State of Colorado. Further, if it is required, the CMBDA Political Action Committee will make every effort to refund contributions which are not allowed under the Federal regulations.

Thank you for the assistance you have given our Committee in complying with the Federal regulations.

Very truly yours,

CMBDA POLITICAL ACTION COMMITTEE

James M. Anderson

James M. Anderson
Treasurer

JMA/tp

ATTACHMENT #6

00040210925

In reply please refer to: 2SVL/78-76



FEDERAL ELECTION COMMISSION

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

April 16, 1979

Steven Binder, Treasurer
Colorado Municipal Bond Dealers
Association, Inc.

E.F. Hutton
1700 Broadway
Denver, Colorado 80202

Dear Mr. Binder:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by CMBA Political Action Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

- 2 -

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Mark Kleinman, in our Reports Analysis Division at (800)424-9530. Our local number is (702)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested
Enclosures

7110110927

ATTACHMENT #7

00040210928

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 5-15-79

RE: M letter

I spoke with Stephen Binder, Chairman of the Colorado Municipal Bond Dealers Association, Inc. (303) 861-5000, regarding the unregistered status. I explained that if the committee did not wish to register that it should refund the amount in excess of \$1000.

The caller stated that the committee --- Association did not wish to register and would request a refund.

Stephen Binder, Chairman of Association
(303) 861-5000

00040210929

CHAIRMAN OF THE BOARD:

Steven D. Binder
Sullivan & Company Inc.

PRESIDENT & VICE-CHAIRMAN:

Richard L. Gunderson
George K. Baum & Co.

SECRETARY & DIRECTOR:

James M. Anderson
Hanifen, Imhoff & Samford, Inc.

TREASURER & DIRECTOR:

Michael Sullivan
United Bank of Denver

ASSISTANT TREASURER:

Stephen R. Levy
First National Bank of Denver

DIRECTOR:

Frank Bernardi
Bosworth, Sullivan & Company

DIRECTOR:

Robert J. Conrad
Kirchner, Moore & Co.

DIRECTOR:

Dennis F. Coughlin
Coughlin & Company

DIRECTOR:

J. R. Green
Boettcher & Company

DIRECTOR:

Joseph Imhoff
Hanifen, Imhoff & Samford, Inc.

RECEIVED
COLORADO MUNICIPAL BOND
COMMISSION

DEALERS ASSOCIATION, INC.

'79 MAY 24 PM 1:09

May 21, 1979

Mark Kleinman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20403

Re: The Colorado Municipal Bond Dealers Association
Political Action Committee

Dear Mr. Kleinman:

Pursuant to our telephone conversation of Tuesday, May 15, the Board of Directors of the Colorado Municipal Bond Dealers Association will take action on requesting a refund of monies forwarded to the Political Action Committee for campaign contributions for 1978. The Board meeting will be held on June 2.

I will forward to you the resolution passed by the Board. In the meantime if you have any questions, please feel free to call me or Jim Anderson.

Respectfully,



Steven D. Binder
President

SDB/emc

ATTACHMENT #9

00040710932

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: ROBERT SNOW

DATE: 5-30-79

RE: M letter --- Corporate contributions

I spoke with Stephen Binder (303) 861-5000, Chairman of PAC and President of the Colorado Municipal Bond Dealers Association, Inc., to explain that the transfers in from the Association were corporate contributions. Although we had noted that the incorporation status of the Association was suspended, in speaking with Mr. Binder he stated that the Association had failed to renew its incorporation papers. (Note: after conferring with the Office of General Counsel - Brad Litchfield, it was determined that the transfers in question were to be treated as corporate contributions because the incorporation status change should not alter the status of the money held in that account) The issue is to be handled as an SV and not an M letter situation.

I stated that the Association must seek a full refund of all monies contributed to the PAC. Secondly, I urged that the Association submit a letter to the Commission stating that the refund had been requested. I further suggested that the PAC submit a letter to the Commission to indicate that the refund was underway (if not already made).

Stephen Binder, Chairman of PAC
(303) 861-5000

Note: On 5-31-79 James Anderson, Treasurer of PAC called, and I advised him of the above-mentioned details.

James Anderson, Treasurer of PAC
(303) 534-0221

0001110934

ATTACHMENT #10

FEDERAL ELECTION COMMISSION
C.M.B.D.A. POLITICAL ACTION COMMITTEE
624 Seventeenth Street
Denver, Colorado 80202

June 14, 1979

Mr. Steven D. Binder, Chairman
Colorado Municipal Bond Dealers Association, Inc.
c/o E. F. Hutton & Co, Inc.
1700 Broadway
Denver, Colorado 80202

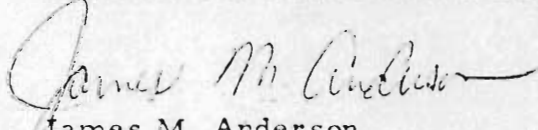
Dear Steve:

I understand that the Board of Directors of the Colorado Municipal Bond Dealers Association passed a resolution at their regular meeting of June 1, 1979, requesting a refund of a contribution in the amount of \$3,000.00. The request for this refund was at the advice of the Federal Election Commission, who alleges that the contribution was not legal.

