

80040203860

THIS IS THE END OF MUR 1114

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

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FEDERAL RESERVE COMMISSION

2752 - 137, (a) (4)

materials removed

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well information (geographic or geophysical) |
| ☐ (5) Internal Documents | |

Signed

date

Stephen M. Miller
8 Aug 1980

FEC 9-21-77



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C.

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. C. Thomas Bendorff
ATLA
National Affairs Department
1050 31st Street, N.W.
Washington, D.C. 20007

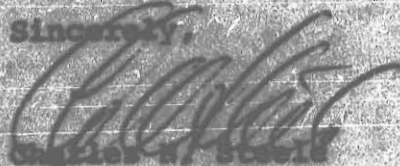
Mr. Bendorff 1114

Dear Mr. Bendorff:

On August 5, 1988, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441b. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,


Charles H. Steele
General Counsel

Enclosure
Conciliation Agreement

80040203862

Enclosed you will find the original copy of
the final consultation report on the
subject of the
subject as in writing.

Enclosed you will find the original copy of
the final consultation report on the
subject of the
subject as in writing.

Enclosed
Consultation Agreement

In the Matter of
Attorneys Congressional
Campaign Trust

Box 1114

RECEIVED
OFFICE OF THE
ATTORNEY GENERAL

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission, hereinafter "the Commission," pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Attorneys Congressional Campaign Trust, "Respondent," violated 2 U.S.C. § 441b.

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

- I. The Commission has jurisdiction over the Respondent and the subject of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 1. Respondent is a political committee which supports federal candidates and is duly registered with the Commission.

00040303064

2. During the period of mid-1970, Respondent Bank, in a letterhead memorandum, reported approximately \$40,000 in corporate contributions during early 1970.
3. Respondent, having discovered its errors, undertook corrections and on its August 1970 monthly report, disclosed its refund of approximately \$40,000 in corporate contributions.

WHEREFORE, Respondent agrees:

V. Respondent's acceptance of corporate contributions is a violation of 2 U.S.C. § 441b; however such violation was not knowing and willful.

VI. Respondent will pay the amount of \$500 to the treasurer of the United States under 2 U.S.C. § 437g(a)(6)(B).

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

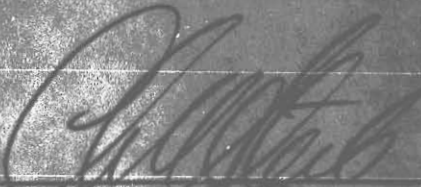
GENERAL CONDITIONS

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

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

that respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to notify the Commission.

8 August 1980
Date


Charles N. Steele
General Counsel
Federal Election Commission

29 Jul 80
Date

Attorneys Congressional Campaign Trust
Attorneys Congressional
Campaign Trust

BY:



ITS:

Attorney

80040303866

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Attorneys Congressional
Campaign Trust

MUR 1114

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 3, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1114:

1. Approve the attached conciliation agreement.
2. CLOSE THE FILE.
3. Send the notification letter as attached to the General Counsel's July 31, 1980 memorandum.

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

Attest:

8/5/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 7-31-80, 3:11
Circulated on 48 hour tally vote basis: 8-1-80, 2:00

800403867

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM

TO: The Commission

FROM: Charles W. Steele *CS*
General Counsel

SUBJECT: MUR 1114 - Conciliation Agreement

Attached is a conciliation agreement which has been signed by Thomas Benderf, counsel for the Attorneys Congressional Campaign Trust.

The attached agreement includes all the provisions which the Commission determined should be included and the civil penalty imposed by the Commission has been submitted.

The Office of General Counsel recommends the acceptance of this agreement and the closing of the file.

Recommendations

1. Approve attached conciliation agreement
2. Close the file
3. Send attached notification letter

Attachments

Conciliation Agreement (1)
Notification Letter (1)

600-2103

FEDERAL ELECTION COMMISSION

In the Matter of
Attorneys Congressional
Campaign Trust

NUR 1114

CONCILIATION AGREEMENT

00040203870

This matter having been initiated by the Federal Election Commission, hereinafter "the Commission," pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Attorneys Congressional Campaign Trust, "Respondent," violated 2 U.S.C. § 441b.

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

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

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

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

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

1. Respondent is a political committee which supports federal candidates and is duly registered with the Commission.

2. During the course of its operations, in mid-1978, Respondent discovered that its account at the Bank, in a lockbox arrangement had accepted approximately \$40,000 in corporate contributions during early 1978.
3. Respondent, having discovered its errors, undertook corrections and on its August 1978 monthly report, disclosed its refund of approximately \$40,000 in corporate contributions.

WHEREFORE, Respondent agrees:

V. Respondent's acceptance of corporate contributions is a violation of 2 U.S.C. § 441b; however, such violation was not knowing and willful.

VI. Respondent will pay the amount of \$500 to the treasurer of the United States under 2 U.S.C. § 437g(a)(6)(B).

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

GENERAL CONDITIONS

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

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

00040203871

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

Date

Charles N. Steele
General Counsel
Federal Election Commission

29 Jul 80

Date

Attorney Congressional Campaign Trust
Attorneys Congressional
Campaign Trust

BY:

ITS:

C. Thomas Bouda
Attorney

80040203872



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C.

**CERTIFIED MAIL
RETURN RECEIPT MAIL**

Mr. C. Thomas Bendorf
ATLA
National Affairs Department
1050 31st Street, N.W.
Washington, D.C. 20007

Re: MUR 1114

Dear Mr. Bendorf:

On July 1, 1988, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441b. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

30040203873

MEMORANDUM TO: CHARLES STEELE
FROM: MAJORIE W. BROWN/ADJUTANT GENERAL
DATE: MARCH 11, 1980
SUBJECT: MUR 1114 - Interim Investigative Report #1
dated 3-6-80; Signed 3-7-80; Received
in OCS 3-10-80, 10:25

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 4:00,
March 10, 1980.

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

30047203874

REPORT THE FEDERAL ELECTION COMMISSION
March 5, 1980

80 MAR 10

In the Matter of
Attorneys Congressional
Campaign Trust

MUR 1114

Interim Investigative Report #1

On February 5, 1980, the Commission found reason to believe that the Attorneys Congressional Campaign Trust ("ACCT") violated 2 U.S.C. § 441b by accepting approximately \$40,000 in corporate contributions.

The acceptance of corporate contributions was brought to the attention of the Board of Trustees by ACCT staff members who discovered the corporate checks during the course of computerizing its records.

On February 27, 1980, representatives of ACCT met with us concerning the possibility of informal conciliation. At that meeting, we were advised by ACCT representatives that they would provide the Commission with additional information and documentation by March 13, 1980.

Upon receipt and review of the additional information, this office will report to the Commission.

7 March 1980
Date


Charles N. Steere
General Counsel

BOARD OF

111 WEST VANDERBILT
CHICAGO, ILL.
THOMAS WHITEHEAD
BROOKLYN, N.Y.

WEST PALM BEACH, FLORIDA
MICHAEL L. POSTON
COLUMBUS, OHIO

ROBERT G. BEGAM
PITTSBURGH, PENNSYLVANIA

HOWARD L. BROWN
PITTSBURGH, PENNSYLVANIA

HOWARD L. BROWN
CLEVELAND, OHIO

LOS ANGELES, CALIFORNIA
RAYMOND L. POSTON, JR.
WASHINGTON, D.C.

KATHLEEN S. SHAFER
WASHINGTON, D.C.

