



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TUE # 1109

DATE FILMED 2/26/80 CAMERA NO. --- 2

CAMERAMAN GRC.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arnold Gronneberg, Treasurer
District 23 - Democratic Non-Partisan
League Party
Hannaford, North Dakota 58448

RE: MUR 1109

Dear Mr. Gronneberg:

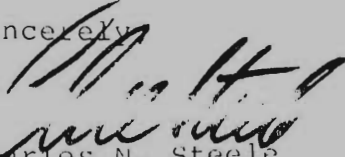
On May 1, 1979, the Commission found reason to believe that your committee may have violated 2 U.S.C. §433 and §434 of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above captioned matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and to close the file with regard to this matter.

This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making expenditures and/or contributions in excess of \$1,000 in connection with federal election activities during a calendar year without registering and reporting is a violation of 2 U.S.C. §433 and §434 and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Carolyn Weeder at (202) 523-4529.

Sincerely,


Charles N. Steele
General Counsel

4-6918-1109

100-100000-100000
100-100000-100000

100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000

100-100000-100000

100-100000-100000

100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000

100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000

100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000

100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000
100-100000-100000

100-100000-100000

100-100000-100000
100-100000-100000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1109
District 23 of the Democratic)
Non-Partisan League Party)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 30, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1109:

1. Take no further action with regard to District 23 of the Democratic Non-Partisan League Party's possible violation of 2 U.S.C. §433 and §434 by failing to register and report as a political committee.
2. Close the file.
3. Approve and send the letter as attached to the First General Counsel's Report dated January 25, 1980.

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

Attest:

1/30/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 1-25-80, 3:06
Circulated on 48 hour vote basis: 1-28-80, 11:00

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION

1-25-80

MUR NO. 1109
STAFF MEMBER(S)

Weeder/Ponder

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: District 23 of the Democratic Non-Partisan
League Party

RELEVANT STATUTE: 2 U.S.C. § 433, § 434

INTERNAL REPORTS CHECKED: North Dakota Democratic Non-Partisan League
Party FEC Committee Reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On December 21, 1979 the Reports Analysis Division referred to the Office of General Counsel the matter in which District 23 of the Democratic Non-Partisan League Party (the "District 23 Committee") may have violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee.

Reports filed with the Commission by the North Dakota Democratic Non-Partisan League Party ("the State Party") disclosed that the District 23 Committee, an unregistered committee, made two contributions in 1977 aggregating \$1401.24 and three contributions in 1978 aggregating \$1038.92. A surface violation letter was sent to the District 23 Committee on October 17, 1978 advising them that they may be considered a political committee pursuant to the FECA. On May 1, 1979 the Commission notified the District 23 Committee of a reason to believe finding after they failed to respond.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 433 and § 434 require any organization which has received contributions or made expenditures in excess of \$1,000 during a calendar year in connection with federal election activities to register and report as a political committee. The District 23 Committee made transfers which exceeded the limitation by \$401.24 in 1977 and \$38.92 in 1978. However, the following circumstance merits consideration.

In 1978 the State Party requested an advisory opinion which specifically addressed the problem of transfers exceeding \$1,000 from its district committees. In response, the Commission offered guidelines whereby the district committees would not be required to register as political committees when transfers were in excess

of \$1,000 during a calendar year. Specifically, the advisory opinion reads as follows:

11, however, the State Party were to establish a separate Federal campaign committee with a segregated Federal account (See 11 C.F.R. §102.6(a)(2)(i)), as you [the State Party] have recommended, a district committee could transfer up to \$1,000 in a calendar year to the State Party's separate Federal account and any amount transferred to the State Party in excess of \$1,000 could be placed in an account the funds from which are not used to influence Federal elections, i.e. one which is used for state and/or local elections. Under this procedure, district committees which did not wish to be considered "political committees" would be able to maintain that status. 1/

The Commission issued the advisory opinion in April 1979, since which time the District 23 Committee has made no transfers exceeding \$1,000. Further, the treasurer of the District 23 Committee sent a letter on September 20, 1979 to inform the Commission of actions initiated toward compliance.

In view of the above discussion and the minimal amounts in violation, the Office of General Counsel recommends taking no further action regarding District 23 of the Democratic Non-Partisan League Party's possible violation of 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee. Accordingly, this Office recommends to close the file on this matter and to approve and send the attached letter.

RECOMMENDATIONS

1. Take no further action with regard to District 23 of the Democratic Non-Partisan League Party's possible violation of 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee.
2. Close the file.
3. Approve and send the attached letter.

Attachments

RAD Referral

Letter to Arnold Gronneberg, Treasurer, District 23 of the Democratic NPL Party

1/ See Advisory Opinion 1978-91 (included within the attached RAD Referral).

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE

12/22/99

ANALYST

Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF

Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW

FROM:

ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE COMMITTEE: District 23 Democratic NPL Party

TREASURER: Arnold Gronneberg

ADDRESS: Hannaford, North Dakota 58413

AFFILIATE(S): Unknown

ALLEGATION(S)

CITE

ATTACHMENT(S)

Failure to register and report
as a political committee

2 D.S.C. 433 & 434

DATE INITIATED: 10/17/98 (copy of surface violation sent to new treasurer
on 6/27/99)

MANNER IN WHICH REVIEW WAS INITIATED:

Normal Review

Other:

ATTACHMENT

Special Project:

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

PERIOD COVERED FROM N/A TO N/A

TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A

CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

SSV1-78-71 (10/17/78)

1

SSV1-78-71 (re-sent to new treasurer 6/27/79)

3

SSV2-78-71 (5/1/79)

2

SSV2-78-71 (re-sent to new treasurer 9/11/79)

5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

1-1-1-1: Greevy with Gronneberg (7/25/79)

4

1-1-1-1: Stolaruk with Gronneberg (9/19/79)

6

1-1-1-1: Stolaruk with Gronneberg (11/6/79)

8

REASONS FOR REFERRAL:

ATTACHMENT

Referred to SSV2/78-71 (9/24/79)

7

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

ATTACHMENT

NONE

PREVIOUS LOGIC AUDIT REFERRALS FROM RAD:

NONE



FEDERAL ELECTION COMMISSION

1118 K STREET, N.W.
WASHINGTON, D.C. 20543

October 17, 1978

Ms. Lorraine Edland
District 23 - RPL Democratic Party
Cooperstown, ND 58425

Dear Ms. Edland:

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 North Dakota Democratic Non-Partisan League Party 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.

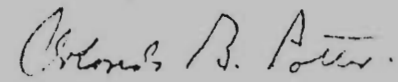
If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

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 of this letter of your decision on this matter. If you have any questions, please contact Lisa Stolaruk in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,



Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

70

Schedule A

July 1976

Federal Election Commission
1125 K Street, N.W.
Washington, D.C. 20541Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See Instructions on back)

Page 1 of 2 for

LINE NUMBER 18(a)

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

Name of Candidate or Committee in full

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 23
Cooperstown, ND 58425Date (month,
day, year)

1-04-77

Amount of each
receipt this period

\$ 401.25

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Robert Wilham, Treasurer, District 4
Norma, ND 58766Date (month,
day, year)

1-04-77

Amount of each
receipt this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

J. Darlene Turitto, Treasurer, Democratic Women, Bismarck
1010 E. Owens Avenue
Bismarck, ND 58501Date (month,
day, year)

2-07-77

Amount of each
receipt this period

600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Ern. Ruby Hennig, Treasurer, Dist. 20, Democratic Women
Barton, ND 58218Date (month,
day, year)

2-18-77

Amount of each
receipt this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Ed Sand, Treasurer, District 26
Ellendale, ND 58436Date (month,
day, year)

2-18-77

Amount of each
receipt this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Terry A. Stollman, Treasurer, District 20
Thompson, ND 58278Date (month,
day, year)

3-21-77

Amount of each
receipt this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Subtotal of receipts this page (optional)

2,901.25

Total this period (last page this line number only)

\$

Contributions, Gifts, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3000
(See Instructions on back)

LINE NUMBER 15(a)

Use separate schedule if for each numbered line

Contributor's Name (Print in full)

SEP 6 PM 8:40

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Elaine Tisch, Treasurer, District 27 - Democratic NPL Party
Lidgerwood, ND 58053

Date (month,
day, year)

4-06-77

Amount of each
receipt this year

\$ 600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 600.00

Full Name, mailing address and ZIP code

Dennis D. Dourville (For Lloyd Ondahl) for Congress Committee
2624 4th Avenue North
Grand Forks, ND 58278

Date (month,
day, year)

4-26-77

Amount of each
receipt this year

\$ 3,145.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$

Full Name, mailing address and ZIP code

Terry J. Stallman, Treasurer, District 20 - Democratic NPL
Thompson, ND 58278 Party

Date (month,
day, year)

5-13-77

Amount of each
receipt this year

\$ 550.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 1,050.00

Full Name, mailing address and ZIP code

Ralph Benitsch, Treasurer, District 35 - Democratic NPL
Breton, ND 58425 Party

Date (month,
day, year)

6-15-77

Amount of each
receipt this year

\$ 400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 400.00

Full Name, mailing address and ZIP code

Lorraine Island, Treasurer, District 23 - Democratic NPL Party
Copper Town, ND 58425

Date (month,
day, year)

6-22-77

Amount of each
receipt this year

\$ 1,000.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 1,401.24

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

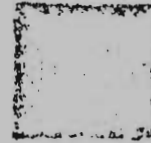
Aggregate Year to date \$

Subtotal of receipts (optional)

\$ 5,695.00

Total this period (list by line number only)

\$ 5,695.00



3501/71-71

SENDER'S CERTIFICATE OF MAIL
A RETURN ADDRESS IS REQUIRED FOR ALL MAIL SENT BY FIRST CLASS MAIL.