The C.M.B.D.A. Political Action Committee will attempt to refund this contribution. However, the PAC currently has no funds from which to reimburse the Association. We will, however, commit any funds we receive to first pay this obligation.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE


James M. Anderson
Treasurer

JMA/tp

cc: Mr. Robert Snow
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463
Re: C00102004

COLORADO MUNICIPAL BOND DEALERS ASSOCIATION, INC.

Minutes of the regular meeting held June 1, 1979 @ 12:00 Noon at the Petroleum Club.
Presiding and conducting the meeting was Association President Steven Binder.

Those present:

Steven D. Binder, Chairman

Directors:

James Anderson

Frank Bernardi

Duke Coonrad

Jack Green

Richard Gunderson

Joseph Imhoff

Michael Sullivan

Guests:

Scot Barker, Gerwin-Newman & Associates

Dean Howell, Gerwin and Company

It was moved by Director Gunderson and seconded by Director Coonrad that the minutes of the regular meeting held on May 4, 1979 be approved. The motion was passed by voice vote.

Director Green moved and it was seconded by Director Sullivan to approve the minutes of the Board's special meeting held on May 14, 1979. The motion was carried by voice vote.

Director Anderson moved and it was seconded by Director Imhoff to approve the Treasurer's Report submitted by Director Sullivan. The motion passed by voice vote. (Report Attached)

Michael Sullivan, the Board's Treasurer, discussed the Association's income from origination fees. Currently, the origination fees are not covering the monthly operating costs. He suggests that the Board look into the possibility of increasing fees. No formal action was taken on this suggestion.

COMMITTEE REPORTS:

Colorado State Legislature Committee Report: Director Coonrad reported that major bills that the Association was concerned with have been decided. The Legislature is currently only discussing the Appropriations Bill.

Report of the CMBDA Political Action Committee: It was reported by Director Anderson that the Federal Election Commission has indicated that the contribution which the Association made to the CMBDA Political Action Committee was not a legal contribution under the current election laws. The Federal Election Commission has suggested that the Association request a return of the contributions. It was moved by Director Anderson and seconded by Director Sullivan that the Association request that the CMBDA Political Action Committee return a contribution of \$3,000, in that the contribution was illegal. The motion was carried by voice vote.

Activity Committee: Director Coughlin was absent, but it was reported by Director Anderson that the Municipal Securities Rulemaking Board breakfast has been set for Thursday, June 7, 1979 at the Brown Palace to discuss the MSRB's rules with Chairman of the Municipal Securities Rulemaking Board, Mr. Robert Brown. Invitations for this meeting were sent out on May 23, 1979.

The golf tournament is scheduled for July 19, 1979.

ATTACHMENT #11

60040210937

18
Action Commission
Street, N.W.
ington, D.C. 20463

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

(Except for Candidates or Committees Receiving Federal Matching Funds)

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

1 C.M.B.D.A. Political Action Committee

2 I.D. No. C00102004

Candidate/Committee

Name of Candidate or Committee (in full)

624 17th Street

Address (number and street)

Denver, Colorado 80202

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

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

☐ Termination Report

☒ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for:

☐ October 10 Quarterly Report

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

(which report)

☐ January 31 Annual Report

☐ Monthly Report _____ on _____ in the State of _____
(month) (date)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

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

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Nov 30, 1978 Through July 10, 1979		
6 Cash on hand January 1, 19		\$ 0
7 Cash on hand at beginning of reporting period	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 0
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 0
9 Total expenditures (from line 25)	\$ 0	\$ 0
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$	\$
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)	\$ 0	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,000	

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

7/11/79

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further
information,
Contact:

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

or call 800/424-9530

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

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

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TELECON TO THE FILES: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 7-19-79

RE: SV --- corporate contribution

I spoke with Mr. James Anderson (303) 534-0221 regarding Q2 - 79 reporting problem. He must show the debt owed to Colorado Municipal Bond Dealers Association, Inc. on a Schedule C. I also stated that he should include a statement that he will make every attempt to repay the debt. Committee will be registered until payment is made.