February 15, 1980

Thomas Whitehead, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1114

Dear Mr. Whitehead:

I am a member of the Board of Trustees of the Attorneys' Congressional Campaign Trust (ACCT). I am aware of the letter dated February 11, 1980 to ACCT from the Commission reporting the Commission's findings, on February 5, 1980, that there is reason to believe that ACCT may have violated 2 U.S.C. §441b(a) by accepting corporate contributions in connection with federal elections. That letter gives ACCT an opportunity to provide further response on the matter at hand.

I understand that we would normally have 10 days within which to respond. As it happens, the Chairman of ACCT, Mr. Robert G. Begam, has just left the country for a three-week trip to China.

006356

Thomas M.
Page 2
February 19

The purpose of
day extension
suspense date
Commission's
this request as

Thank you.

Sincerely,


Howard M. Specter

HAS:car

c: Robert G. Bagan, Require

80040203878

Attorneys Congressional Campaign Trust

1000 31st STREET, N. W.
WASHINGTON, D.C. 20007



80 FEB 19 PM 1:13

RECEIVED
FEDERAL ELECTION
COMMISSION

Thomas Whitehead, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

0040203879

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Raymond Pastor, Jr.
Attorneys Congressional Campaign Trust
1050 31st Street, N.W.
Washington, D.C. 20007

Re: MUR 1114

Dear Mr. Pastor:

The Federal Election Commission has previously notified you that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the possible violations is attached.

Upon further review of the information available to the Commission, the Commission determined, on February 5, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441b(a) by accepting corporate contributions in connection with federal elections.

Under the Act, you had an opportunity to demonstrate, within 15 days of the initial notification, that no action should be taken against your committee.

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

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Suzanne Callahan,
the staff member assigned to this matter, at (202) 535-1073.

Sincerely,

Robert O. Tierman

ROBERT O. TIERMAN
Chairman

Enclosure

8004020308

1. ARTICLE DESCRIPTION: REGISTERED NO. 1871284		2. INSURED NO.	
3. NAME OF INSURED: RAYMOND P. BENTLEY, JR.		4. DATE OF DELIVERY	
5. NAME OF CARRIER:		6. NAME OF DESTINATION:	
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DATE 2-3-80

MUR NO. 1114
STAFF NUMBER(S) & TEL. NO.
James Callahan
(202) 512-5071

RESPONDENT: Attorneys Congressional Campaign Trust

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On January 2, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the Attorneys Congressional Campaign Trust ("the Committee") in connection with its violation of 2 U.S.C. § 441b.

ANALYSIS

This matter was brought to the attention of RAD on September 20, 1978, when the Committee filed its August 1978 monthly report disclosing its refund of approximately \$40,000 in contributions which it had received during 1978.

On October 16, 1978, the Committee was sent an RFAI by RAD requesting further information on the reported refunds. The Committee responded to the RFAI on November 3, 1978, by stating that the acceptance of possible corporate contributions was brought to the attention of the Board of Trustees during the summer of 1978. According to the letter, the opening and depositing of contributions to the Committee was handled by the Riggs National Bank which had been instructed not to accept any contributions which might possibly be corporate.

Nevertheless, during the course of computerizing its records, the committee staff became aware of and advised the Board of Trustees that there were corporate checks in past Committee deposits. The Board then advised the staff to check each deposit made in 1978 and were told to return all possible corporate checks to the contributors.

In the Matter of)
Attorneys Congressional)
Campaign Trust)

MR 1114

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's February 5, 1980 Executive Session, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MR 1114:

1. Find reason to believe the Attorneys Congressional Campaign Trust may have violated 2 U. S. C. §441b.
2. Take no action against the listed contributors for their violations of 2 U.S.C. §441b.

Attest:

2-7-80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

80040203886

Office was notified on February 1, 1944,
of objections received to MUR 1114.

Commissioner Friedersdorf submitted an objection
at 3:15, this date, to MUR 1114.

SOURCE OF INFO:

REPORTING'S NAME: Attorneys Congressional Campaign Trust

RELEVANT STATUTE: 2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: Attorneys Congressional Campaign Trust

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On January 2, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the Attorneys Congressional Campaign Trust ("the Committee") in connection with its violation of 2 U.S.C. § 441b.

FACTUAL AND LEGAL ANALYSIS

This matter was brought to the attention of RAD on September 20, 1978, when the Committee filed its August 1978 monthly report disclosing its refund of approximately \$40,000 in contributions which it had received during 1978.

On October 16, 1978, the Committee was sent an RFAI by RAD requesting further information on the reported refunds. The Committee responded to the RFAI on November 3, 1978, by stating that the acceptance of possible corporate contributions was brought to the attention of the Board of Trustees during the summer of 1978. According to the letter, the opening and depositing of contributions to the Committee was handled by the Riggs National Bank which had been instructed not to accept any contributions which might possibly be corporate.

Nevertheless, during the course of computerizing its records, the committee staff became aware of and advised the Board of Trustees that there were corporate checks in past Committee deposits. The Board then advised the staff to check each deposit made in 1978 and were told to return all possible corporate checks to the contributors.

The staff determination as to which contributions should be refunded was based on whether the following initials appeared on the firm name printed on the questionable checks: P.A. (Professional Association), P.C. (Professional Corporation), or Ltd. (Limited). The staff discovered approximately 400 such checks, most of which were in the amount of \$100 or less, none of which exceeded \$1,000. The committee explained the large number of checks as being the result of a fundraising drive which it held in the beginning of the year.

Although the committee voluntarily achieved compliance with the Act by reviewing and amending its records, it did accept \$40,000 in corporate contributions in violation of § 441b. It is impossible to ascertain, from committee reports on file, how long the corporate checks remained in the committee's account because (a) most of the checks were in amounts less than \$100 and consequently are not itemized on committee reports and (b) the contributions which were itemized listed the signatory of the check as the contributor rather than the law firm.

Should the committee be able to demonstrate that the checks were returned within a reasonable time period, this Office would recommend taking no further action in this matter. However, if the checks were retained for more than 30 days, we would recommend proceeding against the committee. Even though Riggs Bank apparently deposited the checks in error and against the expressed instructions of the committee, it is the ultimate responsibility of the committee to insure that its receipts are properly screened. Therefore, the Office of General Counsel recommends that the Commission find reason to believe the Committee may have violated 2 U.S.C. § 441b. It is recommended that the Commission take no action against the some 400 corporate contributors in view of the individual amounts of the contributions.

RECOMMENDATIONS

1. Find reason to believe the Committee may have violated 2 U.S.C. § 441b.
2. Take no action against the listed contributors for their violations of § 441b.

Attachments

RAD Referral
Letter to Pastor
Notification of RTB Finding

80040203892

80040203893

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

NON-PARTY RELATED

COMMITTEE DOCUMENT

RECEIPTS
PRIMARY GENERALEXPENDITURES
PRIMARY GENERAL

ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST

CONNECTED ORGANIZATION: LAWYERS OF AMERICA ASS'N OF TRIAL

1977 STATEMENT OF ORGANIZATION- AMENDMENT

STATEMENT OF ORGANIZATION- AMENDMENT

STATEMENT OF ORGANIZATION- AMENDMENT

STATEMENT OF ORGANIZATION- AMENDMENT

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STATEMENT OF ORGANIZATION- AMENDMENT

1978 STATEMENT OF ORGANIZATION- AMENDMENT

STATEMENT OF ORGANIZATION- AMENDMENT

MISCELLANEOUS TRANSACTION FROM F.E.C.