1. The following service is requested (check one):
☒ Show to whom and date delivered
☒ Show to whom, date, and a receipt 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
Edmond
Unit 23 NAL
P.O.

3. ARTICLE DESCRIPTION
REGISTERED MAIL CERTIFIED MAIL INSURED MAIL
013644

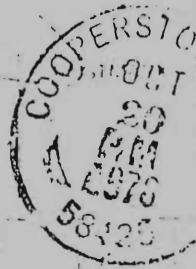
(Always obtain signature of addressee or agent)

4. SIGNATURE
[Signature]

5. DATE OF DELIVERY
10/17

6. ADDRESS (not complete only if requested)

7. UNABLE TO DELIVER REASON



10/17



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON D.C. 20543

May 1, 1979

Lorraine Elland, Treasurer
District 23 - NPL Democratic Party
Goperstown, ND 58425

Dear Ms. Elland:

On October 17, 1978, you were notified that your committee may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

On November 13, 1978, the Commission received a request for an advisory opinion from the recipient of the transfers made by your committee. The recipient, North Dakota Democratic Non-Partisan League Party, requested an opinion concerning application of the Federal Election Campaign Act of 1971, as amended, to the reporting of funds received by the North Dakota Democratic Non-Partisan League Party from local legislative district committees. Attached for your information is a copy of the advisory opinion issued to the committee.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above, or you require additional information, please contact Lisa Stobanuk, our Reports Analyst assigned to you on our toll free number (800)424-9530.

Sincerely,

Joan M. Chikara
Commissioner

Certified Mail
Return Receipt Requested

April 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1978-91

Mr. Art Rude
North Dakota Democratic-NPL Party
1902 E. Divide Avenue
Bismarck, North Dakota 58501

Dear Mr. Rude:

This is in response to your letter of November 8, 1978, as supplemented by letter of January 28, 1979, requesting an advisory opinion on behalf of the North Dakota Democratic-NPL Party ("the State Party") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the reporting of funds received by the State Party from local legislative district committees ("the district committees").

You have described three proposed procedures for handling funds received by the State Party and request an advisory opinion as to whether each is proper under the Act and Commission regulations. The three proposals relate to: (1) contributions received directly by the State Party; (2) funds received in the form of transfers of proceeds from fundraising events held by local legislative district committees; and (3) transfers exceeding \$1,000 in a calendar year to the State Party from local legislative district committees. Each proposal will be treated separately after summarizing the factual situation presented in your request.

Your request indicates that the State Party is organized by legislative districts and that each district is represented on a Policy Committee which determines the budget and financing

of the State Party. Each district committee shares in the financial responsibility by raising a "quota" of funds on behalf of the State Party from individual contributions and fundraising events within the district. You state that when individual contributions are received by the State Party they are receipted, credited to that individual's home district quota, and itemized on the State Party's report to the Commission.^{1/} In addition to these individual itemized contributions, other funds are collected within each district which result from various fundraising events, e.g. political dinners. With respect to the proceeds of these events, the district committee officers make a determination regarding local campaign needs and, at their discretion, forward surplus proceeds to the State Party. Each sum forwarded is credited to the particular district committee's quota. You indicate that in all cases the ticket prices for these events were under \$100 and that, therefore, a precedent had been established by the State Party of reporting these funds as "unitemized transfers from committee",^{2/} regardless of the total amount transferred, which in several instances exceeded \$1000 annually and occasionally exceeded \$1000 in a quarterly reporting period. You state that recently the Commission notified several of the district committees whose reported transfers exceeded \$1000 during 1977 that they may be "political committees subject to the registration, reporting and contribution limitation requirements of the Act". You seek Commission approval of certain methods of reporting funds received from the districts which will obviate the need, in most cases, for the district committees to register and report as political committees under the Act.

1/ Your supplemental response indicated that the State Party is currently organized pursuant to 11 CFR 102.6(a)(2)(ii); that is, it has a single account from which it makes contributions to and expenditures on behalf of both Federal and non-Federal candidates and which reports to the Commission all State Party financial activity. You indicate, however, that you have recommended to the State Party's Executive Committee that it establish a separate Federal account pursuant to 11 CFR 102.6(a)(2)(i).

2/ An examination of reports filed with the Commission by the State Party indicated that these funds have been reported on line 13(a) of FEC Form 3 as "transfers in from affiliated committees" and itemized on Schedule A as having been received from an individual who is identified as the treasurer of the particular district committee.

Contributions received directly by the State Party

You propose to continue current practice with respect to individual itemizable contributions; that is, they will be submitted directly to the State Party, receipted properly, and itemized on the State Party's reports to the Commission. The Commission concludes that this procedure is acceptable as long as any person at the district level who receives such contributions on behalf of the State Party meets the requirements of 2 U.S.C. 512(b) and 11 CFR 102.8, which provide that every person who receives a contribution in excess of \$50 for a political committee shall provide a detailed account thereof to the committee's treasurer within 5 days of receipt of such contribution, including the amount, identification of the contributor, the date on which the contribution was received and, where the contribution exceeds \$100, the occupation and principal place of business of the contributor. Also, 11 CFR 103.3 requires that all contributions received by the State Party be deposited in a designated campaign depository of the State Party within 10 days of their receipt.

Transfers of proceeds from district committee fundraisers

You state that the proceeds of district fundraising events, which consist of small, unitemizable contributions, will be forwarded directly to the State Party and reported to the Commission as "transfers in from affiliated committees". As noted above, the State Party has, in the past, usually reported these transfers as coming from an individual who is identified as the treasurer of a particular district committee. Part 104.2(b)(4) of Commission regulations requires each report filed by a political committee to disclose the identification of each political committee or other political organization from which the reporting committee received any transfer of funds in any amount during the reporting period, together with the amounts and dates of all transfers. Accordingly, the State Party should continue to itemize each transfer from a district committee on Schedule A, but should clearly identify the district committee (by number, as has been done in the past, or otherwise) from which the funds have been received, rather than the individual who may act on behalf of a particular committee.

Transfers exceeding \$1000 from district committees

With respect to your third proposal, that no district committee will transfer in excess of \$1000 in a calendar year to the State Party unless it registers and reports as a "political committee", the Commission notes that as long as the State Party maintains a single account for the purpose of making contributions to or expenditures on behalf of both Federal and non-Federal candidates, any district committee which transfers in excess of \$1000 to the State Party in any calendar year would qualify as a "political committee" subject to registration and reporting under the Act. If, however, the State Party were to establish a separate Federal campaign committee with a segregated Federal account (See 11 CFR 102.6(a)(2)(i)), as you have recommended, a district committee could transfer up to \$1000 in a calendar year to the State Party's separate Federal account and any amount transferred to the State Party in excess of \$1000 could be placed in an account the funds from which are not used to influence Federal elections, i.e. one which is used for state and/or local elections. Under this procedure, district committees which did not wish to be considered "political committees" would be able to maintain that status. In this regard, however, the Commission emphasizes the responsibility of the State Party, as well as all Federal committees which receive transfers from unregistered political organizations, to request assurance from the transferring district committee that the contributions originated from sources which are permissible under the Act.^{2/} (See 2 U.S.C. §§441a, 441b, 441c, 441e and 441f).

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Joan B. Aikens
Chairman for the
Federal Election Commission

By the Commission notes that North Dakota law does not prohibit union contributions to candidates for State office and committee supporting such candidates. Union, as well as corporate, contributions are prohibited under 2 U.S.C. §441b unless made from a separate segregated fund.