(303) 534-0221
James Anderson, Treasurer

60040210940

ATTACHMENT #13

00040210941

TELECON TO THE FILE: CMBDA POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 11-15-79

RE: Third Quarter Report and Other matters including terminating
the PAC

I spoke with James Anderson, Treasurer (303) 893-1222,
after having been referred by Stephen Binder Chairman of PAC
after having been referred by Michael Sullivan to Stephen Binder.
(Note: there was some question by the other callers as to whether
James Anderson was still the Treasurer since he had been in the
process of opening a new company)

He told me that he was sending in the Third Quarter Report for
1979. I told him to include the following points in a cover letter.

1. I had spoken with Stephen Binder regarding the relationship
between the CMBDA Political Action Committee and the
Colorado Municipal Bond Dealers Association. He had indicated
that the above-mentioned association should be considered the
PAC's connected organization. I asked Mr. Anderson and he
concurred. Thus, I told him to include the fact that the
Association was the PAC's connected organization.
2. I asked if the committee wished to terminate. He indicated that
this was the case. I told him that it was complicated by the
\$3500 debt owed by the committee to the Association because of
an illegal corporate contribution. I told him to include the
fact that the committee wished to terminate and that we would
take it from there. Note: this is not the usual debt settlement
situation, so it needs to be looked at further before we decide
on the best course of action.

I further asked if the correct amount of the debt owed should not be
\$3500 instead of the \$3000 listed on their previous July 10 Quarterly
Report. (I had spoken with Stephen Binder regarding this matter
and he had indicated that the committee received \$3000 from the
Association in August and \$500 in November.

The caller concurred with all of the above and indicated that he
would mail the report to the Commission today.

James Anderson, Treasurer
(303) 893-1222

1. The first part of the document is a title page. It contains the title "THE HISTORY OF THE UNITED STATES OF AMERICA" and the author "BY JAMES MADISON".

RECEIVED
FEDERAL ELECTION
COMMISSION

C.M.B.D.A. POLITICAL ACTION COMMITTEE
730 Seventeenth Street, Suite 840
Denver, Colorado 80202
(303)893-1222

NOV 15 AM 8:57

November 15, 1979

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

Attention: Mr. Mark Kleinman

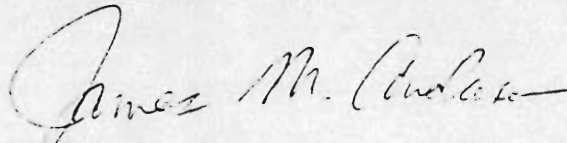
Re: I.D. No. C00102004

Gentlemen:

Please find enclosed our Quarterly Report for October 10. The Committee has had no activity in the past eleven months. We have an outstanding obligation to the Colorado Municipal Bond Dealers Association, Inc., which Association is a connected organization. The Colorado Bond Dealers Association has agreed to forgive this debt. Therefore, we would like to request the Commission's permission to terminate the C.M.B.D.A. Political Action Committee.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA:tp

Enclosures

cc: Mr. Steven D. Binder, President
Colorado Municipal Bond Dealers Association, Inc.

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

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
FEDERAL ELECTION
COMMISSION

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

1 C.M.B.D.A. Political Action Committee

Name of Candidate or Committee (in full)

2 I.D. No. C00102004

Candidate/Committee

730 Seventeenth Street, Suite 840

Address (number and street)

3 _____
Office Sought, State/District (if applicable)

Denver, Colorado 80202

City, State and ZIP Code

☒ Check if address is different than previously reported.

Year of Election _____

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

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

☐ Termination Report

☐ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for:

☒ October 10 Quarterly Report

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

(which report)

☐ January 31 Annual Report

☐ Monthly Report _____
(month)

on _____ in the State of _____
(date)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

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

5 Covering Period <u>Nov. 30, 1978</u> Through <u>October 10, 1979</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1979		\$ -0-
7 Cash on hand at beginning of reporting period	\$ -0-	
8 Total receipts (from line 19)	\$ -0-	\$ -0-
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ -0-	\$ -0-
9 Total expenditures (from line 25)	\$ -0-	\$ -0-
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$	\$
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)	\$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,500	

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

11/15/79

(Date)

James M. Anderson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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

For further
information,
Contact:

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

or call 800/424-9530

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

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

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
C. M. B. D. A. Political Action Committee		FROM: 11/30/78	TO: 10/10/79
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$)			
(d) Subtotal of contributions from individuals		\$ -0-	\$ -0-
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount).		\$	
(b) Funds from other committees (Itemize on Schedule A regardless of amount).		\$	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received.		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts.		\$ -0-	\$ -0-
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount).		\$	
(b) To other committees (Itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount).		\$	
(d) Subtotal of transfers out.		\$	\$
23. Independent Expenditures (use Schedule E).		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)		\$	\$
25. Total Expenditures		\$ -0-	\$ -0-
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).		\$ -0-	