1977 10 DAY PRE-SPECIAL

10 DAY PRE-SPECIAL

30 DAY POST-SPECIAL

APRIL 10 QUARTERLY

APRIL 10 QUARTERLY

JULY 10 QUARTERLY

JULY 10 QUARTERLY

JULY 10 QUARTERLY

OCTOBER 10 QUARTERLY

REQUEST FOR ADDITIONAL INFORMATION

REQUEST FOR ADDITIONAL INFO 2ND

OCTOBER 10 QUARTERLY

YEAR END REPORT

YEAR END REPORT

YEAR END REPORT

1978 APRIL 10 QUARTERLY

APRIL 10 QUARTERLY

APRIL 10 QUARTERLY

REQUEST FOR ADDITIONAL INFORMATION

REQUEST FOR ADDITIONAL INFORMATION

APRIL 10 QUARTERLY

APRIL 10 QUARTERLY

APRIL 10 QUARTERLY

JULY 10 QUARTERLY

JULY 10 QUARTERLY

JULY 10 QUARTERLY

JULY MONTHLY

JULY MONTHLY

AUGUST MONTHLY

AUGUST MONTHLY

SEPTEMBER MONTHLY

REQUEST FOR ADDITIONAL INFORMATION

SEPTEMBER MONTHLY

SEPTEMBER MONTHLY

SEPTEMBER MONTHLY

15,142

1,700

17,044

50,538

51,028

37,824

37,824

37,824

380,007

380,007

24,001

24,001

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129,100

870

7,720

26,147

94,871

50,000

47,000

30,901

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80040203894

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES	
		PRIMARY	GENERAL	PRIMARY	GENERAL
	OCTOBER MONTHLY	19,742		20,124	
	OCTOBER MONTHLY - AMENDMENT	19,742		20,124	
	OCTOBER MONTHLY - AMENDMENT	19,742		20,124	
	10 DAY PRE-GENERAL	13,907		46,079	
	10 DAY PRE-GENERAL - AMENDMENT	13,907		41,079	
	10 DAY PRE-GENERAL - AMENDMENT	13,907		46,079	
	30 DAY POST-GENERAL	13,832		27,304	
	30 DAY POST-GENERAL - AMENDMENT	13,832		27,304	
	YEAR END REPORT	21,154		20,671	
	YEAR END REPORT - AMENDMENT	21,154		20,671	
	YEAR END REPORT - AMENDMENT	21,154		20,671	
	TOTAL	700,000		442,304	

ALL REPORTS HAVE RECEIVED BASIC REVIEW

00040203895

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES	
		PRIMARY	GENERAL	PRIMARY	GENERAL
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST					
CONNECTED ORGANIZATION: LAWYERS OF AMERICA; ASS'N OF TRIAL					
1978 MISCELLANEOUS TRANSACTION TO F.E.C.					
MISCELLANEOUS TRANSACTION FROM F.E.C.					
STATEMENT OF ORGANIZATION- AMENDMENT					
FEBRUARY MONTHLY		13,093		10,007	
APRIL 10 QUARTERLY		26,046		10,376	
APRIL 10 QUARTERLY - AMENDMENT		26,046		10,376	
JULY 10 QUARTERLY		47,620		0,000	
JULY 10 QUARTERLY - AMENDMENT		47,620		0,000	
OCTOBER 10 QUARTERLY		61,004		47,271	
TOTAL		147,449	0	101,000	0

ALL REPORTS HAVE RECEIVED BASIC REVIEW

60040203896

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During review of the September Monthly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an illustration of the information requested.

Sincerely,

Oliver B. Potter

Attachment
FEC Form 12

SUBJECT TO THE FOLLOWING:

A review of the report indicates that additional information is needed. Return a copy of this form with your proposed submission.

Please provide the required data, as indicated (X):

___ Coverage Dates ___ omitted or ___ incorrect

___ Signature ___ omitted or ___ incorrect

___ Summary Page Line(s) ___ Column(s) ___ Totals ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s) ___ Column(s) ___ Totals ___ omitted or ___ incorrect

☒ Schedules Totals ___ disagree with Detailed Summary (Page 2) or ___ omitted

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100
Date(s) ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Full Name(s) Omitted for Schedule(s) ___ Line(s) ___

Mailing Address(es) ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Occupational Descriptions ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Principal Place(s) of Business ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Aggregate Year-to-date Totals ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Nature or Purpose of Expenditure ___ omitted or ___ inadequate for Schedule(s) B ___ Line(s) 21a SEE PAGE TWO

Nature or Purpose of Receipt ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

Inadequate Description of ___ proceeds ___ dates ___ events ___ location of Schedule ___

Other: _____

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-953. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D S N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

1. The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land owned by the United States in the State of California:

Please report and mail your report immediately.

00040230300001

60040303900

1. Name of Committee or Candidate: Raymond L. Poston, Jr.
2. Address: 1325 K Street, N.W.
Washington, D.C. 20463
City, State and Zip: Washington, D.C. 20463
3. Check if address is different than previously reported: ☐
4. Type of Report (Check one):
☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Annual Report
☒ Monthly Report August on 8-1-78 in the State of Mass
☐ Total day report covering primary, general or election
☐ Termination Report
☐ Amendment to: _____
☐ This is the report following _____
This is a report for: ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (specify, name of, etc.)

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

	Column A This Period	Column B Calendar Year-To-Date
5 Covering Period <u>8-1-78</u> Through <u>8-31-78</u>		
6 Cash on hand January 1, 1978		\$ 89,236.80
7 Cash on hand at beginning of reporting period	\$ 250,205.21	
8 Total receipts (from line 1B)	\$ 27,055.00	\$ 460,379.04
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 277,260.21	\$ 549,615.84
9 Total expenditures (from line 2B)	\$ 84,029.03	\$ 356,384.66
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 193,231.18	\$ 193,231.18
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ -0-	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 8,376.90	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
Sept. 20, 1978 Raymond L. Poston, Jr. Raymond L. Poston, Jr.
(Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

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

For further information, Contact:  Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
or call 800/424-9530
Approved by GAO
8-187620 (R0506)
Expires 3-31-81

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

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

NAME OF CANDIDATE		TIME PERIOD	
ACCOUNTING PERIOD		TO: 3-31-68	
14. Contributions Received:			
(a) Itemized (see Schedule B)	\$ 0.00		
(b) Unitemized	\$ 0.00		
(c) Subtotal of contributions	\$ 0.00		
15. Transfers from Political Committees:			
(a) Funds from other committees	\$ 7,020.00		
(b) Funds from other sources	\$ 0.00		
(c) Contributions in-kind	\$ 0.00		
(d) Subtotal of transfers in	\$ 7,020.00		
16. Other Income:			
(a) Itemized (see Schedule A)	\$ 0.00		
(b) Unitemized	\$ 0.00		
(c) Subtotal of other income	\$ 0.00		
17. Loans and Loan Repayments Received:			
(a) Itemized (see Schedule A)	\$ 0.00		
(b) Unitemized	\$ 0.00		
(c) Subtotal of loans and loan repayments received	\$ 0.00		
18. Refunds, Refunds, Refunds of Deposits:			
(a) Itemized (see Schedule A)	\$ 0.00		
(b) Unitemized	\$ 0.00		
(c) Subtotal of refunds, refunds, refunds of deposits	\$ 0.00		
19. Total Receipts		\$ 27,055.00	\$ 460,379.04
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (see Schedule B)	\$ 6,711.60		
(b) Unitemized	\$ 0.00		
(c) Subtotal of operating expenditures	\$ 6,711.60		
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (see Schedule B)	\$ 40,525.00		
(b) Unitemized	\$ 0.00		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 40,525.00		
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committees (Itemize on Schedule B regardless of amount)	\$ 0.00		
(b) To other committees (Itemize on Schedule B regardless of amount)	\$ 36,750.00		
(c) Contributions in-kind to other committees	\$ 42.43		
(d) Subtotal of transfers out	\$ 36,792.43		
23. Independent Expenditures (see Schedule F)		\$ 0.00	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))		\$ 0.00	
(Itemize on Schedule F)	\$ 0.00		
25. Total Expenditures		\$ 84,029.03	\$ 356,384.66
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 27,055.00	
27. Transfers In (from line 15(a))		\$ 7,020.00	
28. Net Receipts (Subtract line 27 from line 26)		\$ 20,035.00	
29. Total Expenditures (from line 25)		\$ 84,029.03	
30. Transfers Out (from line 22(a))		\$ 0.00	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 84,029.03	