10-5502/10-7

1. The following information is requested (check one):
☐ Show to whom delivered (check one)
☐ Show to whom date and address of delivery
☐ RETURN TO DELIVERER
Show to whom and date delivered
☐ RETURN TO DELIVERER
Show to whom date and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Postmaster, NALP

3. ARTICLE DESCRIPTION
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
4-55-1

(Always obtain signature of addressee or agent)
SIGNATURE _____
Agent _____ | Authorized Agent _____

DATE OF DELIVERY _____ POSTMARK _____

ADDRESS _____
by _____ dated _____

UNABLE TO DELIVER REASON _____
CERTIFIED RETURN _____





FEDERAL ELECTION COMMISSION

135 K STREET, N.W.
WASHINGTON, D.C. 20543

June 27, 1979

Arnold Gronneberg, Treasurer
District 23-NPL Democratic Party
Hannaford, ND 58448

Dear Mr. Gronneberg:

On October 17, 1978, Lorraine Idland, former treasurer of District 23-NPL Democratic Party, was sent the attached letter. He learned recently that you have assumed the position of treasurer of the committee.

The letter of October 17, 1978, refers to contributions made by your committee during 1977. The Commission notes however that the committee made contributions during 1978 to the North Dakota Democratic Non-Partisan League Party which aggregated in excess of \$1,000. Therefore, the committee may be a political committee for both calendar years 1977 and 1978. Attached are copies of the reports in which these additional contributions are listed. Please examine the letter of October 17, 1978, and act in accordance with its recommendations.

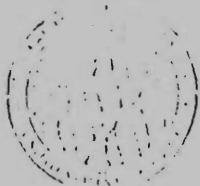
In addition, please be advised that on November 13, 1978, the Commission received a request for an advisory opinion from the recipient of the transfers made by your committee. The recipient, North Dakota Democratic Non-Partisan League Party, requested an opinion concerning application of the Federal Election Campaign Act of 1971, as amended, to the reporting of funds received by the North Dakota Democratic Non-Partisan League Party from local legislative district committees. Attached for your information is a copy of the advisory opinion issued to the committee.

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, or require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)357-2223.

Sincerely,

Orlando P. Potter
Staff Director

Certified Mail
Return Receipt Requested



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.
WASHINGTON, D.C. 20543

October 17, 1978

Ms. Lorraine Edland
District 23 - RPL Democratic Party
Cooperstown, ND 58425

Dear Ms. Edland:

This letter is presented 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 North Dakota Democratic Non-Partisan League Party 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.

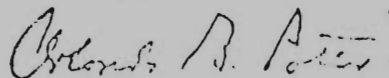
If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

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 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 Lisa Stolaruk in our Reports Analysis Division at (800)624-2600. Our local number is (202)523-1474.

Sincerely,



Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

31715

Name of Candidate or Committee in full

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 23
Cooperstown, ND 58425

Date (month,
day, year)

1-04-77 \$ 401

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Full Name, mailing address and ZIP code

Robert Wilham, Treasurer, District 4
Nemra, ND 58766

Date (month,
day, year)

1-04-77 400

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Full Name, mailing address and ZIP code

J. Darlene Turitto, Treasurer, Democratic Women, Bismarck
1010 E. Owens Avenue
Bismarck, ND-58501

Date (month,
day, year)

2-07-77 600

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Full Name, mailing address and ZIP code

Mrs. Ruby Nesvig, Treasurer, Dist. 20, Democratic Women
Purton, ND 58248

Date (month,
day, year)

2-13-77 400

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Full Name, mailing address and ZIP code

Pat Sand, Treasurer, District 26
Ellendale, ND 58436

Date (month,
day, year)

2-18-77 500

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Full Name, mailing address and ZIP code

Terry J. Stalleman, Treasurer, District 20
Thompson, ND 58278

Date (month,
day, year)

3-21-77 500

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year to date \$ 5

Subtotal (if receipts this page (optional))

\$ 2,000

Total this period (last page this line number only)

\$

SEP 6 AM 8:40

North Dakota Democratic Non-Partisan League Party

Name, mailing address and ZIP code Elaine Tisch, Treasurer, District 27 - Democratic NPL Party Lidgerwood, ND 58553		Date (month, day, year) 4-06-77	Amount of cash received this year \$ 600.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5 600.00		
Name, mailing address and ZIP code Dennis D. Doreville (For Lloyd Omdahl) for Congress Committee 624 4th Avenue North Grand Forks, ND 58278		Date (month, day, year) 4-26-77	Amount of cash received this year 3,145.67
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5		
Name, mailing address and ZIP code Perry J. Stallman, Treasurer, District 20 - Democratic NPL Party Thompson, ND 58275		Date (month, day, year) 5-13-77	Amount of cash received this year 550.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5 1,000.00		
Name, mailing address and ZIP code Ralph Ebenfisch, Treasurer, District 35 - Democratic NPL Party Breiden, ND 58425		Date (month, day, year) 5-15-77	Amount of cash received this year 400.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5 400.00		
Name, mailing address and ZIP code Lorraine Edland, Treasurer, District 23 - Democratic NPL Party Cooperstown, ND 58425		Date (month, day, year) 6-22-77	Amount of cash received this year 1,000.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5 1,660.26		
Name, mailing address and ZIP code		Date (month, day, year)	Amount of cash received this year
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year to date P-5		
Total of receipts this page (over all)			\$5,645.67
Total this period (last page this box number only)			\$5,645.67

Schedule A

Form 1000
 (Use separate schedule for each numbered line)

Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

Page 1 of 2 for
 LINE NUMBER 18(a)

(Use separate schedule for each numbered line)

Name of Candidate or Committee on File

North Dakota Democratic Non-Partisan League Party

Full Name, including address and ZIP code

M. A. Shelton, Treasurer, District 6
 Carbury, ND 58724

Date (month,
 day, year)

Amount of cash
 received in this period

3-7-78
 3-17-78

\$500.00
 100.00

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

J. Darlene Iuritto, Treasurer, Democratic Women, Bismarck
 1010 E. Owens Avenue
 Bismarck, ND 58501

Date (month,
 day, year)

Amount of cash
 received in this period

2-24-78

\$500.00

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

Stutsman County Democratic NPL Women, Hazel E. DeGroot
 Treasurer, Box 915, Jamestown, ND 58401

Date (month,
 day, year)

Amount of cash
 received in this period

3-17-78

\$200.00

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

Lewell Johnson, Treasurer, District 25
 Wahpeton, ND 58075

Date (month,
 day, year)

Amount of cash
 received in this period

1-20-78

\$137.00

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

Arlene Hansen, Treasurer, District 37
 1012 West Villard
 Dickinson, ND 58601

Date (month,
 day, year)

Amount of cash
 received in this period

2-2-78

\$341.45

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

Ferraine Edlund, Treasurer, District 25
 Cooperstown, ND 58425

Date (month,
 day, year)

Amount of cash
 received in this period

3-29-78

\$60.00

Business or other occupation

Occupation

Check if Contributor is self-employed
 Aggregate Year to Date

Full Name, including address and ZIP code

\$341.45

Total cash received from all sources (the line number only)

\$1,000.00

FORM 1041-A
 REVISED
 1978
 U.S. GOVERNMENT PRINTING OFFICE
 11-754-500-500
 500-500

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in Kind,
 Other Income, Loans, Refunds)

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

Page 1 of 2
 Line Number 18a

(Use Separate Schedule for
 each item listed below)

Name of Candidate or Committee in Full

Democratic-NFL Party

Name, Address and ZIP Code

Robert O. Heiser, Treas. D52
 1210 Albany Pl.
 Bismarck, ND 58501

Principal Place of Business

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 126.37

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

11/30/78

126.37

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

Mrs. Gordon Elliot, Treas. D5
 McHallen, ND 58751

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 236.21

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

11/30/78

236.21

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

Shirley Smith, Treas. D12
 Emond, ND 58552

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 132.00

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

12/1/78

132.00

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

Sandra M. Cardinale, Treas.
 112 5th Ave. SE
 Jamestown, ND 58401

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 695.00

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

12/1/78

695.00

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

M. A. Shelton, Treas. D6
 Carbury, ND 58724

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 333.25

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

12/5/78

333.25

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

Art Albrecht, Treas. D13
 214 1st St. SW
 Axtell, ND 58705

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 501.00

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

12/7/78

501.00

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

Harold J. and Ethel J. Treas.
 1111 1st St. SW
 Bismarck, ND 58501

Occupation

☐ Check if Contribution by Telephone
 Aggregate Year To Date \$ 338.00

Principal Place of Business

Date (month
 day, year)

Amount of each Receipt
 this Period

12/7/78

338.00

☐ Personal ☐ General ☐ Other

Name, Address and ZIP Code

TOTAL

\$ 2,363.93

8720

April 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1978-91

Mr. Art Rude
North Dakota Democratic-NPL Party
1902 E. Divide Avenue
Bismarck, North Dakota 58501

Dear Mr. Rude:

This is in response to your letter of November 8, 1978, as supplemented by letter of January 28, 1979, requesting an advisory opinion on behalf of the North Dakota Democratic-NPL Party ("the State Party") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the reporting of funds received by the State Party from local legislative district committees ("the district committees").