226911

RECEIVED
FEDERAL ELECTION
COMMISSION

C.M.B.D.A. POLITICAL ACTION COMMITTEE

730 Seventeenth Street, Suite 840

Denver, Colorado 80202

(303)893-1222

NOV 19 AM 8:57

November 15, 1979

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

Attention: Mr. Mark Kleinman

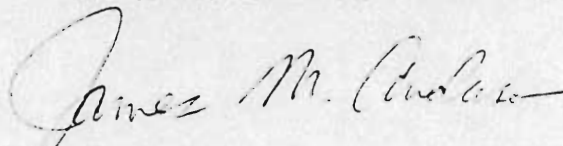
Re: I.D. No. C00102004

Gentlemen:

Please find enclosed our Quarterly Report for October 10. The Committee has had no activity in the past eleven months. We have an outstanding obligation to the Colorado Municipal Bond Dealers Association, Inc., which Association is a connected organization. The Colorado Bond Dealers Association has agreed to forgive this debt. Therefore, we would like to request the Commission's permission to terminate the C.M.B.D.A. Political Action Committee.

Sincerely yours,

C.M.B.D.A. POLITICAL ACTION COMMITTEE



James M. Anderson
Treasurer

JMA:tp

Enclosures

cc: Mr. Steven D. Binder, President
Colorado Municipal Bond Dealers Association, Inc.

1090401110948

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)

RECEIVED
FEDERAL ELECTION
COMMISSION

1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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

1 C.M.B.D.A. Political Action Committee

Name of Candidate or Committee (in full)

2 I.D. No. C00102004

Candidate/Committee

730 Seventeenth Street, Suite 840

Address (number and street)

3 Office Sought, State/District (if applicable)

Denver, Colorado 80202

City, State and ZIP Code

☒ Check if address is different than previously reported.

Year of Election

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

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on _____ in the State of _____
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☐ Primary Election

☐ General Election

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11/15/79

(Date)

James M. Anderson, Treasurer

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

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1325 K Street, N.W.
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
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31. Net Expenditures (Subtract line 30 from line 29).		\$ -0-	

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 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for

Line Number

(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full C.M.B.D.A. Political Action Committee				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor Colorado Municipal Bond Dealers Association c/o Mr. Steven D. Binder E. F. Hutton & Company 1700 Broadway, Denver, Colo. 80202	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		\$ 3,500.00	\$	\$ 3,500.00
NATURE OF OBLIGATION (Details of Debt): Obligation to return contribution as determined by the Federal Election Commission.				
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):				
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) \$ \$ \$				
TOTAL this period (last page this line number only) \$ \$ \$				
Carry outstanding balance only to appropriate line of summary				

ATTACHMENT #15

0000010952

80040210953

FEDERAL ELECTION COMMISSION

DATE 11/21/79

COMMITTEE INDEX OF CANDIDATES SUPPORTED - (D) (77-78)

PAGE 1

COMMITTEE CANDIDATE SUPPORTED OFFICE STATE DST PTY CONTRIBUTIONS TO EXPENDITURES ON BEHALF OF ID#

CMRDA POLITICAL ACTION COMMITTEE
CONNECTED ORGANIZATION: BOND DEALERS ASS'N INC; COLO MUNICIPAL

C00102004

ARMSTRONG, WILLIAM L.	SENATE	CO	REP	1,500	0	88C000040
HASKELL, FLOYD K.		CO	DEM	1,500	0	82C000019
TOTAL				3,000	0	

00040210954

FEDERAL ELECTION COMMISSION

DATE 21NOV79

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)

PAGE 1

SECTION V - CANDIDATE/POLITICAL COMMITTEES

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
ARMSTRONG COMMITTEE; THE CHBDA POLITICAL ACTION COMMITTEE 78FEC/091/1624 0342019 TRANSFER OUT NON-AFFILIATED				78EP78 OCTOBER 10	PRIMARY QUARTERLY	1,000
ARMSTRONG COMMITTEE; THE CHBDA POLITICAL ACTION COMMITTEE 79FEC/091/1624 0527917 TRANSFER OUT NON-AFFILIATED				78EP78 OCTOBER 10	GENERAL QUARTERLY	500
PEOPLE FOR HASKELL CHBDA POLITICAL ACTION COMMITTEE 79FEC/120/1676 0527915 TRANSFER OUT NON-AFFILIATED				21AUG78 10 DAY	PRIMARY PRE-PRIMARY	1,000 AMENDMENT
PEOPLE FOR HASKELL CHBDA POLITICAL ACTION COMMITTEE 79FEC/120/1676 0527916 TRANSFER OUT NON-AFFILIATED				21AUG78 10 DAY	GENERAL PRE-PRIMARY	500 AMENDMENT



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1107

Date Filmed 9/18/80 Camera No. --- 2

Cameraman BPC