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Braud, Warner, Nepp1 & Westensee, Ltd. (Walter D. Braud, Esq.) 50.00
1703 2nd Avenue
Rock Island, IL 61201

David L. Lichtenstein, P.C. (David L. Lichtenstein, Esq.) 100.00
500 Manor Building, 564 Forbes Avenue
Pittsburgh, PA 15219

Highsmith, Strauss & Varner, P.A. (Michael I. Strauss, Esq.)
826 South Bayshore Drive
Suite 17-3, Tower 3
Miami, Florida 33131

Schneider, Shamberg & May, Chartered (John E. Shamberg)
4210 Johnson Drive
Shawnee Mission, Kansas 66205

Schnider, Shenberg & May, Chartered (Lynn R. Johnson, Esq.)
Schnider, Shenberg & May, Chartered (Charles S. Schnider, Esq.)
Schnider, Shenberg & May, Chartered (Gerald T. Elliott, Esq.)

Weinstock, Davis, Kresel & Rothlein, P.C. (Stuart E. Davis, ESq.) 100.00
684 Broadway
Massapequa, New York 11758

Burt, Burt & Rentz, P.A. (Walter H. Burt III)
P. O. Box 525
Albany, Georgia 31702

Tuck R. Chapin, Inc. (Tuck R. Chapin, Esq.)
815 Main Plaza Building
San Antonio, Texas 78205

Goodstein & Jennings, P.A. (Arnold S. Goodstein, Esq.)
P. O. Box 9686
Charleston Heights, S.C. 29410

Kaplan, Dorsey, Sicking & Hessen, P.A. (Abraham L. Bassie, Esq.)
1951 Northwest 17th Avenue
Miami, Florida 33125

Roberts, Caldwell & Planer, P.A. (Joseph B. Roberts, III)
P. O. Box 2335
Gastonia, NC 28052

Schneider, Kaufman & Sherman, P.C. (Peter Schneider, Esq.)
60 East 42nd Street
New York, NY 10017

30040203930
78030.32300

John L. Bagwell, P.C. (John L. Bagwell, Esq.)
P. O. Box 923
Grundy, Virginia 24614

[illegible]

80040303932
6007803962690

10.00

250 01

100.0

25.0

50-0

100 D

100-0

Bradley & Farris Co., L.P.A. (Philip R. Bradley, Esq.)
1620 E. Broad Street
Columbus, Ohio 43203

Malone, Harry & Son, S.C.

(Harry P. Malone, Esq.)

Third South & Pike

Seattle, Wash.

Malone, Harry & Son, S.C.

210-B West Main Street

Durand, Wis. 54736

Busald, Funk & Zevy, P.S.C.

(Edward A. Busald, Esq.)

50.00

75.00

John A. Busald, Esq.

25.00

226 Main Street

Florence, Kentucky 41042

Arthur D. Swanson, P.S.

(Arthur D. Swanson, Esq.)

100.00

4512 Talbot Road South

Renton, Washington 98055

Kahn, Kleinman, Yanowitz & Aronson Co., L.P.A.

(Thomas L. Dettlebach)

100.00

1300 Bond Court Building

Cleveland, Ohio 44114

Martin Heller, P.C.

(Ralph Froeling, Esq.)

100.00

167 West Elm Street

Canton, IL 61520

Franks & Pikofsky, S.C.

(Barnett M. Franks, Esq.)

100.00

2040 W. Wisconsin Avenue, Suite 201

Milwaukee, WI 53233

Parins & McKay, S.C.

(J.D. McKay)

50.00

415 S. Washington Street, P. O. Box 1098

Green Bay, WI 54305

Purtell, Purcell, Wilmot & Burroughs, S.C.

(Michael Skwierawski)

50.00

1330 Marine Plaza

Milwaukee, WI 53202

Joseph P. Trapp, S.C.

(Joseph P. Trapp, Esq.)

100.00

17100 West Capitol Drive

Brookfield, WI 53005

Downey, Brown, Stuard, Fodor & Zuzolo Co., L.P.A.

(John H. Downey) 100.00

295 Harmon, N.W.

Warren, Ohio 44483

1009493713391

80040203935

Federal Election Commission
1325 K Street NW
Washington, D.C. 20543

Dear Mr. Potters:

This letter is in response to your letter dated October 16, 1978 which was received in this office on the 16th of October.

In the earlier part of this year we conducted a Fund Drive which resulted in a large volume of contributions going to our lockbox. The lockbox and opening and depositing of our contributions is handled by the Riggs National Bank in Washington, D.C.

They have been instructed not to accept corporate or professional corporation money or anything that is possibly corporate money. These checks have always been returned to our office and accordingly, we return them to the contributors.

This summer during some work on the computerizing of our contributor files, it came to the attention of the staff that there were corporate checks among past deposits. This was made known to the Board of Trustees and they responded by instructing the staff to go through every deposit made in 1978 and make refunds of all those contributions that were corporate or questionable. This was done and these refunds are all itemized in the September monthly report on the dates 8/23/78 and 8/24/78. In addition, the bank has been reinstructed that these monies are not to be deposited and our deposits are to be very carefully screened to avoid this problem in the future.

As for the contributions being reported and reflected on Schedule A, due to many complications in the computerization of

1722520608

10-1-68

[Signature]
JAMES E. [illegible]
[illegible]

80040203938

TELECOM TO THE FILE: ATTORNEYS CONGRESSIONAL CAMPAIGN

FROM: MARK KLEINMAN

DATE: 10-23-79

RE: Corporate contribution problem

I spoke with Kathleen Bond, Administrator of ADCT, 965-3500, to clarify response of 11-3-78 regarding the return of over \$100 in suspected corporate contributions. I asked to clarify if these returned contributions were first deposited into their account. She stated that they were. I told her that in going over the list of returns, that I could not find these contributions on Schedule C (one over \$100 Note; there are many returns under \$100). She stated that they were listed under the individual's name, in most instances, i.e. Berry and Gore, Ltd. (Bruce S. Berry) is listed under Bruce S. Berry. She further stated that the contributions were on the Q1 and Q2 reports for 1978.

She further stated that in many instances, when the contributor realized that they had made an illegal contribution, because it was drawn on a corporate account, that the individuals in question (lawyers), wrote out personal checks.

965-3500
Kathleen Bond, Administrator

300403939

80040203940

MEMORANDUM FOR THE RECORD

FROM: [illegible]

DATE: 10-10-50

RE: Corporate Contributions

I spoke with Kathleen Mueller (and Helen Rose), Administrators of ACLU, to clarify how the guidelines determine which contributions were "possible" corporate contributions. She indicated that they usually based a decision by the check itself and the ending at the end of the firm's name i.e. P.C., P.A., P.S.