You have described three proposed procedures for handling funds received by the State Party and request an advisory opinion as to whether each is proper under the Act and Commission regulations. The three proposals relate to: (1) contributions received directly by the State Party; (2) funds received in the form of transfers of proceeds from fundraising events held by local legislative district committees; and (3) transfers exceeding \$1,000 in a calendar year to the State Party from local legislative district committees. Each proposal will be treated separately after summarizing the factual situation presented in your request.

Your request indicates that the State Party is organized by legislative districts and that each district is represented on a Policy Committee which determines the budget and financing

of the State Party. Each district committee shares in the financial responsibility by raising a "quota" of funds on behalf of the State Party from individual contributions and fundraising events within the district. You state that when individual contributions are received by the State Party they are receipted, credited to that individual's home district quota, and itemized on the State Party's report to the Commission.^{1/} In addition to these individual itemized contributions, other funds are collected within each district which result from various fundraising events, e.g. political dinners. With respect to the proceeds of these events, the district committee officers make a determination regarding local campaign needs and, at their discretion, forward surplus proceeds to the State Party. Each sum forwarded is credited to the particular district committee's quota. You indicate that in all cases the ticket prices for these events were under \$100 and that, therefore, a precedent had been established by the State Party of reporting these funds as "unitemized transfers from committee",^{2/} regardless of the total amount transferred, which in several instances exceeded \$1000 annually and occasionally exceeded \$1000 in a quarterly reporting period. You state that recently the Commission notified several of the district committees whose reported transfers exceeded \$1000 during 1978 that they may be "political committees subject to the registration, reporting and contribution limitations requirements of the Act". You seek Commission approval of certain methods of reporting funds received from the districts which will obviate the need, in most cases, for the district committees to register and report as political committees under the Act.

1/ Your supplemental response indicates that the State Party is currently organized pursuant to 11 CFR 102.6(a)(2)(ii); that is, it has a single account from which it makes contributions to and expenditures on behalf of both Federal and non-Federal candidates and which reports to the Commission all State Party financial activity. You indicate, however, that you have recommended to the State Party's Executive Committee that it establish a separate Federal account pursuant to 11 CFR 102.6(a)(2)(i).

2/ An examination of reports filed with the Commission by the State Party indicates that these funds have been reported on line 13(a) of FEC Form 3 as "transfers in from affiliated committees" and itemized on Schedule A as having been received from an individual who is identified as the treasurer of the particular district committee.

Contributions received directly by the State Party

You propose to continue current practice with respect to individual itemizable contributions; that is, they will be submitted directly to the State Party, receipted properly, and itemized on the State Party's reports to the Commission. The Commission concludes that this procedure is acceptable as long as any person at the district level who receives such contributions on behalf of the State Party meets the requirements of 2 U.S.C. §432(b) and 11 CFR 102.3, which provide that every person who receives a contribution in excess of \$50 for a political committee shall provide a detailed account thereof to the committee's treasurer within 5 days of receipt of such contribution, including the amount, identification of the contributor, the date on which the contribution was received and, where the contribution exceeds \$100, the occupation and principal place of business of the contributor. Also, 11 CFR 103.3 requires that all contributions received by the State Party be deposited in a designated campaign depository of the State Party within 10 days of their receipt.

Transfers of proceeds from district committee fundraisers

You state that the proceeds of district fundraising events, which consist of small, unitemizable contributions, will be forwarded directly to the State Party and reported to the Commission as "transfers in from affiliated committee". As noted above, the State Party has, in the past, usually reported these transfers as coming from an individual who is identified as the treasurer of a particular district committee. Part 104.2(b)(4) of Commission regulations requires each report filed by a political committee to disclose the identification of each political committee or other political organization from which the reporting committee received any transfer of funds in any amount during the reporting period, together with the amounts and dates of all transfers. Accordingly, the State Party should continue to itemize each transfer from a district committee on Schedule A, but should clearly identify the district committee (by number, as has been done in the past, or otherwise) from which the funds have been received, rather than the individual who may act on behalf of a particular committee.

Transfers exceeding \$1000 from district committees

With respect to your third proposal, that no district committee will transfer in excess of \$1000 in a calendar year to the State Party unless it registers and reports as a "political committee", the Commission notes that as long as the State Party maintains a single account for the purpose of making contributions to or expenditures on behalf of both Federal and non-Federal candidates, any district committee which transfers in excess of \$1000 to the State Party in any calendar year would qualify as a "political committee" subject to registration and reporting under the Act. If, however, the State Party were to establish a separate Federal campaign committee with a segregated Federal account (See 11 CFR 102.6(a)(2)(i)), as you have recommended, a district committee could transfer up to \$1000 in a calendar year to the State Party's separate Federal account and any amount transferred to the State Party in excess of \$1000 could be placed in an account the funds from which are not used to influence Federal elections, i.e. one which is used for state and/or local elections. Under this procedure, district committees which did not wish to be considered "political committees" would be able to maintain that status. In this regard, however, the Commission emphasizes the responsibility of the State Party, as well as all Federal committees which receive transfers from unregistered political organizations, to request assurance from the transferring district committee that the contributions originated from sources which are permissible under the Act. (See 2 U.S.C. §§441a, 441b, 441c, 441e and 441f).

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §3021.

Sincerely yours,

Joan D. Aikens
Chairman for the
Federal Election Commission

The Commission notes that North Dakota law does not prohibit union contributions to candidates for State office and committee supporting such candidates. Union, as well as corporate, contributions are prohibited under 2 U.S.C. §441b unless made from a separate segregated fund.

350175-71

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

2. ARTICLE ADDRESSED TO
Craneberg
Box 23 Bemo NPLP

3. ARTICLE DESCRIPTION
REGISTERED NO. *277018* CERTIFIED NO. _____
(Always obtain signature of addressee or agent)

4. I enclose (check one):
☐ Cash ☐ Ad. for sale ☐ Ad. for sale or agent

5. DATE OF DELIVERY
June 20 1979

6. ADVICE (Complete only if not delivered)
☐ UNABLE TO DELIVER BECAUSE

7. RETURN TO SENDER (check one)
☐ Yes ☐ No

8. POSTAGE (check one)
☐ Paid ☐ Unpaid

9. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

10. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

11. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

12. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

13. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

14. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

15. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

16. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

17. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

18. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

19. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

20. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

21. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

22. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

23. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

24. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

25. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

26. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

27. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

28. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

29. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

30. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

31. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

32. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

33. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

34. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

35. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

36. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

37. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

38. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

39. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

40. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

41. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

42. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

43. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

44. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

45. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

46. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

47. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

48. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

49. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

50. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

51. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

52. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

53. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

54. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

55. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

56. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

57. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

58. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

59. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

60. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

61. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

62. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

63. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

64. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

65. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

66. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

67. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

68. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

69. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

70. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

71. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

72. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

73. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

74. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

75. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

76. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

77. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

78. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

79. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

80. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

81. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

82. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

83. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

84. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

85. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

86. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

87. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

88. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

89. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

90. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

91. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

92. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

93. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

94. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

95. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

96. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

97. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

98. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

99. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent

100. POSTAGE PAID BY (check one)
☐ Addressee ☐ Agent



Telecon:

Greevy with Gronneberg
District 23 NEF Democratic Party
3SV1/78-71
7/25/79

AG called this day regarding the above SV.

He stated that he has been out of town for about a month, and this was the first he had seen the letter.

I explained to him why it was sent, and gave him background on the situation throughout the State and the AO submitted to the SCC. He asked what he should do.

I ran through the options with him, and then suggested that he call the SCC (Art Rude) to talk with them. I stated that one option was available which would minimize his work, i.e. SCC transferring the necessary funds to their State and local account. I suggested this after I learned that the District committee was not otherwise involved in Federal elections, and that they have a \$4,500 quota which is to be contributed to the SCC every year.

He said that he would contact Rude, and would get back to us by phone.

I stated that whatever he decided to do, we should have something in writing, as well as the phone call.



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

September 11, 1979

Arnold Gronneberg, Treasurer
District 23-NFL Democratic Party
Hannaford, MD 58448

Dear Mr. Gronneberg:

On June 27, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolarik, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 457-9023.

Sincerely,

John W. Mackay
Commissioner

Certified Mail:
Return Receipt Requested

DATE: 9/19/79

TIME: 10:00

COMMITTEE: District 23 Democratic Nat

PERSON SPOKEN TO: Arnold Gronneberg (701) 761-2138

FEC'D: Lisa Stolaruk

SUBJECT: 2nd Notice of letter

Mr. Gronneberg called to complain about getting the second notice of letter. He said that he is relatively new at the job as treasurer, and that he turned all of the material over to the 1st Dem. Nat Party to work on. He said that he thought everything was taken care of. I strongly recommended that he contact the state party and see what, if anything, has been done. We have not received anything from the NPL regarding this matter. I also advised him to send a letter stating that he is aware of the situation, and that he is working toward resolving it. I told him that the responsibility is on him to see the matter through, even though he was not treasurer in 1977 when the transfers took place.

3SV2/78-71

Hannaford, N. Dak. 58048

Sept. 20, 1979

Federal Election Commission

1300 K. St. N. W.

Washington, D. C.

73 SEP 20 AM 11:53

Dear Mr. Lisa Stolarm;

This letter is being sent to your commission in regards to the letter I received on Sept. 15th, 1979.

I wish to inform the commission that I have started to comply with the wishes of the Federal Election Commission. Having been chosen as treasurer of this district only last December, I am not versed well enough on the subject at hand, so I have asked the NPL-Democratic Party of North Dakota to review and help me with the information that is require of the commission. I made a trip to Bismarck with all the material that was sent to me by your commission and they informed me that they would review the material and in turn would inform me the procedure to follow, but as the office is almost on a voluntary basis now, evidently nobody has got to it yet. I will try and contact them soon and see if the information your commission requires can be in the mail soon.

Sincerely,

Arnold Kraunenberg

Arnold Kraunenberg

81729

ARNOLD GRONBERG
HANNAFORD, N. DAK 58448



Federal Election Commission
1325 K Street N. W.

Washington, D. C. 20463

Attn. Miss G. J. [illegible]



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arnold Gronneberg, Treasurer
District 23 - Democratic Non-Partisan
League Party
Hannaford, North Dakota 58448

RE: MUR 1109

Dear Mr. Gronneberg:

On May 1, 1979, the Commission found reason to believe that your committee may have violated 2 U.S.C. §433 and §434 of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above captioned matter. However, after considering the circumstances of this matter, the Commission has determined to take no further action and to close the file with regard to this matter.

This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making expenditures and/or contributions in excess of \$1,000 in connection with federal election activities during a calendar year without registering and reporting is a violation of 2 U.S.C. §433 and §434 and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Carolyn Weeder at (202) 523-4529.

Sincerely,

Charles W. Steele
General Counsel

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

D 5.54
RAD 7.2 2.21

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Lisa Stolaruk

TO: Office of General Counsel TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW _____

FROM: John J. J. ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: District 23 Democratic NPL Party

TREASURER: Arnold Gronneberg

ADDRESS: Hannaford, North Dakota 58148

AFFILIATE(S): Unknown

ALLEGATION(S): CITE: ATTACHMENT(S)

Failure to register and report 2 U.S.C. 435 & 434
as a political committee

1

DATE INITIATED: 10/17/78 (copy of surface violation sent to new treasurer
on 6/27/79)

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 N/A TO N/A

TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A

CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

3SV1/74-71 (10/17/78)

1

3SV1/78-71 (re-sent to new treasurer 6/27/79)

3

3SV2/78-71 (5/1/79)

2

3SV2/78-71 (re-sent to new treasurer 9/11/79)

5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Gronneberg (7/25/79)

4

Telecon: Stolaruk with Gronneberg (9/19/79)

6

Telecon: Stolaruk with Gronneberg (11/6/79)

8

REASON(S) FOR REFERRAL:

ATTACHMENT

Response to 3SV2/78-71 (9/24/79)

7

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

ATTACHMENT

NONE

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

NONE



FEDERAL ELECTION COMMISSION

1275 K STREET, N.W.
WASHINGTON, D.C. 20463

October 17, 1978

Ms. Lorraine Edland
District 23 - NPL Democratic Party
Cooperstown, ND 58425

Dear Ms. Edland:

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 North Dakota Democratic Non-Partisan League Party 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.

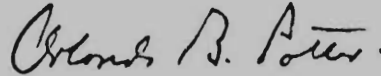
If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

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 Lisa Stolaruk in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,

A handwritten signature in cursive script that reads "Orlando B. Potter".

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

Schedule A

July 1976

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See Instructions on back)

Page 1 of 2 for

LINE NUMBER 18(a)

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

Name of Candidate or Committee in full

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 23
Cooperstown, ND 58425Date (month,
day, year)

1-04-77

Amount of each
receipt this period

\$ 401.24

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Robert Wihham, Treasurer, District 4
Norma, ND 58766Date (month,
day, year)

1-04-77

Amount of each
receipt this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

J. Darlene Turitto, Treasurer, Democratic Women, Bismarck
1010 E. Owens Avenue
Bismarck, ND 58501Date (month,
day, year)

2-07-77

Amount of each
receipt this period

600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Mrs. Ruby Nesvig, Treasurer, Dist. 20, Democratic Women
Buxton, ND 58218Date (month,
day, year)

2-18-77

Amount of each
receipt this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Pat Sand, Treasurer, District 26
Ellendale, ND 58436Date (month,
day, year)

2-18-77

Amount of each
receipt this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Terry J. Stallman, Treasurer, District 20
Thompson, ND 58278Date (month,
day, year)

3-21-77

Amount of each
receipt this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶

\$ 2,801.24

Total this period (last page this line number only) ▶

\$

**Itemized Receipts,
Contributions, Ticket Purchases, Loan
Rebates, and Transfers for Line 18(a) SECTION 108**
Numbers 15, 16, 17 and/or 18 of FEC Form 310N
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 18(a)
(Use separate schedule(s) for each
numbered line)

Candidate or Committee in full

SEP 6 AM 8:40

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code Elaine Tisch, Treasurer, District 27 - Democratic NPL Party Lidgerwood, ND 58053		Date (month, day, year) 4-06-77	Amount of each receipt this period \$ 600.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 600.00		
Full Name, mailing address and ZIP code Dennis D. Dourille (For Lloyd Omdahl) for Congress Committee 2624 4th Avenue North Grand Forks, ND 58278		Date (month, day, year) 4-26-77	Amount of each receipt this period 3,145.62
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code Terry J. Stallman, Treasurer, District 20 - Democratic NPL Thompson, ND 58278 Party		Date (month, day, year) 5-13-77	Amount of each receipt this period 550.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 1,050.00		
Full Name, mailing address and ZIP code Ralph Rebenitsch, Treasurer, District 35 - Democratic NPL Breien, ND 58525 Party		Date (month, day, year) 6-15-77	Amount of each receipt this period 400.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 400.00		
Full Name, mailing address and ZIP code Lorraine Edland, Treasurer, District 23 - Democratic NPL Party Cooperstown, ND 58425		Date (month, day, year) 6-22-77	Amount of each receipt this period 1,000.00
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 1,401.24		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$		
Subtotal of receipts this page (optional)		\$5,695.62	
Total this period (last page this line number only)		\$5,695.62	

3501/78-71

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

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

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

2 ARTICLE ADDRESSED TO
Edlens
Post 23 NAL
RFD

3 ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943644

(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE Addressee Authorized agent
DATE OF DELIVERY
5 ADDRESS (Complete only if requested)
6 UNABLE TO DELIVER BECAUSE

COOPERSTOWN, ND
OCT 20
P.M. 1978
58425

10/17

(2)



FEDERAL ELECTION COMMISSION

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

May 1, 1979

Lorraine Edland, Treasurer
District 23 - NPL Democratic Party
Cooperstown, ND 58425

Dear Ms. Edland:

On October 17, 1978, you were notified that your committee may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

On November 13, 1978, the Commission received a request for an advisory opinion from the recipient of the transfers made by your committee. The recipient, North Dakota Democratic Non-Partisan League Party, requested an opinion concerning application of the Federal Election Campaign Act of 1971, as amended, to the reporting of funds received by the North Dakota Democratic Non-Partisan League Party from local legislative district committees. Attached for your information is a copy of the advisory opinion issued to the committee.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above, or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530.