80043203941

ATTACHED

00040203942



Attorneys [Occupational] Campaign Trust - 3rd QUARTER - 1977

Full Name, Mailing Address and ZIP Code William S. Blatt Ferrero Middlebrooks & Strickland Suite 600, 707 SE 3rd Street Ft. Lauderdale, FL 33302	Particulars of Expenditure Refund of Contribution Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 6-3-79	Amount of each expenditure this period \$40.00
Full Name, Mailing Address and ZIP Code Richard L. Lancione, P.C. 38th & Jefferson Streets Bellaire, Ohio 43906	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$25.00)
Full Name, Mailing Address and ZIP Code Lawrence Litvak, PC 650 Galleria Denver, CO 80222	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Carlos Lidsky, PA 2121 Ponce De Leon Blvd., Suite 710 Coral Gables, FL 33134	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$25.00)
Full Name, Mailing Address and ZIP Code Mascio Co., LPA 4110 Sunset Blvd. Steubenville, OH 43951	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Trezza, Ithurnburn, Steidmayer & Bower 506 Second Street Yuba City, CA 95991	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Dart, Dickinson, O'Riorden, Gibbons & Quale P.O. Box 3979 Sarasota, FL 33578	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$50.00)
Full Name, Mailing Address and ZIP Code Karsman, Brooks & Doreaus, PC P.O. Box 9149 Savannah, Georgia 31402	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$25.00)
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$

Name of Contributor or Contributor's Representative			
Attorneys Congressional Campaign Trust			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Krimsky, Luterman, Stein & Levy, PC One East Penn Square Philadelphia, PA 19102	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Kenneth H. Moran Box 366 Jamestown, ND 58401	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Goodstein & Jennings, PA P.O. Box 9686 Charleston Heights, SC 29410	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$50.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Chartin Heller, PC 167 West Elm Street Canton, IL 61520	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Neil G. Galatz 710 South Fourth Street Las Vegas, NV 89101	Refund of Contribution Expenditure for: ☒ Primary ☐ General ☐ Other	6-14-78	\$1,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 265.00

ATTACHED 17

60040203945



TOTAL 6 00.00
 AGGREGATE TOTAL 6 130.00

7 9 0 3 1 3 6 0 3 6 0

FEC SCHEDULE A
 8/30/78

ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST
 CONTRIBUTIONS RECEIPTS AND TRANSFERS
 REPORTING PERIOD ENDING: 08/30/78

PAGE 10

NAME/ HOME ADDRESS/ OFFICE ADDRESS	OCCUPATION:	DATE	AMOUNT
ALLEN GLENN ESO PO BOX 1316 ABILENE	ATTORNEY SELF-EMPLOYED	8/15/78 8/15/78 8/15/78	20.00 20.00 20.00
TX 79604			
442 WALNUT ABILENE			
TX 79604			
2-19-70			
GORDON AND GORDON 108 SOUTH MOOSE ST MORRILTON	ATTORNEY SELF-EMPLOYED	8/15/78 8/15/78 8/15/78 8/15/78 8/15/78	20.00 20.00 20.00 20.00 20.00
AR 72110			
108 SOUTH MOOSE ST MORRILTON			
AR 72110			
TOTAL 6 100.00 AGGREGATE TOTAL 6 200.00			
KEN B GOZUR ESO 11797 GREY BIRCH PL RESTON	ATTORNEY SELF-EMPLOYED	8/15/78 8/15/78 8/15/78 8/15/78	20.00 20.00 20.00 20.00
VA 22091			
STILLER & GOZUR 1000 CONNECTICUT AVE SUITE 708 WASHINGTON			
DC 20036			
TOTAL 6 80.00 AGGREGATE TOTAL 6 140.00			
JEFFERTON & CREER ESO CENTER PLAZA APARTMENTS NO1620 TULSA	ATTORNEY SELF-EMPLOYED	4/15/78 8/15/78 8/15/78	40.00 40.00 40.00
OK 74103			
CREER & CREER 200 CHADEN BLDG TULSA			
OK 74100			
TOTAL 6 120.00 AGGREGATE TOTAL 6 260.00			

FEC SCHEDULE A
5/30/79

ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST
CONTRIBUTIONS RECEIPTS AND TRANSFERS
REPORTING PERIOD ENDING: 06/30/79

PAGE 1

NAME/
HOME ADDRESS/
OFFICE ADDRESS

SIDNEY W OILBEATH ESQ
333 RUSSELL
CONCORD

TH 07000

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/15/79
2/15/79
2/15/79

100.00
100.00
100.00

707 GAY ST
HARRISVILLE

TH 07000

2-14-79

TOTAL
AGGREGATE TOTAL

100.00
100.00

GORDON AND GORDON
105 SOUTH MOORE ST
HARRILTON

AR 72110

OCCUPATION: ATTORNEY
SELF-EMPLOYED

2/15/79
1/15/79
2/15/79
2/15/79
2/15/79
2/15/79

100.00
100.00
100.00
100.00
100.00
100.00

105 SOUTH MOORE ST
HARRILTON

AR 72110

TOTAL
AGGREGATE TOTAL

100.00
100.00

JEFFERSON & GREER ESQ
CENTER PLAZA APARTMENTS NO1020
TULSA

OK 74100

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/15/79
2/15/79
2/15/79

100.00
100.00
100.00

GREER & GREER
200 BEASON BLDG
TULSA

OK 74100

TOTAL
AGGREGATE TOTAL

100.00
100.00

RICHARD V HANANSON ESQ
100 ST CHARLES
ELMHURST

IL 60120

OCCUPATION: ATTORNEY
SELF-EMPLOYED

2/15/79
1/15/79
2/15/79

100.00
100.00
100.00

100 SOUTH LA SALLE ST
CHICAGO

IL 60600

TOTAL
AGGREGATE TOTAL

100.00
100.00

CERTIFIED MAIL
RETURN RECEIPT

Mr. Raymond Pastor, Jr.
Attorneys Congressional Campaign Fund
1050 31st Street, N.W.
Washington, D.C. 20007

Re: 2000 1122

Dear Mr. Pastor:

The Federal Election Commission has previously notified you that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the possible violations is attached.

Upon further review of the information available to the Commission, the Commission determined, on , 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441b(a) by accepting corporate contributions in connection with federal elections.

Under the Act, you had an opportunity to demonstrate, within 15 days of the initial notification, that no action should be taken against your committee.

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

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

00040203948

Robert G. Harnett
Chairman

Max L. Friedlander
Vice Chairman

Enclosure

00040203942

ASPER

INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

HAD

913-2

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/22/79ANALYST Mark KleimanTO: Office of General CounselTEAM CHIEF Steve HinesTHROUGH: STAFF DIRECTORCOMPLIANCE REVIEW SMFROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSISCANDIDATE/COMMITTEE: Attorneys Congressional Campaign TrustTREASURER: Raymond Poston, Jr.ADDRESS: 1050 31st Street, N.W.
Washington, D.C. 20007AFFILIATE(S): California Trial Lawyers Political Action CommitteeALLEGATION(S): Receipt of corporate contributions.CITE: 2 U.S.C. 441b

SEE

ATTACHMENT(S) #3

DATE INITIATED: 10-16-78

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review☐ Other:☐ Special Project:

ATTACHMENT

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

PERIOD COVERED FROM 8-1-78 TO 8-31-78

TOTAL RECEIPTS \$ 27055 TOTAL EXPENDITURES \$ 84529

CASH ON HAND \$ 193231 DEBTS \$ 8376

HISTORY:

RESULTS OF REVIEW: Request For Additional Information sent 10-16-78 ATTACHMENT #2
to clarify corporate refunds of over \$40000.
Response 11-3-78 showing receipt of corporate contributions. #3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon: 10-23-79
Telecon: 10-26-79

ATTACHMENT #4
#5

REASON(S) FOR REFERRAL: Exceeds threshold

ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None

ATTACHMENT

OTHER RELEVANT INFORMATION:

July 10 Quarterly Report-1979 indicates some ATTACHMENT #6
of the contribution refunds were voided
although the entities are nevertheless incorporated
Additional corporate contributions on April 10 ATTACHMENT #7
Quarterly Report and July 10 Quarterly Report-1979

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

RESPONSE: Attorneys Congressional Campaign Trust

SOURCE OF INFO: INTERNALLY GENERATED

BACKGROUND

On January 2, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the Attorneys Congressional Campaign Trust ("the Committee") in connection with its violation of 2 U.S.C. § 441b.