Sincerely,

Joan D. Aikens
Commissioner

Certified Mail
Return Receipt Requested

April 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1978-91

Mr. Art Rude
North Dakota Democratic-NPL Party
1902 E. Divide Avenue
Bismarck, North Dakota 58501

Dear Mr. Rude:

8 7 4 0
This is in response to your letter of November 8, 1978, as supplemented by letter of January 28, 1979, requesting an advisory opinion on behalf of the North Dakota Democratic-NPL Party ("the State Party") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the reporting of funds received by the State Party from local legislative district committees ("the district committees").

You have described three proposed procedures for handling funds received by the State Party and request an advisory opinion as to whether each is proper under the Act and Commission regulations. The three proposals relate to: (1) contributions received directly by the State Party; (2) funds received in the form of transfers of proceeds from fundraising events held by local legislative district committees; and (3) transfers exceeding \$1,000 in a calendar year to the State Party from local legislative district committees. Each proposal will be treated separately after summarizing the factual situation presented in your request.

Your request indicates that the State Party is organized by legislative districts and that each district is represented on a Policy Committee which determines the budget and financing

of the State Party. Each district committee shares in the financial responsibility by raising a "quota" of funds on behalf of the State Party from individual contributions and fundraising events within the district. You state that when individual contributions are received by the State Party they are receipted, credited to that individual's home district quota, and itemized on the State Party's report to the Commission.^{1/} In addition to these individual itemized contributions, other funds are collected within each district which result from various fundraising events, e.g. political dinners. With respect to the proceeds of these events, the district committee officers make a determination regarding local campaign needs and, at their discretion, forward surplus proceeds to the State Party. Each sum forwarded is credited to the particular district committee's quota. You indicate that in all cases the ticket prices for these events were under \$100 and that, therefore, a precedent had been established by the State Party of reporting these funds as "unitemized transfers from committee",^{2/} regardless of the total amount transferred, which in several instances exceeded \$1000 annually and occasionally exceeded \$1000 in a quarterly reporting period. You state that recently the Commission notified several of the district committees whose reported transfers exceeded \$1000 during 1978 that they may be "political committees subject to the registration, reporting and contribution limitation requirements of the Act". You seek Commission approval of certain methods of reporting funds received from the districts which will obviate the need, in most cases, for the district committees to register and report as political committees under the Act.

1/ Your supplemental response indicates that the State Party is currently organized pursuant to 11 CFR 102.6(a)(2)(ii); that is, it has a single account from which it makes contributions to and expenditures on behalf of both Federal and non-Federal candidates and which reports to the Commission all State Party financial activity. You indicate, however, that you have recommended to the State Party's Executive Committee that it establish a separate Federal account pursuant to 11 CFR 102.6(a)(2)(i).

2/ An examination of reports filed with the Commission by the State Party indicates that these funds have been reported on line 18(a) of FEC Form 3 as "transfers in from affiliated committees" and itemized on Schedule A as having been received from an individual who is identified as the treasurer of the particular district committee.

Contributions received directly by the State Party

You propose to continue current practice with respect to individual itemizable contributions; that is, they will be submitted directly to the State Party, receipted properly, and itemized on the State Party's reports to the Commission. The Commission concludes that this procedure is acceptable as long as any person at the district level who receives such contributions on behalf of the State Party meets the requirements of 2 U.S.C. §432(b) and 11 CFR 102.8, which provide that every person who receives a contribution in excess of \$50 for a political committee shall provide a detailed account thereof to the committee's treasurer within 5 days of receipt of such contribution, including the amount, identification of the contributor, the date on which the contribution was received and, where the contribution exceeds \$100, the occupation and principal place of business of the contributor. Also, 11 CFR 103.3 requires that all contributions received by the State Party be deposited in a designated campaign depository of the State Party within 10 days of their receipt.

Transfers of proceeds from district committee fundraisers

You state that the proceeds of district fundraising events, which consist of small, unitemizable contributions, will be forwarded directly to the State Party and reported to the Commission as "transfers in from affiliated committees". As noted above, the State Party has, in the past, usually reported these transfers as coming from an individual who is identified as the treasurer of a particular district committee. Part 104.2(b)(4) of Commission regulations requires each report filed by a political committee to disclose the identification of each political committee or other political organization from which the reporting committee received any transfer of funds in any amount during the reporting period, together with the amounts and dates of all transfers. Accordingly, the State Party should continue to itemize each transfer from a district committee on Schedule A, but should clearly identify the district committee (by number, as has been done in the past, or otherwise) from which the funds have been received, rather than the individual who may act on behalf of a particular committee.

Transfers exceeding \$1000 from district committees

With respect to your third proposal, that no district committee will transfer in excess of \$1000 in a calendar year to the State Party unless it registers and reports as a "political committee", the Commission notes that as long as the State Party maintains a single account for the purpose of making contributions to or expenditures on behalf of both Federal and non-Federal candidates, any district committee which transfers in excess of \$1000 to the State Party in any calendar year would qualify as a "political committee" subject to registration and reporting under the Act. If, however, the State Party were to establish a separate Federal campaign committee with a segregated Federal account (See 11 CFR 102.6(a)(2)(i)), as you have recommended, a district committee could transfer up to \$1000 in a calendar year to the State Party's separate Federal account and any amount transferred to the State Party in excess of \$1000 could be placed in an account the funds from which are not used to influence Federal elections, i.e. one which is used for state and/or local elections. Under this procedure, district committees which did not wish to be considered "political committees" would be able to maintain that status. In this regard, however, the Commission emphasizes the responsibility of the State Party, as well as all Federal committees which receive transfers from unregistered political organizations, to request assurance from the transferring district committee that the contributions originated from sources which are permissible under the Act.^{3/} (See 2 U.S.C. §§441a, 441b, 441c, 441e and 441f).

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Joan D. Aikens
Chairman for the
Federal Election Commission

^{3/}The Commission notes that North Dakota law does not prohibit union contributions to candidates for State office and committees supporting such candidates. Union, as well as corporate, contributions are prohibited under 2 U.S.C. §441b unless made from a separate segregated fund.



3502/T-7

PS Form 3811, April 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		
1st. 2nd 23 NALP		
3 ARTICLE DESCRIPTION		
REGISTERED NO	CERTIFIED NO	INSURED NO
	64-557	
(Always obtain signature of addressee or agent)		
I have received the article described above		
SIGNATURE	Addressed	☐ Authorized agent
4 DATE OF DELIVERY		POSTMARK
5 ADDRESS (complete only if requested)		
6 UNABLE TO DELIVER BECAUSE		CLERK'S INITIALS

☆GPO 1977 O 74350



3



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

June 27, 1979

Arnold Gronneberg, Treasurer
District 23-NPL Democratic Party
Hannaford, ND 58448

Dear Mr. Gronneberg:

On October 17, 1978, Lorraine Edland, former treasurer of District 23-NPL Democratic Party, was sent the attached letter. We learned recently that you have assumed the position of treasurer of the committee.

The letter of October 17, 1978, refers to contributions made by your committee during 1977. The Commission notes however that the committee made contributions during 1978 to the North Dakota Democratic Non-Partisan League Party which aggregated in excess of \$1,000. Therefore, the committee may be a political committee for both calendar years 1977 and 1978. Attached are copies of the reports in which these additional contributions are listed. Please examine the letter of October 17, 1978, and act in accordance with its recommendations.

In addition, please be advised that on November 13, 1978, the Commission received a request for an advisory opinion from the recipient of the transfers made by your committee. The recipient, North Dakota Democratic Non-Partisan League Party, requested an opinion concerning application of the Federal Election Campaign Act of 1971, as amended, to the reporting of funds received by the North Dakota Democratic Non-Partisan League Party from local legislative district committees. Attached for your information is a copy of the advisory opinion issued to the committee.

Please notify the Commission within thirty (30) days from the date of this letter of your decision on this matter. If you have any questions, or require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,

A handwritten signature in cursive script, appearing to read "Orlando B. Potter".

Orlando B. Potter
Staff Director

Certified Mail
Return Receipt Requested



FEDERAL ELECTION COMMISSION

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

October 17, 1978

Ms. Lorraine Edland
District 23 - RPL Democratic Party
Cooperstown, ND 58425

Dear Ms. Edland:

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 North Dakota Democratic Non-Partisan League Party 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.

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

LINE NUMBER 11 18(a)

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

Jan Commission
Act, H.W.
Jan, D.C. 20463

Name of Candidate or Committee in full

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 23
Cooperstown, ND 58425

Date (month,
day, year)

1-04-77

Amount of cash
received this period

\$ 401.25

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Robert Vilham, Treasurer, District 4
Norma, ND 58766

Date (month,
day, year)

1-04-77

Amount of cash
received this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

J. Darlene Turitto, Treasurer, Democratic Women, Bismarck
1010 E. Owens Avenue
Bismarck, ND 58501

Date (month,
day, year)

2-07-77

Amount of cash
received this period

600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Mrs. Ruby Nesvig, Treasurer, Dist. 20, Democratic Women
Buxton, ND 58218

Date (month,
day, year)

2-18-77

Amount of cash
received this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Pat Sand, Treasurer, District 26
Ellendale, ND 58436

Date (month,
day, year)

2-18-77

Amount of cash
received this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Terry J. Stallman, Treasurer, District 20
Thompson, ND 58278

Date (month,
day, year)

3-21-77

Amount of cash
received this period

500.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Subtotal of receipts this page (optional)

\$ 2,001.25

Total this period (last page this line number only)

\$

707000008748

SEP 6 AM 8:40

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

Elaine Tisch, Treasurer, District 27 - Democratic NPL Party
Bridgerwood, ND 58053

Date (month, day, year)

4-06-77

Amount of each receipt this period

\$ 600.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 600.00

Full Name, mailing address and ZIP code

Dennis D. Dourille (For Lloyd Omdahl) for Congress Committee
2624 4th Avenue North
Grand Forks, ND 58278

Date (month, day, year)

4-26-77

Amount of each receipt this period

3,145.62

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Terry J. Stallman, Treasurer, District 20 - Democratic NPL
Thompson, ND 58278 Party

Date (month, day, year)

5-13-77

Amount of each receipt this period

550.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 1,050.00

Full Name, mailing address and ZIP code

Ralph Rebenitsch, Treasurer, District 35 - Democratic NPL
Breien, ND 58525 Party

Date (month, day, year)

6-15-77

Amount of each receipt this period

400.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 400.00

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 23 - Democratic NPL Party
Cooperstown, ND 58425

Date (month, day, year)

6-22-77

Amount of each receipt this period

1,000.00

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 1,400.24

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Subtotal of receipts this page (optional)

\$5,695.62

Total this period (last page this line number only)

\$5,695.62

Schedule A

Form 1010
 Instructions for Contributors
 (See instructions on back)

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

Page 1 of 2 for
 LINE NUMBER 18(a)

(Use separate schedule for each
 numbered line)

Name of Candidate or Committee or Party

North Dakota Democratic Non-Partisan League Party

Full Name, mailing address and ZIP code

M. A. Shelton, Treasurer, District 6
 Carbury, ND 58724

Date (month,
 day, year)

3-7-78
 3-17-78

Amount of each
 receipt (this amount)

\$500.00
 100.00

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Full Name, mailing address and ZIP code

J. Darlene Turitto, Treasurer, Democratic Women, Bismarck
 1010 E. Owens Avenue
 Bismarck, ND 58501

Date (month,
 day, year)

2-24-78

Amount of each
 receipt (this amount)

\$500.00

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Full Name, mailing address and ZIP code

Stutsman County Democratic NPL Women, Hazel E. DeGroot
 Treasurer, Box 915, Jamestown, ND 58401

Date (month,
 day, year)

3-17-78

Amount of each
 receipt (this amount)

\$200.00

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Full Name, mailing address and ZIP code

Lowell Johnson, Treasurer, District 25
 Wahpeton, ND 58075

Date (month,
 day, year)

1-20-78

Amount of each
 receipt (this amount)

\$1500.00

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Full Name, mailing address and ZIP code

Arlene Haunsen, Treasurer, District 37
 1010 West Villard
 Dickinson, ND 58601

Date (month,
 day, year)

2-2-78

Amount of each
 receipt (this amount)

\$341.45

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Full Name, mailing address and ZIP code

Lorraine Edland, Treasurer, District 25
 Cooperstown, ND 58425

Date (month,
 day, year)

3-29-78

Amount of each
 receipt (this amount)

500.00

Place of business

Occupation

☐ Check if Contributor is self-employed
 Aggregate Year to date

Subtotal (add this page)

\$3041.45

Total the period last page this line number only

\$

SECTION 1
RECEIVED
JAN 1 1979
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20541

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 1 for

Line Number 15a

(Use separate sheets for
each item listed here)

Name of Candidate or Committee in Full

Associate, NPL Party

Re: Name, Mailing Address and ZIP Code
Shirley Smith, Treas. D12
Escondido, MD 38332

Principal Place of Business

Occupation

Date (month
day, year)

Amount of each Receipt
this Period

12/1/78

620.00

Re: Name, Mailing Address and ZIP Code
Hansen Campaign Committee, refund

Principal Place of Business

Occupation

Date (month
day, year)

Amount of each Receipt
this Period

12/5/78

341.51

Re: Name, Mailing Address and ZIP Code
Ascar Thompson, Treas. pa
Escondido, MD 38306

Occupation

Date (month
day, year)

12/5/78

200.00

Re: Name, Mailing Address and ZIP Code
Arnold Gronnberg, Treas.
Hannaford, MD 38418 D25

Occupation

Date (month
day, year)

12/7/78

200.00

Re: Name, Mailing Address and ZIP Code
Della Kossel, Treas. D31
Arlon, MD 38412

Occupation

Date (month
day, year)

12/11/78

100.00

Re: Name, Mailing Address and ZIP Code
M.A. Stetten, Treas. D4
Chilmark, MA 01924

Occupation

Date (month
day, year)

12-14-78

550.00

Re: Name, Mailing Address and ZIP Code
TOTAL

Occupation

Date (month
day, year)

12-11-81

2,118.51

TOTAL

Occupation

Date (month
day, year)

12-11-81

2,118.51

FORM 440-A
REVISED
MAY 1976
Federal Election Commission
1125 A Street, N.W.
Washington, D.C. 20541

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 2 for
Line Number 18a

(Use Separate Schedules for
each multi-lined item)

Name of Candidate or Committee in Full		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Democratic-NPL Party				
Full Name, Address, A Street and ZIP Code		Occupation		
Robert Otheiser, Treas. D52 1210 Albany Dr. Bismarck, ND 58501			11/30/78	126.37
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 126.37		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Mrs. Gordon Elliot, Treas. D5 Mohall, ND 58731			11/30/78	236.21
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 236.21		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Shirley Smith, Treas. D12 Ismond, ND 58532			12/1/78	132.00
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 132.00		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Sandra M. Cardinale, Treas. 112 5th Ave. SE Jamestown, ND 58401			12/1/78	695.00
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 695.00		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
M.A. Shelton, Treas. D6 Carbury, ND 58724			12/5/78	333.25
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 333.25		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Art Kleingartner D13 511 6th St. W. West Fargo, ND 58078			12/7/78	501.60
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 501.60		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Arnold W. Anderson, Treas. Jamestown, ND 58401			12/7/78	338.02
Receipts		Check if Contributor is self-employed		
☐ Primary ☐ General ☐ Other		Aggregate Year To Date \$ 338.02		
Full Name, Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
SUBTOTAL				\$ 2,005.35
TOTAL				\$ 2,005.35

April 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1978-91

Mr. Art Rude
North Dakota Democratic-NPL Party
1902 E. Divide Avenue
Bismarck, North Dakota 58501

Dear Mr. Rude:

This is in response to your letter of November 8, 1978, as supplemented by letter of January 28, 1979, requesting an advisory opinion on behalf of the North Dakota Democratic-NPL Party ("the State Party") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to the reporting of funds received by the State Party from local legislative district committees ("the district committees").

You have described three proposed procedures for handling funds received by the State Party and request an advisory opinion as to whether each is proper under the Act and Commission regulations. The three proposals relate to: (1) contributions received directly by the State Party; (2) funds received in the form of transfers of proceeds from fundraising events held by local legislative district committees; and (3) transfers exceeding \$1,000 in a calendar year to the State Party from local legislative district committees. Each proposal will be treated separately after summarizing the factual situation presented in your request.

Your request indicates that the State Party is organized by legislative districts and that each district is represented on a Policy Committee which determines the budget and financing

of the State Party. Each district committee shares in the financial responsibility by raising a "quota" of funds on behalf of the State Party from individual contributions and fundraising events within the district. You state that when individual contributions are received by the State Party they are receipted, credited to that individual's home district quota, and itemized on the State Party's report to the Commission.^{1/} In addition to these individual itemized contributions, other funds are collected within each district which result from various fundraising events, e.g. political dinners. With respect to the proceeds of these events, the district committee officers make a determination regarding local campaign needs and, at their discretion, forward surplus proceeds to the State Party. Each sum forwarded is credited to the particular district committee's quota. You indicate that in all cases the ticket prices for these events were under \$100 and that, therefore, a precedent had been established by the State Party of reporting these funds as "unitemized transfers from committee",^{2/} regardless of the total amount transferred, which in several instances exceeded \$1000 annually and occasionally exceeded \$1000 in a quarterly reporting period. You state that recently the Commission notified several of the district committees whose reported transfers exceeded \$1000 during 1978 that they may be "political committees subject to the registration, reporting and contribution limitation requirements of the Act". You seek Commission approval of certain methods of reporting funds received from the districts which will obviate the need, in most cases, for the district committees to register and report as political committees under the Act.