ANALYSIS

This matter was brought to the attention of RAD on September 20, 1978, when the Committee filed its August 1978 monthly report disclosing its refund of approximately \$40,000 in contributions which it had received during 1978.

On October 16, 1978, the Committee was sent an RFAI by RAD requesting further information on the reported refunds. The Committee responded to the RFAI on November 3, 1978, by stating that the acceptance of possible corporate contributions was brought to the attention of the Board of Trustees during the summer of 1978. According to the letter, the opening and depositing of contributions to the Committee was handled by the Riggs National Bank which had been instructed not to accept any contributions which might possibly be corporate.

Nevertheless, during the course of computerizing its records, the committee staff became aware of and advised the Board of Trustees that there were corporate checks in past Committee deposits. The Board then advised the staff to check each deposit made in 1978 and were told to return all possible corporate checks to the contributors.

As set forth in 2 U.S.C. § 441b(2), it is unlawful for political committees to accept corporate contributions in connection with federal election activities.

Although the committee voluntarily achieved compliance with the Act by reviewing and amending its records, it did accept \$40,000 in corporate contributions which may be in violation of § 441b. It is impossible to ascertain, from committee reports on file, how long the corporate checks remained in the committee's account because (a) most of the checks were in amounts less than \$100 and consequently are not itemized on committee reports and (b) the contributions which were itemized listed the signatory of the check as the contributor rather than the law firm.

Even though Riggs Bank apparently deposited the checks in error and against the expressed instructions of the committee, it is the ultimate responsibility of the committee to insure that its receipts are properly screened. Therefore, the Office of General Counsel recommends that the Commission find reason to believe the Committee may have violated 2 U.S.C. § 441b.

COMMISSION'S DETERMINATION

Based on the foregoing analysis, the Federal Election Commission has found: Reason to believe the Committee may have violated 2 U.S.C. § 441b.

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/29/79 ANALYST Mark Kleinman
TO: Office of General Counsel TEAM CHIEF Steve Hines Lois Zella
THROUGH: STAFF DIRECTOR ALC COMPLIANCE REVIEW GC
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Attorneys Congressional Campaign Trust
TREASURER: Raymond Poston, Jr.
ADDRESS: 1050 31st Street, N.W.
Washington, D.C. 20007
AFFILIATE(S): California Trial Lawyers Political Action Committee

ALLEGATION(S): Receipt of
corporate contributions.

CITE: 2 U.S.C. 441b SEE ATTACHMENT(S) #3

DATE INITIATED: 10-16-78

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

300405039

MURIN4

REPORT OF THE OFFICE OF THE ATTORNEY GENERAL ON THE REVIEW OF THE RECORDS OF THE OFFICE OF THE ATTORNEY GENERAL. FOR ALL INFORMATION AND ATTACHMENT 1.

PERIOD COVERED FROM 8-1-78 TO 8-31-78

TOTAL RECEIPTS \$ 27055 TOTAL EXPENDITURES \$ 84529

CASH ON HAND \$ 195231 DEBTS \$ 8376

HISTORY:

RESULTS OF REVIEW: Request For Additional Information sent 10-16-78 ATTACHMENT #3
to clarify corporate refunds of over \$40000.
Response 11-3-78 showing receipt of corporate contributions.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon: 10-23-79
Telecon: 10-26-79

ATTACHMENT #4
#5

REASON(S) FOR REFERRAL: Exceeds threshold

ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None

ATTACHMENT

OTHER RELEVANT INFORMATION:

July 10 Quarterly Report-1979 indicates some ATTACHMENT #6
of the contribution refunds were voided
although the entities are nevertheless incorporated
Additional corporate contributions on April 10 ATTACHMENT #7
Quarterly Report and July 10 Quarterly Report-1979

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

80040203956

80040203957

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS PRIMARY	GENERAL	EXPENDITURES PRIMARY	GENERAL	DISBURSEMENTS PRIMARY	GENERAL
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST	CONNECTED ORGANIZATION: LAWYERS OF AMERICA ASS'N OF TRIAL						
1977	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
1978	STATEMENT OF ORGANIZATION- AMENDMENT						
	STATEMENT OF ORGANIZATION- AMENDMENT						
	MISCELLANEOUS TRANSACTION FROM F.E.C.						
1977-1978	10 DAY PRE-SPECIAL	18,142		27,100			
	10 DAY PRE-SPECIAL - AMENDMENT						
	30 DAY POST-SPECIAL	1,700		870			
	APRIL 10 QUARTERLY	17,044		7,740			
	APRIL 10 QUARTERLY - AMENDMENT						
	JULY 10 QUARTERLY	20,535		24,147			
	JULY 10 QUARTERLY - AMENDMENT						
	JULY 10 QUARTERLY - AMENDMENT						
	OCTOBER 10 QUARTERLY	51,020		24,271			
	REQUEST FOR ADDITIONAL INFORMATION						
	REQUEST FOR ADDITIONAL INFO 2ND						
	OCTOBER 10 QUARTERLY - AMENDMENT						
	YEAR END REPORT	27,524		45,973			
	YEAR END REPORT - AMENDMENT	27,524		47,473			
	YEAR END REPORT - AMENDMENT						
1978	APRIL 10 QUARTERLY	300,087		25,701			
	APRIL 10 QUARTERLY - AMENDMENT						
	APRIL 10 QUARTERLY - AMENDMENT						
	REQUEST FOR ADDITIONAL INFORMATION						
	REQUEST FOR ADDITIONAL INFORMATION						
	APRIL 10 QUARTERLY - AMENDMENT						
	APRIL 10 QUARTERLY - AMENDMENT						
	APRIL 10 QUARTERLY - AMENDMENT	300,087		25,701			
	JULY 10 QUARTERLY	24,001		170,481			
	JULY 10 QUARTERLY - AMENDMENT	24,001		170,481			
	JULY 10 QUARTERLY - AMENDMENT	24,001		170,481			
	JULY MONTHLY						
	JULY MONTHLY - AMENDMENT						
	AUGUST MONTHLY	20,385		45,782			
	AUGUST MONTHLY - AMENDMENT	20,385		45,782			
	SEPTEMBER MONTHLY	27,055		84,529			
	REQUEST FOR ADDITIONAL INFORMATION						
	SEPTEMBER MONTHLY - AMENDMENT	27,055		84,529			
	SEPTEMBER MONTHLY - AMENDMENT						
	SEPTEMBER MONTHLY - AMENDMENT	27,055		84,529			

80040203958

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES	
		PRIMARY	GENERAL	PRIMARY	GENERAL
	OCTOBER MONTHLY	19,742		55,134	
	OCTOBER MONTHLY - AMENDMENT	19,742		55,134	
	OCTOBER MONTHLY - AMENDMENT	19,742		55,134	
	10 DAY PRE-GENERAL	13,907		40,000	
	10 DAY PRE-GENERAL - AMENDMENT	13,907		41,000	
	10 DAY PRE-GENERAL - AMENDMENT	13,907		40,000	
	30 DAY POST-GENERAL	11,032		37,200	
	30 DAY POST-GENERAL - AMENDMENT	11,032		37,200	
	YEAR END REPORT	21,154		28,672	
	YEAR END REPORT - AMENDMENT	21,154		28,672	
	YEAR END REPORT - AMENDMENT	21,154		28,672	
	TOTAL	200,000	0	440,234	0