^{1/} Your supplemental response indicates that the State Party is currently organized pursuant to 11 CFR 102.6(a)(2)(ii); that is, it has a single account from which it makes contributions to and expenditures on behalf of both Federal and non-Federal candidates and which reports to the Commission all State Party financial activity. You indicate, however, that you have recommended to the State Party's Executive Committee that it establish a separate Federal account pursuant to 11 CFR 102.6(a)(2)(i).

^{2/} An examination of reports filed with the Commission by the State Party indicates that these funds have been reported on line 13(a) of FEC Form 3 as "transfers in from affiliated committees" and itemized on Schedule A as having been received from an individual who is identified as the treasurer of the particular district committee.

Contributions received directly by the State Party

5
7
5
8
1
7
5
3

You propose to continue current practice with respect to individual itemizable contributions; that is, they will be submitted directly to the State Party, receipted properly, and itemized on the State Party's reports to the Commission. The Commission concludes that this procedure is acceptable as long as any person at the district level who receives such contributions on behalf of the State Party meets the requirements of 2 U.S.C. §432(b) and 11 CFR 102.8, which provide that every person who receives a contribution in excess of \$50 for a political committee shall provide a detailed account thereof to the committee's treasurer within 5 days of receipt of such contribution, including the amount, identification of the contributor, the date on which the contribution was received and, where the contribution exceeds \$100, the occupation and principal place of business of the contributor. Also, 11 CFR 103.3 requires that all contributions received by the State Party be deposited in a designated campaign depository of the State Party within 10 days of their receipt.

Transfers of proceeds from district committee fundraisers

You state that the proceeds of district fundraising events, which consist of small, unitemizable contributions, will be forwarded directly to the State Party and reported to the Commission as "transfers in from affiliated committees". As noted above, the State Party has, in the past, usually reported these transfers as coming from an individual who is identified as the treasurer of a particular district committee. Part 104.2(b)(4) of Commission regulations requires each report filed by a political committee to disclose the identification of each political committee or other political organization from which the reporting committee received any transfer of funds in any amount during the reporting period, together with the amounts and dates of all transfers. Accordingly, the State Party should continue to itemize each transfer from a district committee on Schedule A, but should clearly identify the district committee (by number, as has been done in the past, or otherwise) from which the funds have been received, rather than the individual who may act on behalf of a particular committee.

Transfers exceeding \$1000 from district committees

With respect to your third proposal, that no district committee will transfer in excess of \$1000 in a calendar year to the State Party unless it registers and reports as a "political committee", the Commission notes that as long as the State Party maintains a single account for the purpose of making contributions to or expenditures on behalf of both Federal and non-Federal candidates, any district committee which transfers in excess of \$1000 to the State Party in any calendar year would qualify as a "political committee" subject to registration and reporting under the Act. If, however, the State Party were to establish a separate Federal campaign committee with a segregated Federal account (See 11 CFR 102.6(a)(2)(i)), as you have recommended, a district committee could transfer up to \$1000 in a calendar year to the State Party's separate Federal account and any amount transferred to the State Party in excess of \$1000 could be placed in an account the funds from which are not used to influence Federal elections, i.e. one which is used for state and/or local elections. Under this procedure, district committees which did not wish to be considered "political committees" would be able to maintain that status. In this regard, however, the Commission emphasizes the responsibility of the State Party, as well as all Federal committees which receive transfers from unregistered political organizations, to request assurance from the transferring district committee that the contributions originated from sources which are permissible under the Act.^{3/} (See 2 U.S.C. §§441a, 441b, 441c, 441e and 441f).

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Joan D. Aikens
Chairman for the
Federal Election Commission

^{3/}The Commission notes that North Dakota law does not prohibit union contributions to candidates for State office and committees supporting such candidates. Union, as well as corporate, contributions are prohibited under 2 U.S.C. §441b unless made from a separate segregated fund.

3501/75-71

● Fill in NRK 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
Grannberg
Box 23 Reno NVT

3 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
348248
 (Always obtain signature of addressee or agent)

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

4 DATE OF DELIVERY
June 29 1979

5 ADDRESS Complete only if requested

6 UNABLE TO DELIVER BECAUSE
 USE CLERK'S INITIALS
SC

RETURN TO ADDRESSEE OR POST OFFICE IF NOT DELIVERED AND CERTIFIED MAIL

6/27

☆GPO 1975 O-344-100

Telecon:

Greevy with Gronneberg
District 23 NPL Democratic Party
3SV1/78-71
7/25/79

AG called this day regarding the above SV.

He stated that he has been out of town for about a month, and this was the first he had seen the letter.

I explained to him why it was sent, and gave him background on the situation throughout the State and the AO submitted to the SCC. He asked what he should do.

I ran through the options with him, and then suggested that he call the SCC (Art Rude) to talk with them. I stated that one option was available which would minimize his work, i.e. SCC transferring the necessary funds to their State and local account. I suggested this after I learned that the District committee was not otherwise involved in Federal elections, and that they have a \$4,500 quota which is to be contributed to the SCC every year.

He said that he would contact Rude, and would get back to us by phone. I stated that whatever he decided to do, we should have something in writing, as well as the phone call.

5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 11, 1979

Arnold Gonneberg, Treasurer
District 23-NPL Democratic Party
Hannaford, ND 58448

Dear Mr. Gronneberg:

On June 27, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

John W. McElroy
Commissioner

Certified Mail:
Return Receipt Requested

DATE: 9/19/79

TIME: 10:00

COMMITTEE: District 23 Democratic NPL

PERSON SPOKEN TO: Arnold Gronneberg (701)763-2593

FEC'R: Lisa Stolaruk

SUBJECT: 2nd Notice M letter

Mr. Gronneberg called to complain about getting the second notice M letter. He ~~said~~ said that he is relatively new at the job as treasurer, and ~~that~~ that he turned all of the material over to the ND Dem. NPL Party ~~of~~ to work on. He said that he thought everything was taken care of. I strongly recommended that he contact the state party and see what, if anything, has been done. We have not received anything ~~for~~ from the NPL regarding this matter. I also advised him to send a letter stating that he is aware of the situation, and that he is working ~~toward~~ toward resolving it. I told him that the responsibility is on him to see the matter through, even though he was not treasurer in 1977 when the transfers took place.

7

3SV2/78-71

Hannaford, N. Dak. 58448.

Sept. 20, 1979

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

'79 SEP 24 AM 11:53

Dear Ms. Lisa Stolaruk;

This letter is being sent to your commission in regards to the letter I received on Sept. 15th, 1979.

I wish to inform the commission that I have started to comply with the wishes of the Federal Election Commission. Having been chosen as treasurer of this district only last December, I am not versed well enough on the subject at hand, so I have asked the NPL-Democratic Party of North Dakota to review and help me with the information that is require of the commission. I made a trip to Bismarck with all the material that was sent to me by your commission and they informed me that they would review the material and in turn would inform me the procedure to follow, but as the office is almost on a voluntary basis now, evidently nobody has got to it yet. I will try and contact them soon and see if the information your commission requires can be in the mail soon.

Sincerely,

Arnold Gronneberg
Arnold Gronneberg

0000081762

ARNOLD GRONNEBERG
HANNAFORD, N. DAK. 58448



Federal Election Commission
1325 K Street N. W.

Attn. Lisa Stolaruk

Washington, D. C. 20463

TELECON

8

DATE: 11/6/79

TIME: 2:00

COMMITTEE: District 23 Dem. NPL

PERSON SPOKEN TO: Arnold Gronneberg

FEC'R: Lisa Stolaruk

SUBJECT: M letter

Called Mr. Gronneberg this afternoon to find out ~~whether~~ whether the committee intends to register and report. He said that he forwarded all of the materials to the ND Dem NPL Party, so that they could make out the reports. He was told by them that the reports had already been sent to the FEC. However, we have not received anything as of this date. I recommended that he get back in touch with the headquarters to find out what the status is.

6
7
8



FEDERAL ELECTION COMMISSION

1055 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF OUR # 1109

DATE FILMED 2/26/80 Camera No. --- 2

Cameraman B.P.C.