ALL REPORTS HAVE RECEIVED BASIC REVIEW

00040203959

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

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE	DATED	PAGE
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST								
CONNECTED ORGANIZATION: LAWYERS OF AMERICA ASS'N OF TRIAL								
1978 MISCELLANEOUS TRANSACTION TO F.E.C.								
MISCELLANEOUS TRANSACTION FROM F.E.C.								
STATEMENT OF ORGANIZATION- AMENDMENT								
FEBRUARY MONTHLY		13,093		10,057				
APRIL 10 QUARTERLY		26,844		18,374				
APRIL 10 QUARTERLY - AMENDMENT		26,844		18,374				
JULY 10 QUARTERLY		47,425		0,934				
JULY 10 QUARTERLY - AMENDMENT		47,425		0,934				
OCTOBER 10 QUARTERLY		61,884		47,171				
TOTAL		149,440	0	101,040	0			

ALL REPORTS HAVE RECEIVED BASIC REVIEW

80040203960

Raymond L. ...
Attorneys Congressional Campaigns
1050 First Street, N.W.
Washington, D.C. 20007

Dear Mr. Poston:

This letter is prompted by our interest in assisting candidates who wish to comply with the Federal Election Campaign Act.

During review of the September Monthly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

REPLY TO THE COMMISSION AND DISCLOSE THE RESULTS OF YOUR REVIEW
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971

A review of the report indicates that additional information is needed to return a copy of this form with your submission.

Please provide the required data, as indicated (X):

___ Coverage Dates ___ omitted or ___ incorrect

___ Signature ___ omitted or ___ incorrect

___ Summary Page Line(s) ___ Column(s) ___ Totals ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s) ___ Column(s) ___ Totals ___ omitted or ___ incorrect

☒ Schedule Totals ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s) ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s) Omitted for Schedule(s) ___ Line(s) ___

___ Mailing Address(es) ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupational Descriptions ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Principal Place(s) of Business ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-date Totals ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure ___ omitted or ___ inadequate for Schedule(s) B ___ Line(s) 21a SEE PAGE TWO

___ Nature or Purpose of Receipt ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of ___ proceeds ___ dates ___ events ___ location of Schedule ___

___ Other: _____

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9531. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D S N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

Line 10.

If there are any other items from the results of
control, and from the results of control, then they
should be reported and included accordingly in
Schedule A.

Please respond and send your report accordingly.

807040303096311

1. **Name of Committee or Candidate**
1050 31st St. NW
Washington, D.C. 20007
 City, State and ZIP Code ☐ Check if address is different than previously reported. Year of Election _____

4. **Type of Report (Check appropriate boxes)**

☐ April 10 Quarterly Report ☐ Tenth-day report preceding _____ election (primary, general or amendment) ☐ Termination Report

☐ July 10 Quarterly Report on _____ in the State of _____ ☐ Amendment for _____

☐ October 10 Quarterly Report ☐ Thirtieth-day report following _____ election (which report)

☐ January 31 Annual Report (primary, general or amendment)

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

This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (specify, runoff, etc.)

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

5. Covering Period <u>8-1-78</u> Through <u>8-31-78</u>	Column A This Period	Column B Calendar Year-To-Date
6. Cash on hand January 1, 1978		\$ 89,236.80
7. Cash on hand at beginning of reporting period	\$ 250,205.21	
8. Total receipts (from line 19)	\$ 27,055.00	\$ 460,379.04
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 277,260.21	\$ 549,615.84
9. Total expenditures (from line 25)	\$ 84,029.03	\$ 356,384.66
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 193,231.18	\$ 193,231.18
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ _____	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ -0-	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 8,376.90	

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

Sept. 20, 1978 Raymond L. Poston, Jr. Raymond L. Poston, Jr.
 (Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

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

For further information, contact:  Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463 or call 800/424-9630

Approved by GAO
 8-187820 (R0508)
 Expires 3-31-81

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

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

64523083040006

NAME OF CANDIDATE

ACHIEVEMENT

FEDERAL ELECTION

TO: 1964

14. Contributions Received:			
(a) Itemized (see Schedule B)			
(b) Unitemized			
(c) Subtotal of contributions received			
Less by credit of contributions			
(d) Subtotal of contributions received	\$ 20,035.00		\$ 413,774.72
15. Transfers from Political Committees:			
(a) Funds from affiliated committees			
(b) Funds from other committees			
(c) Contributions in-kind			
(d) Subtotal of transfers from political committees	\$ 7,020.00		\$ 39,870.00
16. Other Income:			
(a) Itemized (see Schedule A)			
(b) Unitemized			
(c) Subtotal of other income	\$ 6,322.72		
17. Loans and Loan Repayments Received:			
(a) Itemized (see Schedule A)			
(b) Unitemized			
(c) Subtotal of loans and loan repayments received	\$ -0-		\$ -0-
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (see Schedule A)			
(b) Unitemized			
(c) Subtotal of refunds, rebates, returns of deposits	\$ 411.60		
19. Total Receipts		\$ 27,055.00	\$ 460,379.04
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (see Schedule B)	\$ 6,711.60		
(b) Unitemized	\$ -0-		
(c) Subtotal of operating expenditures	\$ 6,711.60		\$ 73,444.48
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (see Schedule B)	\$ 40,525.00		
(b) Unitemized	\$ -0-		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 40,525.00		\$ 41,560.00
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committees (Itemize on Schedule B regardless of amount)	\$ -0-		
(b) To other committees (Itemize on Schedule B regardless of amount)	\$ 36,750.00		
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)	\$ 42.43		
(d) Subtotal of transfers out	\$ 36,792.43		\$ 241,380.18
23. Independent Expenditures (see Schedule E)		\$ -0-	\$ -0-
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441old) (Itemize on Schedule F)		\$ -0-	\$ -0-
25. Total Expenditures		\$ 84,029.03	\$ 356,384.66
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 27,055.00	
27. Transfers In (from line 15(a))		\$ 7,020.00	
28. Net Receipts (Subtract line 27 from line 26)		\$ 20,035.00	
29. Total Expenditures (from line 25)		\$ 84,029.03	
30. Transfers Out (from line 22(a))		\$ -0-	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 84,029.03	

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Schnider, Shamberg & May, Chartered (Gerald T. Elliott, Esq.)

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Ray Goldstein 50.
James R. Clouse, Jr. 25.
J. Jeffrey Rice 25.

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P. O. Box 100
Colorado Springs, Colorado

Mr. James E. Ray, AKA (James Earl Ray)
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Rockford, Illinois 61101

Armed, Gary E. Ray, AKA (D. Robert Ray, AKA)
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Marietta, Georgia 30060

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1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

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Subtotal \$40,485.00
Pages 2-34

Total this period \$40,525.00

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[Handwritten signature]
J. Edgar Hoover, Jr.
Director

80040204002

TELEPHONE TO THE FILE: ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST

FROM: MARK KLEINMAN

DATE: 10-23-79

RE: Corporate contribution problem

I spoke with Kathleen Bond, Administrator of ACCT, 965-3500, to clarify response of 11-3-78 regarding the return of over \$20,000 in suspected corporate contributions. I asked to clarify if these returned contributions were first deposited into their accounts. She stated that they were. I told her that in going over the list of returns, that I could not find these contributions on Schedule A (the ones over \$100 Note: there are many returns under \$100). She stated that they were listed under the individual's name, in most instances, i.e. Berry and Gore, Ltd. (Bruce S. Berry) is listed under Bruce S. Berry. She further stated that the contributions were on the Q1 and Q2 reports for 1978.

She further stated that in many instances, when the contributor realized that they had made an illegal contribution, because it was drawn on a corporate account, that the individuals in question (lawyers), wrote out personal checks.

965-3500
Kathleen Bond, Administrator

60040204003

80040204004

TELETYPE TO THE FILE: ATTORNEY GENERAL'S OFFICE

FROM: MARK KLEINMAN

DATE: 10-26-79

RE: Corporate Contributions

I spoke with Kathleen Manafort (Bond Maiden Lane), Administrator of AOCT, to clarify how the committee determines which contributions were "possible" corporate contributions. She indicated that they usually based a decision by the check itself and the ending at the end of the firm's name i.e. P.C., P.A., P.S.

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Section 527(c)(2)
 40100, 40101
 40102, 40103

Section 527(c)(2)
 40100, 40101
 40102, 40103

Section 527(c)(2)
 40100, 40101
 40102, 40103

Name of Candidate or Committee in Full

Attorneys Congressional Campaign Trust JULY 10 - AUGUST 14, 1977

Full Name, Mailing Address and ZIP Code William S. Blatt Ferrero Middlebrooks & Strickland Suite 600, 707 SE 3rd Street Ft. Lauderdale, FL 33302	Particulars of Expenditure Refund of Contribution Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 4-3-78	Amount of each expenditure this period \$40.00
Full Name, Mailing Address and ZIP Code Richard L. Lancione, P.C. 38th & Jefferson Streets Bellaire, Ohio 43906	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$25.00)
Full Name, Mailing Address and ZIP Code Lawrence Litwak, PC 650 Galleria Denver, CO 80222	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Carlos Lidsky, PA 2121 Ponce De Leon Blvd., Suite 710 Coral Gables, FL 33134	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$25.00)
Full Name, Mailing Address and ZIP Code Mascio Co., LPA 4110 Sunset Blvd. Steubenville, OH 43951	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Trezza, Ithurnburn, Steidmayer & Bower 506 Second Street Yuba City, CA 95991	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-23-78	Amount of each expenditure this period (\$100.00)
Full Name, Mailing Address and ZIP Code Dart, Dickinson, O'Riorden, Gibbons & Quale P.O. Box 3979 Sarasota, FL 33578	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$50.00)
Full Name, Mailing Address and ZIP Code Karsman, Brooks & Doreaus, PC P.O. Box 9149 Savannah, Georgia 31402	Particulars of Expenditure VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 8-24-78	Amount of each expenditure this period (\$25.00)

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

Name of Candidate or Committee in Full		Line 20a, 21b, and 22 of FPC Form 2		Amount of each expenditure this period	
Attorneys Campaign Fund					
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
Krimsky, Luteran, Stein & Levy, PC One East Penn Square Philadelphia, PA 19107	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
Kenneth M. Moran Box 366 Jamestown, ND 58401	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
Goodstein & Jennings, PA P.O. Box 9685 Charleston Heights, SC 29410	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$50.00)		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
Martin Heller, PC 162 West Elm Street Canton, IL 61520	VOID Contribution Refund Expenditure for: ☐ Primary ☐ General ☐ Other	8-24-78	(\$100.00)		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
Neil G. Galatz 710 South Fourth Street Las Vegas, NV 89101	Refund of Contribution Expenditure for: ☐ Primary ☐ General ☐ Other	6-14-78	\$1,000.00		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
	Expenditure for: ☐ Primary ☐ General ☐ Other				
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
	Expenditure for: ☐ Primary ☐ General ☐ Other				
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period		
	Expenditure for: ☐ Primary ☐ General ☐ Other				
SUBTOTAL of expenditures this page (optional)			\$		
TOTAL this period (last page this line number only)			\$ 265.00		

ATTACHMENT 37

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TOTAL 100.00
AGGREGATE TOTAL 100.00

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FEC SCHEDULE A
8/30/79

ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST
CONTRIBUTIONS RECEIPTS AND TRANSFERS
REPORTING PERIOD ENDING: 08/30/79

PAGE 10

NAME/
HOME ADDRESS/
OFFICE ADDRESS

ALLEN GLENN ESQ
PO BOX 1316
ABILENE

TX 79604

OCCUPATION: ATTORNEY 8/15/79 20.00
SELF-EMPLOYED 4/15/79 20.00
8/15/79 20.00

442 WALNUT
ABILENE

TX 79604

2-19-70

TOTAL 20.00
AGGREGATE TOTAL 100.00

GORDON AND GORDON
106 SOUTH MOOSE ST
MORRILTON

AR 72110

OCCUPATION: ATTORNEY 8/15/79 20.00
SELF-EMPLOYED 8/15/79 20.00
8/15/79 20.00
4/15/79 20.00
4/15/79 20.00
8/15/79 20.00

106 SOUTH MOOSE ST
MORRILTON

AR 72110

TOTAL 20.00
AGGREGATE TOTAL 200.00

KEN H BOZUR ESQ
11797 GREY BIRCH PL
RESTON

VA 22091

OCCUPATION: ATTORNEY 8/15/79 20.00
SELF-EMPLOYED 4/15/79 20.00
8/15/79 20.00
8/15/79 20.00
8/15/79 20.00

STILLER & BOZUR
1000 CONNECTICUT AVE SUITE 700
WASHINGTON

DC 20036

TOTAL 20.00
AGGREGATE TOTAL 240.00

JEFFERSON & GREEN ESQ
CENTER PLAZA APARTMENTS NO1020
TULSA

OK 74108

OCCUPATION: ATTORNEY 8/15/79 20.00
SELF-EMPLOYED 8/15/79 20.00
8/15/79 20.00

GREEN & GREEN
200 BRANCH BLVD
TULSA

OK 74108

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FEC SCHEDULE A
8/29/79

ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST
CONTRIBUTIONS RECEIPTS AND TRANSFERS
REPORTING PERIOD ENDING: 08/31/79

PAGE 4

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HOME ADDRESS/
OFFICE ADDRESS

SIDNEY W GILHEATH ESQ
333 RUSSELL
CONCORD

TN 37008

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/18/79
2/18/79
2/18/79

40.00
40.00
40.00

707 GAY ST
KNOXVILLE

TN 37902

TOTAL
AGGREGATE TOTAL

120.00
120.00

GORDON AND GORDON
100 SOUTH HEDGE ST
HARRILTON

AR 72112

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/18/79
1/18/79
2/18/79
2/18/79
2/18/79

10.00
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100 SOUTH HEDGE ST
HARRILTON

AR 72112

TOTAL
AGGREGATE TOTAL

120.00
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JEFFERSON S GREER ESQ
CENTER PLAZA APARTMENTS NO1020
TULSA

OK 74100

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/18/79
2/18/79
2/18/79

40.00
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40.00

GREER S GREER
200 BEACON BLVD
TULSA

OK 74100

TOTAL
AGGREGATE TOTAL

120.00
120.00

RICHARD W HANCOCK ESQ
100 ST CHARLES
ELMWOOD

IL 60120

OCCUPATION: ATTORNEY
SELF-EMPLOYED

1/18/79
1/18/79
2/18/79

40.00
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100 SOUTH LADALLE ST
CHICAGO

IL 60600

TOTAL
AGGREGATE TOTAL

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